

brownfield redevelopment. Currently, the City's does not have the resources to fund a Brownfield Program and can only rely on grant-funded programs to address a small percentage of these sites.

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

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

*Source: ECO Northwest Springfield Economic Development Objectives and Strategies*

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

*Source: ECO Northwest*

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

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

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

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

29. The location decisions of businesses are primarily based on the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region. Most economic development strategies available to local governments only indirectly affect the cost and quality of these primary location factors. *Source: ECO Northwest*
30. Local governments can most directly affect tax rates (within the bounds of Measures 5 and 50), the cost to businesses and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest effect on the level and type of economic development in the community. *Source: ECO Northwest*
31. Local governments in Oregon also play a central role in the provision of buildable land through inclusion in the Urban Growth Boundary, plan designation, zoning, and provision of public services. While providing buildable land for businesses to locate or expand is one of the most direct ways that the City of Springfield can affect the level and type of economic development, this action alone is not sufficient to guarantee economic development in the community. Market conditions must create demand for this land, and local factors of production must be favorable for business activity.
32. As part of Springfield’s Commercial and Industrial Buildable Lands Study, a range of potential economic development strategies were identified to inform policy development:

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

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### Potential Economic Development Strategies

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

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

Source: ECONorthwest.

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

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

**City of Springfield:**

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

For the Planning Period 2010-2030

Prepared for

City of Springfield

by

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Final Report

August 2015

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# Acknowledgements

Numerous people contributed to the completion of the Springfield economic opportunities analysis. We would like to acknowledge the hard work of the project Steering Committee, Technical Advisory Committee, and City of Springfield Staff.

## **Commercial and Industrial Lands Stakeholder Committee 2008-2009**

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

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# Executive Summary

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

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

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

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

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

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

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

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

## WHAT IS SPRINGFIELD’S ECONOMIC DEVELOPMENT VISION?

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

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

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

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

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

## TARGET INDUSTRIES

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

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

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

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

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

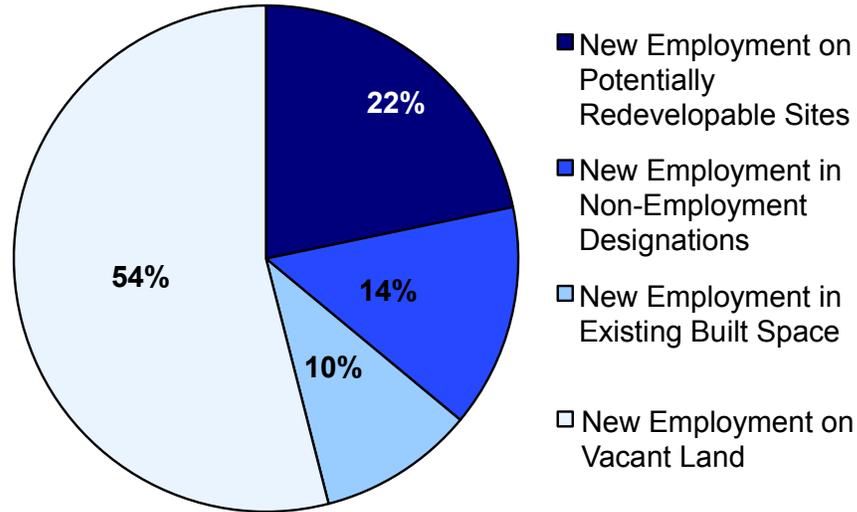
## COMPARISON OF LAND CAPACITY AND DEMAND

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

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

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

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



Source: ECONorthwest

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

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

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

Source: ECONorthwest.

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

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

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

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

Source: ECONorthwest based on QCEW data

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

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

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

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

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

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

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

Source: ECONorthwest

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

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

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

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

Source: ECONorthwest

## CHARACTERISTICS OF NEEDED SITES

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

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

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

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

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

## IMPLICATIONS

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

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

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

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

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

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

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

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

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

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

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

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

# Introduction

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

## BACKGROUND

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

The project includes two key phases:

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

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

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

## FRAMEWORK FOR ECONOMIC DEVELOPMENT PLANNING IN OREGON

The content of this report is designed to meet the requirements of Oregon Statewide Planning Goal 9 and the administrative rule that implements Goal 9 (OAR 660-009). The Land Conservation and Development Commission adopted amendments to this administrative rule in December 2005.<sup>4</sup> The analysis in this report is designed to conform to the requirements for an Economic Opportunities Analysis in OAR 660-009 as amended.

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

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

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

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

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

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

## ORGANIZATION OF THIS REPORT

The remainder of this report is organized as follows:

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

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

This report also includes three appendices:

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

# Land Available for Industrial and Other Employment Uses

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

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

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

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

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

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:

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

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

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

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

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

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

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

## DEFINITIONS

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

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

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

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

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

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

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

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

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

### Identifying Vacant Land

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

- *Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000<sup>8</sup> are considered vacant (not including lands that are identified as having mobile homes).<sup>9</sup> Note that this definition is considerably more inclusive than what is required by OAR 660-009-0005(14). It includes all lots or parcels that are less than one half-acre and did not automatically classify lots between 0.5 and 5.0 acres as developed if they had pre-existing development. Lots in that category were visually inspected to make a determination of whether they should be classified as developed or vacant.
- *Developed land.* Land that is developed at densities consistent with current zoning/ plan designation and improvements that make it unlikely to redevelop during the analysis period. Lands not classified as vacant, potentially redevelopable, or public are considered developed.<sup>10</sup> Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable. Thus, the definition of developed land used for the CIBL is different (e.g., more inclusive) than the definition in the administrative rule. For purposes of the CIBL, developed land is considered committed during the 20-year period and unavailable for redevelopment.

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

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

<sup>9</sup> 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.

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

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

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

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

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

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

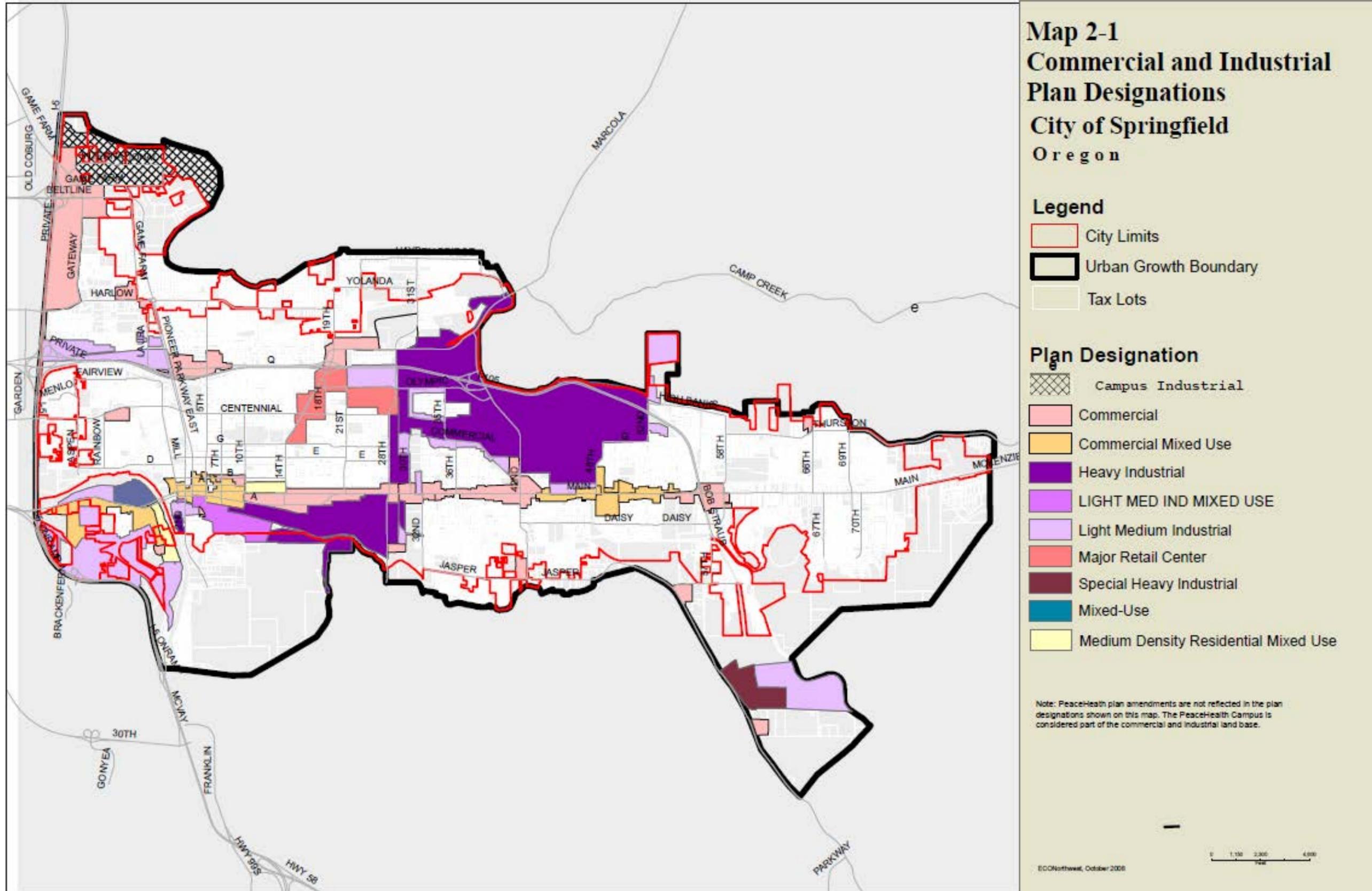
ECONorthwest used a systematic process to develop and review Springfield’s Commercial and Industrial land inventory. Processing and analyzing data from the Lane Council of Governments (LCOG) land use database (a database that inventories land uses at the sub-tax lot level), ECONorthwest identified the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

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

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

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

Map 2-1 Plan Designation



## CONSTRAINTS

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

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

Thus, the Administrative Rule provides a broad definition of constraints and leaves discretion for local governments in the application of the definition. Absolute constraints<sup>13</sup> were deducted from the buildable portion of lots as they were determined to be factors that temporarily or permanently limit or prevent the use of land for economic development as defined in OAR 660-009-0005(2). For the purpose of this study, the following factors are considered **absolute development constraints** which make employment land unsuitable for development:<sup>14</sup>

- Wetlands – Source: City of Springfield Local Wetland Inventory. File used: wet\_lwi.shp, accessed 2008
- Floodway – Source: Army Corps of Engineers digital “FIRM” maps. File used: fld\_way.shp, accessed 2008
- Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes\_over\_15.shp, accessed 2008
- Riparian resource areas – Source: City of Springfield. File used: Riparian\_resource\_areas.shp, accessed 2008

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

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

<sup>14</sup> Each of these files were provided to ECONorthwest by the City in 2008.

<sup>15</sup> Each of these files were provided to ECONorthwest by the City in 2008.

- Floodplain – Source: Army Corps of Engineers digital “FIRM” maps. File used: lane\_dfirm.shp, accessed 2008
- Willamette River Greenway – Source: Lane Council of Governments. File used: Greenway\_10m\_20080303.shp, accessed 2008
- BPA Easements – Source: Bonneville Power Administration. File used: bparow\_lane.shp, accessed 2008

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

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

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

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

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

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

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

# RESULTS OF THE BUILDABLE LANDS INVENTORY

## LAND BASE

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

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

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

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

Source: City of Springfield GIS data; analysis by ECONorthwest

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

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

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

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

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

Source: analysis by ECONorthwest

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

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

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

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

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

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

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

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

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

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

Source: City of Springfield data; analysis by ECONorthwest

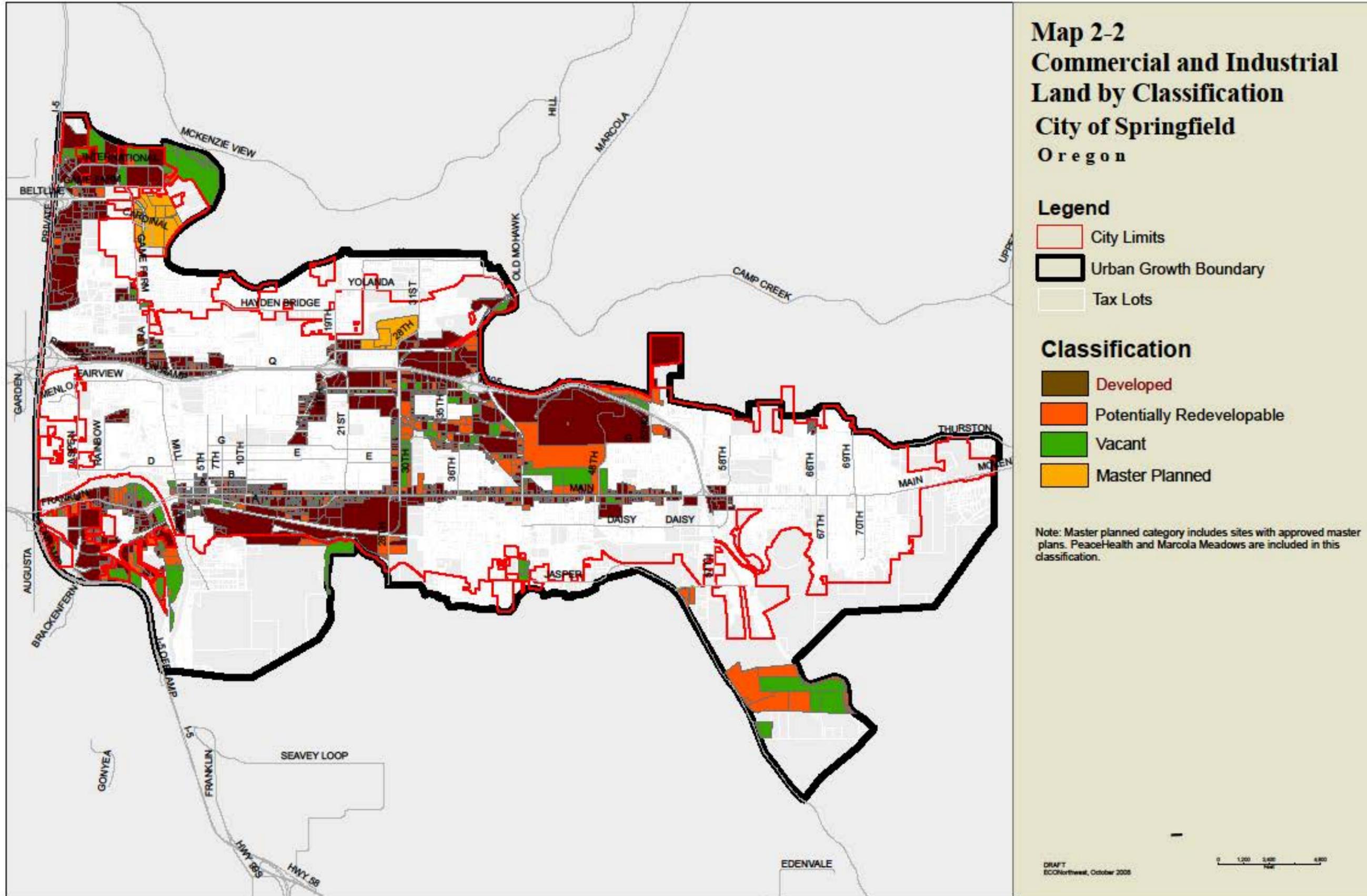
Note: Totals may be off by up to one acre due to rounding.

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

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

Map 2-2 shows land by classification.

Map 2-2. Land by Classification, Springfield UGB



## VACANT<sup>16</sup> SUITABLE AND POTENTIALLY REDEVELOPABLE LAND

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

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

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

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

Source: City of Springfield GIS data; analysis by ECONorthwest

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

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

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

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

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

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

Source: City of Springfield GIS data; analysis by ECONorthwest

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

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

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

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

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

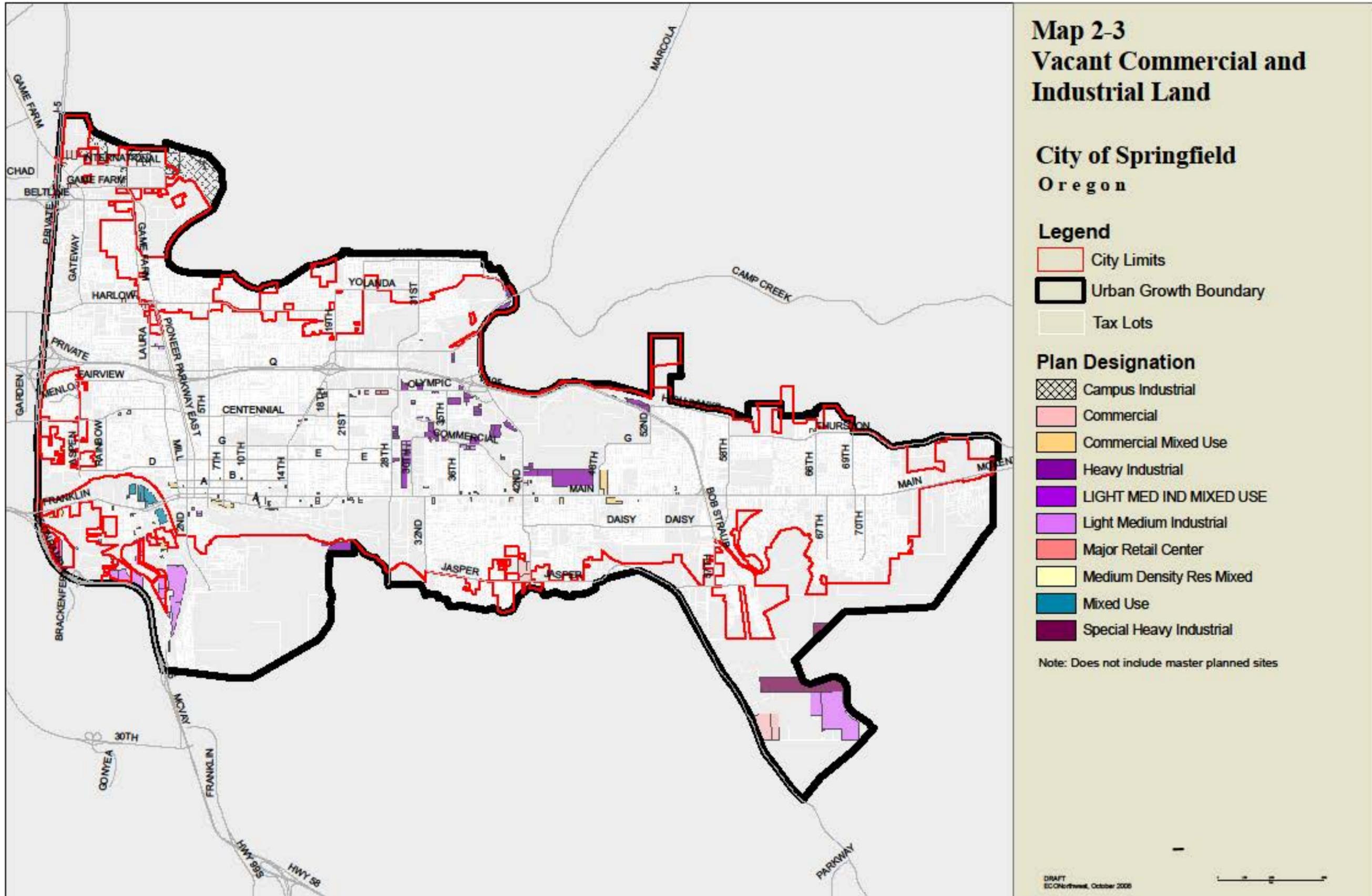
Source: City of Springfield GIS data; analysis by ECONorthwest

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

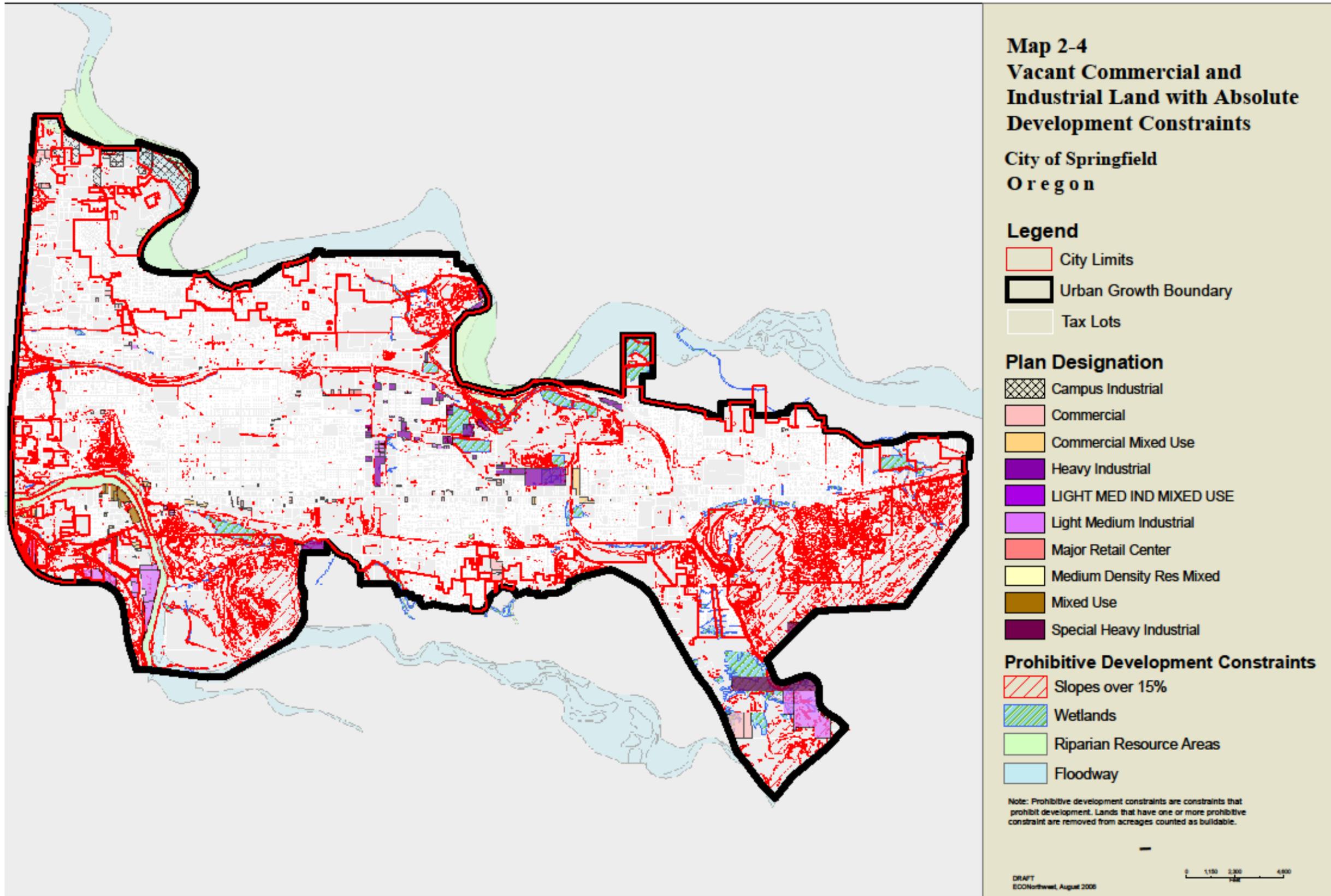
Note: Acres may not sum to tenths due to rounding.

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

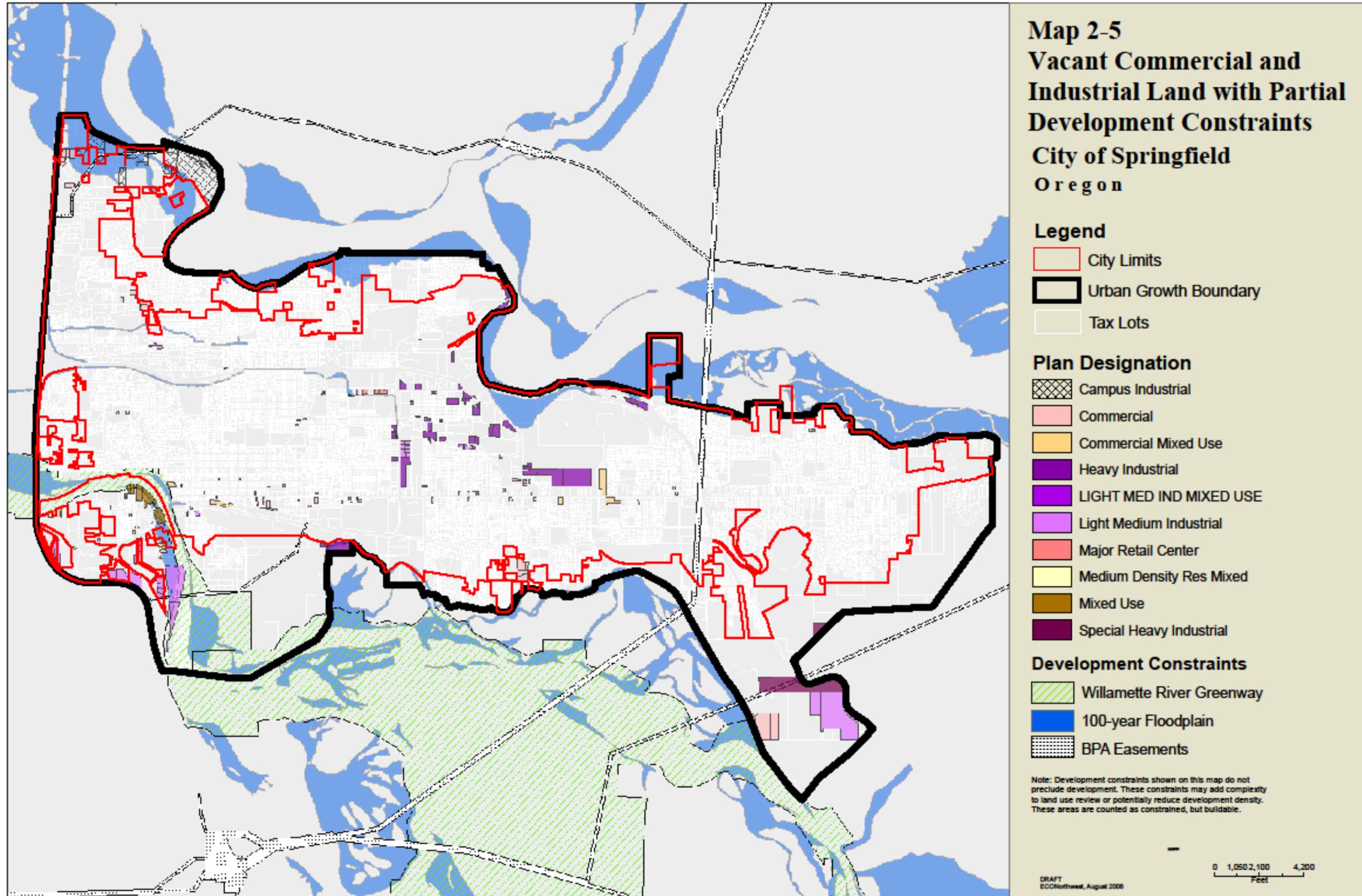
Map 2-3. Vacant Commercial and Industrial Land, City of Springfield



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



Map 2-5. Vacant Lands with development constraints



## CAPACITY TO ACCOMODATE EMPLOYMENT GROWTH THROUGH REDEVELOPMENT

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

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

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

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

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

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

## IDENTIFICATION OF POTENTIALLY REDEVELOPABLE LAND

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

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

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

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

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

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

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

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

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

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

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

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

**Table 2-10. Tax lots by Redevelopment Potential categories**

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

Source: City of Springfield GIS data; analysis by ECONorthwest

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

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

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

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

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

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

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

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

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

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

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

**Table 2-11. Buildable acres in potentially redevelopable tax lots by plan designation and parcel size, Springfield UGB, 2008<sup>19</sup>**

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

Source: City of Springfield GIS data; analysis by ECONorthwest

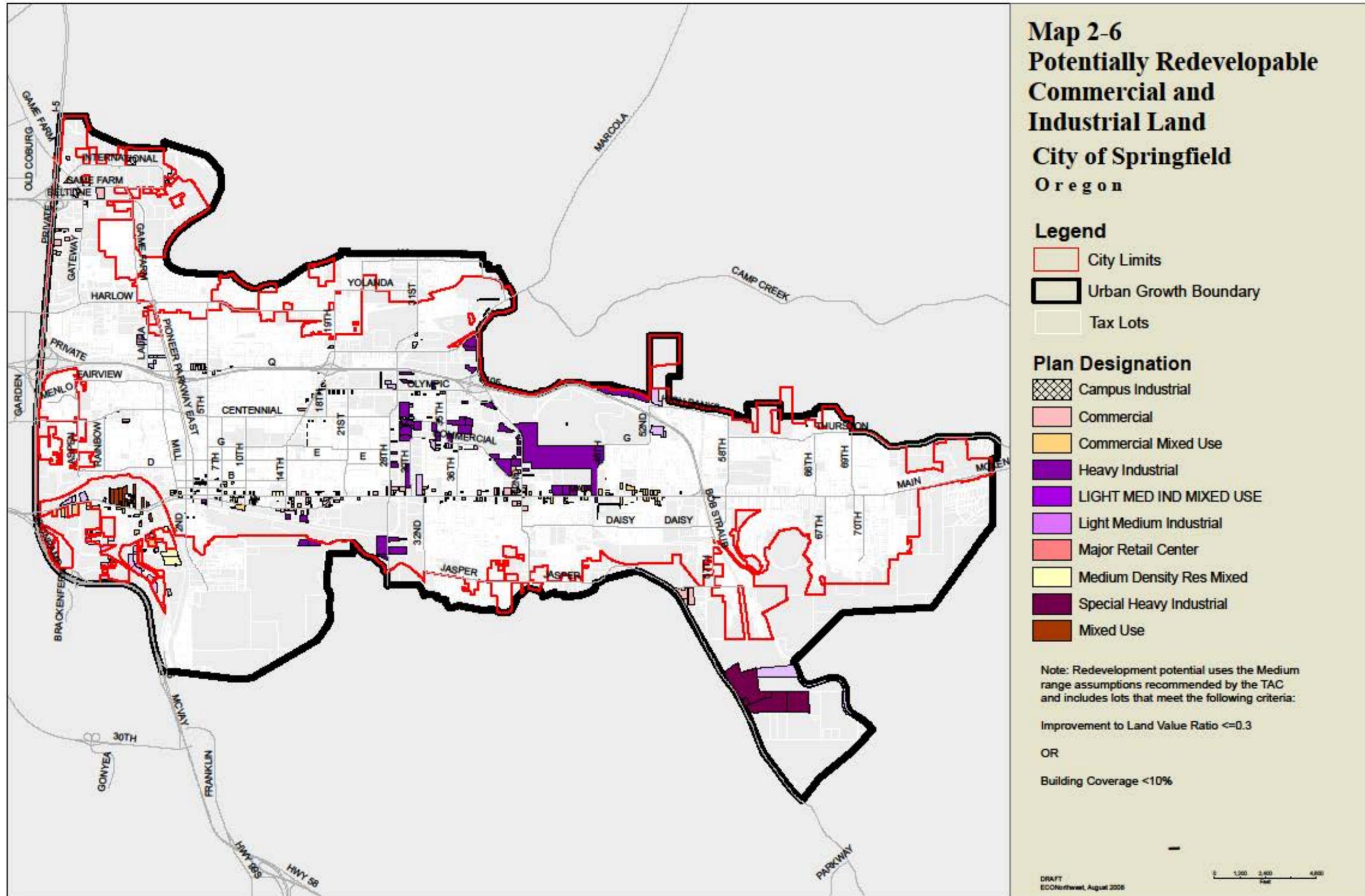
Note: Buildable acres includes "constrained" acres and "unconstrained" acres

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

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

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

Map 2-6. Potentially redevelopable land



## EVALUATION OF POTENTIALLY REDEVELOPABLE LAND IN SITES 5 ACRES AND LARGER

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

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

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

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

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

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

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

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

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

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

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

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

## SHORT-TERM LAND SUPPLY

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

### POLICY CONTEXT

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

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

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

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

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

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

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

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

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

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

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

## **ANALYSIS OF SHORT-TERM SUPPLY OF LAND**

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

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

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

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

**Table 2-13. Short-term land supply**

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

Source: City of Springfield GIS data; analysis by ECONorthwest

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

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

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



# Economic Trends and Factors Affecting Future Economic Growth in Springfield

## Chapter 3

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

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

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

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

## AVAILABILITY OF LABOR

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

### GROWING POPULATION

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

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

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

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

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

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

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

### AGING POPULATION

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

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

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

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

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

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

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

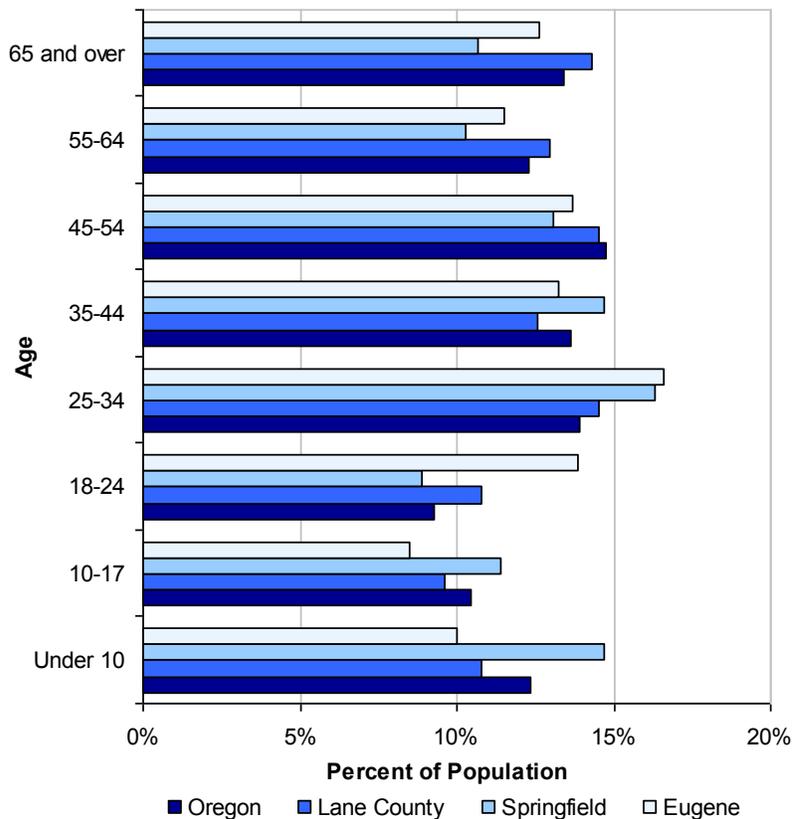
Note: Share refers to the change in the percent of an age group between 2000 and 2008. For example, the share of people 18 to 24 years old decreased from 11% to 9%, a decrease of 2.3%.

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

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

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

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



Source: Claritas 2008, percentages calculated by ECONorthwest.

## INCOME

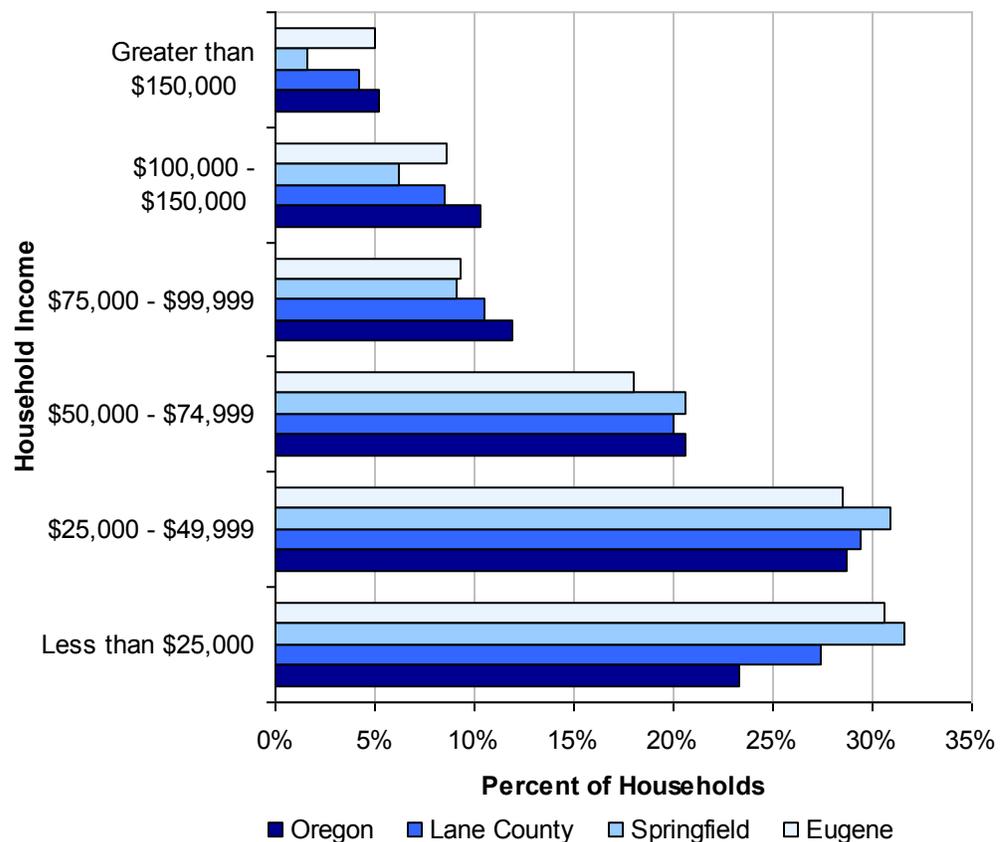
Over the last twenty-four years, income in Oregon has been below national averages and income in Lane County has been below state averages. There are four basic reasons that income has been lower in Oregon and Lane County than in the U.S.: (1) wages for similar jobs are lower; (2) the occupational mix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

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

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

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

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



Source: Claritas 2008

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

## EDUCATIONAL ATTAINMENT

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

## WORKFORCE PARTICIPATION

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

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

## COMMUTING PATTERNS

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

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

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

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

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

## CHANGES IN EMPLOYMENT

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

## SHIFTS IN EMPLOYMENT

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

In the 1970s Oregon started to transition away from reliance on traditional resource-extraction industries. An important indicator of this transition is the shift within Oregon's manufacturing sector, with a decline in the level of employment in the Lumber & Wood Products industry<sup>22</sup> and concurrent growth of employment in high-technology manufacturing industries (Industrial Machinery, Electronic Equipment, and Instruments<sup>23</sup>).

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<sup>22</sup> Lumber and Wood Products manufacturing is in Standard Industrial Classification (SIC) 24

<sup>23</sup> SIC 35, 36, 38

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

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

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

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

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

## OUTLOOK FOR GROWTH IN SPRINGFIELD

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

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

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

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

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

## **REGIONAL BUSINESS ACTIVITY**

### **GROWING IMPORTANCE OF HEALTHCARE**

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

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

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

### **CONTINUED IMPORTANCE OF MANUFACTURING**

Manufacturing continues to be important to the economy in Springfield and in Lane County. Manufacturing accounted for 14% of employment (more than 20,000 jobs) in Lane County and 10% of employment (more than 2,700 jobs) in Springfield in 2006.<sup>24</sup> Manufacturing industries continue to offer jobs with above-average wages, making these jobs more desirable.

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<sup>24</sup> Oregon Employment Department

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

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

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

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

## **TOURISM IN LANE COUNTY**

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

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

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<sup>25</sup> "Economic Data Packet, Mary 2008," Oregon Economic And Community Development Department

## SIGNIFICANCE OF AGRICULTURE IN LANE COUNTY

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

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

## SPRINGFIELD'S COMPARATIVE ADVANTAGES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield is able to attract educated workers from most of Eugene and surrounding areas in Lane County.

It does not appear that workforce will be a constraint on employment growth in Springfield. Springfield should be able to continue to draw on residents of Eugene for workers, even if energy prices continue to rise but Springfield's ability to attract workers from outside of the Eugene-Springfield area may be negatively impacted by continued increases in energy prices.

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

# Land Demand and Site Needs in Springfield

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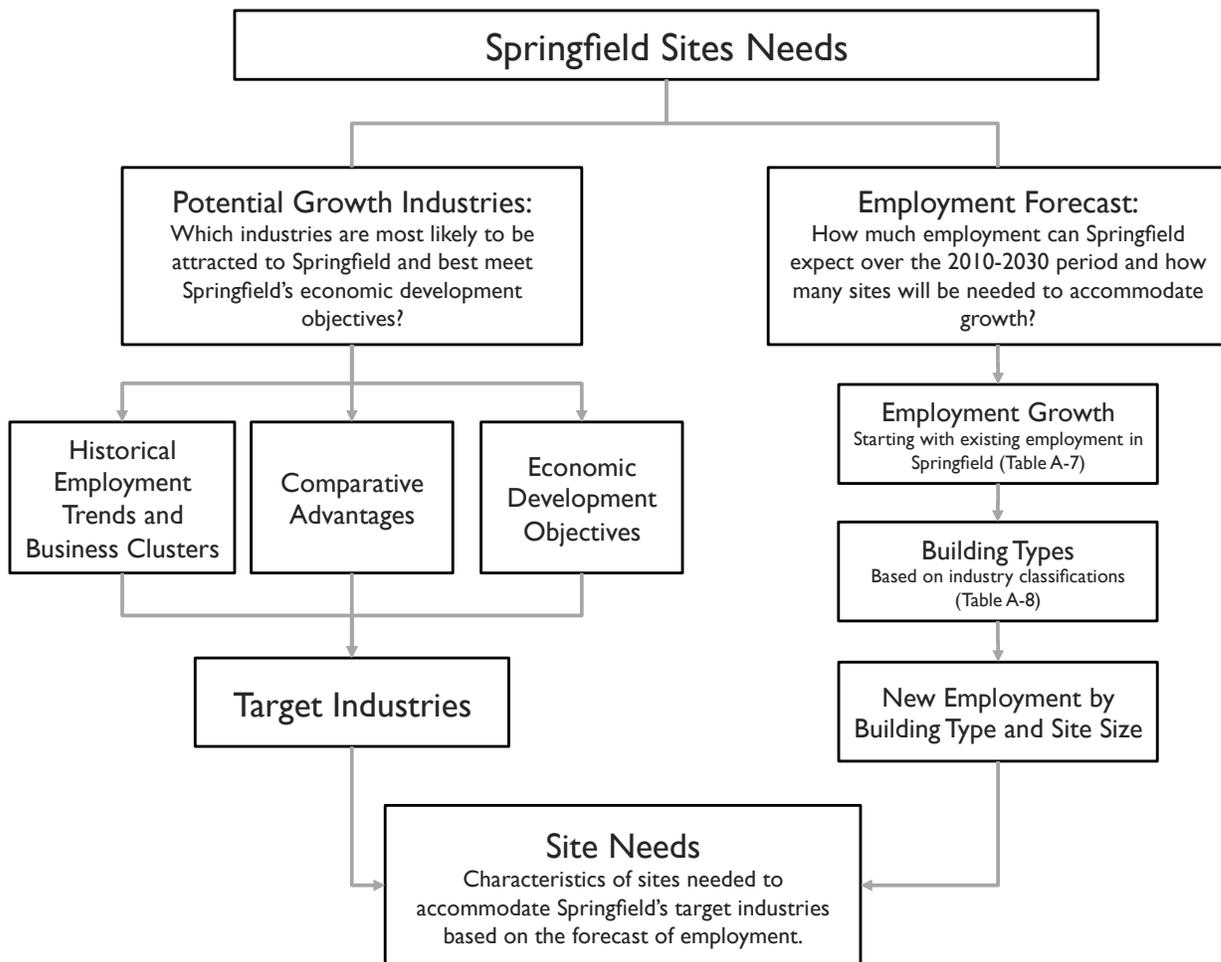
OAR 660-009 requires cities to maintain a 20-year inventory of sites designated for employment. To provide for at least a 20-year supply of commercial and industrial sites consistent with local community development objectives, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield.

This chapter and Appendix C (which presents the full forecast of employment growth and site needs) addresses the requirements of OAR 660-009-0015(2) for the City to “identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion.”

Figure 4-1 shows the process for identifying Springfield’s site needs. The process involved identifying potential growth industries, in the form of target industries, and identifying characteristics of sites needed by these industries. The process also involved forecasting employment growth in Springfield and allocating that employment growth to building types (e.g., general industrial or office buildings) and site sizes (by acres).

Chapter 4 presents Springfield’s potential growth industries and summarizes the employment forecast (which is documented in detail in Appendix C). Chapter 5 describes the site needs of the target industries.

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



Source: ECONorthwest

## POTENTIAL GROWTH INDUSTRIES

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

## KEY TRENDS AFFECTING EMPLOYMENT GROWTH

Previous chapters reviewed historical growth trends by industry in the Eugene-Springfield Region and Lane County since 1980 and employment in Springfield. A review of key historical trends in employment in the Eugene-Springfield Region can help identify potential growth industries in Springfield. In other words, economic opportunities in Springfield are a function of regional historical trends and future economic shifts.

While nearly all sectors of the economy in the Region experienced growth over this period, some sectors grew faster than others, resulting in a shift in the distribution of employment by sector. Key **historical trends** include in the 1980 to 2007 period include:

- A substantial increase in the share of employment in Services, which increased from 23% to 42% of covered employment in Lane County.
- A decrease in the share of employment in Retail Trade, from 21% to 13%. The number of jobs in retail did not decrease substantially over the 27-year period (a loss of nearly 550 retail jobs) but growth in retail jobs lagged behind growth in other sectors, especially service sectors.
- A decline in the share of employment in Manufacturing, which fell from 20% to 13% of covered employment.
- A decline in the share of employment in Government, which decreased from 20% to 16% of covered employment.

Together, these sectors represent about 84% of employment in the County. Other sectors of the County's economy have a relatively stable and small share of the County's employment.

Historical employment trends show a substantial shift in the Region's economy that mirrored shifts in the State and national economies, specifically the substantial growth in Services and decline of Manufacturing. While these trends are expected to continue into the future, **future shifts** are not expected to be as dramatic as those experienced over the past twenty years. There are several reasons for this expectation (e.g., that the future will be somewhat different than the past):

- Growth in the Services sector has matured and should track more closely with overall employment and population growth rather than continuing to gain a substantial share of total employment.
- The decline in Manufacturing was due, in part, to decreased timber harvests and the outsourcing of production to facilities in countries with lower costs. Timber harvests are expected to level off and increase in the future as commercial forests that were replanted since the 1970s grow to a harvestable size. While outsourcing will continue, much of what can be outsourced has already gone. Remaining Manufacturing firms are tied to their region to be near supplies or markets, or manufacture specialized goods where small production quantities, fast turn-around times, and the need for quality limit the ability to outsource.
- The mix of Manufacturing jobs in the Eugene-Springfield Region changed over the past twenty years with declines in Wood Products and the growth of employment in Recreational Vehicle (RV) manufacturing, machinery manufacturing, metals manufacturing, and high-tech industries, such as Computer and Electronics Manufacturing.

## **BUSINESS CLUSTERS IN SPRINGFIELD**

One way to assess the types of businesses that are likely to have future growth in an area is to examine relative concentration and employment growth of existing businesses. This method of analysis can help determine relationships and linkages within industries, also called industrial clusters. Sectors that are highly concentrated (meaning there are more than the "average" number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial clusters. Sectors with either high concentration of businesses or high employment growth may be part of an emerging cluster, with potential for future growth.

The sectors with the most growth potential (identified in Chapter 3) are: Health and Social Assistance; Administrative and Support; Construction;

and Accommodations and Food Services. Other sectors with growth opportunities are: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

Table 4-1 shows existing and potential business clusters in Springfield. The clusters identified in Table 4-1 are based on employment trends, Springfield's comparative advantages, the OED's employment forecast for Lane County, the types of firms that have considered locating in Springfield, and analysis of existing and developing business clusters in Springfield and Lane County.

**Table 4-1. Existing and potential business clusters in Springfield**

<b>Cluster</b>	<b>Employment Potential</b>	<b>Secondary Employment</b>
<b>Medical Services</b>	Associated with RiverBend Regional Medical Center: 3,400 new jobs in 2008 Additional medical services Additional services Employment at a new or expanded McKenzie-Willamette Hospital Facility	Associated with RiverBend and McKenzie Willamette hospitals: Medical Services and Suppliers Research and Education Medical equipment manufacturing Non-medical office space Services like retail, restaurants, financial services, etc.
<b>Manufacturing</b>	Growth potential depends on firms growing locally or choosing to locate in Springfield. Types of firms include: <ul style="list-style-type: none"> <li>• Food processing</li> <li>• High-tech electronics</li> <li>• Recreational Equipment</li> <li>• Medical Equipment manufacturing.</li> <li>• Furniture manufacturing</li> <li>• Specialty apparel</li> <li>• Cottage industries such as jewelry, apparel, or personal care products</li> <li>• Plastics manufacturing</li> </ul>	Manufacturing of related or complementary products Additional manufacturing Services like retail, restaurants, financial services, etc.
<b>Wood Products and Specialty Wood Products</b>	Growth potential depends on the international demand for wood products. The existing wood products and paper manufacturing cluster is evolving based on industry innovation.	Services like retail, restaurants, financial services, etc.
<b>Call Centers</b>	Growth potential depends on firms choosing to locate in Springfield. Eugene and Springfield have advantages for attracting call centers because of the pool of trained call center workers.	Back-office functions for companies with call centers Services like retail, restaurants, financial services, etc.

<b>Cluster</b>	<b>Employment Potential</b>	<b>Secondary Employment</b>
<b>Back-Office Functions</b>	Growth potential depends on firms growing locally or choosing to locate in Springfield. There is a lot of national competition for these functions.	Related back-office functions (if a cluster grows) Services like retail, restaurants, financial services, etc.
<b>Tourism</b>	Growth potential depends on holding events in the Eugene-Springfield area that attract visitors. Growth may also depend on development of infrastructure to attract and service visitors, such as hotels or outdoor activities.	Services like hotels, retail, restaurants, arts and entertainment, etc.
<b>High-tech</b>	Growth potential depends on firms growing locally or choosing to locate in Springfield. Types of firms include: <ul style="list-style-type: none"> <li>• Software development</li> <li>• Computer electronics</li> <li>• Computer service providers</li> <li>• Data centers</li> </ul>	Service and materials providers Services like retail, restaurants, financial services, etc.
<b>Biotech</b>	Growth potential depends on firms choosing to locate in Springfield. There is a lot of national competition for these firms. Springfield has advantages in attracting these firms because of the University of Oregon's work in Biotech, presence of Invitrogen, and national growth in the industry.	Related biotech firms Suppliers or other specialized service providers Services like retail, restaurants, financial services, etc.

## TARGET INDUSTRIES

Goal 9 requires cities to identify the number and characteristics of sites “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses (OAR 660-009-0014(2)).” In developing this assessment, cities are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion (OAR 660-009-0015(2)). Cities are required to “estimate the types and amounts of industrial and other employment uses likely to occur in the planning area,” taking into consideration relevant economic advantages and disadvantages (OAR 660-009-0015(4)).

Identifying the number and characteristics of needed sites starts with understanding the types of businesses that may locate in Springfield over the 20-year planning period. Consistent with the requirements of Goal 9, these industries are grouped into “major categories of industrial or other employment uses” (OAR 660-009-0015(1)). This grouping is commonly referred to as “target industries.”

The target industries for Springfield were identified based on a range of factors:

- Springfield’s existing employment base and the clusters of businesses in Springfield, such as those shown in Table 4-1, Table A-12, or Table A-7.
- Springfield’s comparative advantages, especially Springfield’s location in the Southern Willamette Valley next to Eugene, the easy access to Interstate 5 in Springfield, and the availability of educated and trained labor force from across the region.
- Local and regional economic trends, such as changes in regional employment (Table A-5), changes in regional business clusters, growth in tourism (Table A-13), growth in agriculture production (Table A-14), or forecasts for regional employment growth (Table A-16).
- National and statewide economic trends over the last three decades, such as growth in services or decline in wood products manufacturing.
- Local and regional demographic trends, such as population growth and growth in people over age 60.
- Existing businesses and business clusters in Springfield, such as those identified in Table 4-1.
- Springfield’s economic development objectives, such as:
  - Increasing employment in regional clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.
  - Recruiting businesses that pay higher than average wages for the region.

The characteristics of Springfield will affect the types of businesses most likely to locate in Springfield. Springfield’s attributes that may attract firms are: the City’s proximity to I-5, high quality of life, proximity to the University of Oregon, the presence of the RiverBend campus, positive business climate, availability of skilled and semi-skilled labor, and proximity to indoor and outdoor recreational opportunities. The types of businesses that may be attractive to Springfield include:

- **Medical Services.** The development of a regional medical center cluster at RiverBend presents an opportunity to attract medical

firms, medical research firms, and other professional services. PeaceHealth is in the process of attracting these firms, through development of a research-oriented relationship with OHSU and the University of Oregon. The possible expansion of the McKenzie-Willamette Medical Center in Springfield presents additional opportunities for attracting medical services and employment in healthcare.

- **Services for seniors.** Springfield’s growing population of retirees or near retirees, may attract or create demand for health services that provide services to older people, such as assisted living facilities or retirement centers. These facilities may prefer to locate in relatively close proximity to RiverBend or McKenzie-Willamette.
- **Manufacturing.** Springfield’s attributes may attract small scale manufacturing firms (e.g., firms with fewer than 50 employees). Springfield may also be attractive to large manufacturing firms, provided that land is available for development. Examples of manufacturing include medical equipment, high-tech electronics, recreational equipment, furniture manufacturing, specialty apparel, and other specialty manufacturing.
- **Specialty Food Processing.** Springfield’s proximity to agricultural resources may make the City attractive to specialty food processing firms, such as those that specialize in organic or natural foods or wineries.
- **High-Tech.** Springfield’s access to highly educated labor, access to comparatively inexpensive electricity, and high quality of life may make Springfield attractive to high-tech firms. The types of firms that may be attracted to Springfield range from high-tech manufacturing to data centers to software development.
- **Professional and Technical Services.** Springfield’s attributes make it attractive to businesses that need access to educated workers and want a high quality of life. These types of businesses could include engineering, biotechnology, research, and other professional services that are attracted to high-quality settings.

Springfield’s reputation as a blue-collar community may present challenges in attracting these types of businesses. Recent trends and efforts by the City suggest the reputation as a blue-collar community is in the process of changing. The City can facilitate this change through building off of the medical cluster forming at RiverBend and through promoting Springfield as a good place to locate professional service firms.

- **Call Centers.** The existing call center cluster including Symantec and Royal Caribbean may attract other call centers to Springfield. The potential for growth in call centers in the Eugene-Springfield area will be dependent of the availability of skilled labor.
- **Back-Office Functions.** Springfield's high quality of life and relatively low wages may attract back-office functions, such as Hawes Investments' offices in Springfield. Back-office functions include administrative functions, such as accounting or information technology. The potential for growth in back-office functions may be limited by national competition for this type of employment. Springfield may be more successful at attracting back-office functions for firms that have a reason to locate in the Region, such as firms with corporate headquarters on the West Coast or firms that do a substantial amount of business in the Willamette Valley.
- **Tourism.** Visitors may be attracted to Springfield to take advantage of recreational opportunities and other amenities. They may also be attracted as a result of regional events, such as the Olympic Track and Field trials, the Oregon Country Fair, or the University of Oregon Bach Festival. Industries that serve tourists, such as food services and accommodations, are likely to grow if tourism increases.
- **Green businesses.** There is no clear definition of what constitutes a green industry or business. In general, green businesses are those that produce products or services that improve or maintain environmental quality, as described in Appendix A. Opportunities for environmentally conscious businesses are growing. The types of green businesses that may choose to locate or expand in Springfield includes: green construction firms (e.g., firms that use LEED-certified building practices), organic food processing, sustainable logging and/or lumber products manufacturing, or alternative energy production (e.g., manufacturing solar panels or bio-fuels).
- **Corporate Headquarters.** Springfield's quality of life, location along I-5, and availability of educated workers may make Springfield attractive as a place to locate corporate headquarters. These same qualities, combined with the relatively low cost of semi-skilled labor and cluster of call centers, make Springfield attractive as a place to locate back-office functions, such as call centers.
- **Services for Residents.** Population growth will drive development of retail and government services, especially education, in Springfield.

- **Government and Public Services.** Springfield will continue to be the location for institutions such as: Springfield City Services, State services such as the Department of Motor Vehicles and Oregon Department of Transportation offices, the Springfield School District, and the Springfield Utility Board.

OAR 660-009-0025 requires cities designate sufficient land for employment to accommodate forecast needs. OAR 660-009-0025(1) and (2) articulate the requirements:

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

(2) Total Land Supply. Plans must designate serviceable land suitable to meet the site needs identified in section (1) of this rule. Except as provided for in section (5) of this rule, the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

Thus, Springfield must identify the characteristics of “needed” sites and designate enough land to accommodate the needs. Table 4-2 shows a list of target industries and what plan designations in which the uses would be allowable. The conclusion is that each target industry is allowed in multiple plan designations.

**Table 4-2. Target Industries and Plan Designations**

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

## EMPLOYMENT FORECAST

To provide for an adequate supply of commercial and industrial sites consistent with plan policies, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Goal 9 requires cities identify “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses.” The number of needed sites is dependent on the site requirements of employers. The estimate of land need is presented in the site needs analysis in the next section.

Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield. This section presents a projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

The EOA presents a forecast for employment growth for Springfield for the 2010 to 2030 period. The City’s intent was to adopt this EOA in 2010 and the City noticed DLCD of this intent on October 30, 2009.<sup>28</sup> 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.

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<sup>28</sup> Springfield submitted a notice to adopt the 2009 Economic Opportunities Analysis on October 30, 2009. The date of the first evidentiary hearing in the notice was December 15, 2009, with a final hearing in July 2010. The purpose of this hearing was to provisionally adopt by resolution a draft Commercial and Industrial Building Lands Inventory, Economic Opportunities Analysis, Economic Development Objections and Implementation Strategies in order to carry out mandate of 2007 Or Laws Chapter 650 requiring Springfield to establish its own Urban Growth Boundary. The Resolution recognizes the that action was an interim step and that further steps were needed before adoption of a final inventory, analysis, and determination of capacity.

The City submitted notice with policy amendments to DLCD on December 31<sup>st</sup>, 2009, with a first evidentiary hearing on February 17, 2010. This notice included the 2009 Economic Opportunities Analysis.

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

<b>Year</b>	<b>Total Employment</b>
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
<b>Change 2010 to 2030</b>	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

Springfield is part of the regional economic center in the Southern Willamette Valley region. The ratio of population to employment will decrease from 1.6 people per job to 1.5 people per job between 2008 and 2030. This change shows that employment will grow faster than population in Springfield, suggesting that some Springfield businesses will continue to have employees who commute from Eugene or other cities in the region.

Table 4-4 shows the forecast of employment growth by building type in Springfield's UGB in 2030. In 2010, a total of about 60% of Springfield's employment is in office and other services' building types. About 18% is in retail, 15% is in general industrial and 7% is in warehousing and distribution.

For the purpose of the Springfield EOA, building types are used to relate employment by industry to site needs. In short, the method used to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development – demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. It is also consistent with OAR 660-009-0015(1) which states "Industrial or other employment uses with compatible site characteristics may be grouped together into

common site categories. “ For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a “typical” building type, grouped by industrial and commercial uses. Table A-8 in the appendix shows how industries are related to building types and site needs.

**Table 4-4. Forecast of employment growth in by building type, Springfield UGB, 2010-2030**

Building Type	2010		2030		Change 2010 to 2030
	Employment	% of Total	Employment	% of Total	
<b>Industrial</b>					
Warehousing & Distribution	2,954	7.0%	3,343	6.0%	389
General Industrial	6,457	15.3%	7,523	13.5%	1,066
<b>Commercial</b>					
Office	12,561	29.7%	17,274	31.0%	4,713
Retail	7,709	18.2%	9,752	17.5%	2,043
Other Services	12,603	29.8%	17,832	32.0%	5,229
<b>Total</b>	<b>42,284</b>	<b>100.0%</b>	<b>55,724</b>	<b>100.0%</b>	<b>13,440</b>

Source: ECONorthwest

Note: Green shading denotes an assumption by ECONorthwest

Note: The forecast assumes that the share of employment in other services' building types will increase by about 2.2% over the 20-year period. We expect that medical employment will grow faster than government employment, based on historical trends that show government accounting for a decreasing share of employment and the growing medical cluster in Springfield.

The forecast in Table 4-4 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). The rationale supporting these assumptions is presented in Appendix C.

## SITE NEEDS

OAR 660-009-0015(2) requires the EOA identify the number of sites, by type, reasonably expected to be needed for the 20-year planning period. Types of needed sites are based on the site characteristics typical of expected uses. The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be by general size categories that are defined locally (i.e., small, medium, or large sites), or it can be industry or use-based (i.e., manufacturing sites or distribution sites).

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

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

Appendix C discusses the productive factors that affect business' locational decisions and the implications of these factors for businesses that may locate in Springfield. The appendix also discusses the characteristics of sites needed to accommodate employment growth and Springfield's ability to provide sites with these characteristics.

## LONG-TERM LAND AND SITE NEEDS

Appendix C presents the process for converting between the employment forecast to site needs. Table 4-5 presents the estimate of needed sites by site size and type of building. The results show that Springfield needs approximately 273 sites. Most sites are small, 2-acres or less. Springfield needs approximately 24 sites larger than 5-acres, including 4 sites larger than 20-acres.

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

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

Source: ECONorthwest

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

## SHORT-TERM SITE NEEDS

Springfield has four large-scale development plans currently underway: RiverBend Node, Marcola Meadows Node, the Glenwood Riverfront Node and the Downtown District Node. RiverBend, Marcola Meadows and Glenwood Riverfront District have approved master plans and are available for immediate development. In addition, the City is currently developing a Downtown District Plan and Implementation Strategy to facilitate and promote downtown redevelopment.

- **RiverBend Node.** PeaceHealth’s main hospital at RiverBend opened in August 2008. The relocation or expansion of other medical firms to the RiverBend campus is underway. In addition to these uses, PeaceHealth plans further development of the RiverBend campus, which is about 72 acres in size. Other uses may include a mixture of residential development, office and commercial support services, retail, and educational and research functions to support collaborations with Oregon Health Services University and the University of Oregon. Studies for the RiverBend master plan indicated that there may be demand for additional office development (400,000-500,000 square feet) and commercial retail services (50,000 to 70,000 square feet).
- **Marcola Meadows Node.** Marcola Meadows is a master-planned proposed mixed use project located on a vacant 100-acre parcel in Springfield. The project is expected to include about 190 single unit detached homes, about 120 townhouses, about 120 homes in apartments, and 54 homes for senior living. The total proposed land requirement of the residential village would be 39 acres.

The Marcola Meadows Master Plan includes a commercial anchor development, professional offices and retail. The planned commercial component will occupy about 44 acres. The remaining land in the development will be used for common open space and streets.<sup>29</sup>

- **Glenwood Node.** Glenwood currently has a mixture of residential, commercial, and industrial zoning, with areas that are underdeveloped or undeveloped. Glenwood’s current development pattern is: 83 acres of industrial land, 64 acres of retail, 66 acres of manufactured dwellings, 37 acres of single-family dwellings, and 167 acres of vacant land.

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<sup>29</sup> Marcola Meadows Pre Plan.

Redevelopment of Glenwood is in the planning stages. The 48-acre Glenwood Riverfront Plan District is currently designated for Mixed Use Nodal Development and is available for development. The City is updating the Glenwood Refinement Plan for the rest of Glenwood in phases. Goals for redevelopment include developing residential, employment and mixed use areas, providing transition between residential and industrial areas, and capitalizing on Glenwood's location between Eugene and Springfield and riverfront land.<sup>30</sup>

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<sup>30</sup> Glenwood Refinement Plan. November 1999.



# Land Capacity and Demand

This chapter provides a brief summary of the implications of the economic opportunities needs analysis for the City of Springfield. This study looked at economic trends and land needs from a regional and local perspective. This chapter includes a general comparison of land supply and demand. The comparison of land capacity and demand is followed by a discussion of the key implications of the EOA for the City of Springfield.

## COMPARISON OF LAND CAPACITY AND DEMAND

This section presents an analysis of land availability and capacity for employment uses in Springfield. Chapter 4 presents an analysis of potential growth industries in Springfield and the employment forecast for Springfield. Based on this analysis, Table 5-1 shows a comparison of land supply and need in terms of sites by site size.

### Redevelopment Capacity

The City makes the following assumptions about redevelopment of industrial and commercial land:

- All sites 5 acres and smaller that were identified as having redevelopment potential may redevelop over the 2010-2030 period.
- Five sites between 5-20 acres and one site 20 acres and larger are likely to redevelop over the 2010-2030 period. Table 2-12 provides a site-by-site evaluation of redevelopment potential for sites larger than 5 acres.

Table 5-1 uses the inventory of buildable vacant land from Chapter 2.

- **Vacant land.** The vacant land summary in Table 5-1 is summarized from Table 2-9.
- **Redevelopable land.** The redevelopable land summary in Table 5-1 makes two assumptions about redevelopment potential:<sup>31</sup>
  - *Sites smaller than five acres.* All of the sites smaller than 5 acres with redevelopment potential in Table 2-11 are shown in Table 5-1.
  - *Sites larger than five acres.* Table 2-12 presents a site-by-site evaluation of redevelopment potential of sites identified as potentially redevelopable in Table 2-11. Table 5-1 includes all of the sites identified as providing an opportunity for redevelopment of a 5-acre site (in Table 2-12) as potentially redevelopable sites over the planning period.

The results show that Springfield has a deficit of about 2 industrial sites and 7 commercial and mixed use sites.

<sup>31</sup> The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

**Table 5-1. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030**

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

Source: ECONorthwest.

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

Converting the site needs shown in Table 5-1 to an estimate of land needs requires making assumptions about average site sizes needed in Springfield. The average site sizes in Table 5-2 are based on empirical analysis of the size of Industrial and Commercial taxlots with employment in Springfield in 2006. This analysis involved relating covered employment data (covered employment in Springfield is shown in Table C-1) to taxlots in Springfield. The taxlots were grouped into categories of site size (i.e., less than 1 acre, 1-2 acres, etc.) by type of land (i.e., industrial or commercial/mixed-use). For each group, the average site size was determined, as shown in Table 5-2. For example, there were 75 Industrial sites smaller than 1 acre in Springfield with employment, with an average of 0.5 acres per site.

**Table 5-2. Average size of needed sites based on average sizes of sites with employment in Springfield, Springfield UGB**

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

Source: ECONorthwest based on QCEW data

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

Table 5-3 shows sites needed (from Table 5-1) and land need (based on number of sites needed in Table 5-1 and average site size in Table 5-2). The results show that Springfield has a deficit in the current UGB of the following land types for the 2010 to 2030 period:

- **Industrial land.** Springfield has a **need for 126 acres** of industrial land on two sites larger than 20 acres. In the context of this study, industrial uses means any major employer that would be allowed in an industrial land designation (e.g., campus industrial, light-medium industrial, light-medium industrial mixed use, heavy industrial, or special heavy industrial).
- **Commercial sites.** Springfield has a **need for 104 acres** of commercial land on 9 sites. Springfield’s commercial site needs range from sites 2 to 5 acres in size to one site that is 60 acres in size. In the context of this study, commercial use means any use that would be allowed in a commercial land designation (e.g., commercial, commercial mixed use, employment mixed use).

**Table 5-3. Comparison of employment land supply and site needs, Springfield UGB, 2010-2030**

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

Source: ECONorthwest

The summary of land needs in Table 5-3 shows Springfield’s land need for all sites of all sizes. One of the City’s economic development strategies is to encourage redevelopment, especially in Downtown and Glenwood. Table 5-1 shows that Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption about redevelopment, **Springfield concludes that all land needs on sites smaller than five acres would be accommodated through redevelopment.** The City had a deficit of two commercial and mixed use sites smaller than five acres, which would require six acres of land (Table 5-3).

Table 5-4 shows Springfield’s employment land need, assuming that all site needs for sites smaller than five acres would be addressed through redevelopment. **Springfield has the need for approximately two**

**industrial sites on 126 acres and five commercial and mixed use sites on about 97 acres** that cannot be accommodated within the existing UGB over the 2010 to 2030 period.

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

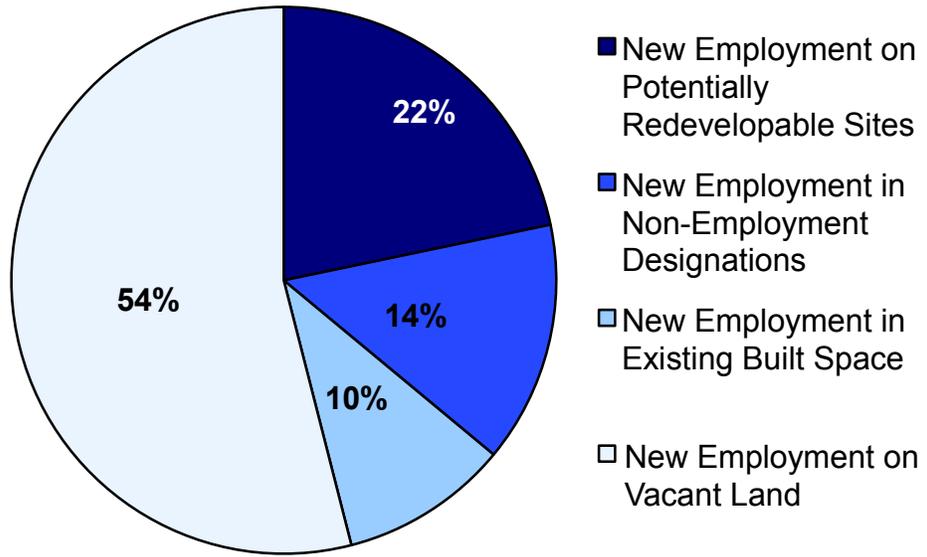
	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
<b>Industrial</b>				
Sites needed	none	none	2	<b>2</b>
Land need (acres)	none	none	126	<b>126</b>
<b>Commercial and Mixed Use</b>				
Sites needed	none	4	1	<b>5</b>
Land need (acres)	none	37	60	<b>97</b>
<b>Total sites needed</b>	<b>none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

Source: ECONorthwest

Figure 5-1 summarizes how Springfield will accommodate new employment based analysis in Chapter 5 and Appendix C. Springfield's employment forecast shows growth of 13,440 new employees over the planning period (Table C-2).

- 14% of new employment (1,918 employees) will locate on **land not designated for employment use**, such as residential land (Table C-12).
- 10% of new employment (1,344 employees) will locate in **existing commercial or industrial built space**, such as vacant buildings or office spaces (Table C-12).
- 22% of new employment (about 2,921 employees) will locate on **potentially redevelopable sites**, where redevelopment results in an increase in the amount of employment accommodated on the site (Table 5-1 shows assumptions about potentially redevelopable sites and Table C-6 shows that need for sites smaller than 5 acres will be accommodated through redevelopment).
- 54% of new employment (about 7,256 employees) will locate on **land that is currently vacant**, including land within the UGB and sites that Springfield does not currently have within the UGB (Table 5-1 and Table C-6).

**Figure 5-1. Summary of Location of Employment Growth by Type of Land, Springfield UGB, 2010-2030**



Source: ECONorthwest

## CHARACTERISTICS OF NEEDED SITES

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

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

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

The demand for employment sites (summarized in Table 5-1) is driven by expected employment growth in industries that have historically needed sites in different size groupings. Table C-6 shows that Springfield has a deficit of two Industrial sites 20 acres and larger, which may be needed by target industries such as light manufacturing, high-tech manufacturing, recreation equipment manufacturing, wood products manufacturing, medical products manufacturing, alternative energy manufacturing, or specialty food processing.

Springfield also has a deficit of Commercial and Mixed Use sites, including: four site 5 to 20 acres in size and one site 20 acres and larger. The target industries that may locate on these sites include: Medical Services, Professional and Technical Services, Back-Office Functions, Call Centers, or Corporate Headquarters. Table 4-2 summarizes the Comprehensive Plan Designations where Springfield's target industries are allowed within Springfield's existing UGB.

This section describes the site needs of these target industries, focusing on the deficit of 223 acres of employment land in Springfield identified in Table 5-4.

## **SITE SIZE AND OTHER CHARACTERISTICS**

This section presents information about the sites needed by the target industries based on information by Business Oregon, economic development efforts in Springfield, a study about industry site needs in Springfield by Tadzo, and other sources. Appendix C (Tables C-6 to C-11) present details of research about site needs of Springfield's target industries from these sources. Table 5-5 summarizes these site needs.

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

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

## SITE NEEDS FOR SPRINGFIELD'S TARGET INDUSTRIES

This section presents a refinement of the discussion of the characteristics of needed sites in Springfield on pages 59 to 63 of the EOA to describe the connection between the typical site need and operations of target industries.

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

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

In *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), LUBA provided a recent interpretation of this requirement, by applying a “two-prong test” for establishing relevant site characteristics as follows: (1) that the attribute be “typical of the industrial or employment use” and (2) that it have “some meaningful connection with the operation of the industrial or employment use.” The first of those prongs, that the attributes be “typical,” appears expressly in OAR 660-009-0015(2), which refers to “site characteristics typical of expected uses.” In upholding LUBA’s two prong test, the Court of Appeals agreed, “[t]hat ‘necessary’ site characteristics are those attributes that are reasonably necessary to the successful operation of particular industrial or employment uses, in the sense that they bear some important relationship to that operation.” *Friends of Yamhill County v. City of Newberg*, 240 Or App 738, 747 (2011).

### TARGET INDUSTRIES: MANUFACTURING

Springfield identified the following types of target industries in manufacturing (as part of the General Industrial employment category) that require sites 5 acres and larger: medical equipment, high-tech electronics and manufacturing, recreational equipment, furniture manufacturing, specialty food processing. Table 5-1 shows that Springfield has a deficit of two sites larger than 20 acres to accommodate these types of manufacturing businesses, with an average site size of 63 acres. Manufacturing is most likely to occur in an industrial or campus industrial zone.

The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), *aff'd* 240 Or App 738 (2011).

1. **Site size.** Sites where manufacturing firms might locate range in size from 10 to 20 acres and up to 60 acres or more for large-scale manufacturers. Springfield has a deficit of two sites in the site size of “20 acres and larger,” which have an average site size of 63 acres.
  - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Site size is important for manufacturers. The site needs to be large enough to accommodate the needed built space, as well as accommodate storage space or space for phased development. In addition, the site needs to be large enough to accommodate dedication of public right-of-way and/or easements that may be needed to extend or increase the capacity of existing transportation, infrastructure and utilities to serve the manufacturing use, on-site circulation, parking and loading, on-site stormwater management, waste management, and to meet applicable site coverage or open space requirements, and applicable land use or natural resource buffers required through the City’s development or building code regulations.

Table C-7 shows employment estimates for manufacturing businesses that considered locating in the Eugene-Springfield area. Size of site is generally connected to levels of employment, with larger amounts of employment generally locating on larger sites.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites “a minimum acreage” as a site characteristic. The average size of existing industrial employment sites larger than 20 acres in Springfield is 63 acres (Table 5-2).

In addition, Business Oregon finds that competitively sized general manufacturing firms are 10 acres in size and high-tech manufacturing or campus industrial manufacturing require 25-acre sites. Industrial businesses that considered locating in the Eugene-Springfield area needed sites ranging in size from 10 acres to 200 acres or larger. The Tadzo report concludes that manufacturers in Springfield’s target industries that need a 200,000 square foot building require

sites between 18 and 24 acres and businesses that need a 500,000 square foot building need sites between 45 and 60 acres in size. Major employment sites with industrial uses in the Portland Metro area range in size from 25 to 160 acres and average about 50 acres in size.

2. **Topography.** Manufacturing sites should be relatively flat, with slopes of not more than 7% and preferably no more than 5%. Consistent with OAR 660-009-0005(2), Springfield considers sites with slopes over 7% to be unsuitable for manufacturing uses.
  - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Business Oregon identifies sites with a slope of less than 5% (or less than 7% for High Tech Manufacturing or Campus Industrial) as necessary for a competitive site. Manufacturing buildings require level floor plates to support efficient physical layout of equipment, materials staging, assembly, packing and loading processes, reducing costs and offering maximum flexibility, as well as level areas to provide for freight access and pedestrian walkways that meet ADA standards. The real estate development literature describes the increases in development costs and other difficulties associated with industrial development on a sloped site.
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Business Oregon finds that competitive sites generally have a slope of 5% or less, except high tech manufacturing and campus industrial, which have a slope of 7% or less.
3. **Transportation Access.** Manufacturing buildings generally are located on arterial or major collector streets. Sites need to have unimpeded access within 15 miles of an interstate highway or principal arterial road that is designated as a freight route, based on analysis from Business Oregon (Table C-8).

Many businesses in Springfield, especially the large businesses like those in Springfield's target industries, are located as close to Interstate 5 or a state highway as possible. Map A-1 and Map A-2 show the location of employers in Springfield. Much of Springfield's employment base, especially large employers, is clustered in the Gateway area, within one mile (or less) of I-5. Most other employers are located along or within one-quarter to one-half mile of a state highway.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Distance from transportation facilities is meaningful because it directly affects the industry's time, labor, and fuel costs. Cost efficient freight movement is necessary for effective and economical manufacturing operations. Designated Federal, State, and local freight routes have design features that ensure freight vehicle movement and weight. This attribute is meaningful to industry operations because it directly affects the industry's travel time, labor and fuel costs to use lower classification, slower speed streets that are designed for local traffic

Unimpeded access to designated freight routes that are designed and constructed to ensure passage of freight vehicle sizes and weights is meaningful to the operation of the manufacturing use because it directly affects the industry's ability to move its freight vehicles. Local streets are not designed and built to accommodate heavy freight vehicles. Avoiding use of the local street network minimizes traffic conflicts with adjacent residential land uses along streets not designed for freight vehicles and higher traffic volumes. This site characteristic also helps to minimize traffic conflicts on local streets, improve mobility, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective industrial operations.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes" as a site characteristic. Business Oregon finds that manufacturing and industrial firms need to be located relatively close to an interstate highway or principle arterial road, generally within 15 minutes or less, for shipping freight. The literature about siting of industrial buildings, including manufacturing, is clear that manufactures must be adjacent to a major transportation facility to optimize supply chain flows and delivery response time.<sup>32</sup> Most businesses in Springfield are located within one-mile of Interstate 5 or within one-half mile of a state highway.

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<sup>32</sup> *Business Park and Industrial Development Handbook*, Urban Land Institute, 2001.

4. **Access to services.** City services should be directly accessible to the site, including sanitary sewer, and municipal water. The pipeline must be at least 8 inches and some manufacturers may require a 10 inch pipe minimum for both water and wastewater. Some target industries, such as high tech or specialty food processing, may require higher volumes of water and wastewater treatment.
  - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Industrial buildings require access to municipal water, municipal sanitary sewer, and electricity/gas. At a minimum, manufacturers must have access to water and wastewater for typical manufacturing uses. Some manufacturers, such as high tech or specialty food processors, may require water and wastewater services as part of their manufacturing process. Developing a site with direct access to municipal services is substantially more cost-effective than extending municipal services to an unserved site.<sup>33</sup>
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic. Business Oregon finds that competitive sites must have access to urban services, including water, wastewater, natural gas, electricity, and major telecommunications facilities.
5. **Land assembly.** Sites may include one or more tax lots. Sites with two or fewer owners are necessary (a single owner is most desirable) to reduce the cost and uncertainty of land assembly. Consistent with OAR 660-009-0005(2), Springfield considers parcel fragmentation as a development constraint that directly affects suitability as defined in OAR 660-009-0005(12).
  - Attribute has "some meaningful connection with the operation of the industrial or employment use" - The cost of land assembly, in financial terms and in terms of extra time needed for site assembly, can make developing an industrial site with multiple land owners infeasible, resulting in the business choosing not to build on the site and possibly not locating in Springfield.

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<sup>33</sup> Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(2) specifically lists parcel fragmentation as a development constraint that “ temporarily or permanently limit or prevent the use of land for economic development.” Developing an industrial building on a site with more than two owners requires negotiating land assembly and purchase from multiple owners. Land assembly is difficult and often costly for a number of reasons. People own land for a variety of reasons, such as desire to develop the land, desire to keep the land undeveloped, desire to sell the land for a profit. Getting land owners to sell land can be difficult, especially if the ownership is legally disputed, such as in the case of inheritance cases. If a landowner is a willing seller, they may have an unrealistic expectation of their land’s value, in the context of comparable land values. In addition, one parcel of land may have multiple owners, compounding the issues described above.

Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers of industrial buildings typically choose to develop sites with one or two owners.

## **TARGET INDUSTRIES: LARGE OFFICE EMPLOYERS**

Springfield identified the following types of large office employers as target industries that require sites of five acres or larger: high tech, corporate headquarters, biotech, professional and technical services, back office, and medical services. These and other target industries may locate on stand-alone sites or may locate in business parks. The types of buildings may be typical office buildings, flex buildings,<sup>34</sup> or multiple buildings in a “campus” environment.

Large office employers are likely to locate in commercial or mixed-use zones, with some large office employers (e.g., high tech, biotech,

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<sup>34</sup> Flex space is buildings that could be used for light industrial, office space, or both. Flex space typically has less costly finishing and improvements, such as having bare concrete floors rather than carpet. Businesses that sometimes occupy flex space include plumbing or electrical contractors, computer technology companies such as internet service providers or some software businesses, or service firms that prefer a more “industrial” feeling to their office space, such as some architecture firms.

professional or technical services, back office) locating in mixed-employment zones, such as campus industrial. Table C-6 shows that Springfield has a deficit of four site 5 to 20 acres in size (average site size of 9.3 acres) and one site 20 acres and larger (average site size of 60 acres).

The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), *aff'd* 240 Or App 738 (2011).

1. **Site size.** Sites for office, flex, and business parks where businesses might locate range in size from 10 to 20 acres in size to 75 or 100 acre business parks to very large (multi-hundred acre) sites for large employers.
  - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Site size is important for businesses locating in office, flex, or business parks. The site needs to be large enough to accommodate the needed built space. In addition, the site needs to be large enough to accommodate commercial activities, meet landscaping requirements, meet parking requirements, dedication of public right-of-way and/or easements that may be needed to extend or increase the capacity of existing transportation or infrastructure to serve the businesses, on-site stormwater management, waste management. Sites must also be large enough to meet applicable site coverage or open space requirements, and applicable land use or natural resource buffers required through the City's development or building code regulations.
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "a minimum acreage" as a site characteristic. The Tadzo report concludes that large employers in target industries (e.g., Back Office, Corporate Headquarters, and Professional and Technical Services) may require sites of 8 to 12 acres to 100,000 square foot buildings or sites of 16 to 24 acres for 200,000 square foot buildings. These and other target industries may locate in business parks. Key characteristics of business parks in the Portland Metro region are sites of 25 to 100 acres, with 500,000 to 750,000 square feet of built space.
2. **Topography.** Sites for office, flex, and business parks businesses should be relatively flat, with slopes of not more than 15%. Consistent with OAR 660-009-0005(2), Springfield considers sites with slopes over 15% to be unsuitable for large office employers.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial developments can occur on land with low- to moderate slopes. For the purposes of this analysis, including in the buildable lands inventory, the maximum slope that is appropriate for commercial development is 15%. Commercial buildings on sites with higher slope pose engineering challenges that increases costs and reduces building flexibility, as well as pose challenges for freight delivery. In addition, client and employee access is an important factor in commercial buildings. Sites with steeper slopes will require greater investment in pedestrian walkways that meet ADA standards. The real estate development literature describes the increases in development costs and other difficulties associated with commercial development on a more sloped site.
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Commercial sites, including the business parks and office developments in Portland, are generally relatively flat.
3. **Transportation Access.** Commercial office, flex, and business park buildings generally locate on arterial or major collector streets, to ensure that there is sufficient automotive access for employees and customers, as well as for the visibility of a location along a major road. Large office, flex, and business park buildings need to have access to an arterial or state highway. In addition, transit access is important for Springfield's commercial office, flex, and business park buildings, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile.

Many businesses in Springfield, especially the large businesses like those in Springfield's target industries, are located as close to Interstate 5 or a state highway as possible. Map A-1 and Map A-2 show the location of employers in Springfield. Much of Springfield's employment base, especially large employers, is clustered in the Gateway area, within one mile (or less) of I-5. Most other employers are located along or within one-quarter to one-half mile of a state highway. Large office employers that have located in Springfield over the last decade have located in the Gateway area, such as RiverBend Hospital, Symantec, Pacific Source, or Royal Caribbean Cruise Lines.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - This site characteristic helps to minimize the amount of traffic on local streets, minimize commercial traffic in residential neighborhoods, improve mobility, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective commercial operations. A location with access to an arterial or state highway will have greater visibility, which is important to businesses that depend on in-person customer access. A location with access to mass transit within one-half mile will provide transportation opportunities for employees and customers without access to an automobile.
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes" as a site characteristic.
4. **Access to services.** City services should be directly accessible to the site, including sanitary sewer, and municipal water.
- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial buildings require access to municipal water, municipal sanitary sewer, and electricity/gas. Developing a site with direct access to municipal services is substantially more cost-effective than extending municipal services to an unserved site.<sup>35</sup>
  - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic.
5. **Land ownership.** Sites may include one or more tax lots. Sites with two or fewer owners are necessary to reduce the cost and uncertainty of land assembly. Consistent with OAR 660-009-0005(2), Springfield considers parcel fragmentation as a development constraint that directly affects suitability as defined in OAR 660-009-0005(12).

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<sup>35</sup> Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - The cost of land assembly, in financial terms and in terms of extra time needed for site assembly, can make developing a commercial site with multiple land owners financially infeasible, resulting in the business choosing not to build on the site and possibly not locating in Springfield.
- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "site configuration" as a site characteristic. Developing a commercial building on a site with more than two owners requires negotiating land assembly and purchase from multiple owners. Land assembly is difficult and often costly for a number of reasons. People own land for a variety of reasons, such as desire to develop the land, desire to keep the land undeveloped, desire to sell the land for a profit. Getting land owners to sell land can be difficult, especially if the ownership is legally disputed, such as in the case of inheritance cases. If a landowner is a willing seller, they may have an unrealistic expectation of their land's value, in the context of comparable land values. In addition, one parcel of land may have multiple owners, compounding the issues described above.

Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers of commercial buildings typically choose to develop sites with one or two owners.

The City of Springfield Economic Development Agency (SEDA) has provided and continues to provide public assistance to overcome parcelization constraints within the Glenwood and Downtown Urban Renewal Districts to facilitate redevelopment in Glenwood and Downtown. In addition to comprehensive planning and technical support to assist potential developer projects, SEDA assistance has included land purchase and purchase of options on future property sales. The City has limited resources for this type of activity and thus success with parcel assembly over the

past ten years has been mixed. The City does not have resources to facilitate parcel assembly throughout the City.

## IMPLICATIONS

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

- *Economic growth.* Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030 using the OAR 660-024-0040(8)(a)(ii) methodology. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.
- *Buildable lands.* Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.
- *Redevelopment potential.*<sup>36</sup> 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.

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<sup>36</sup> This study identifies land with redevelopment potential as land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses (providing additional employment capacity) during the planning period.

The City will need to make strategic investments that support redevelopment and to continue supporting redevelopment through City plans and policies. For example, redevelopment in the City's targeted Downtown and Glenwood areas will require substantial investments in public infrastructure to provide public facilities and to overcome the existing impediments to development, including parcel assembly issues.

- *Employment that will not require vacant land.* Springfield assumed that 46% of employment would not require vacant employment land.<sup>37</sup> Springfield's assumptions about employment that will not require vacant land are as follows:

#### **Employment that does not require vacant land**

46% of all new employment (6,105 employees) will be accommodated on land that currently has improvements:

- 14% will locate on land designated for other uses (i.e., residential uses)
- 10% will locate in existing built space
- 22% will locate on "potentially redevelopable land"

Needed sites are based on the 54% of new employment (7,256) that will require vacant, suitable land.

- Fourteen percent of employment (1,918 employees) will locate in non-employment designations. These employees will include people with home occupations, working from home, and businesses that locate in residential or other non-employment designations. This assumption is based on the percent of employment located in non-employment designations in 2006. See Appendix C and Table C-12 for more information about this assumption.
- Ten percent of new employment (1,344 employees) will locate in existing built space. See Appendix C and Table C-12 for more information about this assumption.
- Twenty-one percent of new employment (2,921 employees) will locate on redevelopable sites. Table 5-1 shows that Springfield assumes 188 industrial sites and 342 commercial and mixed use sites<sup>38</sup> will redevelop over the planning period. The estimate of employment on these sites was based on the average number of employees per site by site size in 2006. See Chapter 2 for more information about redevelopment assumptions.

- *Need for large sites.* Springfield will be able to meet all employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses

<sup>37</sup> The estimate of 46% of new employment not requiring vacant land is based on the assumption that 1,918 employees will locate in non-employment designations, 1,344 employees will locate in existing built space, and 2,921 employees will locate on redevelopable sites. The total number of new employees not requiring new land is 6,183 employees, which is approximately 46% of the forecasted growth of 13,440 jobs.

<sup>38</sup> The analysis in Table 5-1 shows that 340 commercial and mixed-use sites are considered potentially redevelopable. Table 5-4 assumes that the need for two sites in the 2 to 5 acre size range will be accommodated through redevelopment. As a result, Springfield assumes demand for 342 commercial and mixed-use sites will be accommodated through redevelopment.

on non-employment land (e.g., home occupations). The employment land needs that may not be met within the UGB are for sites five acres and larger. The City has only one suitable site 20 acres or larger.

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

For example, in the past twenty years, most of the Gateway area developed. The area has a mix of uses including the International Way campus employment district, regional mall, apartments, offices, and more recently, the PeaceHealth RiverBend Medical Center Campus. Twenty-years ago it would have seemed highly unlikely that PeaceHealth would build their new regional facility in Springfield. If the City had not had desirable, serviceable land available, PeaceHealth would probably not have located their new facility in Springfield. Over the last 20 years, employment and commerce in the Gateway area has become a local and regional economic engine and major employment center. In 2006, the Gateway area had 33% of Springfield's employment (more than 9,800 employees) and 33% of payroll in the city, at \$325 million. By 2009, Gateway accounted for nearly 36% of the city's employment and \$368 million in payroll. In 2013, employment in the Gateway area accounted for 40% of employment in Springfield (more than 10,700 employees) and 43% of payroll in the city.<sup>39</sup>

- *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.

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<sup>39</sup> Kim Thompson, Oregon Employment Department, "The Gateway Area & Growth in Springfield," presentation to Gateway Development Committee, October 24, 2014.

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

- *Site assembly.* Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Map 2-3 shows that of industrial- and commercial-designated sites are scattered throughout the City, generally along Main Street or in Mid-Springfield, and the majority of sites are smaller than 2 acres. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners.
- *Need to expand the UGB to accommodate need for large sites.* Springfield's need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway.
- *Short-term land supply.* Based on the Goal 9 definition of short-term land supply and criteria for "engineering feasibility," the majority of inventoried commercial and industrial land supply within the Springfield UGB is part of the short-term land supply, assuming that funding is available to extend or increase capacity of infrastructure and urban services. The Goal 9 rule definition of short-term land supply does not account for land availability, such as whether the landowner is willing to sell it or the owner is willing to redevelop it. The Goal 9 rule definition of short-term land supply also does not account for needed site characteristics, such as site size. As a result, the City's short-term land supply as defined by Goal 9 may not be available and developers may have difficulty finding developable land with specific site characteristics.

# National, State, County, and Local Trends

## Appendix A

This appendix summarizes national, state, county, and local trends affecting Springfield. It presents a demographic and socioeconomic profile of Springfield (relative to Lane County and Oregon) and describes trends that will influence the potential for economic growth in Springfield. This appendix covers recent and current economic conditions in the City, and forecasts from the State Employment Department for employment growth in Lane County. This appendix meets the intent of OAR 660-009-0015(1).

## NATIONAL, STATE, AND REGIONAL TRENDS

### NATIONAL TRENDS

Economic development in Springfield over the next twenty years will occur in the context of long-run national trends. The most important of these trends include:

- **The aging of the baby boom generation, accompanied by increases in life expectancy.** The number of people age 65 and older will more than double by 2050, while the number of people under age 65 will grow only 22 percent. The economic effects of this demographic change include a slowing of the growth of the labor force, an increase in the demand for healthcare services, and an increase in the percent of the federal budget dedicated to Social Security and Medicare.<sup>40</sup>

Baby boomers are expecting to work longer than previous generations. An increasing proportion of people in their early to mid-50s expect to work full-time after age 65. In 2004, about 40% of these workers expect to work full-time after age 65, compared with about 30% in 1992.<sup>41</sup> This trend can be seen in Oregon, where the share of workers 65 years and older grew from 2% of the workforce

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<sup>40</sup> The Board of Trustees, Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, 2008, *The 2008 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds*, April 10, 2008.

<sup>41</sup> "The Health and Retirement Study," 2007, National Institute of Aging, National Institutes of Health, U.S. Department of Health and Human Services.

in 1992 to 3% of the workforce in 2002, an increase of 64%. Over the same ten-year period, workers 45 to 64 years increased by 70%.<sup>42</sup>

- **Tightening labor force.** Growth in the labor force is projected to slow over the 2006-2016 period as a result of: (1) aging and retirement of the baby boomer generation and (2) the labor force participation by women has peaked. Job growth is expected to outpace population growth, with a 10% increase in employment (15.6 million jobs) compared to a 9% increase in civilian noninstitutional population 16 years and older (22 million people).<sup>43</sup>
- **Need for replacement workers.** The need for workers to replace retiring baby boomers will outpace job growth. According to the Bureau of Labor Statistics, net replacement needs will be 33.4 million job openings over the 2006-2016 period, more than twice the growth in employment of 15.6 million jobs. Management occupations and teachers will have the greatest need for replacement workers because these occupations have older-than-average workforce.<sup>44</sup>
- **Increases in labor productivity.** Productivity, as measured by output per hour, increased over the 1995 to 2005 period. The largest increases in productivity occurred over the 1995 to 2000 period, led by industries that produced, sold, or intensively used information technology products. Productivity increased over the 2000 to 2005 period but at a slower rate than during the latter half of the 1990's. The sectors that experienced the largest productivity increases over the 2000 to 2005 period were: Information, Manufacturing, Retail Trade, and Wholesale Trade. Productivity in mining decreased over the five-year period.<sup>45</sup>
- **Continued trend towards domestic outsourcing.** Businesses continue to outsource work to less expensive markets. Outsourcing generally falls into two categories: (1) moving jobs from relatively expensive areas to less expensive areas within the U.S. and (2) moving jobs outside of the U.S. to countries with lower labor costs.

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<sup>42</sup> "Growing Numbers of Older Workers in Oregon," Oregon Employment Department.

<sup>43</sup> Arlene Dohm and Lyn Shnipper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

<sup>44</sup> Arlene Dohm and Lyn Shnipper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

<sup>45</sup> Corey Holman, Bobbie Joyeaux, and Christopher Kask, "Labor Productivity trends since 2000, by sector and industry," Bureau of Labor Statistics *Monthly Labor Review*, February 2008.

About three-quarters of layoffs in the U.S. between 1995 and 2004 were the result of domestic relocation, involving movement of work within the same company. The industries with the largest amounts of domestic outsourcing were: manufacturing, retail trade, and information.<sup>46</sup>

- **Continued growth in global trade and the globalization of business activity.** With increased global trade, both exports and imports rise. Faced with increasing domestic and international competition, firms will seek to reduce costs through implementing quality- and productivity-enhancing technologies, such as robotics or factor automation. In addition, some production processes will be outsourced offshore.<sup>47</sup>
- **Continued shift of employment from manufacturing and resource-intensive industries to the service-oriented sectors of the economy.** Increased worker productivity and the international outsourcing of routine tasks lead to declines in employment in the major goods-producing industries. Projections from the Bureau of Labor Statistics indicate that U.S. employment growth will continue to be strongest in healthcare and social assistance, professional and business services, and other service industries. Construction employment will also grow but manufacturing employment will decline.<sup>48</sup>
- **The importance of high-quality natural resources.** The relationship between natural resources and local economies has changed as the economy has shifted away from resource extraction. Increases in the population and in households' incomes, plus changes in tastes and preferences, have dramatically increased demands for outdoor recreation, scenic vistas, clean water, and other resource-related amenities. Such amenities contribute to a region's quality of life and play an important role in attracting both households and firms.<sup>49</sup>

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<sup>46</sup> Sharon P. Brown and Lewis B. Siegel, "Mass Layoff Data Indicate Outsourcing and Offshoring Work," *Monthly Labor Review*, August 2005, pp. 3-10.

<sup>47</sup> Eric B. Figueroa and Rose A. Woods, 2007, "Industry Output and Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 53-85.

<sup>48</sup> Eric B. Figueroa and Rose A. Woods, 2007, "Industry Output and Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 53-85.; Arlene Dohm and Lyn Shniper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

<sup>49</sup> For a more thorough discussion of relevant research, see, for example, Power, T.M. and R.N. Barrett. 2001. *Post-Cowboy Economics: Pay and Prosperity in the New American West*. Island Press, and Kim, K.-K., D.W. Marcouiller, and S.C. Deller. 2005.

- **Continued westward and southward migration of the U.S. population.** Although there are some exceptions at the state level, a 2006 U.S. Census report documents an ongoing pattern of interstate population movement from the Northeast and Midwest to the South and West.<sup>50</sup>
- **The growing importance of education as a determinant of wages and household income.** According to the Bureau of Labor Statistics, a majority of the fastest growing occupations will require an academic degree, and on average they will yield higher incomes than occupations that do not require an academic degree. The fastest growing of occupations requiring an academic degree will be: computer software application engineers, elementary school teachers, and accountants and auditors. Occupations that do not require an academic degree (e.g., retail sales person, food preparation workers, and home care aides) will grow, accounting for about half of all jobs by 2016. These occupations typically have lower pay than occupations requiring an academic degree.<sup>51</sup>

The national median income in 2006 was about \$32,000. Workers without a high school diploma earned \$13,000 less than the median income and workers with a high school diploma earned \$6,000 less than median income. Workers with some college earned slightly less than median and workers with a bachelor's degree earned \$13,000 more than median. Workers in Oregon experience the same patterns as the nation but pay is generally lower in Oregon than the national average.<sup>52</sup>

- **Continued increase in demand for energy.** Energy prices are forecast to remain at relatively high levels, as seen in the 2006 to 2008 period, possibly increasing further over the planning period. Output from the most energy-intensive industries is expected to decline, but growth in the population and in the economy is expected to increase the total amount of energy demanded. Energy sources are expected to diversify and the energy efficiency of

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"Natural Amenities and Rural Development: Understanding Spatial and Distributional Attributes." *Growth and Change* 36 (2): 273-297.

<sup>50</sup> Marc J. Perry, 2006, *Domestic Net Migration in the United States: 2000 to 2004*, Washington, DC, Current Population Reports, P25-1135, U.S. Census Bureau.

<sup>51</sup> Arlene Dohm and Lyn Shnipser, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

<sup>52</sup> "Growing Number of Older Workers in Oregon," Oregon Employment Department and American Community Survey, U.S. Census, 2006.

automobiles, appliances, and production processes are projected to increase. Despite increases in energy efficiency and decreases in demand for energy by some industries, demand for energy is expected to increase over the 2008 to 2030 period because of increases in population and economic activity.<sup>53</sup>

- **Impact of rising energy prices on commuting patterns.** Energy prices may continue to be high (relative to historic energy prices) or continue to rise over the planning period.<sup>54</sup> The increases in energy prices may impact willingness to commute long distances. There is some indication that increases in fuel prices have resulted in decreased suburban housing price (i.e., housing demand), especially in large urban areas (e.g., Los Angeles or Chicago) and suburbs far from the center city. If this pattern continues, the area in Oregon most likely to be most impacted is Portland, which has the largest area of urban and suburban development in the state.<sup>55</sup>
- **Possible effect of rising transportation and fuel prices on globalization.** Increases in globalization are related to the cost of transportation: When transportation is less expensive, companies move production to areas with lower labor costs. Oregon has benefited from this trend, with domestic outsourcing of call centers and other back office functions. In other cases, businesses in Oregon (and the nation) have “off-shored” employment to other countries, most frequently manufacturing jobs.

Increases in either transportation or labor costs may impact globalization. When the wage gap between two areas is larger than the additional costs of transporting goods, companies are likely to shift operations to an area with lower labor costs. Conversely, when transportation costs increase, companies may have incentive to relocate to be closer to suppliers or consumers.

This effect occurs incrementally over time and it is difficult to measure the impact in the short-term. If fuel prices and transportation costs decrease over the planning period, businesses may not make the decision to relocate (based on transportation

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<sup>53</sup> Energy Information Administration, 2008, *Annual Energy Outlook 2008 with Projections to 2030*, U.S. Department of Energy, DOE/EIA-0383(2008), April.

<sup>54</sup> Energy Information Administration, 2008, *Annual Energy Outlook 2008 with Projections to 2030*, U.S. Department of Energy, DOE/EIA-0383(2008), April.

<sup>55</sup> Cortright, Joe. “Driven to the Brink: How the Gas Price Spike Popped the Housing Bubble and devalued the Suburbs,” May 2008.

costs) because the benefits of being closer to suppliers and markets may not exceed the costs of relocation.

- **Growing opportunities for “green” businesses.** Businesses are increasingly concerned with “green” business opportunities and practices. These business practices are concerned with “the design, commercialization, and use of processes and products that are feasible and economical while reducing the generation of pollution at the source and minimizing the risk to human health and the environment.”<sup>56</sup>

Green business opportunities have historically been at the mercy of feasibility and economics; if a firm ignores feasibility and economics while trying to be green, the firm may not be able to afford to operate long enough to learn how to make green businesses feasible. The three types of green business opportunities are products, processes, and education.

- *Producing green products.* Green products perform the function of regular products, but do it in a way that uses fewer resources or creates less pollution. For example, hybrid vehicles are green because they use less gasoline to operate and add fewer pollutants to the air. Yet hybrid vehicles serve the same function as non-hybrid cars. Another example is bamboo fencing and lumber, which is green because bamboo is more renewable than traditional lumber. Bamboo products have the strength necessary for building.
- *Providing education about green practices or products.* Green education is often closely related to producing green products and is often done by consultants or nonprofits. Examples of companies involved in green education include the U.S. Green Building Council, which certifies buildings as green (LEED certification), or a consulting firm that writes a green (or sustainable) plan for a city or business.
- *Using green business practices.* Green business practices are alternative methods of doing business that promote resource conservation, prevent or reduce pollution, or have other beneficial environmental effects. Examples of green business processes include: buying products locally to reduce shipping distance, recycling waste products (where

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<sup>56</sup> Urban Green Partnership at [urbangreenpartnership.org](http://urbangreenpartnership.org)

possible), or maximizing the use of natural lighting to reduce use of electricity and light bulbs.

For example, ECONorthwest is a green educator because we help our clients manage natural resources effectively and take all costs and benefits of a particular action into account in order to properly judge the correct course of action. A frequent method of marketing green products involves green education. It is much easier to sell a hybrid car to a customer who knows the environmental benefits of owning a hybrid, so educating potential customers can aid greatly in increasing sales.

- **Potential impacts of global climate change.** There is growing support for but not a consensus about whether global climate change is occurring as a result of greenhouse gas emissions. There is a lot of uncertainty surrounding global climate change, including the pace of climate change and the ecological and economic impacts of climate changes. Climate change may result in the following changes in the Pacific Northwest: (1) increase in average temperatures, (2) shift in the type of precipitation, with more winter precipitation falling as rain, (3) decrease in mountain snowpack and earlier spring thaw and (4) increases in carbon dioxide in the air.<sup>57</sup> Assuming that global climate change is occurring and will continue to occur over the next 20-years, a few broad, potential economic impacts for the nation and Pacific Northwest include:<sup>58</sup>
  - *Potential impact on agriculture and forestry.* Climate change may impact Oregon’s agriculture through changes in: growing season, temperature ranges, and water availability.<sup>59</sup> Climate change may impact Oregon’s forestry through increase in wildfires, decrease in the rate of tree growth, change in mix of tree species, and increases in disease and pests that damage trees.<sup>60</sup>

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<sup>57</sup> “Economic Impacts of Climate Change on Forest Resources in Oregon: A Preliminary Analysis,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, May 2007.

<sup>58</sup> The issue of global climate change is complex and there is a substantial amount of uncertainty about climate change. This discussion is not intended to describe all potential impacts of climate change but to present a few ways that climate change may impact the economy of cities in Oregon and the Pacific Northwest.

<sup>59</sup> “The Economic Impacts of Climate Change in Oregon: A preliminary Assessment,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

<sup>60</sup> “Economic Impacts of Climate Change on Forest Resources in Oregon: A Preliminary Analysis,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, May 2007.

- Potential impact on tourism and recreation. Impacts on tourism and recreation may range from: (1) decreases in snow-based recreation if snow-pack in the Cascades decreases, (2) negative impacts to tourism along the Oregon Coast as a result of damage and beach erosion from rising sea levels,<sup>61</sup> (3) negative impacts on availability of water summer river recreation (e.g., river rafting or sports fishing) as a result of lower summer river flows, and (4) negative impacts on the availability of water for domestic and business uses.
- *Potential changes in government policies.* There is currently no substantial national public policy response to global climate change. States and regional associations of states are in the process of formulating policy responses to address climate change including: increasing renewable energy generation, selling agricultural carbon sequestration credits, and encouraging energy efficiency.<sup>62</sup> Without clear indications of the government policies that may be adopted, it is not possible to assess the impact of government policies on the economy.

Global climate change may offer economic opportunities. The search for alternative energy sources may result in increased investment and employment in “green” energy sources, such as wind, solar, and biofuels. Firms in the Northwest are well positioned to lead efforts on climate change mitigation, which may result in export products, such as renewable technologies or green manufacturing.<sup>63</sup>

Short-term national trends will also affect economic growth in the region, but these trends are difficult to predict. At times these trends may run counter to the long-term trends described above. A recent example is the downturn in economic activity in 2007 following declines in the housing market and the mortgage banking crisis. The result of the economic downturn has been a decrease in employment related to the housing market, such as construction and real estate. Employment in these industries will recover as the housing market recovers and will continue

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<sup>61</sup> “The Economic Impacts of Climate Change in Oregon: A preliminary Assessment,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

<sup>62</sup> Pew Center on Global Climate Change website: [http://www.pewclimate.org/what\\_s\\_being\\_done/in\\_the\\_states/](http://www.pewclimate.org/what_s_being_done/in_the_states/)

<sup>63</sup> “The Economic Impacts of Climate Change in Oregon: A preliminary Assessment,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

to play a significant role in the national, state, and local economy over the long run. This report takes a long-run perspective on economic conditions (as the Goal 9 requirements intend) and does not attempt to predict the impacts of short-run national business cycles on employment or economic activity.

## STATE TRENDS

State and regional trends will also affect economic development in Springfield over the next twenty years. The most important of these trends includes: continued in-migration from other states, distribution of population and employment across the State,

- **Continued in-migration from other states.** Oregon will continue to experience in-migration from other states, especially California and Washington. According to a U.S. Census study, Oregon had net interstate in-migration (more people moved *to* Oregon than moved *from* Oregon) during the period 1990-2004.<sup>64</sup> Oregon had an annual average of 26,290 more in-migrants than out-migrants during the period 1990-2000. The annual average dropped to 12,880 during the period 2000-2004.<sup>65</sup> Most in-migrants come from California, Washington, and other western states.<sup>66</sup>
- **Concentration of population and employment in the Willamette Valley.** Nearly 70% of Oregon's population lives in the Willamette Valley. About 10% of Oregon's population lives in Southern Oregon and 9% lives in Central Oregon. The Oregon Office of Economic Analysis (OEA) forecasts that population will continue to be concentrated in the Willamette Valley through 2040, increasing slightly to 71% of Oregon's population.

Employment growth generally follows the same trend as population growth. Employment growth varies between regions even more, however, as employment reacts more quickly to changing economic conditions. Total employment increased in each

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<sup>64</sup> Marc J. Perry, 2006, *Domestic Net Migration in the United States: 2000 to 2004*, Washington, DC, Current Population Reports, P25-1135, U.S. Census Bureau.

<sup>65</sup> In contrast, California had net interstate *out-migration* over the same period. During 1990-2000, California had an annual average of 220,871 more out-migrants than in-migrants. The net outmigration slowed to 99,039 per year during 2000-2004.

<sup>66</sup> Oregon Department of Motor Vehicles collects data about state-of-origin for drivers licenses surrendered by people applying for an Oregon drivers license from out-of-state. Between 2000 and 2007, about one-third of licenses surrendered were from California, 15% to 18% were surrendered from Washington, and about 17% to 19% were from the following states: Arizona, Idaho, Nevada, Colorado, and Texas.

of the state's regions over the period 1970-2006 but over 70% of Oregon's employment was located in the Willamette Valley.

- **Change in the type of the industries in Oregon.** As Oregon has transitioned away from natural resource-based industries, the composition of Oregon's employment has shifted from natural resource based manufacturing and other industries to service industries. The share of Oregon's total employment in Service industries increased from its 1970s average of 19% to 30% in 2000, while employment in Manufacturing declined from an average of 18% in the 1970s to an average of 10% in 2005.
- **Shift in manufacturing from natural resource-based to high-tech and other manufacturing industries.** Since 1970, Oregon started to transition away from reliance on traditional resource-extraction industries. A significant indicator of this transition is the shift within Oregon's manufacturing sector, with a decline in the level of employment in the Lumber & Wood Products industry and concurrent growth of employment in other manufacturing industries, such as high-technology manufacturing (Industrial Machinery, Electronic Equipment, and Instruments), Transportation Equipment manufacturing, and Printing and Publishing.<sup>67</sup>
- **Continued importance of manufacturing to Oregon's economy.** Revenue from exports totaled \$16.5 million in 2007, an increase of \$5.1 million or 45% since 2000. Four of the five industries that accounted for more than three-quarters of revenue from exports in 2007 (\$12.6 million) were manufacturing industries: Computers and Electronic Production (\$6.3 million); Crop Production (\$2.2 million); Transportation Equipment (\$1.7 million); Machinery Manufacturers (\$1.7 million); and Chemical Manufacturers (\$0.7 million). Manufacturing employment is concentrated in five counties in the Willamette Valley or Portland area: Washington, Multnomah, Lane, Clackamas, and Marion Counties. Average wages for employees of manufacturing firms in these counties in 2006 ranged from \$71,500 to \$34,200 and were generally above the state's average (about \$38,000)<sup>68</sup>

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<sup>67</sup> Although Oregon's economy has diversified since the 1970's, natural resource-based manufacturing accounts for more than one-third of employment in manufacturing in Oregon in 2006, with the most employment in Wood Product and Food manufacturing.

<sup>68</sup> OECD, "Economic Data Packet, March 2008."

- **Small businesses continue to account for over 50% of employment in Oregon.** Small business, with 100 or fewer employees, account for 51% of private sector employment in Oregon, up from about 50.2% of private employment in 2000 and down from 52.5% in 1996. Workers of small businesses typically had lower wages than the state average, with average wages of \$33,130 compared to the statewide average of about \$38,000 in 2006.
- **Continued lack of diversity in the State Economy.** While the transition from Lumber and Wood Products manufacturing to high-tech manufacturing has increased the diversity of employment within Oregon, it has not significantly improved Oregon's diversity relative to the national economy. Oregon's relative diversity has historically ranked low among states. Oregon ranked 35<sup>th</sup> in diversity (1<sup>st</sup> = most diversified) based on Gross State Product data for 1963–1986, and 32<sup>nd</sup> based on data for the 1977–1996 period.<sup>69</sup> A recent analysis, based on 2006 data, ranked Oregon 31<sup>st</sup>.<sup>70</sup> These rankings suggest that Oregon is still heavily dependent on a limited number of industries. Relatively low economic diversity increases the risk of economic volatility as measured by changes in output or employment.

The changing composition of employment has not affected all regions of Oregon evenly. Growth in high-tech and Services employment has been concentrated in urban areas of the Willamette Valley and Southern Oregon, particularly in Washington, Benton, and Josephine Counties. The brunt of the decline in Lumber & Wood Products employment was felt in rural Oregon, where these jobs represented a larger share of total employment and an even larger share of high-paying jobs than in urban areas.

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<sup>69</sup> LeBre, Jon. 1999. "Diversification and the Oregon Economy: An Update." *Oregon Labor Trends*. February.

<sup>70</sup> CFED, 2007, The Development Report Card for the States, <http://www.cfed.org>.

## ECONOMIC TRENDS IN LANE COUNTY AND SPRINGFIELD

Future economic growth in Springfield will be affected in part by demographic and economic trends in the city and surrounding region. A review of historical demographic and economic trends provides a context for establishing a reasonable expectation of future growth in Springfield. In addition, the relationship between demographic and economic indicators such as population and employment can help assess the local influence of future trends and resulting economic conditions. This section addresses the following trends in Springfield:

- Population and demographics
- Household and personal income
- Employment
- Business activity
- Outlook for growth in Springfield

### POPULATION AND DEMOGRAPHIC CHARACTERISTICS

Population growth in Oregon tends to follow economic cycles. Historically, Oregon's economy is more cyclical than the nation's, growing faster than the national economy during expansions, and contracting more rapidly than the nation during recessions. Oregon grew more rapidly than the U.S. in the 1990s (which was generally an expansionary period) but lagged behind the U.S. in the 1980s. Oregon's slow growth in the 1980s was primarily due to the nationwide recession early in the decade. As the nation's economic growth has slowed during 2007, Oregon's population growth began to slow.

Oregon's population grew from 2.8 million people in 1990 to 3.7 million people in 2007, an increase of more than 900,000 people at an average annual rate of 1.6%. Oregon's growth rate slowed to 1.3% annual growth between 2000 and 2007.

Lane County grew slower than the State average between 1990 and 2007, growing at 1.1% annually and adding more than 60,000 people. More than 60% of the County's population lived in the Eugene-Springfield area in 2007, with about 17% of the County's population in Springfield. Springfield's population grew faster than the County average, at 1.5% annually, adding 12,637 residents over the seventeen-year period.

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

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

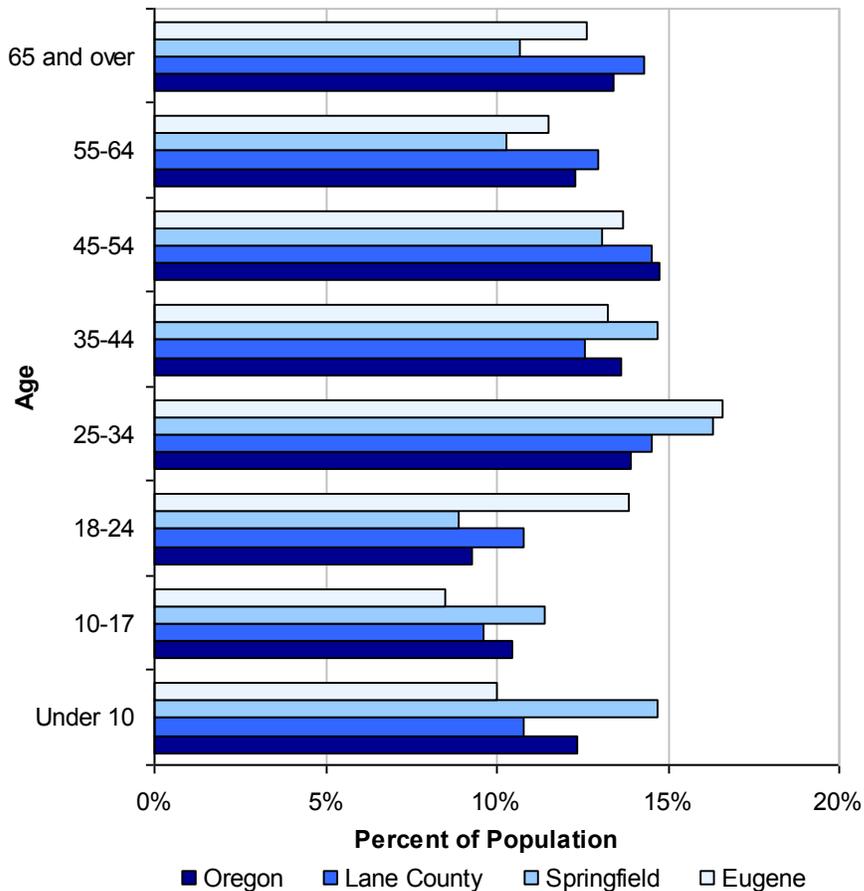
Source: U.S. Census, the Population Research Center at Portland State University.

Notes: Benton, Clackamas, Lane, Linn, Marion, Multnomah, Polk, Washington, and Yamhill Counties represent the Willamette Valley Region.

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

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

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



Source: Claritas 2008, percentages calculated by ECONorthwest.

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

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

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

Source: U.S. Census 2000 and Claritas 2008

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

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

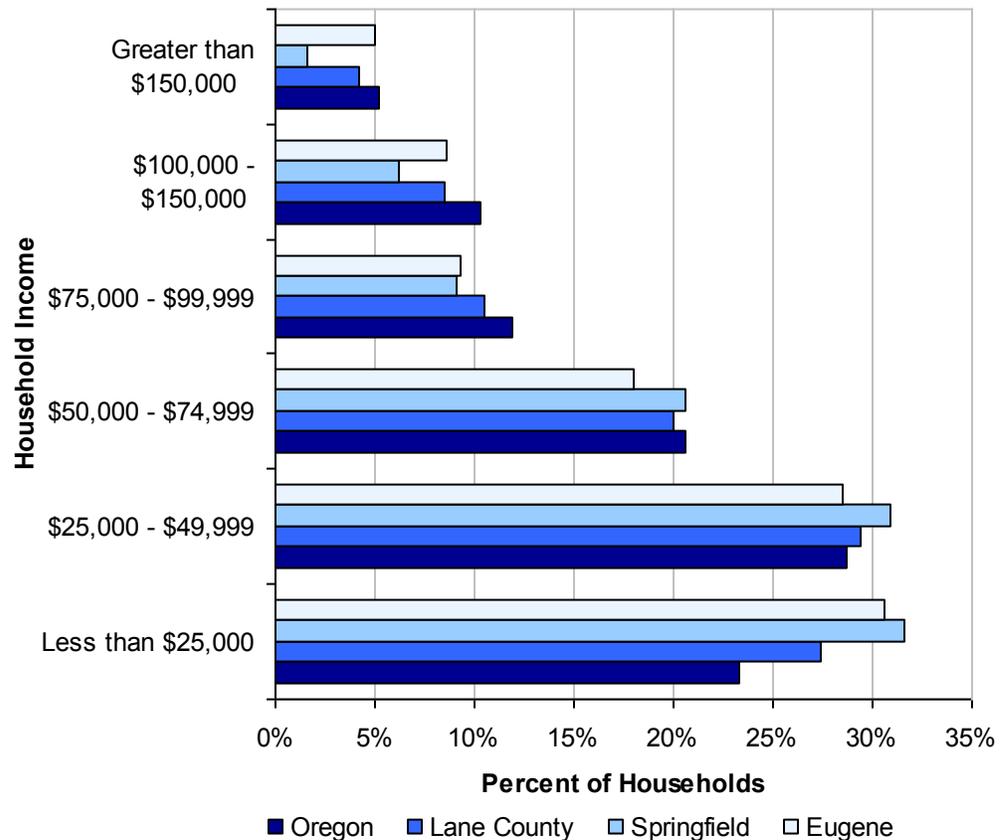
Note: Percentages may not add to 100% as a result of rounding errors.

## HOUSEHOLD AND PERSONAL INCOME

Income in Lane County and Springfield has historically been lower than the State or national averages. Lane County's median household income in 2006 was \$42,127, compared with \$46,230 for Oregon and the national average of \$48,451. The median household income in Springfield in 1999 was \$33,031, 89% of the County average of \$36,942.

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

**Figure A-2. Distribution of household income of Oregon, Lane County, Eugene, and Springfield, 2008**

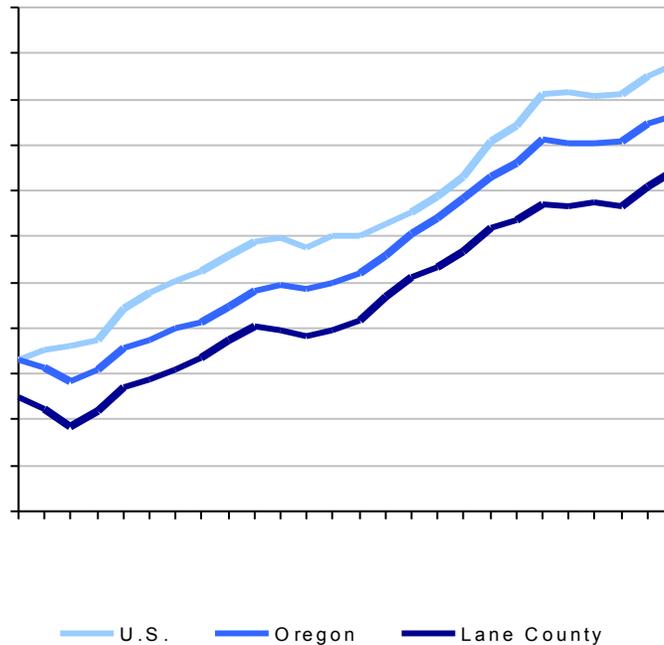


Source: Claritas 2008

Figure A-3 shows the change in per capita personal income for the U.S., Oregon, and Lane County between 1980 and 2005 (in constant 2005 dollars). Oregon's per capita personal income was consistently lower than the U.S. average over the 25-year period. While the gap between the Oregon and U.S. average narrowed in the mid-1990s, it widened again starting in the late 1990's.

Lane County's personal income over the 25-year period was consistently lower than Oregon's personal income. In 2005, per capita personal income in Lane County was approximately 92% of Oregon's per capital income and 87% of the U.S. per capital income. During the 25-year period, per capita personal income in both Lane County and Oregon grew by 49%, while personal income grew by 59% nationally during the same period.

**Figure A-3. Per capita personal income in the U.S., Oregon, and Lane County, 1980-2005, (\$2005)**

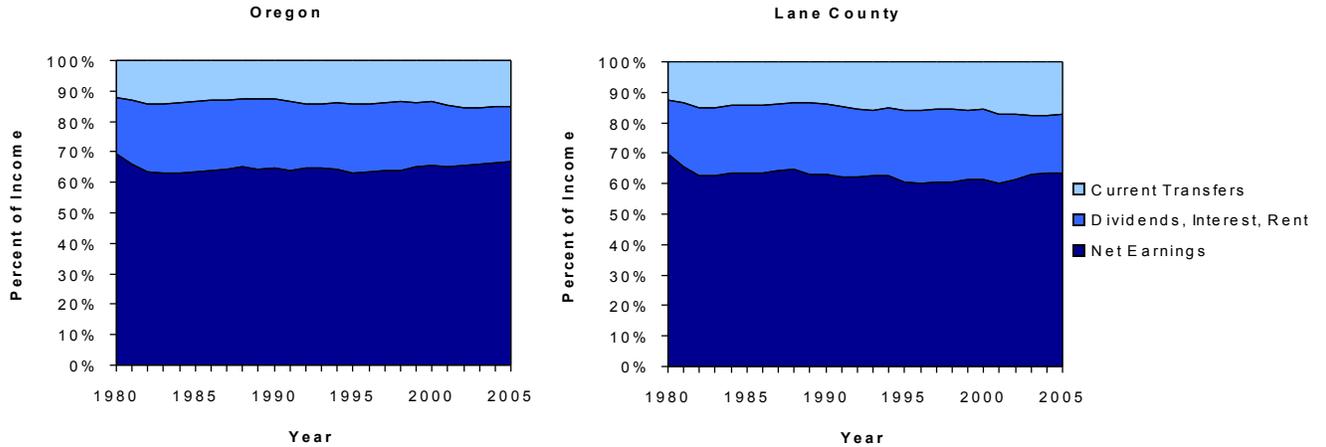


Source: Regional Economic Information System, Bureau of Economic Analysis, U.S. Department of Commerce

Figure A-4 shows the major sources of per capita personal income for Oregon and Lane County between 1980 and 2005. Lane County's share of personal income from net earnings was lower than for Oregon and the County's share of personal income from transfer payments and dividends, interest, and rent was higher than the State average.

Retirees are most likely to have personal income from current transfers and dividends, interest, and rent. The larger share of personal income from these sources makes sense because Lane County has a larger share of people over 60-years than the State average. Figure A-1 shows that Lane County has a higher percentage of residents over 60 years old than the State average. In addition, the share of population aged 65 and older increased by 16% between 1990 and 2000 in Lane County, compared with a 12% statewide increase in population 65 and older.

**Figure A-4. Per capita personal income by major sources, Oregon and Lane County, 1980-2005**



Source: Regional Economic Information System, Bureau of Economic Analysis, U.S. Department of Commerce

Table A-3 shows average annual pay per employee in the U.S., Oregon, and Lane County for 2000 to 2006. The national average wage grew faster than State or County averages. The average U.S. wage increased by 20% (more than \$7,000), compared to the State increase of 16% (more than \$5,000) or the County increase of 19% (more than \$5,000). Wages in Lane County relative to the U.S. decreased by 1% over the six-year period.

Lane County’s average annual wage has increased by 19% (more than \$5,000) from \$27,878 to \$33,240 over the 2000 to 2006 period. Lane County’s average pay has grown faster than the State average, increasing from 85% of the State average in 2000 to 87% in 2006.

**Table A-3. Average annual pay, Oregon and Lane County (nominal dollars), 2000-2006**

	U.S	Oregon	Lane County	Lane County	
				% of U.S.	% of State
2000	\$35,323	\$32,776	\$27,878	79%	85%
2001	\$36,219	\$33,202	\$28,982	80%	87%
2002	\$36,764	\$33,685	\$29,427	80%	87%
2003	\$37,765	\$34,455	\$30,325	80%	88%
2004	\$39,354	\$35,627	\$31,339	80%	88%
2005	\$40,677	\$36,593	\$32,302	79%	88%
2006	\$42,535	\$38,070	\$33,240	78%	87%
<b>Change 2000 to 2006</b>					
Nominal Change	\$7,212	\$5,294	\$5,362		
Percent Change	20%	16%	19%		

Source: Oregon Employment Department and U.S. Bureau of Labor Statistics

Springfield's average wages are similar to the County average. The average wage for workers in Springfield in 2006 was nearly \$33,000.

## LANE COUNTY EMPLOYMENT TRENDS

Tables A-4 and A-5 present data from the Oregon Employment Department that show changes in covered employment<sup>71</sup> for Lane County between 1980 and 2005. The changes in sectors and industries are shown in two tables: (1) between 1980 and 2000 and (2) between 2001 and 2005. The analysis is divided in this way because of changes in industry and sector classification that made it difficult to compare information about employment collected after 2001 with information collected prior to 2000.

Employment data in this section is summarized by *sector*, each of which includes several individual *industries*. For example, the Retail Trade sector includes General Merchandise Stores, Motor Vehicle and Parts Dealers, Food and Beverage Stores, and other retail industries.

Table A-4 shows the changes in covered employment by sector in Lane County between 1980 and 2000. Covered employment in the County grew from 97,600 to 139,696, an increase of 43% or 42,096 jobs. Every sector added jobs during this period, except for Mining. The sectors with the greatest change in employment were Services and Retail Trade, adding a total of 29,423 jobs or about 70% of all new jobs.

Manufacturing grew by 4,020 jobs during the twenty-year period. The industries with the largest manufacturing growth were Transportation equipment manufacturing (R.V. manufacturing), computer and electronics manufacturing, and machinery manufacturing.

Average pay per employee increased from about \$13,700 in 1980 to \$27,900 in 2000. The sectors that grew the fastest generally paid less than average, with Services paying between 80% to 90% of average and Retail Trade paying about 60% of average. Manufacturing jobs generally paid more than the average, varying between 140% of average in 1980 to 124% of average by 2000.

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<sup>71</sup> Covered employment refers to jobs covered by unemployment insurance, which includes most wage and salary jobs but does not include sole proprietors, seasonal farm workers, and other classes of employees.

**Table A-4. Covered employment in Lane County, 1980-2000**

Sector	1980	1990	2000	Change 1980 to 2000		
				Difference	Percent	AAGR
Agriculture, Forestry & Fishing	1,137	1,863	2,101	964	85%	2.5%
Mining	231	179	154	-77	-33%	-1.6%
Construction	4,600	3,992	6,834	2,234	49%	1.6%
<b>Manufacturing</b>	<b>19,638</b>	<b>20,654</b>	<b>23,658</b>	<b>4,020</b>	<b>20%</b>	<b>0.7%</b>
Trans., Comm., & Utilities	3,836	3,750	3,845	9	0%	0.0%
Wholesale Trade	5,578	5,900	6,422	844	15%	0.6%
<b>Retail Trade</b>	<b>20,299</b>	<b>24,429</b>	<b>28,758</b>	<b>8,459</b>	<b>42%</b>	<b>1.4%</b>
Finance, Insurance & Real Estate	4,217	4,523	6,198	1,981	47%	1.6%
<b>Services</b>	<b>18,272</b>	<b>27,817</b>	<b>39,236</b>	<b>20,964</b>	<b>115%</b>	<b>3.1%</b>
Nonclassifiable/all others	13	50	37	24	185%	4.3%
Government	19,779	20,219	22,453	2,674	14%	0.5%
<b>Total</b>	<b>97,600</b>	<b>113,376</b>	<b>139,696</b>	<b>42,096</b>	<b>43%</b>	<b>1.4%</b>

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Note: AAGR is average annual growth rate

Table A-5 shows the change in covered employment by sector for Lane County between 2001 and 2007. Employment increased by 13,549 jobs or 10% during this period. The private sectors with the largest increases in numbers of employees were Administration Support and Cleaning, Retail Trade, Construction, and Health and Social Assistance. The sector that lost the greatest number of employees during this period was Agriculture, Forestry, Fishing and Mining.

**Table A-5. Covered employment in Lane County, 2001-2007**

Sector	2001	2007	Change 2001 to 2007		
			Difference	Percent	AAGR
Natural Resources and Mining	2,338	2,062	-276	-12%	-2.1%
<b>Construction</b>	<b>6,366</b>	<b>8,034</b>	<b>1,668</b>	<b>26%</b>	4.0%
Manufacturing	19,697	19,864	167	1%	0.1%
Wholesale	5,300	6,071	771	15%	2.3%
<b>Retail</b>	<b>17,912</b>	<b>19,755</b>	<b>1,843</b>	<b>10%</b>	1.6%
Transportation & Warehousing	2,606	3,047	441	17%	2.6%
Information	3,729	3,901	172	5%	0.8%
Finance & Insurance	3,963	4,313	350	9%	1.4%
Real Estate Rental & Leasing	2,508	2,530	22	1%	0.1%
Professional, Scientific & Tech. Srv.	5,571	5,658	87	2%	0.3%
Management of Companies	1,818	1,901	83	5%	0.7%
<b>Admin. Support &amp; Cleaning Srv.</b>	<b>6,399</b>	<b>8,738</b>	<b>2,339</b>	<b>37%</b>	5.3%
Education	1,067	1,389	322	30%	4.5%
<b>Health &amp; Social Assistance</b>	<b>16,871</b>	<b>18,966</b>	<b>2,095</b>	<b>12%</b>	2.0%
Arts, Entertainment & Recreation	1,542	2,163	621	40%	5.8%
Accommodations & Food Services	11,746	12,737	991	8%	1.4%
Other Services (except Public Admin.)	5,552	5,674	122	2%	0.4%
Private Non-Classified	49	45	-4	-8%	-1.4%
Government	22,398	24,133	1,735	8%	1.3%
<b>Total</b>	<b>137,432</b>	<b>150,981</b>	<b>13,549</b>	<b>10%</b>	<b>2.4%</b>

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Note: AAGR is average annual growth rate

Table A-6 shows a summary of employment in Lane County in 2007. Table A-6 shows the ten largest sectors in **bold** are the top ten employers, sectors with below average pay per employee in **red**, and sectors with above average pay per employee in **blue**. Table A-6 shows:

- Construction, Manufacturing, Government, and Health and Social Assistance were among the sectors with the greatest employment in Lane County and have above average pay per employee. These sectors accounted for 47% of employment or nearly 71,000 employees in Lane County.
- Retail, Accommodations and Food Services, and Administration and Support and Waste Management were among the sectors with the greatest employment in Lane County and have below average pay per employee. These sectors accounted for 27% of employment or more than 41,000 employees in Lane County.

**Table A-6. Covered employment in Lane County, 2007**

Sector/Industry	Establish- ments	Employment	Percent of Employment	Average Pay per Employee
Natural Resources & Mining	228	2,062	1%	\$34,662
<b>Construction</b>	<b>1,249</b>	<b>8,034</b>	<b>5%</b>	<b>\$41,346</b>
Construction of buildings	445	445	0%	\$445
Specialty trade contractors	695	695	0%	\$695
<b>Manufacturing</b>	<b>599</b>	<b>19,864</b>	<b>13%</b>	<b>\$41,055</b>
Wood product manufacturing	76	4,548	3%	\$42,423
Machinery manufacturing	51	1,816	1%	\$48,027
Computer & electronic product mfg.	20	1,934	1%	\$56,594
Transportation equipment mfg.	31	4,093	3%	\$31,942
Wholesale	588	6,071	4%	\$44,609
<b>Retail</b>	<b>1,276</b>	<b>19,755</b>	<b>13%</b>	<b>\$24,258</b>
Motor vehicle & parts dealers	159	2,997	2%	\$39,809
Building material & garden supply stores	85	1,603	1%	\$27,883
Food & beverage stores	205	4,044	3%	\$20,451
General merch&ise stores	58	4,073	3%	\$21,784
Miscellaneous store retailers	174	1,455	1%	\$20,513
Transportation, Warehousing & Utilities	267	3,047	2%	\$37,448
Information	180	3,901	3%	\$50,769
Finance & Insurance	611	4,313	3%	\$49,753
Credit intermediation & related activities	252	252	0%	\$252
Insurance carriers & related activitie	230	230	0%	\$230
Real Estate Rental & Leasing	566	2,530	2%	\$25,994
Professional, Scientific & Technical Svcs	1,004	5,658	4%	\$41,314
Management of Companies	87	1,901	1%	\$66,758
<b>Admin. &amp; Support &amp; Waste Mgmt</b>	<b>484</b>	<b>8,738</b>	<b>6%</b>	<b>\$21,771</b>
Private Education	135	1,389	1%	\$23,709
<b>Health &amp; Social Assistance</b>	<b>971</b>	<b>18,966</b>	<b>13%</b>	<b>\$39,836</b>
Ambulatory health care services	598	6,453	4%	\$52,408
Nursing & residential care facilities	181	3,915	3%	\$22,013
Arts, Entertainment & Recreation	151	2,163	1%	\$13,533
<b>Accommodations &amp; Food Services</b>	<b>861</b>	<b>12,737</b>	<b>8%</b>	<b>\$13,749</b>
Accommodation	100	100	0%	\$100
Food services & drinking places	734	734	0%	\$734
Other Services	1,322	5,674	4%	\$22,345
Repair & maintenance	309	309	0%	\$309
Membership associations & organization	437	437	0%	\$437
Private Non-Classified	66	45	0%	\$41,167
<b>Government</b>	<b>376</b>	<b>24,133</b>	<b>16%</b>	<b>\$39,312</b>
Federal	70	1,764	1%	\$57,977
<b>State</b>	<b>61</b>	<b>6,878</b>	<b>5%</b>	<b>\$39,498</b>
<b>Local</b>	<b>245</b>	<b>15,491</b>	<b>10%</b>	<b>\$37,105</b>
<b>Education &amp; Health Services</b>	<b>147</b>	<b>8,547</b>	<b>6%</b>	<b>\$31,343</b>
Public Administration	49	4,268	3%	\$47,464
<b>Total</b>	<b>11,021</b>	<b>150,981</b>	<b>100%</b>	<b>\$34,328</b>

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Notes: Sectors in **bold** are the top ten employers, sectors in **red** have below average pay per employee, and sectors in **blue** have above average pay per employee.

Note: Average pay per employee is shown as reported by the Oregon Employment Department.

## EMPLOYMENT IN SPRINGFIELD

Table A-7 shows a summary of confidential employment data for Springfield in 2006. Springfield had 27,310 jobs at 1,819 establishments in 2006, with an average firm size of 15 employees. The sectors with the greatest employees were: Retail (13%), Government (13%), Health Care and Social Assistance (11%), and Manufacturing (10%). These sectors accounted for 17,863 or 65% of Springfield's jobs.

**Table A-7. Covered employment in Springfield, 2006**

Sector / Industry	Establish- ments	Employees	
		Number	% of Total
<b>Agriculture, Forestry, Fishing, and Mining</b>	<b>22</b>	<b>282</b>	<b>1%</b>
Forestry and Logging	11	136	0%
Other Agriculture, Forestry, Fishing, and Mining	11	146	1%
<b>Construction</b>	<b>205</b>	<b>1,922</b>	<b>7%</b>
<b>Manufacturing</b>	<b>104</b>	<b>2,714</b>	<b>10%</b>
Wood Product Manufacturing	18	1,013	4%
Chemical Manufacturing	3	251	1%
Fabricated Metal Product Manufacturing	18	233	1%
Transportation Equipment Manufacturing	7	188	1%
Food Manufacturing	6	111	0%
Plastics and Rubber Products Manufacturing	6	111	0%
Furniture and Related Product Manufacturing	9	80	0%
Machinery Manufacturing	7	68	0%
Other Manufacturing	30	659	2%
<b>Wholesale Trade</b>	<b>71</b>	<b>1,230</b>	<b>5%</b>
<b>Retail</b>	<b>265</b>	<b>3,632</b>	<b>13%</b>
General Merchandise Stores	24	1,008	4%
Food and Beverage Stores	42	744	3%
Motor Vehicle and Parts Dealers	35	339	1%
Building Material, Garden Equipment, & Supplies Dealers	15	278	1%
Electronics and Appliance Stores	16	210	1%
Other Retail	133	1,053	4%
<b>Transportation and Warehousing and Utilities</b>	<b>55</b>	<b>941</b>	<b>3%</b>
<b>Information</b>	<b>24</b>	<b>1,356</b>	<b>5%</b>
<b>Finance and Insurance</b>	<b>99</b>	<b>1,110</b>	<b>4%</b>
<b>Real Estate and Rental and Leasing</b>	<b>98</b>	<b>441</b>	<b>2%</b>
<b>Professional, Scientific, and Technical Services</b>	<b>97</b>	<b>576</b>	<b>2%</b>
<b>Management of Companies and Enterprises</b>	<b>24</b>	<b>343</b>	<b>1%</b>
<b>Admin. &amp; Support and Waste Mgt Services</b>	<b>82</b>	<b>2,460</b>	<b>9%</b>
<b>Private Educational Services</b>	<b>12</b>	<b>109</b>	<b>0%</b>
<b>Health Care and Social Assistance</b>	<b>167</b>	<b>3,069</b>	<b>11%</b>
<b>Arts, Entertainment, and Recreation</b>	<b>30</b>	<b>321</b>	<b>1%</b>
<b>Accommodation and Food Services</b>	<b>179</b>	<b>2,453</b>	<b>9%</b>
Accommodation	12	227	1%
Food Services and Drinking Places	167	2,226	8%
<b>Other Services</b>	<b>217</b>	<b>816</b>	<b>3%</b>
<b>Government</b>	<b>68</b>	<b>3,535</b>	<b>13%</b>
Federal and State	13	368	1%
Local	55	3,167	12%
<b>Total</b>	<b>1,819</b>	<b>27,310</b>	<b>100%</b>

Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW). Summary by industry and percentages calculated by ECONorthwest

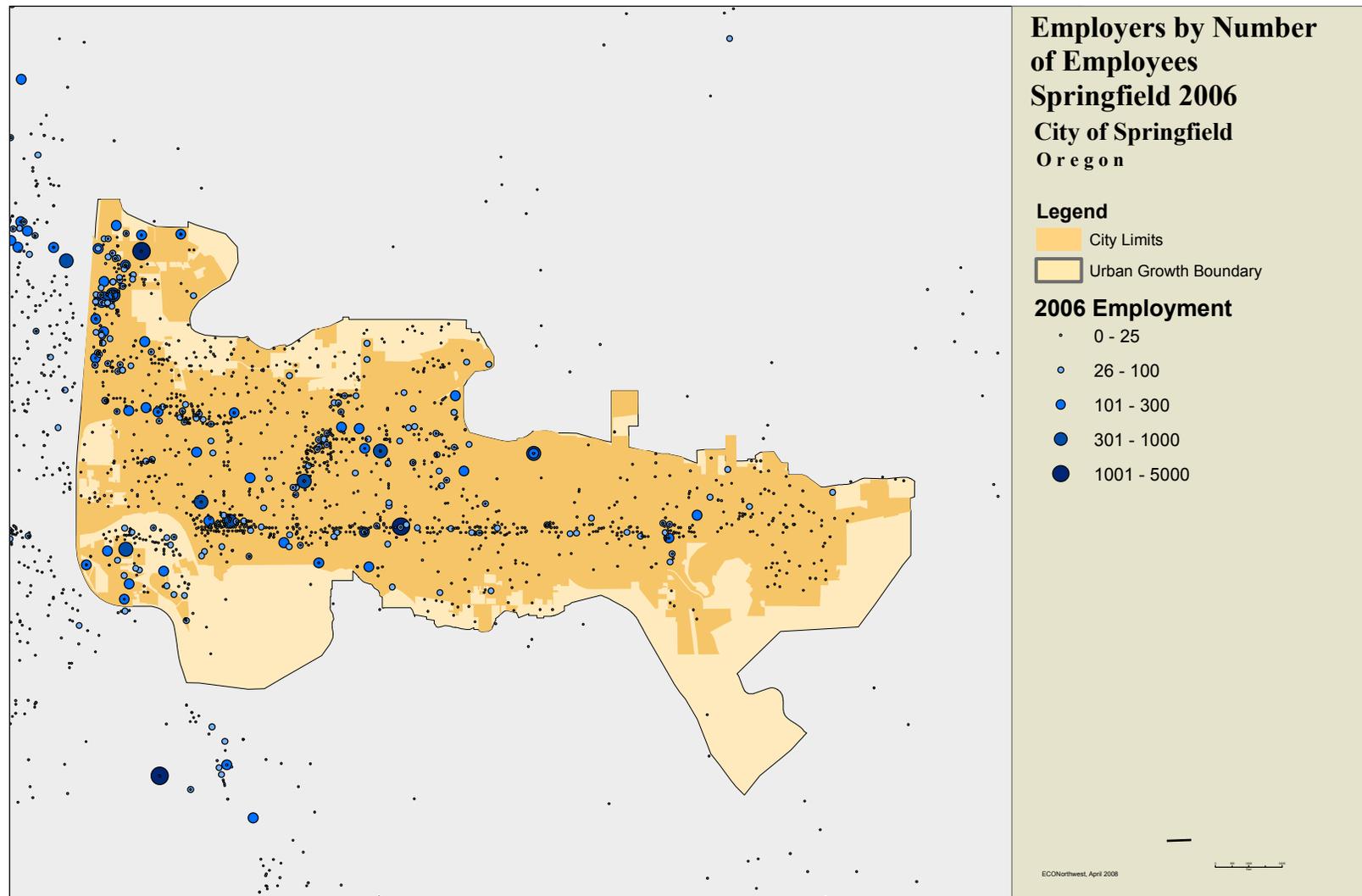
Note: The percent column does not add to 100% as a result of rounding errors.

Map A-1 shows employment in Springfield by plan designations and number of employees in 2006. Map A-1 shows that employees are distributed throughout Springfield, with concentrations along Main Street and in Gateway.

Map A-2 shows the size of employers in Springfield by Plan Designation. Larger employers are clustered along Main Street, in Gateway, and in other areas zoned for commercial and industrial use. Small employers are scattered in most parts of the City.

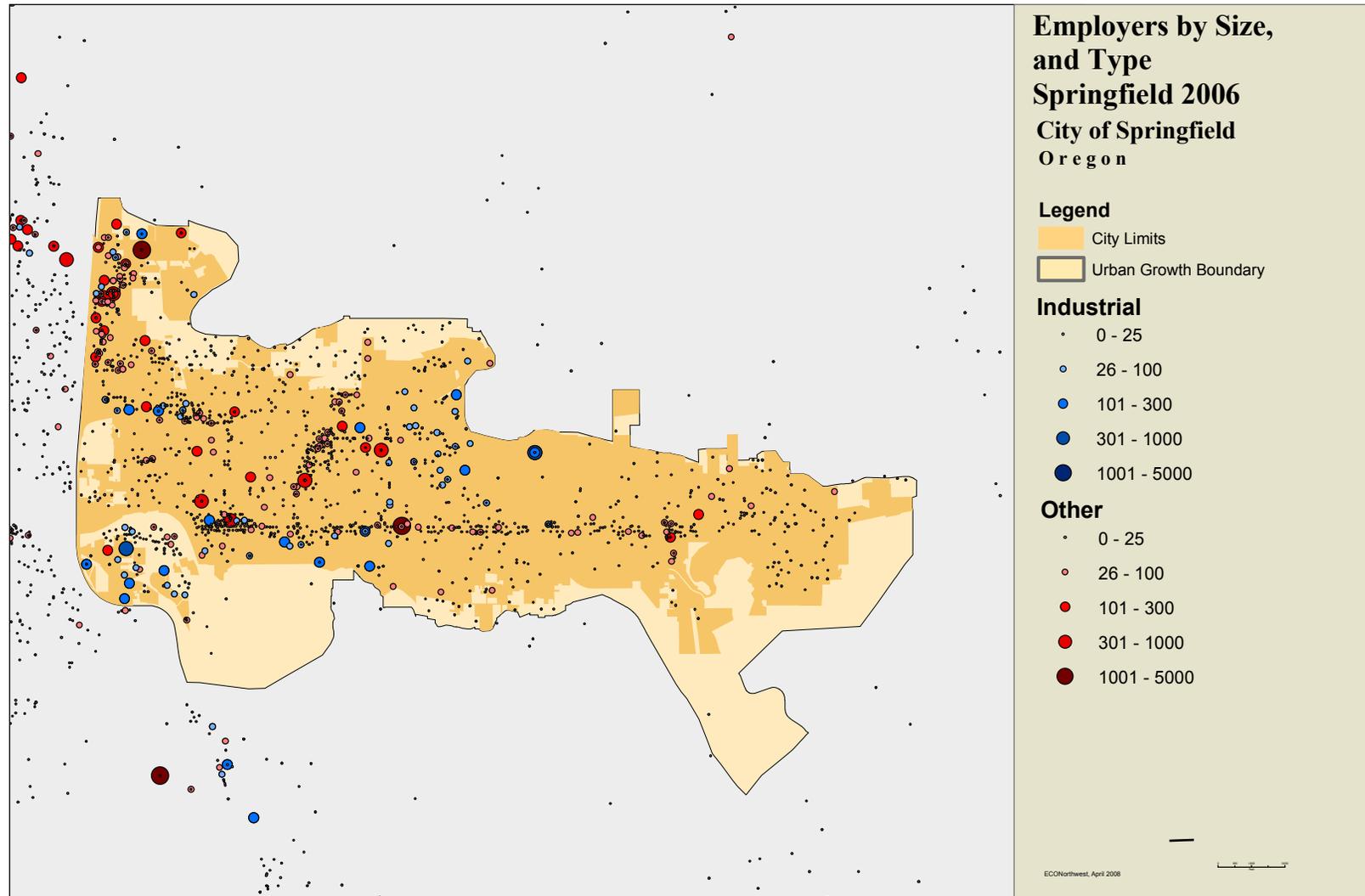


Map A-1. Employment by Employer Size, 2006



Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW and Springfield GIS data).

Map A-2. Employment by Size and Employer Type, 2006



Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW and Springfield GIS data).

Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. One way to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development – demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a “typical” building type, grouped by industrial and commercial uses.

**Table A-8. Converting employment to building types**

Building Type		Types of industries	NAICS Sectors
<b>Industrial</b>			
W D	Warehousing & Distribution	Transportation & Wholesale Trade	48-49, 42
GI	General Industrial	Ag, Mining, Utilities, Construction, Manufacturing	11, 21, 22, 23, 31-33
<b>Commercial</b>			
Office	Office	Information, FIRE, Professional Srv, Mgt of Companies, Adm in & Support & Waste Mgt, Utilities, Arts/Entertainment, Other Services	51-56, 71, 81
Retail	Retail	Retail (incl. Accom & Food Srv)	44-45, 72
Med/Gov.	Medical & Government Institutions	Health & Social Services, Public Administration	61, 62, 92

Source: ECONorthwest based on methodology used by Metro in the report “Urban Growth Report: An Employment Need Analysis,” 2002

Table A-9 shows employment by Comprehensive Plan Designation in 2006. About 39% of Springfield’s employment is located in commercial plan designations, with more than 8,000 employees in the Commercial designation. An additional 34% of the City’s employment is located in industrial designations. About 16% of Springfield’s employment is located in residential designations with 10% in the Low Density Residential designation.

**Table A-9. Covered employment by Plan Designation, Springfield, 2006**

Plan Designation	Industrial		Commercial		Total	
	Emp.	Percent	Emp.	Percent	Emp.	Percent
<b>Commercial</b>						
Commercial	450	5.7%	7,649	39.8%	8,099	29.9%
Major Retail Center	20	0.3%	2,316	12.1%	2,336	8.6%
Subtotal	470	6.0%	9,965	51.9%	10,435	38.5%
<b>Government</b>						
Government & Education	67	0.9%	660	3.4%	727	2.7%
<b>Industrial</b>						
Campus Industrial	274	3.5%	2,142	11.1%	2,416	8.9%
Heavy Industrial, Special Heavy Industrial, and Sand and Gravel	2,908	36.9%	304	1.6%	3,212	11.7%
Light Medium Industrial	3,032	38.5%	645	3.4%	3,677	13.6%
Subtotal	6,214	78.9%	3,091	16.1%	9,305	34.3%
<b>Mixed-Use</b>						
Commercial Mixed Use	318	4.0%	1,450	7.5%	1,768	6.5%
Light Med Ind Mixed Use and Medium Density Res Mixed	113	1.4%	169	0.9%	282	0.7%
Subtotal	431	5.5%	1,619	8.4%	2,050	7.6%
<b>Residential</b>						
High Density Residential	0	0.0%	456	2.4%	456	1.7%
Low Density Residential	592	7.5%	2,093	10.9%	2,685	9.9%
Medium Density Residential	100	1.3%	1,082	5.6%	1,182	4.4%
Subtotal	692	8.8%	3,631	18.9%	4,323	16.0%
<b>Other</b>						
Parks and Open Space	0	0.0%	250	1.3%	250	0.9%
<b>TOTAL</b>	<b>7,874</b>	<b>100.0%</b>	<b>19,216</b>	<b>100.0%</b>	<b>27,090</b>	<b>100.0%</b>

Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW) and Springfield GIS data; calculations and analysis by ECONorthwest

Note: The number of employees shown in Table A-9 (27,090) is fewer than shown in Table A-7 (27,310) because of data issues between the QCEW and GIS data.

Table A-10 shows the estimated covered employment located in non-residential plan designations by type of building in Springfield in 2006. More than half of Springfield's employment in 2006 was located in Office and Retail buildings. More than two-thirds of Springfield's firms were located in Office and Retail buildings.

**Table A-10. Estimated covered employment in non-residential plan designations by type of building, Springfield, 2006**

Building Type	Employees		Firms	
	Number	Percent	Number	Percent
W D	2,457	11 %	50	8 %
G I	4,336	20 %	101	17 %
Office	6,212	28 %	192	31 %
Retail	5,500	25 %	220	36 %
Med/Gov	3,604	16 %	49	8 %
<b>Total</b>	<b>22,109</b>	<b>100 %</b>	<b>612</b>	<b>100 %</b>

Source: ECONorthwest based on QCEW data

Table A-11 shows the distribution of employees by building type and site size in non-residential plan designations in Springfield in 2006. About 22% of Springfield's employment is on sites 5 to 20 acres, 21% is on sites less than 1-acre, and 19% is on sites greater than 50 acres.

**Table A-11. Percent of employees by building type and site sizes, Springfield, 2006**

Building Type	Site Size (acres)						Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	Greater than 50	
W D	13 %	6 %	3 %	63 %	12 %	3 %	100 %
G I	15 %	17 %	17 %	18 %	2 %	31 %	100 %
Office	28 %	14 %	15 %	23 %	13 %	8 %	100 %
Retail	29 %	13 %	11 %	18 %	10 %	18 %	100 %
Med/Gov	9 %	4 %	8 %	5 %	35 %	38 %	100 %
<b>Total</b>	<b>21 %</b>	<b>12 %</b>	<b>12 %</b>	<b>22 %</b>	<b>13 %</b>	<b>19 %</b>	<b>100 %</b>

Source: ECONorthwest based on QCEW data

Note: Total Employees may not add to 100% because of rounding errors.

The percent of employees by building type and site size was calculated based on the number of employees in each building type and site size categories using QCEW data and City of Springfield tax lot data.

## BUSINESS CLUSTERS

One way to assess the types of businesses that are likely to have future growth in an area is to examine relative concentration and employment growth of existing businesses. This method of analysis can help determine relationships and linkages within industries, also called industrial clusters. Sectors that are highly concentrated (meaning there are more than the "average" number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial cluster. Sectors with either high concentration of businesses or high employment group may be part of an emerging cluster, with potential for future growth.

The Oregon Economic and Community Development Department (OECDD) prepared a report titled "Oregon's Traded Clusters: Major Industries and Trends." This report identified 25 clusters in Lane County.

- **Business Services.** This cluster is dominated by Professional, Scientific, and Technical Services and Employment Services. The average annual wage varies by sector, with the highest pay in Professional, Scientific, and Technical Services (about \$51,800). Employment growth in these industries was moderate to fast between 2003 and 2005. Business Services firms may be attracted to Springfield as a result of firms located in Springfield, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Communication Equipment** This cluster includes manufacturing and wholesaling of computer, communications, and audio and video equipment. Lane County has clusters of both manufacturing and wholesaling communication equipment but the manufacturing cluster is bigger in the County. Employment growth in the cluster was fastest in computer and peripheral manufacturing between 2003 and 2005. The average annual wage in this sector is higher than the State average, at \$68,076. Firms in this cluster may be attracted to Springfield as the City's location and access to transportation, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Information Technology.** This cluster includes Telecommunications, Software Publishers, and Internet Service Providers. The average annual wage was above State averages. Growth in the cluster varied between 2003 and 2005, with a decrease in Telecommunications employment and increases in employment with Internet Service Providers. Information Technology firms may be attracted to Springfield because of the availability of educated workers within the region and the high quality of life and access to recreation in Springfield. Springfield may be attractive as a location to outsource back-office functions for larger Information Technology firms.
- **Logistics and Distribution.** This cluster includes truck transportation and warehousing. This cluster grew during the 2003-2005 period, with the greatest growth in Truck Transportation. Wages in this cluster were similar to State averages. Firms in this cluster may be attracted to Springfield as the City's location relative

to other cities in the Willamette Valley and Oregon and the access to transportation via I-5 and Highway 126.

- **Medical products.** This cluster includes medical and equipment supplies manufacturing. This sector has higher than average wages and had moderate employment growth during the 2003 to 2005 period. Firms may be attracted to Springfield as a result of firms located in Springfield, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Metals and Related Products.** This cluster includes metals manufacturing, including Fabricated Metals Manufacturing and Primary Metals Manufacturing. Although employment decreased in this cluster over the 2003-2005 period, Lane County has the largest cluster of Metal Wholesalers outside of the Portland metropolitan area. Wages in this cluster were general at or above State averages. Firms may be attracted to Springfield as a result of existing businesses and the availability of labor.
- **Processed Foods and Beverages.** This cluster includes manufacturing of food and beverages. Employment in this cluster decreased over the 2003-2005 period and average wages in this cluster are at or below State averages. Firms may be attracted to Springfield as a result of the City's proximity to food growers and the availability of labor.
- **Wood and Other Forest Products.** This cluster includes wood product manufacturing, logging, paper making, and support activities. The average annual wage was below State averages and employment grew slowly within the cluster over the 2003-2005 period. Firms may be attracted to Springfield as a result of the City's proximity to natural resources and the availability of labor.

Table A-12 shows potential growth sectors in Springfield, based on existing concentrations of employment and the Oregon Employment Department's (OED) forecast for employment growth over the 2006-2016 period. Sectors with high employment concentration and high growth forecasts are the industries most likely to grow. These sectors are: Health and Social Assistance; Administrative and Support and Waste Management Services; Construction; and Accommodations and Food Services.

Springfield may have opportunities for growth in sectors that the OED forecasts will have high growth but Springfield does not currently have

high concentrations in: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

**Table A-12. Potential growth of industries in Springfield**

<b>Low Employment Growth Projection for Lane County</b>	<b>High Employment Growth Projection for Lane County</b>
<b>High Employment Concentration in Springfield (relative to Oregon)</b>	
Information	Health Care & Social Assistance
Finance & Insurance	Admin. & Support & Waste Mgt Srv.
Transportation, Warehousing & Utilities	Construction
Real Estate & Rental & Leasing	Accommodation & Food Srv.
Wholesale Trade	
<b>Low Employment Concentration in Springfield (relative to Oregon)</b>	
Government	Arts, Entertainment, & Recreation
Other Srv.	Management of Companies & Enterprises
Manufacturing	Professional, Scientific, & Technical Srv.
Retail	Private Educational Srv.
Agriculture, Forestry, Fishing, & Mining	

Source: Oregon Employment Department; calculations by ECONorthwest

## REGIONAL BUSINESS ACTIVITY

Springfield exists within with Eugene-Springfield regional economy. Springfield is able to attract labor from across the region, Springfield employers and residents benefit from training opportunities present in Eugene (e.g., the University of Oregon and Lane Community College), and Springfield businesses and residents are effected by economic activity within the region. This section presents the large-scale regional business activities.

- Peace Health at RiverBend.** Peace Health has built a new hospital complex at RiverBend and will complete the transition of staff from the University District facility to RiverBend by the end of Sept. 2008. The RiverBend campus will have 2,500 PeaceHealth employees, in occupations including: physicians, nurses, medical technicians, other medical staff, environmental services staff, and food services staff. PeaceHealth started relocating administrative and other staff to the RiverBend Annex in 2006, which has 700 employees.

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

PeaceHealth plans to further develop the RiverBend campus to include a wide range of uses: a mixture of housing types, office and commercial support services, retail, and educational and research functions to support collaborations with Oregon Health Services University and the University of Oregon. Studies for the RiverBend master plan indicated that there may be demand for additional office development (400,000-500,000 square feet) and commercial retail services (50,000 to 70,000 square feet).

- **Manufacturing.** Manufacturing is important to the economy in Springfield and in Lane County. Manufacturing accounted for 14% of employment (more than 20,000 jobs) in Lane County and 10% of employment (more than 2,700 jobs) in Springfield in 2006.<sup>72</sup>

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.<sup>73</sup> These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County. Other export industries with substantial employment in Lane County are: Woods Products Manufacturing, Food Manufacturing, and Fabricated Metal Product Manufacturing.<sup>74</sup>

- **Recreational Vehicles.** Lane County has a cluster of recreational vehicles (RVs) manufacturers and retailers. Two of Lane County's largest manufacturers are Monaco Coach and County Coach. Employment in RV manufacturing has declined since 2006 as a result of declining demand for RVs due, in part, to increases in gasoline costs. High energy costs may continue to depress demand for RVs, at least in the next two to five years.
- **Wood Products and Paper Manufacturing.** Manufacturing timber-related products has historically been a source of

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<sup>72</sup> Oregon Employment Department

<sup>73</sup> "Economic Data Packet, Mary 2008," Oregon Economic And Community Development Department

<sup>74</sup> Oregon Employment Department

employment and exports in Lane County. Employment in these industries has declined since the 1980's but continues to account for more than one-quarter of manufacturing employment in Lane County in 2006. Continued changes create uncertainty for future employment in these industries. For example, Weyerhaeuser, one of Lane County's largest employers, announced in March 2008 that it was selling several facilities in Oregon and Lane County to International Paper Corporation. It is unclear whether and how this sale will impact employment in paper manufacturing.

- **Call centers.** The trend towards domestic outsourcing of back-office functions has lead several companies to locate call centers in the Eugene-Springfield area. The largest among these call centers is Symantec, located in Springfield. Other recent call centers to locate in the Eugene-Springfield area include Royal Caribbean and Enterprise. The Eugene-Springfield's trained labor pool of relatively low-cost workers for call centers gives the region an advantage for attracting additional call centers.
- **Tourism.** Tourism brings economic activity into an area from outside sources. Tourism expenditures in Lane County in 2006 grew 7.5%, to \$553 million, exceeding the statewide tourism growth rate for the year. Tourism accounts for about 7,500 jobs in Lane County.<sup>75</sup>

A major source of tourism spending is overnight accommodations. In 2008, the Eugene-Springfield Region has 3,118 total rooms. Since 1997, 629 limited service hotel rooms were added. During the same period, 377 full service rooms, 92 limited service rooms, and 15,464 square feet of meeting space have closed.<sup>76</sup>

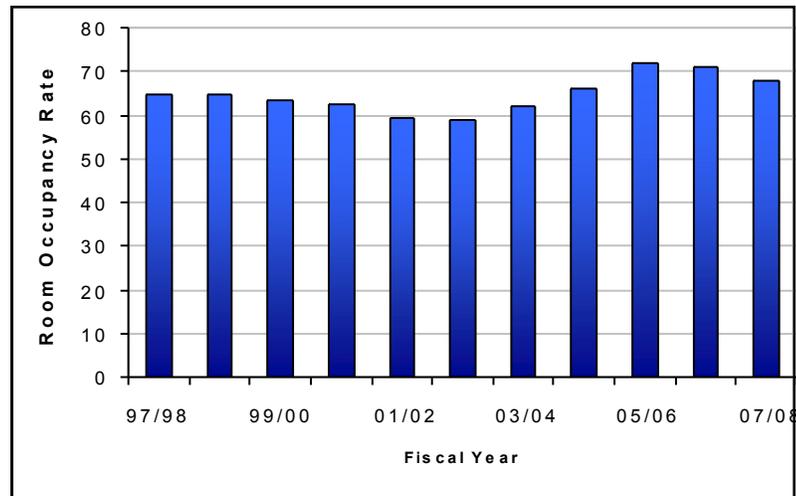
Figure A-5 shows the hotel occupancy rate in the Eugene-Springfield Region from fiscal year 1998 to fiscal year 2008. The Region's occupancy rate varied from 59% in fiscal year 2002 and 2003 to 72% in fiscal year 2006.

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<sup>75</sup> Convention & Visitors Association of Lane County Oregon, CVALCO

<sup>76</sup> Convention & Visitors Association of Lane County Oregon, CVALCO

**Figure A-5. Hotel room occupancy rate, Eugene-Springfield Region, Fiscal Years 1998 to 2008**



Source: Convention & Visitors Association of Lane County Oregon, CVALCO  
 Note: 2008 data current through March 2008

Springfield levies a 9.5% transient lodging tax on overnight accommodations. Springfield's lodging tax rate is 9.5%. Table A-13 shows transient lodging tax revenue for Lane County and Springfield for fiscal year 2000 through 2008. Springfield's lodging tax revenue varied from \$1.2 million in fiscal year 2004 to \$1.6 million in fiscal year 2007. Springfield's transient lodging tax revenues accounted for about one-quarter of total County revenues.

**Table A-13. Transient lodging tax revenues, Lane County and Springfield, Fiscal Years 2000 to 2008**

Fiscal Year	Lane County	Springfield	Springfield's % of County
2000	\$4,753,583	\$1,366,788	29%
2001	\$4,834,210	\$1,314,714	27%
2002	\$4,865,320	\$1,265,825	26%
2003	\$4,820,662	\$1,275,426	26%
2004	\$5,095,869	\$1,187,367	23%
2005	\$5,378,361	\$1,242,653	23%
2006	\$6,016,364	\$1,504,813	25%
2007	\$6,611,718	\$1,597,994	24%
2008	\$5,103,490	\$1,235,685	24%

Source: Convention & Visitors Association of Lane County Oregon, CVALCO  
 Note: 2008 data current through March 2008

- **Agriculture.** Agricultural production is an important component of Lane County's economy. In 2002, Lane County had approximately \$88 million in total gross sales from agriculture.

Table A-14 shows the top five agricultural products in Lane County in 1997 and 2002. Lane County's agriculture products with the greatest value of sales in 2002 were Nursery (\$21 million) and Milk & dairy (\$10.3 million). Milk & dairy had the largest average sales value per farm (\$1.1 million), nearly double the 1997 average sales value for dairies in 1997 (\$0.6 million). This change may indicate that dairies have grown larger over the five-year period.

Other important changes are the decrease in value of sales for poultry and eggs (down \$4.2 million) cattle and calves (down \$2.2 million). The decrease in sales for cattle and calves may be explained by the decrease of 248 farms with cattle and calves.

**Table A-14. Six agricultural products with the highest sales value, Lane County 1997 and 2002**

Item	Value of Sales	Farms	Average Value of Sales per Farm
<b>2002 Total Sales</b>			
Nursery, greenhouse, floriculture, & sod	\$ 21,001,000	208	\$ 100,966
Milk & other dairy products from cows	\$ 10,290,000	9	\$ 1,143,333
Cattle & calves	\$ 7,622,000	779	\$ 9,784
Fruits, tree nuts, & berries	\$ 6,683,000	382	\$ 17,495
Vegetables, melons, potatoes, & sweet potatoes	\$ 5,955,000	155	\$ 38,419
Poultry & eggs	\$ 5,919,000	218	\$ 27,151
<b>1997 Total Sales</b>			
Poultry & eggs	\$ 10,074,000	144	\$ 69,958
Cattle & calves	\$ 9,780,000	1,027	\$ 9,523
Milk & other dairy products from cows	\$ 7,306,000	13	\$ 562,000
Fruits, tree nuts, & berries	\$ 6,842,000	303	\$ 22,581
Vegetables, melons, potatoes, & sweet potatoes	NA	NA	NA
Nursery, greenhouse, floriculture, & sod	NA	NA	NA

Source: USDA Census of Agriculture, 2002; Calculations by ECONorthwest

Note: The definition of the following categories of farm products changed between 1997 and 2002: Nursery, greenhouse, floriculture, and sod; Other crops and hay; and vegetables, melons, potatoes, and sweet potatoes. These changes prevent direct comparison between the Total Sales of these agricultural products in 1989 and 2002.

## OUTLOOK FOR GROWTH IN SPRINGFIELD

Table A-15 shows the population forecast developed by the Office of Economic Analysis for Oregon and Lane County for 2000 through 2040. Lane County is forecast to grow at a slower rate than Oregon over the 2005 to 2030 period. The forecast shows Lane County's population will grow by about 96,600 people over the 25-year period, a 29% increase. Over the same period, Oregon is forecast to grow by more than 1.2 million people, a 35% increase.

**Table A-15. State population forecast,  
Oregon and Lane County, 2000 to 2040**

Year	Lane	
	Oregon	County
2000	3,436,750	323,950
2005	3,618,200	333,855
2010	3,843,900	347,494
2015	4,095,708	365,639
2020	4,359,258	387,574
2025	4,626,015	409,159
2030	4,891,225	430,454
2035	5,154,793	451,038
2040	5,425,408	471,511
<b>Change 2005 to 2030</b>		
Amount	1,273,025	96,599
% Change	35%	29%
AAGR	1.2%	1.0%

Source: Office of Economic Analysis

Note: AAGR is average annual growth rate

Table A-16 shows the Oregon Employment Department's forecast for employment growth by industry for Lane County over the 2006 to 2016 period. The sectors that will lead employment growth in Lane County for the ten-year period are Health Care & Social Assistance (adding 5,600 jobs), Government (adding 3,600 jobs), Professional and Business Services (adding 3,000 jobs), Leisure & Hospitality (adding 2,800 jobs), and Retail Trade (adding 2,400 jobs). Together, these sectors are expected to add 17,400 new jobs or 76% of employment growth in Lane County.

**Table A-16. Nonfarm employment forecast by industry in Lane County, 2006-2016**

Sector / Industry	2006	2016	Change 2006-2016	
			Amount	% Change
Natural resources & Mining	900	900	0	0%
Construction	8,000	9,200	1,200	15%
Manufacturing	20,300	21,000	700	3%
Durable Goods	16,300	16,900	600	4%
Wood product mfg.	4,700	4,500	-200	-4%
Transportation equip. mfg.	4,400	4,700	300	7%
Nondurable goods	4,000	4,100	100	3%
Transportation, & utilities	3,300	3,700	400	12%
Wholesale trade	5,900	6,500	600	10%
<b>Retail trade</b>	<b>19,700</b>	<b>22,100</b>	<b>2,400</b>	<b>12%</b>
Information	3,700	4,100	400	11%
Financial activities	8,300	9,300	1,000	12%
<b>Professional &amp; business srv.</b>	<b>16,100</b>	<b>19,100</b>	<b>3,000</b>	<b>19%</b>
Administrative & support srv.	8,200	9,700	1,500	18%
Education	1,500	1,900	400	27%
<b>Health care &amp; social assist.</b>	<b>18,100</b>	<b>23,700</b>	<b>5,600</b>	<b>31%</b>
Health care	15,400	20,500	5,100	33%
<b>Leisure &amp; hospitality</b>	<b>14,200</b>	<b>17,000</b>	<b>2,800</b>	<b>20%</b>
Accommodation & food srv.	12,100	14,300	2,200	18%
Food srv. & drinking places	10,700	12,700	2,000	19%
Other srv.	5,100	5,700	600	12%
<b>Government</b>	<b>28,400</b>	<b>32,000</b>	<b>3,600</b>	<b>13%</b>
Federal government	1,800	1,700	-100	-6%
State government	11,300	13,200	1,900	17%
State education	8,700	10,200	1,500	17%
Local government	15,400	17,100	1,700	11%
Local education	8,600	9,300	700	8%
<b>Total nonfarm employment</b>	<b>153,400</b>	<b>176,100</b>	<b>22,700</b>	<b>15%</b>

Source: Oregon Employment Department. Employment Projections by Industry 2004-2014. Projections summarized by ECONorthwest.

Note: Percent Change was calculated based on the change in employees divided by the number of employees in 2006. For example, Retail trade's expected percent change is 15% because 2,400 employees is 12% of the 19,700 employees in retail trade in 2006 (2400 divided by 19700 = 15%).

# Factors Affecting Future Economic Growth in Springfield

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## Appendix B

This appendix presents a detailed analysis consistent with the requirements of OAR 660-009-0015(4) of Springfield’s comparative advantage relative to the Eugene/Springfield area, Lane County, Willamette Valley, and Oregon. The information presented in this appendix is summarized in Chapter 3.

Goal 9 requires cities to identify the number and characteristics of sites “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses (OAR 660-009-0014(2)).” In developing this assessment, cities are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion (OAR 660-009-0015(2)). Cities are required to “estimate the types and amounts of industrial and other employment uses likely to occur in the planning area,” taking into consideration relevant economic advantages and disadvantages (OAR 660-009-0015(4)).

Identifying the number and characteristics of needed sites starts with understanding the types of businesses that may locate in Springfield over the 20-year planning period. Consistent with the requirements of Goal 9, these industries are grouped into “major categories of industrial or other employment uses” (OAR 660-009-0015(1)). This grouping is commonly referred to as “target industries.”

This appendix summarizes the factors that affect the types of businesses likely to locate in Springfield. These factors are a key consideration when identifying Springfield’s target industries (in Chapter 4).

## WHAT IS COMPARATIVE ADVANTAGE

Each economic region has different combinations of productive factors: land (and natural resources), labor (including technological expertise), and capital (investments in infrastructure, technology, and public services). While all areas have these factors to some degree, the mix and condition of these factors vary. The mix and condition of productive factors may allow firms in a region to produce goods and services more cheaply, or to generate more revenue, than firms in other regions.

By affecting the cost of production and marketing, comparative advantages affect the pattern of economic development in a region

relative to other regions. Goal 9 and OAR 660-009-0015(4) recognizes this by requiring plans to include an analysis of the relative supply and cost of factors of production.<sup>77</sup> An analysis of comparative advantage depends on the geographic areas being compared. In general, economic conditions in Springfield will be largely shaped by national and regional economic conditions affecting the Willamette Valley. Chapter 2 and Appendix A present trends and forecasts of conditions in Oregon and Springfield to help establish the context for economic development in Springfield. Local economic factors will help determine the amount and type of development in Springfield relative to other communities in Oregon.

This appendix focuses on the comparative advantages of Springfield relative to the rest of Oregon. The implications of the factors that contribute to Springfield's comparative advantage are discussed at the end of this chapter.

## LOCATION

Springfield is a city with a population of approximately 57,320 people in 2007, located in the Southern Willamette Valley. Interstate 5 runs to the west of Springfield and Highway 126 runs east-west through Springfield. Springfield is located between the Willamette River (to the south) and McKenzie River (to the north). Springfield's location will continue to impact Springfield's future economic development.

- Springfield shares a border with Eugene, the 2<sup>nd</sup> largest city in the State of Oregon, with a population of approximately 153,690 people in 2007. The Eugene-Springfield Metropolitan Statistical Area (MSA), which includes all of Lane County, had more than 343,000 people in 2007, accounting for 9% of Oregon's population.
- Springfield has easy access to the State's highway system and other transportation opportunities. Interstate 5 runs to the west of Springfield and Highway 126 is the main east-west route through Springfield. Residents and businesses in Springfield can access other modes of transportation in Eugene, including the Eugene Airport, Greyhound bus service, and passenger rail service.
- Residents of Springfield have easy access to shopping, cultural activities, indoor and outdoor recreational activities, and other amenities in Springfield, Eugene, and rural Lane County.

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<sup>77</sup> OAR 660-009-0015(4) requires assessment of the "community economic development potential." This assessment must consider economic advantages and disadvantages—or what Goal 9 broadly considers "comparative advantages."

- Springfield residents have several opportunities for post-secondary education: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College.

Springfield's location, access to I-5 and Highway 126, and proximity to Eugene are primary comparative advantages for economic development in Springfield.

## BUYING POWER OF MARKETS

The buying power of Springfield and the Eugene-Springfield area forms part of Springfield's comparative advantage by providing a market for goods and services. Table B-1 shows the combined total expenditures for households in Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA) in 2008. Households in Springfield are expected to spend about \$937 million in 2008, about 14% of total household expenditures in the Eugene-Springfield MSA.

**Table B-1. Aggregate annual household expenditures for common purchases, Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA), 2008**

	Springfield	Eugene/ Springfield MSA	Springfield % of MSA Spending
Apparel	\$ 78,765,734	\$ 548,162,423	14%
Entertainment	\$ 106,917,462	\$ 777,731,151	14%
Food at Home	\$ 135,808,782	\$ 875,120,493	16%
Health Care	\$ 72,511,784	\$ 534,882,328	14%
Household Equipment	\$ 48,498,974	\$ 367,679,233	13%
Shelter-Related Expenses	\$ 49,925,453	\$ 369,146,828	14%
Transportation	\$ 185,522,716	\$ 1,304,243,991	14%
Miscellaneous Items	\$ 259,702,794	\$ 1,890,881,821	14%
<b>Total</b>	<b>\$ 937,653,699</b>	<b>\$ 6,667,848,268</b>	<b>14%</b>

Source: Claritas, 2008

Note: Table B-1 does not include spending on shelter or housing

Table B-2 shows average household expenditures for common purchases in Springfield and the Eugene-Springfield MSA in 2008. Springfield households spend an average of \$42,700 on commonly purchased items, not including housing, which typically accounts for 20% or more of household expenditures. Springfield's households spent less than the regional and nation averages, with about 91% of the \$47,000 average expenditures for all households in the Eugene-Springfield MSA and 84% of national average household expenditures.

Springfield households spent the most on miscellaneous items (\$11,800), such as personal care items, education, child care, pet care, and eating out.

Transportation accounted for 20% of Springfield household expenditures, food at home accounted for 14%, and entertainment accounted for 11% of expenditures. Compared to household spending for the entire MSA or the nation, Springfield households spent a more on food at home and less on household equipment (e.g., home furnishings and major appliances ) and shelter-related expenses (e.g., household repairs, fuel, and telephone service).

**Table B-2. Average annual household expenditures for common purchases, Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA), 2008**

	Springfield Households		Eugene/ Springfield MSA	Springfield's Expenditures Compared to:	
	Expenditures	% of Total		E/S MSA	U.S
Apparel	\$ 3,589	8%	\$ 3,869	93%	77%
Entertainment	\$ 4,871	11%	\$ 5,490	89%	84%
Food at Home	\$ 6,187	14%	\$ 6,177	100%	98%
Health Care	\$ 3,304	8%	\$ 3,775	88%	77%
Household Equipment	\$ 2,210	5%	\$ 2,595	85%	76%
Shelter-Related Expenses	\$ 2,275	5%	\$ 2,606	87%	75%
Transportation	\$ 8,452	20%	\$ 9,206	92%	90%
Miscellaneous Items	\$ 11,832	28%	\$ 13,347	89%	80%
<b>Total</b>	<b>\$ 42,720</b>	<b>100%</b>	<b>\$ 47,065</b>	<b>91%</b>	<b>84%</b>

Source: Claritas, 2008

Note: Table B-2 does not include spending on shelter or housing, which typically accounts for 20% or more of household expenditures.

Note: The Percent of Total does not add to 100% as a result of rounding errors.

## AVAILABILITY OF TRANSPORTATION FACILITIES

Businesses and residents in Springfield have access to a variety of modes of transportation: automotive (Interstate 5, multiple State highways, and local roads); rail (Union Pacific and Amtrak); transit (LTD); and air (Eugene Airport).

Springfield has excellent automotive access for commuting and freight movement. Springfield is located along Interstate 5, the primary north-south transportation corridor on the West Coast, linking Springfield to domestic markets in the United States and international markets via West Coast ports. Springfield has developed along Highway 126, connecting Springfield to rural areas to the East of Springfield. Highway 126 is the primary east-west highway in Lane County, running from Florence to Redmond. Businesses and residents of Springfield also have access to Highway 99 in Eugene and Highway 58 in Pleasant Hill.

Other transportation options in Springfield are:

- **Rail.** Multiple Union Pacific rail lines serve Springfield, providing freight service. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25<sup>th</sup> St.
- **Transit.** The Lane Transit District (LTD) provides transit service to the Eugene-Springfield region. LTD serves Springfield with multiple bus lines, providing bus service within Springfield and connecting Springfield with Eugene. LTD recently began operating a bus rapid transit (BRT) system, called EmX, which provides service between Springfield Station and Eugene Station. Construction is underway for the new Pioneer Parkway BRT route, which will connect to the Sacred Heart Medical Center, and the Gateway Mall.
- **Air.** The Eugene Airport provides both passenger and freight service for Eugene and Springfield residents. The airport is the second busiest in the state, and the fifth largest in the Pacific Northwest. The airport is served by five commercial airlines, and is the primary airport for a six county region.

Transportation is a comparative advantage that primarily affects the overall type of employment and its growth for the region.

## PUBLIC FACILITIES AND SERVICES

Provision of public facilities and services can impact a firm's decision on location within a region but ECO's past research has shown that businesses make locational decisions primarily based on factors that are similar with a region. These factors are: the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region.

Once a business has chosen to locate within a region, they consider the factors that local governments can most directly affect: tax rates, the cost and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest effect on the level and type of economic development in the community.

## PUBLIC POLICY

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

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

The economic development strategy also includes objectives that support redevelopment of existing land within the UGB, especially in Downtown and in Glenwood, and other infill development opportunities. In addition, the City has established financial mechanisms to support redevelopment through the creation of the Glenwood Urban Renewal District and Downtown Urban Renewal District.

## TAX POLICY

The tax policy of a jurisdiction is a consideration in economic development policy. Table B-3 shows that Springfield's property tax rate is between \$16.32 and \$18.65 per \$1,000 of assessed value, compared with a state average of \$15.20. The property tax rate in Eugene is more variable than Springfield's, ranging from \$10.31 to \$24.68 per \$1,000 of assessed value.<sup>78</sup>

**Table B-3. Property tax rate per \$1,000 assessed value for Springfield, Eugene, and Oregon, 2007.**

Area	Tax Rate (per \$1,000 assessed value)
Oregon	\$15.20
Lane County	\$15.47
<b>Springfield</b>	<b>\$16.32 - \$18.65</b>
Eugene	\$10.31 - \$24.68

Source: Oregon Department of Revenue

## WATER

Springfield's water provider is the Springfield Utility Board (SUB). Springfield's primary source of water is wells, supplemented by surface water from the Middle Fork of the Willamette River. Springfield has 33 wells in 7 well fields, which provide the majority of Springfield's water. SUB has purchased rights to water from the McKenzie River, to supply future need for water.

Springfield's water treatment plant is located on the Middle Fork of the Willamette River, which provides water treatment for the city. The water treatment plant is at or near capacity, with peak summer residential and commercial irrigation demands exceeding the plant's capacity at times. SUB is addressing peak demands by educating customers peak shifting, the practice of irrigating landscaping in the evening or at night.

SUB is planning upgrades to the water treatment plant in 2008 and 2009 to address issues meeting demand at peak times. SUB is also planning upgrades double the plant's capacity in 2010. Springfield plans to build two additional water treatment plants on the McKenzie River, as demand

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<sup>78</sup> Property tax rates for Springfield and Eugene are a composite of the rates for all properties with an address in Eugene or Springfield. It is almost certain that some of these properties is located outside of both the Eugene and Springfield urban growth boundaries and are subject to unincorporated Lane County tax rates.

for water increases. SUB expects to need the new treatment plants by 2013 to 2018.

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

## **WASTEWATER**

Springfield's wastewater services are provided by Metropolitan Wastewater Management Commission (MWMC), which operates a wastewater facility that serves Springfield, Eugene, and Lane County. Springfield's wastewater system, which includes the sanitary sewer and other equipment, is managed by Springfield Public Works.

Springfield is about to meet current wastewater demands, except in instances of heavy rainfall. On dry days, Springfield generates about 6 million gallons of wastewater per day. During heavy rainfall, Springfield can generate 100 million gallons of wastewater per day, as a result of infiltration and inflow into wastewater pipes.

Springfield recently completed an update of the Wastewater Master Plan, which identified \$65 million of upgrades to the system, which will provide service to unserved areas in Springfield and address problems with infiltration and inflow into wastewater pipes.

Springfield expects to be able to meet expected growth. The City expects to provide service to 6,100 new equivalent dwelling units, which includes residences and businesses, over the next 20 years. If Springfield needs to expand its urban growth boundary, the City will need to plan how to provide service to the new areas.

## **LABOR MARKET FACTORS**

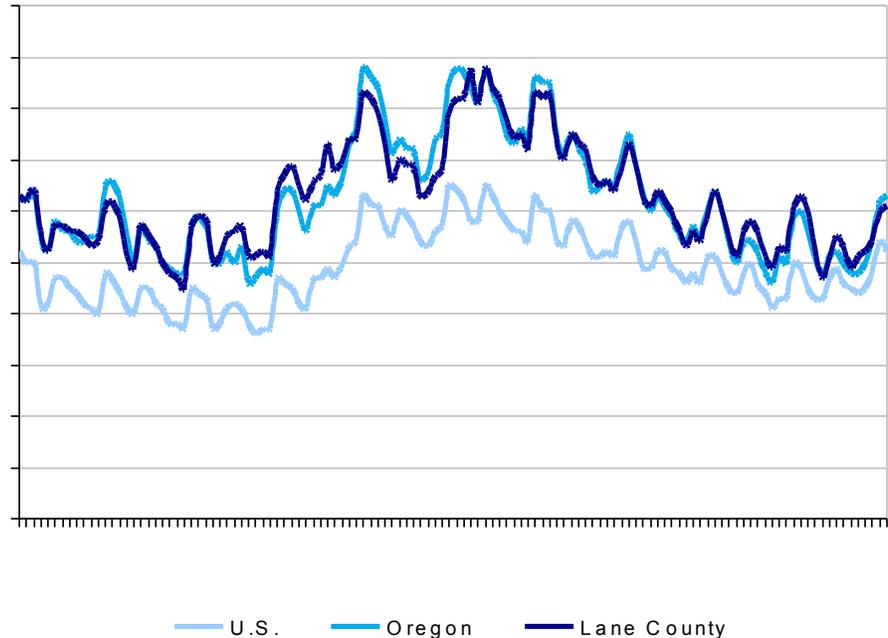
The availability of labor is critical for economic development. Availability of labor depends not only on the number of workers available, but the quality, skills, and experience of available workers as well. This section examines the availability of workers for Springfield.

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

labor force. According to the 2000 Census, Lane County has more than 166,000 people in its labor force, with 16% of the County's labor force located in Springfield (27,000 participants in the labor force).

The unemployment rate is one indicator of the relative number of workers who are actively seeking employment. Labor force data from the Oregon Employment Department shows that unemployment in Lane County 6.1% in February 2008, lower than the State average of 6.3%. Figure B-1 shows the unemployment rate for Lane County, Oregon, and the United States for the past decade. During this period, Lane County's unemployment has been very similar to the statewide unemployment rate. The County and State unemployment rates have been consistently higher than the national average, but the difference has decreased in recent years.

**Figure B-1. Unemployment rates for Lane County, Oregon, and the U.S., January 1998 to February 2008**



Source: Bureau of Labor Statistics

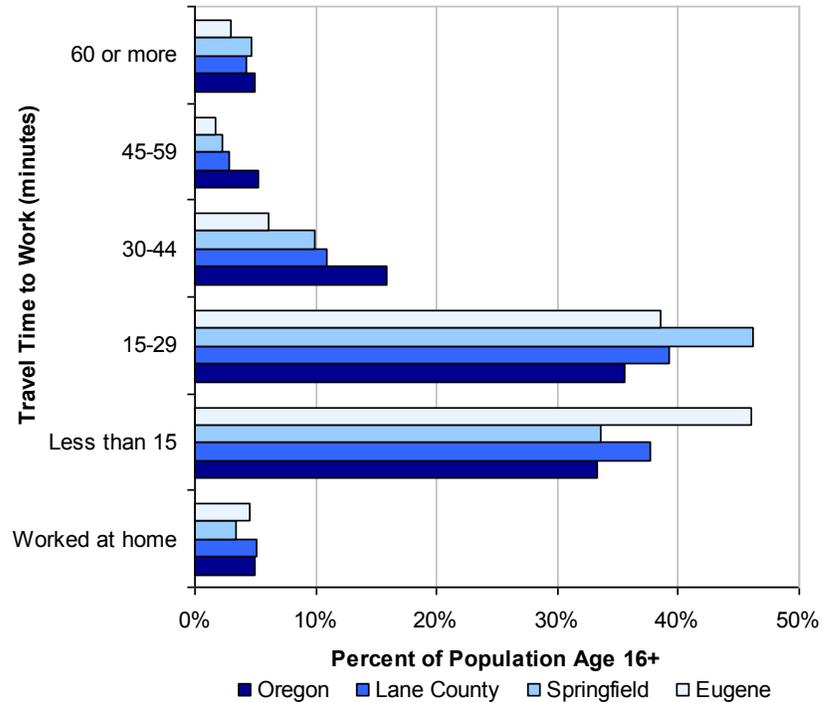
Note: unemployment data is not seasonally adjusted

Another important factor in the labor force is the distance that workers are willing to commute. Figure B-2 shows a comparison of the commute time to work for residents 16 years and older for Oregon, Lane County, Eugene, and Springfield in 2008.

Springfield residents were more likely to have a commute of between 15 and 29 minutes than residents of the State, County, or Eugene. About 46% of Springfield residents commute 15 to 29 minutes, compared with the

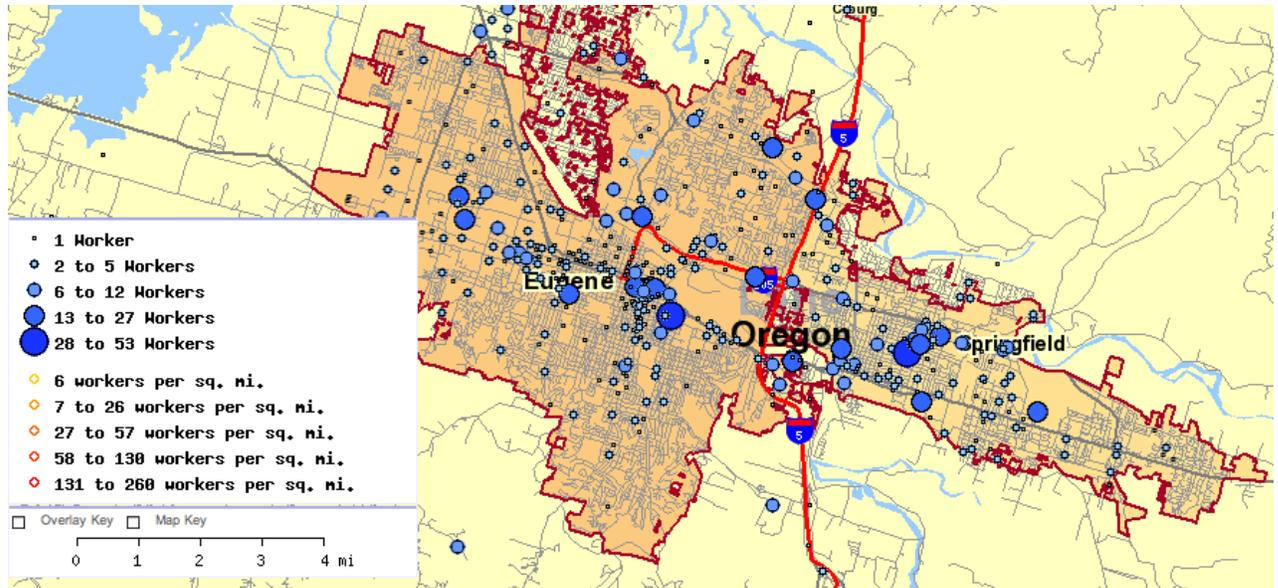
36% of State residents, 39% of County residents, and 38% of Eugene's residents.

**Figure B-2. Commuting time to work in minutes for residents 16 years and older, Oregon, Lane County, Eugene, and Springfield, 2008**



Source: Claritas 2008

Figure B-3 and Table B-4 show where residents of Springfield work in 2004. Figure B-3 and Table B-4 show that 81% of Springfield's residents were employed in Lane County, with 40% of Springfield's residents working in Eugene and 25% working in Springfield. Close to 1,000 Springfield workers (4%) commute to Multnomah County, the majority of who work in Portland.

**Figure B-3. Places that residents of Springfield were employed, 2004**

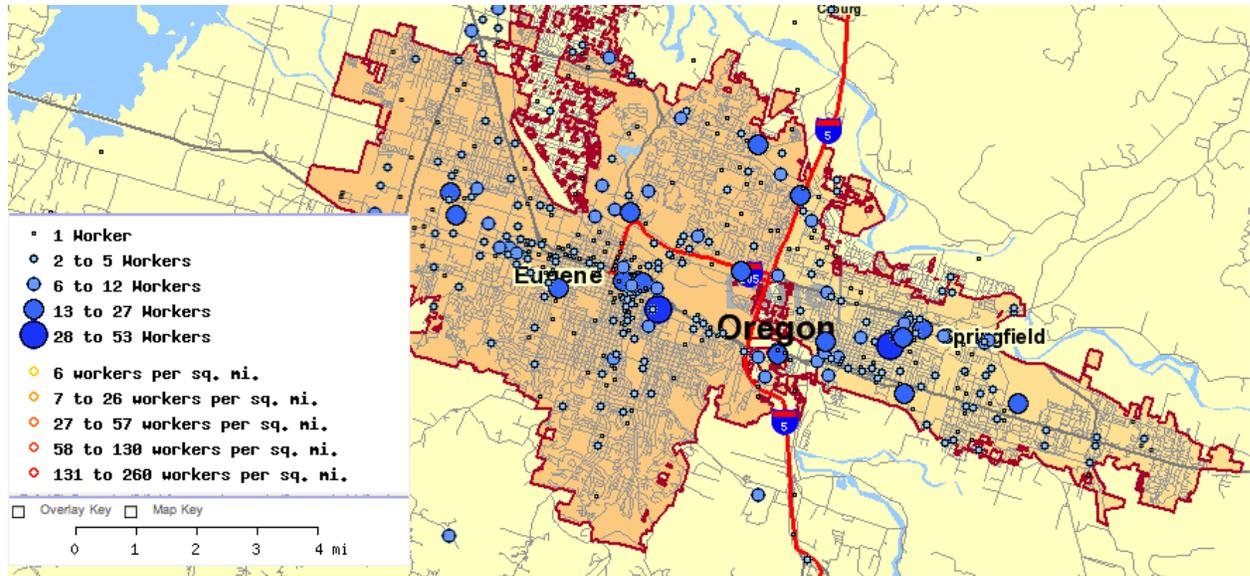
Source: U.S. Census Bureau: LED on the Map

**Table B-4. Places that residents of Springfield were employed, 2004**

Location	Number	Percent
Lane County	18,649	81%
<b>Eugene</b>	<b>9,261</b>	<b>40%</b>
<b>Springfield</b>	<b>5,675</b>	<b>25%</b>
Coburg	638	3%
Junction City	475	2%
Multnomah Co.	975	4%
Portland	839	4%
All Other Locations	3,385	15%
<b>Total</b>	<b>23,009</b>	<b>100%</b>

Source: U.S. Census Bureau: LED on the Map

Figure B-4 and Table B-5 show where employees of firms located in Springfield lived in 2004. Seventy-nine percent of Springfield's workers lived in Lane County. Twenty-nine percent lived in Springfield, and 23% lived in Eugene. About 27% of Springfield's workers lived in unincorporated areas of Lane County and 21% lived outside of Lane County.

**Figure B-4. Places where workers in Springfield lived, 2004**

Source: U.S. Census Bureau: LED on the Map

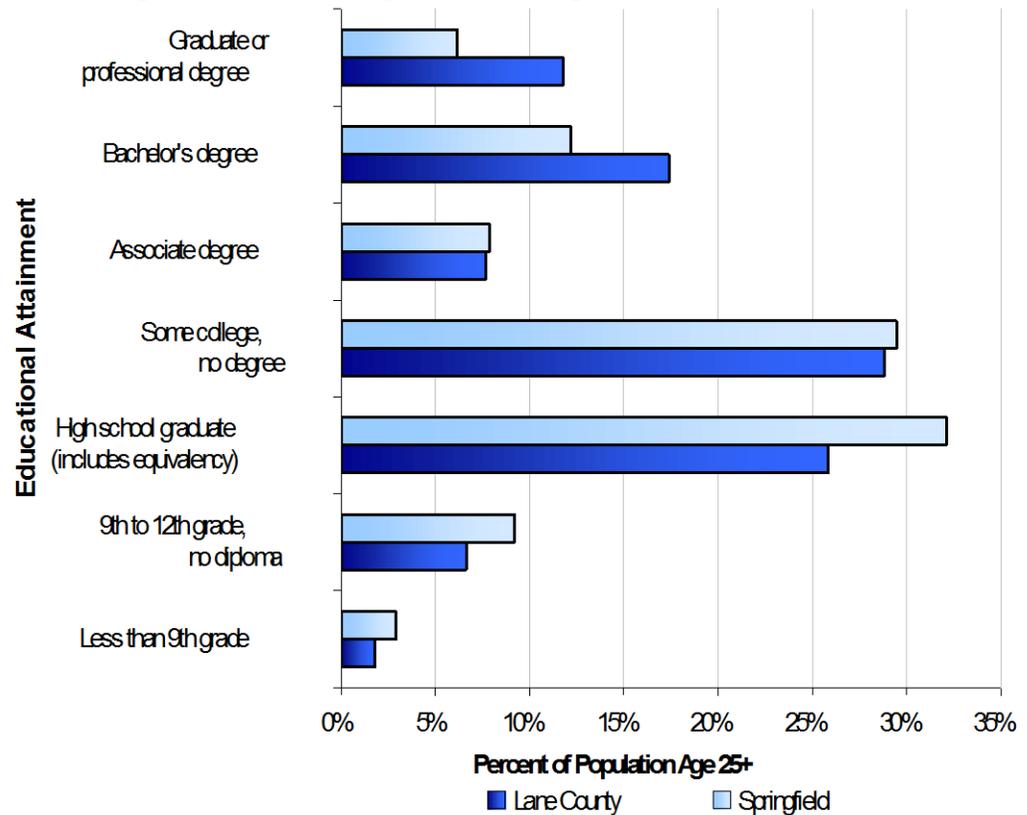
**Table B-5. Places where workers in Springfield lived, 2004**

Location	Number	Percent
Lane County	15,341	79%
<b>Springfield</b>	<b>5,675</b>	<b>29%</b>
<b>Eugene</b>	<b>4,565</b>	<b>23%</b>
All Other Locations	4,112	21%
Linn County	537	3%
Marion County	428	2%
Jackson County	409	2%
Other locations	2,738	14%
<b>Total</b>	<b>19,453</b>	<b>100%</b>

Source: U.S. Census Bureau: LED on the Map

Educational attainment is an important labor force factor because firms need to be able to find educated workers. Figure B-5 shows the share of population by education level completed in Springfield and Lane County in 2007. In 2007, Springfield had a smaller share of residents with an associate's degree or higher (26%) than residents of Lane County (37%). In comparison, 47% of Eugene's residents have an associate's degree or higher.

**Figure B-5. Educational attainment for the population 25 years and over, Oregon, Lane County, and Springfield, 2007**



Source: OregonProspector.com

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

Table B-6 shows changes in ethnicity Oregon, Lane County, and Springfield between 1990, 2000, and 2008. This table shows that the Springfield has a larger share of Hispanic or Latino residents than Lane County 2000, with 6.6% of residents in Springfield were Hispanic compared to the County average of 4.6%. Between 1990 and 2000, Springfield's Hispanic and Latino population grew by 168% (2,176 people), compared with growth in the Hispanic and Latino population of 117% in Lane County and 144% in Oregon.

In 2008, Hispanic residents accounted for about 11% of Oregon's population and 6% of Lane County's population. Springfield's Hispanic population grew by 95% between 2000 and 2008, more than twice the rate of growth for the County or State during the same period.

**Table B-6. Changes in ethnicity, Oregon, Lane County, and Springfield, 1990, 2000, and 2008**

	Oregon	Lane County	Springfield
<b>1990</b>			
Total Population	2,842,321	282,912	44,683
Hispanic or Latino	112,707	6,852	1,299
Percent Hispanic or Latino	4.0%	2.4%	2.9%
<b>2000</b>			
Total Population	3,421,399	322,959	52,729
Hispanic or Latino	275,314	14,874	3,475
Percent Hispanic or Latino	8.0%	4.6%	6.6%
<b>2008</b>			
Total Population	3,772,854	343,961	56,016
Hispanic or Latino	400,435	20,941	5,293
Percent Hispanic or Latino	10.6%	6.1%	9.4%
<b>Change 1900-2000</b>			
Hispanic or Latino	162,607	8,022	2,176
Percent Hispanic or Latino	144%	117%	168%
<b>Change 2000-2008</b>			
Hispanic or Latino	125,121	6,067	1,818
Percent Hispanic or Latino	45%	41%	52%

Source: U.S. Census 1990 and 2000, Claritas 2008

Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield are able to attract educated workers from most of Eugene and surrounding areas in Lane county.

It does not appear that workforce will be a constraint on employment growth in Springfield. Springfield should be able to continue to draw on residents of Eugene for workers, even if energy prices continue to rise but Springfield's ability to attract workers from outside of the Eugene-Springfield area may be negatively impacted by continued increases in energy prices.

# Employment Forecast and Site Needs for Industrial and other Employment Uses

## Appendix C

This appendix presents a detailed analysis of Springfield's site needs consistent with the requirements of OAR 660-009-0015(2) and of OAR 660-009-0025(1). This appendix includes an employment forecast and an analysis of site needs to accommodate industrial and other employment uses in Springfield for the 2010 to 2030 period. The information presented in this appendix is summarized in Chapter 4.

## EMPLOYMENT FORECAST

To provide for an adequate supply of commercial and industrial sites consistent with plan policies, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Goal 9 requires cities to identify "the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses." The number of needed sites is dependent on the site requirements of employers. The estimate of land need is presented in the site needs analysis in the next section.

Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield. This section presents a projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

The projection of employment has three major steps:

1. **Establish base employment for the projection.** We start with the estimate of covered employment in Springfield's UGB presented in Chapter 3. Covered employment does not include all workers, so we adjust covered employment to reflect total employment in Springfield.
2. **Project total employment.** The projection of total employment will be calculated using the safe harbor method suggested in OAR 660-024.

3. **Allocate employment.** This step involves allocating employment to different building types, based on similar requirements for built space.

## **EMPLOYMENT BASE FOR PROJECTION**

To forecast employment growth in Springfield, we must start with a base of employment growth on which to forecast. Table C-1 shows ECO's estimate of total employment in the Springfield UGB in 2006. To develop the figures, ECO started with estimated covered employment in the Springfield UGB from confidential QCEW (Quarterly Census of Employment and Wages) data provided by the Oregon Employment Department.

Covered employment, however, does not include all workers in an economy. Most notably, covered employment does not include sole proprietors. Analysis of data shows that covered employment reported by the Oregon Employment Department for Lane County is only about 74% of total employment reported by the U.S. Department of Commerce. We made this comparison by sector for Lane County and used the resulting ratios to convert covered employment to total employment in Springfield.

Table C-1 shows Springfield had an estimated 36,706 employees within its UGB in 2006. This figure results in a population-to-employment ratio of 1.7 persons per employee. The statewide average is about 1.9 persons per employee.

**Table C-1. Estimated total employment in the Springfield UGB by sector, 2006**

Sector	Covered Employment		Estimated Total Employment
	Number	% of Total Emp.	
Agriculture, Forestry, Fishing, & Mining	282	73%	387
Construction	1,922	65%	2,973
Manufacturing	2,714	99%	2,750
Wholesale Trade	1,230	85%	1,446
Retail	3,632	79%	4,609
Transportation & Warehousing & Utilities	941	70%	1,349
Information	1,356	79%	1,710
Finance & Insurance	1,110	66%	1,673
Real Estate & Rental & Leasing	441	33%	1,341
Professional, Scientific, & Technical Services	576	52%	1,107
Management of Companies & Enterprises	343	97%	354
Admin. & Support & Waste Mgt Services	2,460	76%	3,239
Private Educational Services	109	38%	290
Health Care & Social Assistance	3,069	77%	4,008
Arts, Entertainment, & Recreation	321	41%	777
Accommodation & Food Services	2,453	91%	2,686
Other Services	816	48%	1,685
Government	3,535	82%	4,322
<b>Total</b>	<b>27,310</b>	<b>74%</b>	<b>36,706</b>

Source: 2005 covered employment from confidential Quarterly Census of Employment and Wage (QCEW) data provided by the Oregon Employment Department. Covered employment as a percent of total employment calculated by ECONorthwest using data for Lane County employment from the U.S. Department of Commerce, Bureau of Economic Analysis (total) and the Oregon Employment Department (covered).

The employment forecast covers the 2010 to 2030 period, requiring an estimate of total employment for Springfield in 2008. Between 2006 and 2008, Springfield has had one major change in employment, beyond expected employment growth: PeaceHealth has built a new regional medical center at RiverBend. PeaceHealth estimates that there will be approximately 3,400 new employees in Springfield in 2008 as a result of the hospital at RiverBend.

ECO estimates that Springfield has 37,733 employees in 2008, plus the 3,400 employees at RiverBend. The result is an employment base of 41,133 total employees in Springfield in 2008 for the planning period 2010-2030.

## EMPLOYMENT PROJECTION

OAR 660-024-0040 (9) (a) (A) allows the City to determine employment land needs based on “The county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department.” Springfield is part of Region 5, which includes all of Lane County. Based on this safe harbor, employment in Springfield can be assumed to grow at 1.4% annually. Table C-2 shows the result of applying this growth rate to the total employment base of 41,133 in Springfield. Table C-2 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030.

**Table C-2. Forecast of employment growth in Springfield’s UGB, 2010–2040**

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

Source: ECONorthwest

Springfield is part of the regional economic center in the Eugene-Springfield region. The ratio of population to employment will decrease from 1.6 to 1.5 people per job between 2010 and 2030. This change shows that employment will grow faster than population in Springfield, suggesting that some Springfield will continue to have employees who commute from Eugene or other cities in the region.

## ALLOCATE EMPLOYMENT TO DIFFERENT BUILDING TYPES

The next step in the employment forecast is to allocate future employment to building type, as described in Table A-8 in Appendix A. The allocation was done by grouping employment into building types with similar building and site requirements. For example, the following service sectors were grouped together into the “office” building type because they need similar types of built space with similar site requirements: information, finance, real estate, professional services, management of companies, administrative support, utilities, arts and entertainment, and other services.

Table C-3 shows the forecast of employment growth by building type in Springfield’s UGB in 2030. Table C-3 shows the amount of employment by building type in 2010. In 2010, a total of about 60% of Springfield’s employment is in office and other services’ building types. About 18% is in retail, 15% is in general industrial and 7% is in warehousing and distribution.

**Table C-3. Forecast of employment growth in by building type, Springfield UGB, 2010–2030**

Building Type	2010		2030		Change 2010 to 2030
	Employment	% of Total	Employment	% of Total	
<b>Industrial</b>					
Warehousing & Distribution	2,954	7.0%	3,343	6.0%	389
General Industrial	6,457	15.3%	7,523	13.5%	1,066
<b>Commercial</b>					
Office	12,561	29.7%	17,274	31.0%	4,713
Retail	7,709	18.2%	9,752	17.5%	2,043
Other Services	12,603	29.8%	17,832	32.0%	5,229
<b>Total</b>	<b>42,284</b>	<b>100.0%</b>	<b>55,724</b>	<b>100.0%</b>	<b>13,440</b>

Source: ECONorthwest

Note: Green shading denotes an assumption by ECONorthwest

The forecast in Table C-3 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). In terms of jobs, employment will increase in all of these sectors.

The assumptions about the changes in share of all employment are based on the following considerations:

- **Increase in the share of employment in office and other services.** Springfield's target industries are predominantly office and other services, such as medical services, services for seniors, call centers, back office functions, high tech, professional services, corporate headquarters, and other services. The forecast assumes that these industries will grow faster than other employment in Springfield.
- **Decrease in employment in other categories.** The decreases in employment in other categories is based on the following factors:
  - While Springfield expects that general industrial will grow, the City expects industrial employment will grow slower than all employment in the City. This expectation is based on the target industries that Springfield has identified and the Oregon Employment Department's forecast for employment growth in Lane County for 2006 to 2016.
  - Springfield expects that employment in warehousing and distribution will grow but slower than all employment because Springfield is at a disadvantage for siting warehouse and distribution firms. These firms need sites that have easy access to I-5 and flat sites of 20 or more acres. There are relatively few sites in or around Springfield that meet these criteria.
  - Employment in retail will grow with population. Springfield expects that retail will grow slightly slower than all employment. This assumption is based on the expectation that Springfield's target industries will grow faster than overall employment growth, including retail employment.

It is worth noting that the employment projections in this appendix do not take into account a major jump in employment that could result from the location of one or more large employers in the community during the planning period. This could take place if the City were successful in its recruitment efforts, either on its own and/or in conjunction with the Governors Initiative to bring new industry to the State. PeaceHealth and Symantec are examples of such events. Such a major change in the community's employment would essentially be over and above the growth anticipated by the City's employment forecast and the implied land needs (for employment, but also for housing, parks and other uses). Major economic events such as the successful recruitment of a very large employer are very difficult to include in a study of this nature. The implications, however, are relatively predictable: more demand for land (of all types) and public services.

If the City were successful in recruitment of a major business to the City, the land needed by such a business would be over and above the land need identified in this EOA. If the business needed a site larger than five acres, especially one larger than 20 acres, this growth may result in land deficiencies before 2030 and the City may need to reexamine whether there is enough land within the UGB to accommodate additional growth.

## SITE NEEDS

OAR 660-009-0015(2) requires the EOA identify the number of sites, by type, reasonably expected to be needed for the 20-year planning period. Types of needed sites are based on the site characteristics typical of expected uses. The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be described by general size categories that are defined locally (i.e., small, medium, or large sites), or can be identified by industry or use (i.e., manufacturing sites or distribution sites).

Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. Previous research conducted by ECO has found that while there are always specific criteria that are industry-dependent and specific to a firm, many firms share at least a few common site criteria. In general, all firms need sites that are relatively flat, free of natural or regulatory constraints on development, with good transportation access and adequate public services. The exact amount, quality, and relative importance of these factors vary among different types of firms. This section discusses the site requirements for firms in industries with growth potential in the Eugene-Springfield Region, as indicated by the Oregon Employment Department forecast shown in Table A-12.

## FACTORS THAT AFFECT LOCATIONAL DECISIONS

Why do firms locate where they do? There is no single answer – different firms choose their locations for different reasons. Key determinates of a location decision are a firm's *factors of production*. For example, a firm that spends a large portion of total costs on unskilled labor will be drawn to locations where labor is relatively inexpensive. A firm with large energy demands will give more weight to locations where energy is relatively inexpensive. In general, firms choose locations they believe will allow them to maximize net revenues: if demand for goods and services is held roughly constant, then revenue maximization is approximated by cost minimization.

The typical categories that economists use to describe a firm's production function are:

- **Labor.** Labor is often and increasingly the most important factor of production. Other things equal, firms look at productivity – labor output per dollar. Productivity can decrease if certain types of labor are in short supply, which increases the costs by requiring either more pay to acquire the labor that is available, the recruiting of labor from other areas, or the use of the less productive labor that is available locally. Based on existing commuting patterns, Springfield has access to labor from the Eugene-Springfield Region.
- **Land.** Demand for land depends on the type of firm. Manufacturing firms need more space and tend to prefer suburban locations where land is relatively less expensive and less difficult to develop. Warehousing and distribution firms need to locate close to interstate highways.
- **Local infrastructure.** An important role of government is to increase economic capacity by improving quality and efficiency of infrastructure and facilities, such as roads, bridges, water and sewer systems, airport and cargo facilities, energy systems, and telecommunications.
- **Access to markets.** Though part of infrastructure, transportation merits special attention. Firms need to move their product, either goods or services, to the market, and they rely on access to different modes of transportation to do this. Springfield's access to I-5 and Highway 126 provide the City with advantages in attracting businesses that need easy access to highways.
- **Materials.** Firms producing goods, and even firms producing services, need various materials to develop products that they can sell. Some firms need natural resources. For example, lumber manufacturing requires trees. Or, farther down the line, firms may need intermediate materials: for example, dimensioned lumber to build manufactured housing.
- **Entrepreneurship.** This input to production may be thought of as good management, or even more broadly as a spirit of innovation, optimism, and ambition that distinguishes one firm from another even though most of their other factor inputs may be quite similar.

The supply, cost, and quality of any of these factors depend on market factors: on conditions of supply and demand locally, nationally, and even

globally. But they also depend on public policy. In general, public policy can affect these factors of production through:

- **Regulation.** Regulations protect the health and safety of a community and help maintain the quality of life. Overly burdensome regulations, however, can be a disincentive for businesses to locate in a community. Simplified bureaucracies and straightforward regulations can reduce the burden on businesses and help them react quickly in a competitive marketplace.
- **Taxes.** Firms tend to seek locations where they can optimize their after-tax profits. Studies show that tax rates are not a primary location factor within a region – they matter only after businesses have made decisions based on labor, transportation, raw materials, and capital costs. The cost of these production factors is usually similar within a region. Therefore, differences in tax levels across communities within a region are more important in the location decision than are differences in tax levels between regions.
- **Financial incentives.** Governments can offer firms incentives to encourage growth. Studies have shown that most types of financial incentives have had little significant effect on firm location between regions. For manufacturing industries with significant equipment costs, however, property or investment tax credit or abatement incentives can play a significant role in location decisions. Incentives are more effective at redirecting growth within a region than they are at providing a competitive advantage between regions.

This discussion may suggest that a location decision is based entirely on a straight-forward accounting of costs, with the best location being the one with the lowest level of overall costs. Studies of economic development, however, have shown that location decisions depend on a variety of other factors that indirectly affect costs of production. These indirect factors include agglomerative economies (also known industry clusters), quality of life, and innovative capacity.

- **Industry clusters.** Firms with similar business activities can realize operational savings when they congregate in a single location or region. Clustering can reduce costs by creating economies of scale for suppliers. For this reason, firms tend to locate in areas where there is already a presence of other firms engaged in similar or related activities.

- **Quality of life.** A community that features many quality amenities, such as access to recreational opportunities, culture, low crime, good schools, affordable housing, and a clean environment can attract people simply because it is a nice place to be. A region's quality of life can attract skilled workers, and if the amenities lure enough potential workers to the region, the excess labor supply pushes their wages down so that firms in the region can find skilled labor for a relatively low cost. The characteristics of local communities can affect the distribution of economic development within a region, with different communities appealing to different types of workers and business owners. Sometimes location decisions by business owners are based on an emotional or historical attachment to a place or set of amenities, without much regard for the cost of other factors of production.
- **Innovative capacity.** Increasing evidence suggests that a culture promoting innovation, creativity, flexibility, and adaptability is essential to keeping U.S. cities economically vital and internationally competitive. Innovation is particularly important in industries that require an educated workforce. High-tech companies need to have access to new ideas typically associated with a university or research institute. Innovation affects both the overall level and type of economic development in a region. Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business.

Table C-4 provides a summary of production factors in Springfield as well as comments received through the Technical Advisory and Stakeholder Advisory Committees and Citizen Involvement process on local opportunities and constraints. It also discusses implications of each factor for future economic development in Springfield.

**Table C-4. Summary of production factors and their implications for Springfield**

<b>Category</b>	<b>Opportunities</b>	<b>Challenges</b>	<b>Implications</b>
<b>Labor</b>	<ul style="list-style-type: none"> <li>• Access to labor from the across the Eugene-Springfield Region</li> </ul>	<ul style="list-style-type: none"> <li>• Existing workforce has lower educational attainment than regional averages</li> <li>• Potential difficulty in finding dependable labor for manufacturing jobs</li> </ul>	<p>The City has access to labor from the region. As the City adds more high-end housing stock, the City is likely to attract a more educated workforce.</p> <p>Commuting patterns may be negatively impacted by increases in energy prices. The impact is likely to be less in the immediate Eugene-Springfield area but is likely to be greater for commuters that live further from Eugene and Springfield.</p>
<b>Land</b>	<ul style="list-style-type: none"> <li>• Opportunities for redevelopment and infill development, especially in Downtown and Glenwood</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of large parcels of land near highways</li> <li>• Cost of land</li> <li>• Short-term availability</li> </ul>	<p>Firms that prefer large, undeveloped parcels near highways are unlikely to locate in Springfield under current conditions, (e.g. manufacturers that require freight access).</p>
<b>Local infrastructure</b>	<ul style="list-style-type: none"> <li>• Proximity to I-5 and Highway 126 and availability of freight shipping by rail</li> <li>• Opportunities for transportation via transit, bicycle, and pedestrian</li> <li>• Capacity of water and wastewater systems</li> </ul>	<ul style="list-style-type: none"> <li>• Cost of providing infrastructure</li> </ul>	<p>Springfield has sufficient local infrastructure to attract and retain businesses.</p>
<b>Access to markets</b>	<ul style="list-style-type: none"> <li>• Proximity to I-5 and Highway 126 and availability of freight shipping by rail</li> <li>• Proximity to Eugene Airport for transportation of people and small quantities of goods</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of sites with good transportation access, especially to I-5</li> </ul>	<p>Springfield's location relative to highway and rail transportation corridors is sufficient to attract firms that need access to markets via highways. Existing developed land uses are able to use the I-5 and rail freight corridors.</p> <p>The City lacks large sites that are well-located in relation to the I-5 corridor. At present, Springfield is relatively unlikely to attract firms that need close proximity to I-5. If the City had suitable sites for development near I-5, the city would be more likely to attract these firms.</p>

<b>Category</b>	<b>Opportunities</b>	<b>Challenges</b>	<b>Implications</b>
<b>Materials</b>	<ul style="list-style-type: none"> <li>Proximity to natural resources (e.g., timber or agricultural products)</li> <li>Access to multiple rail lines</li> </ul>	<ul style="list-style-type: none"> <li>Cost of shipping raw and finished products</li> </ul>	Springfield may be attractive to manufacturers that need access to natural resources. However, firms dependent on highway access to transport large quantities of materials may not locate in Springfield until infrastructure needs are addressed or the City adds suitable land with direct access to I-5.
<b>Entrepreneurship</b>	<ul style="list-style-type: none"> <li>Proximity of the University of Oregon</li> <li>Quality of life</li> </ul>	<ul style="list-style-type: none"> <li>Springfield's image as having a "blue collar" business environment.</li> </ul>	Springfield may be attractive to entrepreneurs who value the City's quality of life attributes, access to outdoor recreation, and other locational attributes. Springfield has opportunities to encourage entrepreneurship through continued improvement of the City's image and through attracting more professional jobs, such as the developing medical cluster.
<b>Regulation</b>	<ul style="list-style-type: none"> <li>Pro-business attitudes among City officials and leaders</li> <li>Ability to craft regulations that are conducive to business</li> </ul>	<ul style="list-style-type: none"> <li>High Systems Development Charges (SDCs)</li> </ul>	The City has the opportunity to develop a regulatory framework that can promote economic activity through economic development policies, plans for providing infrastructure, and provision of a variety of housing types.
<b>Taxes</b>	<ul style="list-style-type: none"> <li>Property taxes are comparable to Eugene</li> </ul>		Springfield needs revenue sources for providing public services and infrastructure, just as other cities do. The City has options about how to raise these funds: through property taxes, development fees, and other fees to taxes.
<b>Industry clusters</b>	<ul style="list-style-type: none"> <li>Presence of a developing medical cluster and existing call center cluster</li> <li>Opportunities for development of other clusters</li> </ul>	<ul style="list-style-type: none"> <li>Availability of sites</li> <li>Transportation access</li> <li>Labor availability</li> </ul>	Springfield may be able to build employment in existing clusters, especially the developing medical cluster. Springfield has opportunities to develop other clusters, such as high-tech or small scale manufacturing.

Category	Opportunities	Challenges	Implications
<b>Quality of life</b>	<ul style="list-style-type: none"> <li>• High quality of life, including access to recreation, proximity to cultural amenities in Eugene, regional shopping opportunities and environmental quality</li> </ul>	<ul style="list-style-type: none"> <li>• Growth management challenges, such as balancing development with protection of environmental quality</li> </ul>	Springfield's policy choices will affect the City's quality of life, such as decisions regarding development of natural areas, housing policies, or policies that lead to redevelopment of downtown.
<b>Innovative capacity</b>	<ul style="list-style-type: none"> <li>• Educated regional workforce</li> <li>• Existing professional and business service firms</li> <li>• Proximity to the University of Oregon</li> <li>• Existing businesses, clusters, and innovators in the Region</li> </ul>	<ul style="list-style-type: none"> <li>• Attracting and retaining good workers in the region</li> <li>• Availability of higher-end housing and cultural amenities to attract creative class workers</li> </ul>	Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business.



## CHARACTERISTICS OF SITES NEEDED TO ACCOMMODATE EMPLOYMENT GROWTH

Table C-5 summarizes common site needs for target industries and key issues related to sites in Springfield.

**Table C-5. Summary of site requirements**

Site Attribute	Comments about these site attributes in Springfield
<p><b>Flat sites.</b> Flat topography (slopes with grades less than 5% for industrial businesses and less than 15% for commercial businesses) is needed by almost all firms in every industry except for small Office and Commercial firms that could be accommodated in small structures built on sloped sites. Flat sites are particularly important for Industrial firms in manufacturing, trucking, and warehousing, since these firms strongly prefer to locate all of their production activity on one level with loading dock access for heavy trucks.</p>	<p>The commercial and industrial land inventory excluded lands with slopes over 15%. Some available sites in the Glenwood area have slopes that exceed 5% which may be inappropriate for some employment uses.</p>
<p><b>Parcel configuration and parking.</b> Large Industrial and Commercial firms that require on-site parking or truck access are attracted to sites that offer adequate flexibility in site circulation and building layout. Parking ratios of 0.5 to 2 spaces per 1,000 square feet for Industrial and 2 to 3 spaces per 1,000 square feet for Commercial are typical ratios for these firms. In general rectangular sites are preferred, with a parcel width of at least 200-feet and length that is at least two times the width for build-to-suit sites. Parcel width of at least 400 feet is desired for flexible industrial/business park developments and the largest Commercial users.</p>	<p>Parcel configuration and parking do not appear to be a constraining factor on vacant land with the city's existing land base.</p> <p>The parcel configuration and need for parking on some sites identified as potentially redevelopable make some sites unlikely to redevelop over the 20-year planning period, as described in Chapter 2.</p>
<p><b>Soil type.</b> Soil stability and ground vibration characteristics are fairly important considerations for some highly specialized manufacturing processes, such as microchip fabrications. Otherwise soil types are not very important for Commercial, Office, or Industrial firms—provided that drainage is not a major issue.</p>	<p>Soils do not appear to be a constraining factor on most sites in Springfield. The City Code provides special development and engineering standards to protect wetlands, flood plains, riparian corridors, wildlife areas, steep slopes and other sensitive areas.</p>
<p><b>Road transportation.</b> All firms are heavily dependent upon surface transportation for efficient movement of goods, customers, and workers. Access to an adequate highway and arterial roadway network is needed for all industries. Close proximity to a highway or arterial roadway is critical for firms that generate a large volume of truck or auto trips or for firms that rely on visibility from passing traffic to help generate business. This need for proximity explains much of the highway strip development prevalent in urban areas today.</p>	<p>Businesses in Springfield have access to I-5, Highway 126, Highway 99 (in Eugene), and Highway 58.</p> <p>The Gateway area is highly visible from I-5. Springfield also has a well-developed street network within the City. The City may need to work with large businesses to increase automotive capacity in newly developed areas or in areas where the intensity of employment uses increase substantially.</p>

<b>Site Attribute</b>	<b>Comments about these site attributes in Springfield</b>
<p><b>Rail transportation.</b> Rail access can be very important to certain types of heavy industries. The region has good rail access to many industrial sites.</p>	<p>Springfield is served by multiple Union Pacific rail lines. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25<sup>th</sup> St.</p>
<p><b>Air transportation.</b> Proximity to air transportation is important for some firms engaged in manufacturing, finance, or business services.</p>	<p>Springfield is located 15 miles from the Eugene Airport.</p>
<p><b>Transit.</b> Transit access is important for Springfield's target industries, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile.</p>	<p>Springfield has access to transit through the Lane Transit District (LTD). There are multiple bus lines that run throughout Springfield and multiple buses that connect Springfield and Eugene. The first two lines of the EmX bus rapid transit system serves existing employment nodes in Glenwood, Downtown and RiverBend/Gateway. Additional Frequent Transit Network (FTN) routes are identified in the Regional Transportation Plan and are being planned for the Main Street Corridor.</p>
<p><b>Pedestrian and bicycle facilities.</b> The ability for workers to access amenities and support services such as shopping, entertainment and recreation areas by foot or bike is increasingly important to employers, particularly those with high-wage professional jobs. The need for safe and efficient bicycle and pedestrian networks will prove their importance over time as support services and neighborhoods are developed adjacent to employment centers.</p>	<p>Springfield has pedestrian and bicycle facilities. Springfield last updated the City Bicycle Plan in 1998. The plan proposes expansion of bicycle facilities to improve bicycle connectivity throughout the City and to neighboring communities.</p> <p>People in Springfield are able to use bicycle facilities for commuting if they live and work in areas of the City that have bicycle infrastructure. Commuting via pedestrian facilities may be more limited to people who live near their work.</p> <p>Springfield's pedestrian and bicycle facilities can be used on conjunction with LTD buses to provide opportunities for alternative methods of commuting for people that live further from work.</p>
<p><b>Labor force.</b> Firms are looking at reducing their workforce risk, that is, employers want to be assured of an adequate labor pool with the skills and qualities most attractive to that industry. Communities can address this concern with adequate education and training of its populace. Firms also review turnover rates, productivity levels, types and amount of skilled workers for their industry in the area, management recruitment, and other labor force issues in a potential site area.</p>	<p>Commuting patterns within Springfield suggest that businesses in Springfield have access to the workforce of the Eugene-Springfield Region.</p> <p>Firms in Springfield will need employees with a range of skills, from people with customer service skills to highly educated professionals. Some types of skills that employers may need include: management skills, technology, manufacturing (e.g., machinist or wood-working), a range of medical training, creative skills, and other skills or education. The educational and skill requirements of businesses in Springfield are likely to be similar to the needs of businesses throughout the Eugene-Springfield Region.</p>

<b>Site Attribute</b>	<b>Comments about these site attributes in Springfield</b>
<b>Amenities.</b> According to the International Economic Development Council, <sup>79</sup> 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. Many urban amenities are available in Springfield and Eugene.
<b>Fiber optics and telephone.</b> 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.
<b>Potable water.</b> 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.
<b>Power requirements.</b> 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.
<b>Land use buffers.</b> 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.

<sup>79</sup> International Economic Development Council. "Economic Development Reference Guide," <http://www.iedconline.org/hotlinks/SiteSel.html>. 10/25/02.

Table C-6 through Table C-11 present information from a range of sources about site needs of businesses that either considered locating in Oregon (including in the Eugene-Springfield area) or are in Springfield's target industries. The examples of site needs of these businesses illustrate that businesses have a wide range of need for site size, location, and characteristics based on the business's individual operational needs. The site needs of businesses vary from business to business, even within the same industry. As a result, one business's site needs may be different and potentially even conflicting with another business's site needs.

One of the key factors that businesses consider when making decisions about where to locate is the availability of vacant, large, and flat parcels of land. Table C-6 shows examples of traded-sector firms that considered locating in Oregon and Southern Washington between 1997 and 2010. Table C-6 shows that firms looking for office or flex space<sup>80</sup> required sites from 30 acres up to more than 100 acres. Warehouse and distribution firms looked for sites between about 50 and 200 acres. Manufacturing firms required sites from 25 acres to 250 acres in size.

These firms worked with Business Oregon to find suitable sites in Oregon. Some of the firms chose to locate in Oregon and some chose to locate elsewhere. One of the factors that influenced decisions to locate elsewhere was availability of large parcels of land with infrastructure services (e.g., transportation access, wastewater, etc.).

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<sup>80</sup> Flex space is buildings that could be used for light industrial, office space, or both. Flex space typically has less costly finishing and improvements, such as having bare concrete floors rather than carpet. Businesses that sometimes occupy flex space include plumbing or electrical contractors, computer technology companies such as internet service providers or some software businesses, or service firms that prefer a more "industrial" feeling to their office space, such as some architecture firms.

**Table C-6. Examples of firms that considered locating in Oregon and Southern Washington between 1997 and 2010**

Type of business	General Location Considered	Site size (acres)	Building Size (square feet)	Located in Oregon ?
<b>Office or Flex space</b>				
Private technology firm	Northern Oregon I-5	100+	1 msf	
Facebook Data Center	Prineville	118	147,000 sf	Yes
Siltronics	Portland Harbor	35		
Nautilus	Vancouver	35	489,000	Yes
Google Data Center	The Dalles	30		Yes
<b>Warehouse and Distribution</b>				
Lowe's	Lebanon	204	1.3 to 2.2 msf	Yes
NOAH-PepsiCo	Albany	204	2.5 msf	No
Wal-Mart	Hermiston	200	1.3 msf	Yes
Target	Albany	175	1.3 msf	Yes
Fed Ex	Troutdale	78	500,000 sf	Yes
Dollar-Tree	Ridgefield, Wa	75	800,000 sf	
Home Depot	Salem	50 to 100	400,000+	Yes
<b>Manufacturing</b>				
Apricus	Northern Oregon	250	Very large	No
Navitas	Oregon	150 to 200		No
Pacific Ethanol	Boardman	137		Yes
SolarWorld	Hillsboro	75	1 msf	Yes
Schott Solar	I-5 corridor	50+	up to 800,000 sf	No
Genentech	Hillsboro	50	500,000 sf	Yes
Amy's Kitchen	White City	50		Yes
Sanyo Solar	Salem	25	150,000 sf	Yes
Spectrawatt	Hillsboro	25	225,000 sf	No

Source: Business Oregon

Table C-7 provides examples of businesses that considered locating in the Eugene-Springfield area between 2008 and 2013. These businesses all required sites at least 10 acres in size.

**Table C-7. Examples of manufacturing and other businesses that considered locating in the Eugene-Springfield area between 2008 and 2013**

Industry	Site size	Other information about site needs	Est. number of jobs	Year
Life science and biopharmaceutical manufacturing	60 acres	400,000 sq. ft. building Rectangular configuration and flat topography Avoid proximity to heavy industry, < 5 miles to highway	1,000	
Solar module manufacturing	10 to 20 acres	Existing bldg. 210,000 sq ft	434	2013
Manufacturing	15 to 25 acres and proximity to 40-100 acre site for expansion	120,000 sq. ft. building + 150,000 support space Flat and rectangular site configuration Close proximity to highway	150-200 up to 2,000	2008
MIT Solar Grade Silicon	30-40 acres		350	2008
Manufacturing	200 to 400 acres		347	2013
Manufacture and assembly of solar energy chemicals	65 acres	Build new	300	2009
Food processing and distribution	Needs at least 30 acres + more for expansion	300,000 sq. ft. w potential to expand Rectangular configuration Within 10 miles of highway Prefer a business park with compatible industries, buffered from commercial and residential areas, aesthetics of site important, visibility not required	215	2013
Manufacturing	25 acres	350-400,000 sq. ft. w/ 25 acres	135	2013
Lithium- ion batteries manufacturing	10 to 12 acres	200-300,000 sq. ft	124 up to 350	2009
High tech manufacturing		50,00 sq. ft. bldg. w outside storage	80-100	2013
Musical instrument manufacturer		100,000 sq. ft. bldg. with highway access	50 up to 350	2013
Chemical and plastic manufacturing	20 to 25 acres	Rectangular shaped site	50	2013
Data Center	20 acres or more	200,000-400,000 sq. ft. bldg.	25	2013
Aquaculture	10 to 25 acres	Two water sources	25	2013
Manufacturing	15 to 20 acres	Access to rail		2013
Food processing and warehouse		80-100,000 sq. ft. manufacturing facility 150-200,000 Sq. ft. warehouse Pref rail access		

Source: City of Springfield based on information from Business Oregon, Lane Metro Partnerships, and City of Springfield business contacts

Tables C-6 and C-7 provide examples of businesses that considered locating in Oregon and in Springfield. Business Oregon is the State agency that recruits businesses to Oregon, including the Eugene-Springfield area. Table C-8 presents information from Business Oregon about the characteristics that businesses similar to Springfield's target industries are seeking on employment sites larger than 10 acres. The matrix describes the site characteristics necessary to make a site competitive for by the industries shown in Table C-8, including site sizes that would meet selection requirements of the majority of industries in the listed industry sectors.

**Table C-8. Industrial Development Competitiveness Matrix**

Industry Sector	Site size* (Acres)	Site topography (Slope)	Site Access Max distance in miles to interstate or major arterial	Utilities (Min. line size in inches) Water / Sanitary Sewer	Special Considerations
Regionally to Nationally Scaled Clean-Tech Manufacturer	50	0-5%	10	10 / 10	Acreage allotment includes Expansion space (often an exercisable option). Very high utility volumes in one or more areas common. Sensitive to nearby uses.
Globally Scaled Clean Technology Campus	100	0-5%	10	10 / 10	Demanding criteria-driven site selection. High material and visitor throughput. Major Commercial Airport a must. Redundancy in trip routes and utilities vital. Surrounding Environmental (vibration, noise, etc.) Buffering and expansion space necessary. Sensitive to encroachment activities of nearby uses (residential, institutional, commercial).
Heavy Industrial/ Manufacturing	25	0-5%	10	8 / 8	Adequate distance from sensitive land uses (residential, parks, large retail centers) necessary. High throughput of materials. Large yard spaces and/or buffering required. Often transportation related requiring marine/rail links.
General Manufacturing	10	0-5%	20	8 / 8	Adequate distance from sensitive land uses(residential, parks) necessary.
Food Processing	20	0-5%	30	10 / 10	May require high volume/supply of water and sanitary sewer treatment. Often needs substantial storage/yard space for input storage. On-site water pretreatment needed in many instances.
High-tech Manufacturing or Campus Industrial	25	0-7%	15	10 / 10	Surrounding environment of great concern (vibration, noise, air quality, etc.). Increased setbacks may be required and/or on-site utility service areas. Avoid sites close to wastewater treatment plants, landfills, sewage lagoons, and other such land uses. May require high volume/supply of water and sanitary sewer treatment.
Regional (multistate) Distribution Center	200	0-5%	5 Only Interstate highway or equivalent	4 / 4	Transportation routing and proximity to/from major highways is crucial. Expansion options required. Truck staging requirements mandatory. Does not like to site or have routing issues between site and interstate that have rail crossings, school zones, airport runways, or drawbridges
Warehouse/Distribution	25	0-5%	5 Only Interstate highway or equivalent	4 / 4	Transportation infrastructure such as roads and bridges to/from major highways is most competitive factor.

Source: Business Oregon

\*Note: Site size is the competitive acreage that would meet the site selection requirements of the majority of industries in this sector.

Table C-9 and Table C-10 present analysis from excerpted from the “Industry Intelligence” report developed for the City of Springfield by Tadzo.<sup>81</sup> The report provides information about the range of site size needs for some of Springfield’s target industries.

Table C-9 shows that Springfield’s manufacturing target industries generally need sites at least 10 acres for a 100,000 square foot building and need sites 45 to 60 acres for a 500,000 square foot building. These site sizes are consistent with the sizes of sites and buildings needed by manufacturing firms that considered locating in Springfield since 2008 (see Table C-7). These types of manufacturing uses are likely to locate in districts that allow light industrial and campus industrial uses, possibly mixing with large-scale office employment uses.

**Table C-9. Manufacturing site needs, Springfield, selected target industries**

	<i>Minimum Acreage Needs<sup>2</sup></i>			Building Type	Building Layout	Comments
	100,000 s.f. bldg.	200,000 s.f. bldg.	500,000 s.f. bldg.			
Medical Equipment Mfg	10	20	50	Light Manufacturing	Rectangular	Acreage needed to account for storm water drainage; green space; employee parking and truck movement.
High Tech Electronics Mfg	9	18	45	Light Manufacturing	Rectangular	Acreage needed to account for storm water drainage; green space; employee parking and truck movement. High tech manufacturing is typically more automated, thus requiring less employee parking than food processing or other manufacturing.
Recreational Equipment	10	20	50	Light Manufacturing	Rectangular or Square	Acreage needed to account for storm water drainage; green space; employee parking and truck movement. Early-stage operations for start-up operations are often housed in square building layouts and advance to more automated assembly lines as the company grows in product offerings and technology. Currently there is a growing trend for reshoring of recreational equipment manufacturing to boast USA branding. Also wages in China and India are steadily rising so the cost advantages are reducing.
Wood Furniture	12	24	60	Light Manufacturing	Rectangular or Square	The wood furniture manufacturing process is often completed in pods due to craftsman nature of operations versus large assembly lines. Outside storage of input goods is a typical siting criterion that contributes to larger acreage demands. Finished goods are typically large, requiring larger warehouse space as part of the operations.
Specialty Food Processing	10	20	50	Food Grade Mfg	Rectangular	Acreage needed to account for buffer from other operations is critical for protecting food quality. Acreage needed also encompasses storm water drainage; green space; waste water pre-treatment operations; parking and truck movement. Additionally, food processors typically desire extra acreage to plan for expansions adjacent to facility.

Source: “Industry Intelligence” report developed for the City of Springfield by Tadzo, November 21, 2014

<sup>81</sup> Tadzo is a Washington State-based firm that specializes in economic development and site selection.

Table C-10 shows that target industries in office sectors need sites less than 5 acres for a building of 50,000 square foot or less. Larger office site needs range from about 10 acres for a 100,000 square foot building to 20 or more acres for a 200,000 square foot building. Office uses on sites larger than 10 acres are likely to occur in a range of zones, including commercial, mixed use, or a mixed employment zone (with compatible light industrial uses).

**Table C-10. Office site needs, Springfield, selected target industries**

	<i>Minimum Acreage Needs</i>				<b>Building Type</b>	<b>Building Layout</b>	<b>Comments</b>
	<b>20,000 s.f. bldg.</b>	<b>50,000 s.f. bldg.</b>	<b>100,000 s.f. bldg.</b>	<b>200,000 s.f. bldg.</b>			
<b>Back Office</b>	2-3	4-6	8-12	16-24	Urban Office ≤ 50,000 s.f. building	Single story	Typical urban office setting is utilized for back office operation via reuse of retail facilities that offer one-story building with open floor plan. Campus style office will be important for larger operations and more prestigious companies.
					Campus Style Office ≥ 50,000 s.f. building		Acreage needed to account for storm water drainage; green space; and employee parking. Employee density can be high so employee parking can be much higher than other office operations.
<b>Headquarters</b>	2	5	10	20	Urban Office ≤ 50,000 s.f. building	1 to 4 story buildings typical for Oregon outside of Portland.	Urban office may be adequate for small headquarter operations. Significant North American headquarters as well as major corporate headquarters will likely prefer campus style office with integrated amenities on-site.
					Campus Style Office ≥ 50,000 s.f. building	Urban office space could be part of mixed-used development.	Acreage needed to account for storm water drainage; green space; and employee parking. Extensive green space that integrates the natural environment into building design is typically important for these operations, along with employee amenities for outside experiences such as trails/walking paths and break areas.
<b>Professional/ Technical Services</b>	2	5	10	20	Urban Office ≤ 50,000 s.f. building	1 to 4 story buildings typical for Oregon outside of Portland.	Urban office may be adequate although as campus style office develops, professional/technical services will want to locate in close proximity of customers.
					Suburban Multi- Tenant Office ≥ 50,000 s.f. office	Urban office space could be part of mixed-used development.	Acreage needed to account for storm water drainage; green space; and employee parking. Extensive green space that integrates the natural environment into building design is typically important for these operations, along with employee amenities for outside experiences such as trails/walking paths and break areas.

Source: "Industry Intelligence" report developed for the City of Springfield by Tadzo, November 21, 2014

Businesses in Springfield’s target industries may consider locating within a business or industrial park. Table C-11 shows examples of business park sites in the Portland Metro area. Business parks in the Portland area generally range in size from 25 acres to 75 or 100 acres in size.

**Table C-11. Examples of business park sites, Portland Metro area**

Business Park	Site Acres	Building Square Feet
AmberGlen Business Center	72	572,685
AmberGlen East and West	44	536,000
Beaverton Creek	56	512,852
Columbia Commerce Park	31	562,888
Cornell Oaks Corporate Center	107	684,000
Creekside Corporate Park	50	615,113
Kruse Woods Corporate Center	76	1,652,105
Lincoln Center	22	728,770
Nimbus Corporate Park	47	688,632
Oregon Business Park 1	36	782,294
Oregon Business Park 3	35	501,029
PacTrust Business Center	40	570,539
Pacific Business Park (South)	26	340,864
Pacific Corporate Center	56	601,542
Parkside Business Center	52	687,829
Southshore Corporate Park	312	1,630,000
Tualatin Business Center I and II	33	383,305
Wilsonville Business Center	30	710,000
Woodside Corporate Park	37	579,845

Source: Metro UGR, Appendix 5 Multi-tenant (business park)/Large lot analysis

In addition, the Portland Metro area has the following types of major employment sites, which range from 25 to more than 500 acres.<sup>82</sup> These provide examples of site needs of employers located on sites larger than 25 acres of the type included in Springfield’s target industries.

- **General industrial.** The Portland region has 21 general industrial major employment sites, ranging in size from 25 acres to 164 acres and averaging 53 acres. Firms on these sites range from beverage manufacturing to manufacturers of construction products to specialty manufacturing.
- **Warehouse and distribution.** The Portland region has 15 warehouse and distribution major employment sites, ranging in size from 25 acres to 452 acres and averaging 74 acres. Firms on these sites range from wholesalers to general warehouse and distribution to company-specific distributors.

<sup>82</sup> These examples are documented in the Portland Metro 2009-2030 Urban Growth Report, Appendix 4

- **Flex.** The Portland region has 14 flex major employment sites, ranging in size from 25 acres to 522 acres and averaging 112 acres. Firms on these sites include small and large semiconductor manufacturing and other high tech manufacturing.
- **Office.** The Portland region has three office major employment sites, ranging in size from 44 acres to 123 acres and averaging 82 acres. Firms on these sites are generally high-tech businesses.
- **Institutional.** The Portland region has six medical major employment sites, ranging in size from 31 acres to 75 acres and averaging 54 acres.

## LONG-TERM LAND AND SITE NEEDS

Table C-3, presented earlier in this appendix, discusses Springfield's forecast for employment by building type. The analysis of long-term site needs in Springfield builds off of the employment forecast for Springfield. Consistent with the requirements of OAR 660-009-0015(2), the site needs analysis presented in this section identifies the number of sites by broad category of site type and size reasonably expected to be needed for the 20-year planning period.

The steps to get from the employment forecast in Table C-3 to an estimate of needed sites are:

1. Determine the amount of employment that can be accommodated in non-employment plan designations based on historical development patterns and market trends. (See Table C-12)
2. Allocate new employment requiring land in employment designations<sup>83</sup> to sites ranging in size from less than 1 acre to greater than 20 acres. This allocation is based on historic employment patterns, discussed in Appendix A. (See Table C-13 and Table C-14)
3. Estimate the number of sites needed based on the employment forecast, historic development patterns, and infill and redevelopment potential. (See Table C-15)
4. Estimate the needed sites by site size and building type, using the range of sites identified in the previous step. (See Table C-16)

The remainder of this section is organized based on these steps.

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<sup>83</sup> Not all new employment will require additional land in employment plan designations. Some employment growth will occur on land not designated for employment use (e.g., employment in residential and residential mixed use plan designations) and some employment growth will not require new commercial or industrial built space or land (e.g., new employment accommodated in existing built space).

### Step 1: Determine amount of employment that can be accommodated in non-employment plan designations.

In 2006, approximately 16% of Springfield's employment was located in non-employment (predominantly residential) plan designations. Of this employment in non-employment plan designations, 2% was employment in industrial employment categories (such as a construction business run from a residence) and 14% was in commercial employment categories (such as neighborhood retail, doctor's offices, or home-based employment). Table A-9 and Map A-1 show the location of existing employment in Springfield.

#### Employment that does not require vacant land

Some employment will not require new land for development, including:

- 14% (1,918 employees) will locate on land designated for other uses (i.e., residential uses)
- 10% (1,344 new employees) will locate in existing built space

We assumed that a similar percentage of commercial employment (14% of new employment) would continue locating in non-employment designations. This assumption is reasonable because Springfield's plans call for integration of selected commercial uses in residential neighborhoods. In addition, telecommuting and working from home full-time is becoming more common and is likely to become more widely accepted over the next 20 years. We did not assume that additional industrial employment would locate in non-employment designations because these uses are relatively uncommon and Springfield's development policies do not actively encourage location of industrial employment in residential neighborhoods.

Table C-12 shows employment growth by the employment location. Table C-12 makes two assumptions that decrease land needed for new employment:

- **Some commercial employment growth will occur on land not designated for employment use.** Currently, 14% of commercial employment occurs within non-employment zones, predominantly in residential zones. These types of employment uses generally include neighborhood markets, medical offices, small restaurants, and home offices. ECO assumes that this trend will continue based on Springfield's development policies and the increasing acceptance of telecommuting and working from home.
- **Some employment growth will not require new commercial or industrial built space or land.** Some employment growth will be accommodated on existing developed or redeveloped land, such as a business occupying a vacant building or when an existing firm adds employees without expanding space.

Between 2003 and 2009, vacancy rates of commercial and

industrial buildings in the Eugene-Springfield region varied from a vacancy rate of about 1% (in 2006) to about 7% (in 2009). Vacancy rates in Springfield were generally similar, except that Springfield had a higher vacancy rate for industrial buildings (about 8%) between 2003 and 2005.<sup>84 85</sup>

This analysis only accounts for vacant space in buildings and does not account for businesses adding employees to an existing space, such as adding a new desk in an existing office without expansion. Although space per employee fluctuates with changes in the economy because it is easier to layoff employees than to downsize office space, the amount of space allocated to office employees has been shrinking since 2000, when the national average amount of space per employee was about 200 square feet. By 2007 to 2009, the average space decreased to between 194 to 196 square feet per employee.<sup>86</sup>

ECO assumed that employment would be accommodated in existing commercial and industrial space through filling vacant built space and through increases in efficient use of work space. ECO assumed that 10% of new employment will be accommodated in existing commercial or industrial built space, both through filling vacant built space and through increasing efficient use of existing work space.

**Using these assumptions, Springfield will need to provide land for approximately 10,178 new employees between 2010 and 2030.**

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<sup>84</sup> This analysis is based on Co-Star data for the City of Springfield and the Eugene-Springfield region combined.

<sup>85</sup> During the recent recession, vacancy rates in the Eugene-Springfield region increased in 2009 and peaked around 7%, with industrial vacancy peaking at about 11%.

<sup>86</sup> This analysis is based on CoStar data and documented in an article on NAIOP, the Commercial Real Estate Development Association website. <http://www.naiop.org/en/Magazine/2015/Spring-2015/Business-Trends/Trends-in-Square-Feet-per-Office-Employee.aspx>

**Table C-12. New employment locations, including employment locating in non-employment plan designations in existing built space, or on new land, Springfield, 2030**

Type	New Employment	Employment Location		
		Non-employment designations	Existing Com. & Ind. Built Space	Employment on New Land
<b>Industrial</b>				
Warehousing & Distribution	389	0	39	350
General Industrial	1,066	0	107	959
<b>Commercial</b>				
Office	4,713	754	471	3,488
Retail	2,043	327	204	1,512
Other Services	5,229	837	523	3,869
<b>Total</b>	<b>13,440</b>	<b>1,918</b>	<b>1,344</b>	<b>10,178</b>

Source: ECONorthwest

## Step 2. Allocate new employment requiring land in employment designations to sites by site size.

Determining Springfield's site needs requires distributing employment to a range of site sizes, ranging from small sites (less than 1 acre and 1 to 2 acre sites) to large sites (20 acres and larger). Table C-13 shows the distribution of employees by building type and site size in non-residential plan designations in Springfield in 2006. About 22% of Springfield's employment is on sites 5 to 20 acres, 21% is on sites of less than 1-acre, and 33% is on sites larger than 20 acres.

**Table C-13. Percent of employees by building type and site sizes, Springfield, 2006**

Building Type	Site Size (acres)					Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	13%	6%	3%	63%	15%	100%
General Industrial	15%	17%	17%	18%	34%	100%
Office	28%	14%	15%	23%	20%	100%
Retail	29%	13%	11%	18%	28%	100%
Other Services	9%	4%	8%	5%	74%	100%
<b>Total</b>	<b>21%</b>	<b>12%</b>	<b>12%</b>	<b>22%</b>	<b>33%</b>	<b>100%</b>

Source: ECONorthwest based on QCEW data

Note: Total Employees may not add to 100% as a result of rounding.

The percent of employees by building type and site size was calculated based on the number of employees in each building type and site size categories using QCEW data and City of Springfield tax lot data.

Table C-14 distributes employees (shown in Table C-12) based on the historic distribution of employment by site size and building type shown in Table C-13. In other words, the analysis assumes that future employment will require similar site sizes as current firms. For example, 21% of employment will locate on sites less than 1 acre.

**Table C-14. Forecast of growth employment by building type and site size, Springfield, 2010 to 2030**

Building Type	Site Size (acres)					Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	46	21	9	221	53	350
General Industrial	141	161	167	168	322	959
Office	1,024	448	400	645	970	3,488
Retail	143	65	116	76	1,111	1,512
Other Services	817	451	460	869	1,271	3,869
<b>Total</b>	<b>2,171</b>	<b>1,148</b>	<b>1,153</b>	<b>1,979</b>	<b>3,728</b>	<b>10,178</b>

Source: ECONorthwest

Note: The number of employees by site size may not add to the total shown in Table C-14 as a result of rounding in the calculation of number of employees.

**Step 3: Estimate the number of sites needed based on the employment forecast, historic development patterns, and infill and redevelopment potential.**

Table C-15 shows the range of sites needed by site size and building type in Springfield in 2030. The table uses information the following information to determine the range of site needs:

- **Total employment** is employment by site size from Table C-14.
- **Average employees per firm** is based on analysis of the average number of employees per firm by site size in Springfield in 2006.
- **Needed sites based on historic employment patterns** estimates the number of sites needed by dividing the total employment by average number of employees per firm. This calculation provides an estimate of the number of sites needed based on historical data. Table C-15 does not take into account redevelopment potential of existing sites, which is addressed through analysis in the buildable lands inventory in Chapter 2.

**Table C-15. Needed sites by site size and building type, Springfield, 2010 to 2030 \***

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Total Employment	2,171	1,148	1,153	1,979	3,728	10,178
Average Employees per Firm	12	30	39	101	908	
Needed Sites based on historic employment patterns	181	38	30	20	4	273

Source: ECONorthwest

\*Note: Table C-15 calculates total number of needed sites by size and type and does not factor in number of needed sites that assumed to be provided through vacant land or on potentially redevelopable sites. Redevelopment potential of existing sites is addressed through analysis in the buildable lands inventory in Chapter 2, in Table 2-12.

**Step 4: Estimate the needed sites by site size and building type, using the range of sites identified in the previous step.**

Table C-16 presents an estimate of needed sites by site size and type of building. The results show that Springfield needs approximately 273 sites. Most sites are small, 2 acres or less. Springfield needs approximately 4 sites larger than 20 acres.

**Table C-16. Estimated needed sites by site size and building type, Springfield, 2010 to 2030\***

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

Source: ECONorthwest

\*Note: Table C-16 calculates total number of needed sites by size and type and does not factor in number of needed sites that assumed to be provided through vacant land or on potentially redevelopable sites. Redevelopment potential of existing sites is addressed through analysis in the buildable lands inventory in Chapter 2, in Table 2-12.

The implication of Table C-16 is that Springfield will continue to need sites in a range of site sizes, consistent with the City's established development patterns. While much of Springfield's employment will locate on sites smaller than 5 acres, 22% of employment will locate in sites 5 to 20 acres and 33% of new employment will locate on sites 20 acres and larger.

The identified site needs shown in Table C-16 do not distinguish sites by comprehensive plan designation. This study assumes employment will continue to locate on land designated for industrial and other employment uses, as identified on Table 4-2.

# Springfield Economic Development Objectives and Strategies

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## Appendix D

This appendix presents the memorandum that describes Springfield's Economic Development Objectives and Strategies.

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# ECONorthwest

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**October 15, 2008**

**TO: Springfield City Council & Planning Commission**  
**FROM: Bob Parker and Beth Goodman**  
**SUBJECT: ECONOMIC DEVELOPMENT OBJECTIVES AND IMPLEMENTATION STRATEGIES**

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The City of Springfield is conducting a Commercial Industrial Buildable Land Needs analysis. Broadly, the project has three components: (1) a buildable lands inventory; (2) an economic opportunities analysis; and (3) an economic development strategy. All of these elements are required to comply with statewide planning Goal 9 and the Goal 9 rule (OAR 660-009). The economic development strategy builds from previous work by the City and will be used to guide development of land-use policies to implement the City's economic development vision.

Economic development policies may address a range of outcomes, from policies to attract firms or retain existing firms to policies to improve or maintain quality of life. The economic development strategy presented in this memorandum was developed in support of the EOA and is designed to meet the requirements of Goal 9. As a result, the economic development strategy focuses on land-use issues, without addressing broader economic development strategies such as labor force education that may also be a priority to the City and residents of Springfield.

The economic development strategy is the result of input from multiple sources:

- **City Council and Planning Commission.** At joint worksessions in June 2008, decisionmakers provided guidance on economic development objectives for Springfield.
- **Commercial Industrial Buildable Lands Stakeholder Committee.** The Stakeholder Committee provided input on the economic development objectives suggested by decisionmakers and suggested implementation strategies for each objective.
- **Community Development Survey.** The City administered an on-line survey about community development issues.
- **Visioning Workshops.** The City of Springfield held two community workshops to discuss community development issues.
- **Springfield Economic Development Plan.** The City of Springfield completed a draft Economic Development Plan, dated April 13, 2006. The Economic Development Plan addresses a range of economic development issues, including (but not limited to) land-use planning for economic growth.

## ORGANIZATION OF THIS MEMORANDUM

The remainder of the memorandum is organized as follows:

- **Public Opinions about Economic Development Summarizes** selected results from the on-line community development survey and the public workshops.
- **Framework for Understanding Economic Development Policies and Actions** provides an overview of economic development issues and types of economic development policies and strategies that municipalities can adopt to achieve various economic development goals.
- **Economic Development Strategies and Implementation Steps** for Springfield presents objectives and strategies related to land-use to implement the City's economic development goals.
- **Appendix A: Metro Plan Economic Element** presents the economic goal, findings, objectives and policies from the Metro Plan to provide context about existing regional economic development policies.

## PUBLIC OPINIONS ABOUT ECONOMIC DEVELOPMENT

While the analysis required to meet Goal 9 emphasizes market conditions and local productive factors as the primary determinant of potential economic growth, Oregon's Statewide Planning Goals also recognize a role for local governments and citizens to express their desire for the level and type of economic growth in their community. The desires of a city are formally stated in its adopted Comprehensive Plan, economic development plans, and refinement plans. Development of these plans always includes opportunities for public comment and plans are adopted by elected bodies, so these plans collectively represent the community economic development vision.

The 2004 Update of the Eugene-Springfield Metropolitan Area General Plan includes an economic element that articulates the region's economic goals and objectives (presented in Appendix A). The Metro Plan lists a single economic development goal:

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

The range of views by individual citizens, however, is more diverse than the consensus represented in adopted plans. This project included two public workshops and an online survey to solicit citizen's views on economic opportunities in Springfield, issues affecting economic development, and potential policies to address these issues. This section summarizes the views expressed at the public workshop and in the online survey.

## RESULTS OF THE ONLINE SURVEY

As a part of this project, ECONorthwest developed and implemented an online survey from April 4, 2008 through May 27, 2008. The intent of the survey was to collect anecdotal information on the opinions and preferences of survey respondents on a variety of community

development issues ranging from pace of growth to the importance of amenities and issues to opinions about broad economic development policies. Following is a summary of the key findings from the survey. The survey had 214 respondents, with 186 respondents completing the entire survey, nearly three-quarters of whom lived inside the Springfield Urban Growth Boundary (UGB).

- A majority of survey respondents (60%) think that Springfield is a better place to live than it was 10 years ago. Respondents identified a broad range of reasons. Some frequently mentioned reasons were new businesses, newer, more vibrant buildings, an improved downtown, and the EmX.
- About 66% of respondents felt the rate of growth was “about right,” while about 18% indicated it is “too fast.” The remaining 16% of respondents thought that growth was too slow (10%) or did not have an opinion (6%).
- About 76% of respondents felt that the city should “manage growth” as opposed to limited growth or pursuing faster rates of growth. About 78% of respondents thought that Springfield should manage growth by targeting specific types of employers.
- Respondents identified the following three land-use issues as the top problems in Springfield: (1) availability of family wage jobs; (2) development on steep slopes and in floodplains; and (3) availability of affordable housing.
- A majority of respondents felt that redevelopment is a high priority in Downtown (71%) and in Glenwood (63%).
- A majority of respondents support economic development policies that increase economic activity, including policies to recruit new businesses and retain existing businesses.
- About 85% of respondents supported policies to maintain Springfield’s existing environmental quality.

## **RESULTS OF PUBLIC WORKSHOP**

The City of Springfield held two community workshops to discuss community development issues, one on May 20, 2008 and one on July 31, 2008. The intent of the workshops was to collect anecdotal information on the opinions and preferences about community issues. At the workshops, small groups formed to discuss issues of concern for developing Springfield’s economy. The City summarized the results of each group’s discussion. This section summarizes the themes discussed the workshops.

**Table 1. Summary of input from the Springfield Economic Development Workshop**

Category	Issues and themes
Jobs and the economy	Attract businesses that provide stable, living or family wage jobs that provide benefits Recruit businesses that provide green or sustainable products Lower the costs of doing business in the City, such as system development charges and permitting fees Attract businesses to the City through the use of enterprise zones
Sustainability and the environment	Balance environmental protection and greenfield development Encourage green building practices for new development Capitalize on opportunities to increase walkability and bicycling
Land use and zoning	Balance the use of developing green-fields with redeveloping existing land and emphasizing infill Encourage more efficient land uses, including higher density development where appropriate Promote nodal development and mixed-use development, especially in downtown Provide opportunities for high quality development along the riverfront Reevaluate allowable uses, especially near schools Consider parking and transportation needs when planning for new uses, especially in downtown
Redevelopment	Focus on redevelopment in downtown and Glenwood. Revitalize downtown through redevelopment and rehabilitation of old buildings Promote re-use of vacant buildings in downtown Keep a historical perspective when considering redevelopment

Source: Springfield economic development workshops, May 20, 2008 and July 31, 2008

## FRAMEWORK FOR UNDERSTANDING ECONOMIC DEVELOPMENT POLICIES AND ACTIONS

A wide range of economic development policies and actions are available to cities that can affect the level and type of economic development in their community. To affect economic development, any policy or action must affect a factor of production that influence business locations and job growth. In brief, the factors that have the most impact on business locations and job growth are:

- Labor
- Land
- Local Infrastructure
- Access to markets and materials
- Agglomerative economies (clusters)
- Quality of life
- Entrepreneurship

The supply, cost, and quality of any of these factors obviously depend on national and global market forces that local government has no influence over. But they also depend on public policy, which can generally affect these factors of production through:

- Planning
- Regulation
- Provision of public services
- Taxes
- Incentives

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

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

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

## **POTENTIAL ECONOMIC DEVELOPMENT POLICIES AND ACTIONS**

A broad range of policies and actions are available to cities in achieving local economic development objectives. The effectiveness of any individual tool or combination of tools depends on the specific objectives the municipality wants to achieve. In short, local strategies should be customized not only to meet locally defined objectives, but to recognize economic opportunities and limitations (as defined in the Economic Opportunity Analysis (EOA)). Positive outcomes are not guaranteed: even good programs can result in limited or modest results.

Table 2 identifies a range of potential economic development strategies that the City of Springfield could consider implementing. These strategies range from those closely associated with the basic functions of government (provision of buildable land and public services) to those sometimes viewed as outside the primary functions of government (such as financial incentives and business assistance). The actual policies and actions adopted by the City of Springfield will depend on the specific economic development issues and the role of the City in economic development in the community.

**Table 2. Range of potential economic development strategies**

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

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

Source: ECONorthwest.

## **ECONOMIC DEVELOPMENT STRATEGIES AND IMPLEMENTATION STEPS FOR SPRINGFIELD**

The following economic development strategies for Springfield are based on five sources of information: (1) guidance on developing the strategies from the City Council and Planning Commission; (2) input from the Stakeholder Committee on the strategies and implementation steps; (3) public input on preferred types of growth and development strategies from the visioning survey and public workshops; (4) existing goals and strategies in the Economic Development Plan; and (5) the principles of economic development presented in the section above and Table 2.

Together these considerations suggest the following criteria and strategy for the City to support economic development in Springfield. The strategies and implementation steps suggested below are organized with objectives most related to land-use planning presented first. The objectives were proposed by Springfield’s decisionmakers or through the Stakeholder group. The implementation strategies was developed by the Stakeholder group or taken from Springfield’s draft Economic Development Plan.

### **Objective 1: Provide an adequate supply of sites of varying locations, configurations, and size, to accommodate industrial and other employment over the planning period.**

The Economic Opportunities Analysis (EOA) identifies the size and characteristics of sites needed in Springfield for employment uses over the planning period. Using the site needs described in the EOA, the City should track employment land use trends and re-evaluate employment land needs in five to seven years. The City should always maintain an adequate supply of land for employment uses.

#### **Suggested implementation steps:**

- Provide land to meet the site characteristics and site sizes described in the EOA. These sites may include vacant, undeveloped land, partially developed sites with

potential for additional development through infill development, and redevelopable areas. The City can provide land in two ways: (1) increasing commercial and industrial land-use efficiency by promoting infill or redevelopment or (2) bringing new land into the urban growth boundary.

- Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout the City and Urban Growth Boundary are known, aggregated, ready to develop, and marketed.
- Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout the City and Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.
- Expand industrial site opportunities through rezoning and evaluating commercial, residential, and industrial land for the best economic return for the community through the process of Periodic Review of the Metro Plan, expanding the urban growth boundary, and other means (e.g., Transportation Growth Management Grants from the State of Oregon).
- Develop and implement a system to monitor the supply of commercial and industrial lands. This includes monitoring commercial and industrial development (through permits) as well as land consumption (e.g. development on vacant, or redevelopable lands).

## **Objective 2: Provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise.**

“Short-term supply” means suitable land that is ready for construction usually within one year of an application for a building permit or request for service extension. “Competitive Short-term Supply” means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.

### **Suggested implementation steps:**

- Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.
- Work with the State to have sites certified as project-ready through the state’s certified Industrial Lands program.
- Track development of land in the short-term supply and replace developed land with undeveloped or redevelopable land with similar characteristics (e.g., location, size, topography, etc.) as the land that recently developed. The City may want to replenish the short-term supply of land on an annual basis or every two to three years.

## **Objective 3: Reserve sites over 20-acres for special developments and industries that require large sites.**

There are comparatively few large sites relatively near to I-5 available for development in the Southern Willamette Valley and no sites with these characteristics in the Eugene-Springfield

area.<sup>1</sup> The City should preserve large sites, especially sites with access to I-5, to provide opportunities for development by industries that require large sites.

**Suggested implementation steps:**

- Designate land for industrial or business parks to provide opportunities for development of business clusters for related or complementary businesses.
- Develop policies that provide flexibility in the industrial or non-retail commercial use of land on large sites.

**Objective 4: Provide adequate infrastructure efficiently and fairly.**

Public infrastructure and services are a cornerstone of any economic development strategy. If roads, water, sewer, and other public facilities are unavailable or inadequate, industries will have little incentive to locate in a community.

**Suggested implementation steps:**

- Coordinate capital improvement planning with land use and transportation planning to coincide with the City's Economic Development Strategy.
- Target resources of the Systems Development Funds of infrastructure on sites that provide prime opportunities for employment uses as a result of location, site size, or other significant site characteristics.
- Ensure that public-private development agreements to recover costs are in effect prior to financing public improvements.
- Establish alternative funding mechanisms in addition to debt service that provide timely completion of 'connecting' public facilities (unpaved block of a street or missing sections of sewer line) with preferences to projects in existing neighborhoods and those fostering economic development.
- Efficiently use existing infrastructure by promoting development, infill, re-use, and redevelopment for commercial and industrial uses and developing strategies and incentives to stimulate private investment that overcome anticipated impacts or downturns in the local economy.
- Support development of citywide high-speed internet access and other telecommunications infrastructures.
- Provide information on infrastructure availability on a site-by-site basis so that developers are able to readily assess infrastructure availability on any given site.
- Assist with providing infrastructure through the use of Urban Renewal funding, where appropriate.

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<sup>1</sup> According to Oregon Prospector, there are only nine sites in the Southern Willamette Valley with the following characteristics: 20 acres or larger, Project Certified, and within about five miles of I-5. The following counties have sites that match these characteristics: three sites in Marion County, one site in Benton County, two sites in Linn County, no sites in Lane County, and three sites in Douglas County.

- Assess lower systems development charges (SDCs) in redevelopment areas with the capacity to provide land for employment, especially for redevelopment of areas five acres and larger.

**Objective 5: Encourage employers to locate in downtown Springfield, when appropriate.**

The City has policies to encourage residential and commercial redevelopment in downtown. The redevelopment of downtown Springfield provides opportunities to both use land more efficiently and minimize the costs of providing infrastructure.

**Suggested implementation steps:**

- Support the continued revitalization of Springfield's Downtown
- Pursue policies to promote infill and redevelopment in downtown Springfield
- Provide the infrastructure and services that businesses need to operate in downtown Springfield
- Develop programs to promote investments in existing buildings to make downtown more attractive, such as the Urban Renewal program.
- Develop a marketing strategy to attract businesses to downtown Springfield, including providing low-cost assistance for businesses moving to downtown

**Objective 6: Encourage redevelopment of Glenwood with a mixed use employment and housing center.**

The City has policies to encourage residential and commercial redevelopment in Glenwood. Like redevelopment in downtown, redevelopment in Glenwood provides opportunities to both use land more efficiently and minimize the costs of providing infrastructure.

**Suggested implementation steps:**

- Redevelop and develop sites in Glenwood through key investments, special standards, and focused activity through the Springfield Economic Development Agency (SEDA), the Glenwood Urban Renewal Plan, the Glenwood Refinement Plan and the Riverfront Development Plan.
- Provide the infrastructure and services to necessary for development in Glenwood.
- Coordinate economic development in Glenwood with regional economic development agencies.
- Promote economic development in Glenwood through techniques, such as land assembly and cooperative development agreements, to assist developers with land assembly problems.

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### **Objective 7: Redevelop brownfields as the opportunities for reuse arise.**

Springfield has more than 20 brownfield sites that will require clean-up before the sites can be redeveloped. Springfield has about 20 to 50 more sites that may be brownfields if the sites were available for redevelopment. The cost of clean-up will vary, depending on the prior uses and type of contamination on the site.

#### **Suggested implementation steps:**

- Inventory existing brownfields in the Springfield UGB. The inventory should include information about the site and brownfield: site location and size, previous uses, pollution or contaminants, and other site characteristics.
- Develop policies that support redevelopment of brownfields. Opportunities to encourage brownfield redevelopment may include tax incentives, decreases or waiving development fees, or private-public partnerships for state or federal grant funding for brownfield redevelopment.
- Provide non-monetary assistance with clean-up and redevelopment of ‘brownfield’ commercial and industrial sites, including, for example, the possible sponsorship of applicable state and federal grants.

### **Objective 8: Encourage development of commercial businesses in close proximity with residential uses, where appropriate.**

Mixing commercial and residential development is appropriate in some areas of Springfield. The City should encourage mixed used development that includes retail, office commercial, and multifamily housing in areas like downtown. In more residential neighborhoods, the City should consider mixing neighborhood retail or small-scale offices with residential uses.

#### **Suggested implementation steps:**

- Continue to support policies to encourage mixed-use development and nodal development in Springfield’s downtown, Glenwood, and mixed-use nodes identified in TransPlan.
- Support policies to mix small-scale commercial uses into existing and new residential neighborhoods where these uses are appropriate and acceptable to residents.
- Support the co-location of residential and commercial uses in existing buildings by providing financial assistance for necessary building upgrades to meet requirements in the City’s building code, such as improvements to meet seismic standards.
- Reduce systems development charges (SDCs) and other development costs to encourage redevelopment and commercial uses in residential areas, where appropriate.

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## **Objective 9: Support and assist existing businesses in Springfield.**

Springfield's existing businesses are important to the City's continuing economic well-being.

### **Suggested implementation steps:**

- Develop and implement an outreach strategy to determine how the City can assist existing businesses. Opportunities for assistance may range from ensuring availability of on-street parking to providing assistance with the development process to forming public-private partnerships to promote Springfield businesses.
- Encourage self-help methods and programs for business districts such as the formation of business associations and special self-assessment districts for parking and economic improvement.
- Pursue special projects and grant applications that provide support to local business and industry.
- Support the co-location of residential and commercial uses in existing buildings by providing financial assistance for necessary building upgrades to meet requirements in the City's building code, such as improvements to meet seismic standards.
- Reduce systems development charges (SDCs) and other development costs to encourage redevelopment and commercial uses in residential areas, where appropriate.

## **Objective 10: Increase the potential for employment in one of the regional industry clusters.**

The clusters include: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.

### **Suggested implementation steps:**

- Provide the services, infrastructure, and land needed to attract these types of businesses, especially where it can increase connectivity between businesses.
- Designate land for industrial/technology/business parks to provide opportunities for development of business clusters for related or complementary businesses.
- Promote development of support businesses for business clusters, including specialized suppliers for the business cluster, restaurants, financial institutions, and other services.
- Promote further development of the health care cluster in the Gateway area by examining land-use policies in the area and, if necessary, modify the policies to promote development of medical and other employment that requires specific types of land.
- Promote development of high-tech businesses by continuing to target these businesses for recruitment and expansion in Springfield.

- Coordinate development of business clusters with other cities and economic development agencies in the Eugene-Springfield region but emphasize development of the business cluster in Springfield.

### **Objective 11: Increase the potential for convention- and tourist-related economic activities.**

Tourism results in economic activity, especially in the service industries like retail, food services, and accommodations. For example, the direct economic benefit of lodging tax receipts from overnight accommodations to Springfield in 2007 was \$1.2 million. Springfield could increase tourism through building tourism-relative facilities, such as a convention center, through growth of businesses that bring tourists to the City, and through increased marketing.

#### **Suggested implementation steps:**

- Assist with conference center development at a suitable site in Springfield with a goal of making it financially independent with self-sustaining operations.
- Encourage development of destination point projects (like the Springfield Museum Interpretive Center, Dorris Ranch Living History Farm and McKenzie River fishing and recreational activities) that draw visitors to the Springfield area from regional, national, and international areas.
- Ensure that the factors that are likely to attract visitors to Springfield, especially Springfield's environmental quality and natural beauty, are protected and enhanced.

### **Objective 12: Attract sustainable businesses and support sustainable development practices.**

The City should foster the creation of a local, sustainable economy by partnering with other organizations to watch for opportunities and vulnerabilities, incubate and coordinate projects and facilitate dialogue, action and education within the community. The City should also work to reduce Springfield's exposure to global economic and social vulnerabilities that could result as fuel supplies cease to be abundant and inexpensive.

#### **Suggested implementation steps:**

- Define "sustainable businesses" and what business practices qualify as "sustainable."
- Promote and recruit businesses that produce sustainable products, have sustainable business practices, and/or have sustainable manufacturing processes.
- Support land use patterns that reduce transportation needs, promote walkability and provide easy access to services and transportation options.
- Rebate development fees for development projects that are certified as sustainable to nationally recognized standards (e.g., LEED buildings).
- Provide incentives for development that uses sustainable building materials or solutions (e.g., instead of using traditional asphalt, using permeable asphalt) or use of sustainable energy sources (e.g., solar or wind power).

- When developing policies that will impact land outside of the Springfield UGB, consider future agricultural needs and economic opportunities to protect agricultural lands for production of local food.

### **Objective 13: Recruit businesses that pay higher than average wages for the region.**

Maintaining and creating high-wage jobs is important for the development of Springfield's economy. Economic development recruitment efforts the City engages in should target high-wage jobs.

#### **Suggested implementation steps:**

- Work with Lane Metro Partnership and other economic development organizations to target and recruit businesses: (1) with above average wages (as reported by the Oregon Employment Department), (2) other benefits such as health insurance, especially for part-time employees, and/or (3) that provide other benefits such as job advancement or ownership opportunities.
- Work with local agencies to meet workforce needs, such as: training and education, job advancement, or local expansion of businesses that are less subject to boom and bust cycles.
- Coordinate with community economic development organizations to develop a coherent and effective marketing program. Coordinate development of the strategy local and state economic development agencies.
- Use word-of-mouth to market Springfield to prospective businesses based on the City's reputation for: rapid processing of permits and applications, maintaining City agreements and commitments, minimizing surprises in the development process, and providing developers with certainty and flexibility in the development process. Depending on this type of marketing will require that the City strive to enhance and maintain the City's reputation for these attributes.

## **APPENDIX A: METRO PLAN ECONOMIC ELEMENT (2004)**

This appendix is the Economic Element from the 2004 update of the Metropolitan Area General Plan. The purpose of this appendix is to provide context for the existing regional economic development policies.

In recent years, there has been a strong structural shift in the Eugene-Springfield metropolitan area's economy. This shift is characterized by four trends: (a) a decline in the lumber and wood products industry as a source of employment; (b) limited increase in employment in other manufacturing activities; (c) diversification of the non-manufacturing segments of the local economy, primarily in trade, services, finance, insurance, and real estate; and (d) the development of this metropolitan area as a regional trade and service center serving southern and eastern Oregon.

The decline in lumber and wood products and diversification of the non-manufacturing sectors are consistent with changes that are occurring in other portions of the state and throughout the nation as a result of rising real incomes and higher productivity of labor in manufacturing. The increase in employment in other manufacturing activities in this area has lagged behind other portions of the state, particularly the Portland area, and many other places in the nation. Given the projected growth in this area's economy, it is essential that an adequate supply (quantitatively and qualitatively) of commercial and industrial land be available. An adequate supply of land includes not only sites sufficient in size to accommodate the needs of the commercial or industrial operations (including expansion), but also includes sites which are attractive from the standpoint of esthetics, transportation costs, labor costs, availability of skilled labor, natural resource availability, proximity to markets, and anticipated growth of local markets.

In striving toward the Land Conservation and Development Commission's (LCDC) Statewide Planning Goal 9: Economic Development, "To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens," the Eugene-Springfield metropolitan area must take advantage of and encourage the further diversification of this area's economic activities and role as a regional center.

This diversification and growth can improve the opportunities for presently underutilized human resources and generally raise the standard of living for metropolitan area residents.

Implicit in the goals and objectives that follow is the premise that the economic health of the area is integrally related to the quality of life for residents. Improved welfare of the residents of the metropolitan area, measured by increases in employment opportunities and reductions in unemployment, increases in real incomes, and improved environmental quality are the ultimate goals of all economic efforts. Economic growth or industrial expansion is acceptable when it is consistent with these goals and objectives.

### **ECONOMIC GOAL**

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

## **FINDINGS, OBJECTIVES, AND POLICIES**

### **Findings**

1. The structure of the Eugene-Springfield metropolitan area economy is undergoing a shift away from lumber and wood products manufacturing (and other heavy industrial activities) and towards a more diverse economic base characterized by growth in light manufacturing activities and the non-manufacturing activities of trade, commercial and professional services, finance, insurance, and real estate.
2. The lumber and wood products sector is the metropolitan area's dominant manufacturing activity; and in this respect, Lane County's forest is the area's most important natural resource utilized as a factor of production.
3. Major institutions in the metropolitan area including the University of Oregon and Sacred Heart Hospital, have had a stabilizing influence on the local economy.
4. The Eugene-Springfield metropolitan area is developing as a regional center for activities, such as tourism, distribution, and financial services, serving the southwestern and central Oregon area.
5. Based on data from the 2000 U.S. Census, the per capita income in 1999 for the Eugene- Springfield metropolitan area was lower than for Oregon as a whole and the Portland metropolitan area.
6. In 2000, the unemployment rate in the Eugene-Springfield metropolitan area was comparable to Oregon and higher than the national rate.
7. Historically, heavy-manufacturing industries, including primary metals, chemicals and paper, have been characterized by high levels of pollution or energy consumption. Changes in technology and environmental regulations have reduced the potential environmental impacts of these industries. Heavy manufacturing industries provide benefits, such as relatively high wage scales and the potential for generating secondary manufacturing activities.
8. Both expansion of existing businesses through use of local capital and entrepreneurial skills and the attraction of new employers offer realistic opportunities for economic development.
9. The healthful environment of the metropolitan area can help attract industrial development, hold workers, and attract convention- and tourist-related economic activities. The concern for clean air and water is high priority with area residents.
10. The provision of adequate public facilities and services is necessary for economic development.
11. There are presently inefficiently used resources in the metropolitan area, including land, labor, and secondary waste products.
12. Major employment areas include the Eugene and Springfield central business districts, the University of Oregon area, Sacred Heart Hospital, the west Eugene industrial area, the north (Gateway) and south Springfield industrial areas, the Highway 99N industrial area, Country Club Road, Chad Drive, and the Mohawk-Northgate area.
13. The metropolitan economy is made up of a number of interrelated and important elements, one of which is construction and construction-related activities. Construction, for example, is essential for all sectors of the economy, as well as for the provision of an adequate supply of affordable housing.
14. The mixture of commercial and office uses with industrial uses can reduce or enhance the utility of industrial areas for industrial purposes, depending upon circumstances.

- Uncontrolled mixing creates problems of compatibility and traffic congestion, and may limit the area available for industrial development. Limited mixing, subject to clear and objective criteria designed to minimize or eliminate incompatibility, traffic problems, and which preserve the area for its primary purpose, can make an industrial area more pleasant, convenient, economical, and attractive as a place to work or locate.
15. Campus industrial firms prefer city services.
  16. Campus industrial firms have varied site location requirements, prefer alternative sites to choose from, and usually benefit from location of other special light industrial firms within the community and within the same industrial development.

## Objectives

1. Improve the level, stability, and distribution of per-capita income for metropolitan residents.
2. Reduce unemployment in the resident labor force, especially chronic long-term unemployment.
3. Encourage local residents to develop skills and other educational attributes that would enable them to obtain existing jobs.
4. Promote industrial and commercial development with local capital, entrepreneurial skills, and experience of the resident labor force, as well as with new light manufacturing companies from outside the metropolitan area.
5. Supply an adequate amount of land within the urban growth boundary to accommodate: the diversifying manufacturing sector (especially low polluting, energy-efficient manufacturing uses); and (b) the expansion of the metropolitan area as a regional distribution, trade, and service center.
6. Maintain strong central business districts to provide for office-based commercial, governmental, and specialized or large-scale retail activities.
7. Ensure compatibility between industrial lands and adjacent areas.
8. Reserve enough remaining large parcels for special developments requiring large lots.
9. Increase the potential for convention- and tourist-related economic activities.
10. Provide the necessary public facilities and services to allow economic development.
11. Attempt to find ways to more effectively use inefficiently used resources such as land, labor, and secondary waste products.
12. Provide for limited mixing of office, commercial, and industrial uses subject to clear, objective criteria which: (a) do not materially reduce the suitability of industrial, office, or commercial areas for their primary use; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.

## Policies

- B.1 Demonstrate a positive interest in existing and new industries, especially those providing above average wage and salary levels, an increased variety of job opportunities, a rise in the standard of living, and utilization of our existing comparative advantage in the level of education and skill of the resident labor force.
- B.2 Encourage economic development, which utilizes local and imported capital, entrepreneurial skills, and the resident labor force.
- B.3 Encourage local residents to develop job skills and other educational attributes that will enable them to fill existing job opportunities.

- B.4 Encourage the continuance of career preparation and employment orientation for metropolitan area residents by the community's educational institutions, labor unions, businesses, and industry.
- B.5 Provide existing industrial activities sufficient adjacent land for future expansion. B.6 Increase the amount of undeveloped land zoned for light industrial and commercial uses correlating the effective supply in terms of suitability and availability with the projections of demand.
- B.7 Encourage industrial park development, including areas for warehousing and distributive industries and research and development activities.
- B.8 Encourage the improvement of the appearance of existing industrial areas, as well as their ability to serve the needs of existing and potential light industrial development.
- B.9 Encourage the expansion of existing and the location of new manufacturing activities, which are characterized by low levels of pollution and efficient energy use.
- B.10 Encourage opportunities for a variety of heavy industrial development in Oregon's second largest metropolitan area.
- B.11 Encourage economic activities, which strengthen the metropolitan area's position as a regional distribution, trade, health, and service center.
- B.12 Discourage future *Metro Plan* amendments that would change development-ready industrial lands (sites defined as short-term in the metropolitan *Industrial Lands Special Study*, 1991) to non-industrial designations.
- B.13 Continue to encourage the development of convention and tourist-related facilities.
- B.14 Continue efforts to keep the Eugene and Springfield central business districts as vital centers of the metropolitan area.
- B.15 Encourage compatibility between industrially zoned lands and adjacent areas in local planning programs.
- B.16 Utilize processes and local controls, which encourage retention of large parcels or consolidation of small parcels of industrially or commercially zoned land to facilitate their use or reuse in a comprehensive rather than piecemeal fashion.
- B.17 Improve land availability for industries dependent on rail access.
- B.18 Encourage the development of transportation facilities which would improve access to industrial and commercial areas and improve freight movement capabilities by implementing the policies and projects in the *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)* and the *Eugene Airport Master Plan*.
- B.19 Local jurisdictions will encourage the allocation of funds to improve transportation access to key industrial sites or areas through capital budgets and priorities.
- B.20 Encourage research and development of products and markets resulting in more efficient use of underutilized, renewable, and nonrenewable resources, including wood waste, recyclable materials, and solar energy.
- B.21 Reserve several areas within the UGB for large-scale, campus-type, light manufacturing uses. (See *Metro Plan* Diagram for locations so designated.)
- B.22 Review local ordinances and revise them to promote greater flexibility for promoting appropriate commercial development in residential neighborhoods.
- B.23 Provide for limited mixing of office, commercial, and industrial uses under procedures which clearly define the conditions under which such uses shall be permitted and which: (a) preserve the suitability of the affected areas for their primary uses; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.

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- B.24 Continue to evaluate other sites in and around Springfield and Eugene for potential light-medium industrial and special light industrial uses, as well as potential residential uses.
  - B.25 Pursue an aggressive annexation program and servicing of designated industrial lands in order to have a sufficient supply of “development ready” land.
  - B.26 In order to provide locational choice and to attract new campus industrial firms to the metropolitan area, Eugene and Springfield shall place as a high priority service extension, annexation, and proper zoning of all designated special light industrial sites.
  - B.27 Eugene, Springfield, and Lane County shall improve monitoring of economic development and trends and shall cooperate in studying and protecting other potential industrial lands outside the urban boundary.
  - B.28 Recognize the vital role of neighborhood commercial facilities in providing services and goods to a particular neighborhood.
  - B.29 Encourage the expansion or redevelopment of existing neighborhood commercial facilities as surrounding residential densities increase or as the characteristics of the support population change.
  - B.30 Industrial land uses abutting the large aggregate extraction ponds north of High Banks Road in Springfield shall demonstrate that they require the location next to water to facilitate the manufacture of testing of products made on-site.

Ordinance \_\_\_\_\_, Exhibit C

**Proposed amendments to Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to adopt the Springfield 2030 Comprehensive Plan Urbanization Element as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030, replacing *Metro Plan* Urbanization and Growth Management policies applicable to lands within Springfield’s jurisdictional area; Proposed amendments to the Springfield Urban Growth Boundary Map and Technical Supplement describing the amended UGB; and Proposed amendments to the Metro Plan Boundary to be coterminous with the UGB.**

- C-1 Springfield 2030 Comprehensive Plan Urbanization Element and Springfield Urban Growth Boundary (UGB) Map
- C-2 UGB Technical Supplement

Ordinance \_\_\_\_\_, Exhibit C-2

## **Amendments to Springfield UGB Technical Supplement Describing the Amended UGB**

The following amendments to the UGB Technical Supplement are necessary to describe the precise location of the amended UGB:

1. List of tax lots that are adjacent to and inside, or split by UGB;
2. Summary of Methodology to refine the Location of the Springfield Urban Growth Boundary

The UGB Technical Supplement previously adopted as Ordinance 6268, Exhibits D and E of is replaced with the attached documents.

## Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary

### Purpose of this action

1. To establish a tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5, in accordance with OAR 660-024-0020(2).
2. To establish a separate Urban Growth Boundary for the city of Springfield, as required by ORS 197.304.

### Background & Findings

1. The Urban Growth Boundary (UGB) was originally acknowledged by the Land Conservation and Development Commission on August 19, 1982.
2. The existing map of the UGB was adopted by the Springfield City Council on May 17, 2004, by Ordinance No. 6087.
3. The tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5 establishes a more precise location of the UGB.
4. The methodology used to determine the precise location of the acknowledged UGB is based on the adopted policies contained in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan).
5. As adopted, the UGB is only tax lot-specific where it is coterminous with city limits, where it has been determined through the annexation process, and where it falls on the outside edge of existing or planned rights-of-way. (Page II-G-14 of the Metro Plan).
6. Where it is not tax lot-specific, the UGB is approximately 200' wide. This is in accordance with the adopted policies in the Metro Plan as well as decisions by the Lane County Hearings Official.
  - a. Levi Landing (Journal #1997-06-142 & #1999-06-144) is the only area where a more precise location of the UGB east of I5 has been determined by the Lane County Hearings Official.
  - b. Letter from Steve Gordon, dated June 29, 1999.
  - c. The best evidence that identifies the location of the UGB in the SE Hills is:
    - i. The city attorney and city staff endorsed the location of the ridgeline separating the drainage basins, as proposed in Journal #2000-06-128, Dilbeck, and
    - ii. The Springfield Planning Commission found the legal description contained in Journal #1998-11-256, Smejkal, accurately describes a portion of the UGB in the southeast hills.
7. Where the UGB description refers to the "Line of Ordinary High Water", this means the line on the bank or shore to which the high water ordinarily rises annually in season. This definition is per ORS 274.005(3).

## Methodology

1. OAR 660-024-0020(2): “The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.”
  - a. This OAR requires the UGB to be shown at a scale that identifies which particular tax lots are included in the UGB. If a tax lot is split by the UGB, there must be sufficient information to determine the precise UGB location.
  - b. Where the UGB does not follow tax lot lines, a written description shall provide sufficient information to determine the precise UGB location. This information is contained in the table called: “Tax lots Adjacent and Split by the UGB”
2. The UGB is coincident with tax lot lines unless the tax lot line is outside the 200’ wide area.
3. The UGB is coincident with tax lot lines when they are coterminous with the outside edge of rights-of-way, so the full width of the right-of-way is inside the UGB.
4. Roads and Rights of Way. The UGB shall lie along the outside edge of existing and planned rights-of-way that form a portion of the UGB so that the full right-of-way is within the UGB. Refer to Policy #2, Page II-C-4 of the Metro Plan.
5. The location of the UGB in relation to the Interstate 5 corridor is based on the policies contained in “Jurisdictional Responsibility” on Page II-D of the Metro Plan:
 

“The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and *Metro Plan* Plan Boundary (Plan Boundary); and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and UGB east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction.”

  - a. **General description.** The northbound lane is inside the Springfield UGB. The southbound lane is outside the Springfield UGB. For the area underneath the Willamette River Bridge, the UGB and the city limits are coincident.
  - b. **Northern terminus.** Extend the ~~norsouthern~~ tax lot line of 17031~~000019500001~~00 to the west until it intersects the centerline of the Interstate 5 right-of-way.
  - c. **Southern terminus.** Extend the southernmost point of tax lot 180311001800 that is south of and adjacent to the Filbert Grove 5<sup>th</sup> Addition, to the W, to the intersection of the Interstate 5 centerline and the common section line of TRS 180311 and 180310. This point is approximately 275’ south of the northbound Interstate 5 on-ramp.
  - d. **Centerline.** For the purposes of the UGB location, the centerline is located within the area between the northbound and southbound travel lanes as they are currently located. A more precise location of the current centerline is included in the following metes and bounds description. If the travel lanes are shifted and

the metes and bounds description conflicts with the new travel lanes, the general description shall apply.

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South 83°17'27" East 1025.05 feet to the centerline of Pacific highway Interstate 5; thence North 6°38'21" East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North 6°42'32" East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South 6°42'32" West 16,629.8013,695.08 feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South 4°17'57" West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South 1°53'22" West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South 9°18'13" East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South 20°29'48" East 15.13 feet to Engineers centerline station 603+50.0634.93 POT BK = 202+88.88 POT AH; thence South 20°29'48" East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South 54°29'18" East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South 88°28'48" East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South 47°03'03" East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South 5°37'18" East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South 9°31'54" East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

6. Split Tax Lots. When the UGB is not coincident with tax lot lines, the criteria from the Metro Plan shall apply. The following criteria are from Page II-G-14 of the Metro Plan. The UGB shall follow the most appropriate feature:
  - a. Protection of Agricultural Lands
  - b. Protection of Forest Lands
  - c. Ridgeline (Drainage Basin)
  - d. Orderly and Economic Public Services
  - e. Floodway Fringe
  - f. Protection of Wetlands

- g. Protection of Sand and Gravel Resources
  - h. Airport Protection
  - i. Existing Development and Services (City Limits)
  - j. Meet Economic Goals
7. The following areas contain tax lots that are split by the UGB. Refer to the detail maps in the technical supplement for further clarification.
- a. **Hayden Bridge Area Split Tax Lots:** The location of the UGB is a fixed distance (300') that is measured from the northern edge of the Hayden Bridge right-of-way, unless it has been previously determined as a result of a land use decision or annexation. The location of 300' north of the right of way was chosen since it included most of the existing dwellings and was within the 200' area. In addition, the land use decisions indicated the UGB was not intended to follow the Hayden Bridge right of way.
  - b. **High Banks Area Split Tax Lots.** The location of the UGB is either:
    - A fixed distance (450') that is measured from the northern edge of the High Banks right-of-way, or
    - Coincident with the city limits.
  - c. **North Gateway Area Split Tax Lots.** Refer to the description of the UGB within the I5 corridor. The location is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan. ~~The UGB is coincident with the unnumbered tax lot that contains the public drainage facility. The tax lot is entirely within the UGB.~~
  - d. **Thurston Area Split Tax Lots.** The city limits extend outside the UGB on the tax lot that contains the Thurston Middle School. On that tax lot, the UGB is coincident with the section line.
  - e. **Southeast Hills Area Split Tax Lots.** The adopted policies indicate the UGB should follow the ridgeline (refer to the table "Metro Plan Urban Growth Boundary Map Key" from Page II-G-21 of the Metro plan). The line was originally drawn in 1982 and generally follows the ridgeline. The city's current mapping technology is able to more accurately follow the ridgeline. The letter from Steve Gordon, dated June 29, 1999, provides evidence of the intent to follow the ridgeline. Journal #1998-11-0256 is a land use decision that provided a legal description for a portion of this area.
  - f. **Clearwater Area Split Tax Lots:** When the UGB does not follow tax lot lines in this area, its location is based on aerial photo interpretation and proximity to the Jasper Rd. right of way. This effort also included a site visit and discussions with the landowner of 5119 Jasper Rd.
  - g. **Willamette Area Split Tax Lots:** Refer to the description of the UGB within the I5 corridor. The location is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan.

## Description of the Springfield UGB within the Interstate 5 corridor

~~March 16, 2011~~

The location of the UGB in relation to the Interstate 5 (I-5) corridor is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan. It states:

"The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and *Metro Plan* Plan Boundary (Plan Boundary); and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and UGB east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction."

### General description

The northbound lane is inside the Springfield UGB. The southbound lane is outside the Springfield UGB. For the area underneath the Willamette River Bridge, the UGB and the city limits are coincident.

### Northern terminus

Extend the ~~norsou~~thern tax lot line of 17031~~000019500001~~00 to the west until it intersects the centerline of the Interstate 5 right-of-way.

### Southern terminus

Extend the southernmost point of tax lot 180311001800 that is south of and adjacent to the Filbert Grove 5<sup>th</sup> Addition, to the W, to the intersection of the I-5 centerline and the common section line of TRS 180311 and 180310. This point is approximately 275' south of the NB I-5 onramp.

### Metes and bounds description

This is a metes and bounds description of the northern and southern terminus points of the Springfield UGB within the I-5 right of way.

For the purposes of the UGB location, the centerline is located within the area between the northbound and southbound travel lanes as they are currently located. A more precise location of the current centerline is included in the following metes and bounds description. If the travel lanes are shifted and the metes and bounds description conflicts with the new travel lanes, the general description shall apply.

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South 83°17'27" East 1025.05 feet to the centerline of Pacific highway Interstate 5; thence North 6°38'21" East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North 6°42'32" East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South 6°42'32" West ~~16,629.8013,695.08~~ feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South 4°17'57" West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South 1°53'22" West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South 9°18'13" East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South 20°29'48" East 15.13 feet to Engineers centerline station 603+~~50.0634,93~~ POT BK = 202+88.88 POT AH; thence South 20°29'48" East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South 54°29'18" East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South 88°28'48" East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South 47°03'03" East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South 5°37'18" East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South 9°31'54" East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

**Springfield UGB within the Interstate 5 Corridor**  
**Metes and Bounds Description (Revised August 20, 2015)**

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South  $83^{\circ}17'27''$  East 1025.05 feet to the centerline of Pacific Highway Interstate 5; thence North  $6^{\circ}38'21''$  East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North  $6^{\circ}42'32''$  East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South  $6^{\circ}42'32''$  West 16,629.80 feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South  $4^{\circ}17'57''$  West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South  $1^{\circ}53'22''$  West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South  $9^{\circ}18'13''$  East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South  $20^{\circ}29'48''$  East 15.13 feet to Engineers centerline station 603+50.06 POT BK = 202+88.88 POT AH; thence South  $20^{\circ}29'48''$  East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South  $54^{\circ}29'18''$  East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South  $88^{\circ}28'48''$  East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South  $47^{\circ}03'03''$  East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South  $5^{\circ}37'18''$  East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South  $9^{\circ}31'54''$  East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

## List of tax lots that are adjacent to and inside, or split by the UGB

4/5/2011 revised 10/8/2015

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
<b>17-02-19</b>	<b>inside UGB or split by UGB</b>	<b>If the tax lot is split by the UGB, where is the UGB located?</b>	<b>name of area containing split tax lots</b>	<b>Plat, Survey, or land use decision</b>
1702190000101	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #94-02-32; plat #94-P0555; CS #32200
1702190000203	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000300	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000400	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000500	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000501	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000601	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000699	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000701	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	SUB2003-00014; Plat #2004- PO1787
1702190000800	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000900	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #87-03-20; CS #28405
1702190001000	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001100	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001200	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702194100101	in			
1702194100102	in			
1702194100200	in			
1702194100300	in			
1702194100800	in			
1702194100900	in			
1702194100901	in			
1702194100902	in			
1702194102900	in			
<b>17-02-20</b>				
1702200000500	in	tax lot line, city limits and UGB are coincident		
1702200000600	in	tax lot line, city limits and UGB are coincident		
1702200000700	in	tax lot line, city limits and UGB are coincident		
1702200000800	in	tax lot line, city limits and UGB are coincident		
1702200001301	in	tax lot line, city limits and UGB are coincident		

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
<b>17-02-27</b>				
1702270000901	split	City limits and UGB are coincident	Highbanks	
1702270000902	split	City limits and UGB are coincident	Highbanks	
1702270001002	split	connect the most northerly NE corner of tax lot 1702342200100 to NW corner of tax lot 1702342100400.	Highbanks	
1702270001004	in			
1702270001101	in			
1702270001102	in			
1702270001502	in			
1702270002002	in			
1702270002100	in			
<b>17-02-28</b>				
1702280000101	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000102	in			
1702280000300	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000301	in			
1702280000302	in			
1702280000401	in	UGB, city limits and tax lot lines are coincident		
1702280000402	in			
1702280000405	in			
1702280000406	in	UGB, city limits and tax lot lines are coincident		
1702280000500	split	450' N of the N edge of Highbanks ROW, then coincident with city limits east of tax lot 1702280000600	Highbanks	
1702280000600	in	UGB, city limits and tax lot lines are coincident		
1702284300200	in			
1702284300202	in	UGB, city limits and tax lot lines are coincident		
1702284300203	in			
1702284301308	in	UGB, city limits and tax lot lines are coincident		
1702284301309	in	UGB, city limits and tax lot lines are coincident		
<b>17-02-29</b>				
1702290002800	split	450' N of Highbanks ROW on the eastern lot line; connect to NE corner of tax lot 1702290002900	Highbanks	
1702290002900	split	Multi-part tax lot. Extend the UGB from tax lot 2800 to the W, coincident with tax lot line 2900 until it intersects the N edge of the ROW of I-105	Highbanks	
1702290002901	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		
1702290003100	split	UGB and city limits are coincident	Highbanks	

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
<b>17-02-30</b>				
170230000401	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		
<b>17-02-34</b>				
1702341107900	in	UGB, city limits and tax lot lines are coincident		
1702341108000	in	UGB, city limits and tax lot lines are coincident		
1702341108100	in	UGB, city limits and tax lot lines are coincident		
1702341108200	in	UGB, city limits and tax lot lines are coincident		
1702341108300	in	UGB, city limits and tax lot lines are coincident		
1702341109000	in	UGB, city limits and tax lot lines are coincident		
1702341109100	in	UGB, city limits and tax lot lines are coincident		
1702341114900	in	UGB, city limits and tax lot lines are coincident		
1702341115000	in	UGB, city limits and tax lot lines are coincident		
1702341115100	in	UGB, city limits and tax lot lines are coincident		
1702341115200	in	UGB, city limits and tax lot lines are coincident		
1702341115300	in	UGB, city limits and tax lot lines are coincident		
1702341115400	in	UGB, city limits and tax lot lines are coincident		
1702341115500	split	split by city limits. Only "leg" portion is inside	Hayden Bridge	UGB formally interpreted in Levi Landing (#97-06-142); refer to plats of Levi Landing
1702341200100	in	UGB, city limits and tax lot lines are coincident		
1702341200500	split	Split by section line 170227 & 170234	Thurston	city limits outside UGB, Thurston Middle School
1702342100400	in	UGB, city limits and tax lot lines are coincident	Thurston	
1702342200100	in			
<b>17-02-35</b>				
1702352204801	in			
1702352204900	split	split by city limits	Thurston	
<b>17-02-36</b>				
1702362000403	in	UGB, city limits and tax lot lines are coincident on most easterly tax lot line		
1702362400102	in			
1702362400200	in			
1702363000100	in			
1702363002900	in			
1702363003200	in			
1702363003300	in			
1702363003400	in			

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1702363003402	in			
<b>17-03-10</b>				
1703100002400	split	split by I-5		
<b>17-03-14</b>				
1703140000900	in			
1703140001100	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)
1703140001900	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)
<b>17-03-15</b>				
1703154000400	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River	Gateway	
<b>17-03-22</b>				
1703220003700	in	UGB, city limits and tax lot lines are coincident		
1703220004102	in	Adjacent to McKenzie River. Refer to plat.		Riverbend Phase 2 (survey)
<b>17-03-23</b>				
1703233200100	in			
1703233200200	in			
1703233200300	in			
1703233200400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202600	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233203200	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203300	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203900	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233400100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400300	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233405400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405500	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405600	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405700	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1703233405900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233410800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233410900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703234200100	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200200	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200300	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200400	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200500	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200600	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200700	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234300100	in			
1703234300200	in	UGB, city limits and tax lot lines are coincident		
1703234305500	in	UGB, city limits and tax lot lines are coincident		
1703234305600	in	UGB, city limits and tax lot lines are coincident		
1703234305700	in	UGB, city limits and tax lot lines are coincident		
1703234305800	in	UGB, city limits and tax lot lines are coincident		
1703234305900	in	UGB, city limits and tax lot lines are coincident		
1703234306000	in	UGB, city limits and tax lot lines are coincident		
1703234306100	in	UGB, city limits and tax lot lines are coincident		
1703234306200	in	UGB, city limits and tax lot lines are coincident		
1703234306300	in	UGB, city limits and tax lot lines are coincident		
1703234406000	in	UGB, city limits and tax lot lines are coincident		
1703234406100	in	UGB, city limits and tax lot lines are coincident		
1703234406200	in	UGB, city limits and tax lot lines are coincident		
1703234406300	in	UGB, city limits and tax lot lines are coincident		
1703234407900	in			PLA #94-11-222; CS #32540
1703234409300	in	UGB, city limits and tax lot lines are coincident		
1703234409400	in	UGB, city limits and tax lot lines are coincident		
1703234409500	in	UGB, city limits and tax lot lines are coincident		
1703234409600	in	UGB, city limits and tax lot lines are coincident		
1703234409700	in	UGB, city limits and tax lot lines are coincident		
1703234409800	in	UGB, city limits and tax lot lines are coincident		
1703234409900	in	UGB, city limits and tax lot lines are coincident		
1703234410000	in	UGB, city limits and tax lot lines are coincident		
1703234410100	in	UGB, city limits and tax lot lines are coincident		
1703234410200	in	UGB, city limits and tax lot lines are coincident		

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
<b>17-03-24</b>				
1703240000101	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000102	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000103	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000104	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000300	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000301	in			
1703240000401	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000503	in			
1703240000507	in			
1703240000603	split	from the NE corner of the city limits on tax lot 1703243102000, then to a point 285' N of the N edge of Hayden Bridge ROW, on the east tax lot line of 1703240000603	Hayden Bridge	Journal #92-10-202 O'Niell; CS #33470 & 31021; Plat #92-P0306.
1703243100100	split	From NE corner of tax lot 1703243200301, to city limits on tax lot 1703243104000.	Hayden Bridge	
1703243100200	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100300	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100600	in			
1703243100701	in			
1703243100702	in			
1703243100704	in			
1703243100900	split	split by city limits	Hayden Bridge	
1703243102000	split	split by city limits, UGB and city limits are coincident	Hayden Bridge	
1703243104000	in	UGB, city limits and tax lot lines are coincident		
1703243104100	in	UGB, city limits and tax lot lines are coincident		
1703243104200	in	UGB, city limits and tax lot lines are coincident		
1703243200200	in			
1703243200301	in			
1703243200302	in			
1703243200303	in			
1703243200304	in			
1703243200305	in			
1703243200306	in			
1703243200307	in			
1703243200500	in			

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1703243200600	in			
1703243200700	in			
1703243200800	in			
1703243200900	in			
<b>18-02-01</b>				
1802010000100	split	follow ridgeline	SE Hills	
<b>18-02-02</b>				
1802020000100	split	follow ridgeline	SE Hills	
1802020000200	split	follow ridgeline	SE Hills	
1802020000300	split	follow ridgeline	SE Hills	
1802020000400	split	follow ridgeline	SE Hills	Refer to Webb survey
1802020000401	in		SE Hills	
<b>18-02-03</b>				
1802030000600	in	follow ridgeline	SE Hills	
<b>18-02-04</b>				
1802040003000	split	approximately 450' S of Jasper Rd to a property corner, then W to the drainage ditch on the W property line. The house and barn at 5119 Jasper Rd are inside the UGB.	Clearwater	
<b>18-02-05</b>				
1802050001801	in			
1802050002600	split	Panhandle; 400' S of the S edge of the Jasper Rd. ROW	Clearwater	
1802050002800	split	On the E lot line 450' S of the S edge of Jasper Rd. ROW. On the W tax lot line 220' S of the S edge of Jasper Rd. ROW.	Clearwater	
1802050002801	split	On the E tax lot line, approximately 450' S of Jasper Rd. to the natural drainage, then to the NW corner of the tax lot. The house (4855 Jasper Rd) is outside.	Clearwater	
1802051303501	in			
1802051303600	in			
1802051303700	in			
1802051303800	in			
1802051304100	in			
1802051304101	in			
1802051304200	in			
1802052300300	in			
1802052300400	in			
1802052300403	in			
1802052300500	in			
1802052300600	in			

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1802052400100	in			Journal #1998-11-0255; Redwood Village plat
1802052400200	in			Journal #1998-11-0255; Redwood Village plat
1802052401000	in			Journal #1998-11-0255; Redwood Village plat
1802052401100	in			Journal #1998-11-0255; Redwood Village plat
1802052401200	in			Journal #1998-11-0255; Redwood Village plat
1802052407900	in			Journal #1998-11-0255; Redwood Village plat
1802052408000	in			Journal #1998-11-0255; Redwood Village plat
1802052408100	in			Journal #1998-11-0255; Redwood Village plat
1802052408201	in			
1802052409400	in			Journal #1998-11-0255; Redwood Village plat
1802052409600	in			Journal #1998-11-0255; Redwood Village plat
1802052409700	in			Journal #1998-11-0255; Redwood Village plat
1802052409800	in			Journal #1998-11-0255; Redwood Village plat
1802052409900	in			Journal #1998-11-0255; Redwood Village plat
1802052410000	in			Journal #1998-11-0255; Redwood Village plat
1802052411000	in			Journal #1998-11-0255; Redwood Village plat
1802052412000	in			Journal #1998-11-0255; Redwood Village plat
1802052413000	in			Journal #1998-11-0255; Redwood Village plat
<b>18-02-06</b>				
1802060001500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1802060001600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001606	in			
1802060004501	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060004600	in			
1802062403500	in			
1802062403501	in			
1802064104902	in			
1802064105700	in			
1802064105800	in			
1802064105900	in			
1802064106000	in			
1802064106100	in			
1802064106200	in			
1802064106300	in			
1802064114500	in			
1802064115900	in	UGB, city limits and tax lot lines are coincident; N bank of Jasper slough		fillbert meadows, LRP2005-00010; SUB2005-00062
1802064200118	in			
1802064200119	in			
1802064200120	in			
1802064200121	in			
1802064200301	in			
1802064200500	in			
1802064200501	in			
1802064200503	split	connect SW corner of tax lot 1802064200800 to SE corner of tax lot 180206420600		
1802064200600	in			
1802064200800	in			
1802064200900	in			
1802064201000	in			
1802064201101	in			
1802064201201	in			
<b>18-02-07</b>				

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1802070000801	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
<b>18-02-08</b>				
1802080000300	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000400	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000602	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
<b>18-02-09</b>				
1802090000100	split	follow ridgeline from the most southerly NE corner of tax lot, to a point along Jasper Rd, 815' from the SW corner of the tax lot	SE Hills	
1802090000600	split	panhandle; approximately 450' S of the S edge of Jasper Rd. ROW	Clearwater	
<b>18-02-10</b>				
1802100001600	in	UGB and tax lot lines are coincident	SE Hills	Weyerhauser Rd.
1802100000100	split	follow ridgeline	SE Hills	Refer to Webb Survey
<b>18-02-11</b>				
1802110000300	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110000400	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110001600	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1802110001700	split	interpretation with legal description	SE Hills	Weyerhauser Rd. Journal #1998-11-0256 contains legal description (attachment D)
1802110002000	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
<b>18-02-15</b>				
1802150000100	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
<b>18-03-01</b>				
1803010001100	in			
1803010002700	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010002800	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003000	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003100	in			
1803010003200	in		willamette	
1803010003201	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
<b>18-03-02</b>				
1803020000600	in			
<b>18-03-11</b>				
1803110000600	split	refer to description of UGB within I5 corridor	willamette	
1803110000700	split	refer to description of UGB within I5 corridor	willamette	
1803110001800	in			
<b>18-03-12</b>				

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
1803120000500	in			
<b>ROW/other</b>				
Jasper Rd.	in	UGB is the S edge of the Jasper Rd ROW, include entire ROW		
Mill Race	in	the Mill Race within 18-03-01 is entirely within the UGB, UGB is top of S bank		
I-105	in	I-105 within 17-02-29 and 17-02-30 is within the UGB		
17-02-35	in	UGB is the N edge of the Thurston Rd ROW, E of 69th Street to the E lot line of 1702362400200		
18-02-06-24	in	The ROW for Garden Ave and Kintzley Ave are within the UGB		
17-02-36	in	UGB is the N edge of the Thurston Rd ROW		
I5 description		refer to methodology in adopted ordinance		

**Summary of UGB List Revisions for Mill Race Area  
Revised 10/8/2015**

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
	<b>inside UGB or split by UGB</b>	<b>If the tax lot is split by the UGB, where is the UGB located?</b>	<b>name of area containing split tax lots</b>	<b>Plat, Survey, or land use decision</b>

Add the following section:

<b>18-02-05</b>				
1802050001801	in			

Remove the following Tax Lots from the "18-02-06" section:

<b>18-02-06</b>				
1802060001006	in			
1802060001007	in			
1802062403600	in			

And add the following to the "18-02-06" section:

<b>18-02-06</b>				
1802060001500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001606	in			
1802060004501	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802064201000	in			
1802064201101	in			
1802064201201	in			

Add the following section:

<b>18-02-07</b>				
1802070000801	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

Add the following section:

<b>18-02-08</b>				
1802080000300	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000400	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

1802080000500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000602	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

Remove the following Tax Lots from the "18-03-01" section:

<b>18-03-01</b>				
1803010000701	in			
1803010001301	in			
1803010003600	in			

And add the following to the "18-03-01" section:

<b>18-03-01</b>				
1803010002700	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010002800	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003000	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003201	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

## Summary of UGB List Revisions for North Springfield/Willamalane Parks Area Revised 10/8/2015

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision

Remove the following Tax Lot from the "17-02-27" section:

<b>17-02-27</b>				
1702270001101	split	UGB and city limits are coincident	Thurston	

And add the following to the "17-02-27" section:

<b>17-02-27</b>				
1702270001101	in			
1702270001502	in			

Add the following to the "17-02-29" section:

<b>17-02-29</b>				
1702290002901	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		

The following section is removed:

<b>17-02-30</b>				
1702300000100	in	UGB, city limits and tax lot lines are coincident		
1702300000101	in	UGB, city limits and tax lot lines are coincident		
1702300000200	in	UGB, city limits and tax lot lines are coincident		
17023000002500	in	UGB, city limits and tax lot lines are coincident		

and replaced with the following section:

<b>17-02-30</b>				
1702300000401	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		

## Summary of UGB List Revisions for North Gateway Area Revised 10/8/2015

<b>Tax lot #</b>	<b>Status</b>	<b>Description</b>	<b>Area</b>	<b>Note</b>
	<b>inside UGB or split by UGB</b>	<b>If the tax lot is split by the UGB, where is the UGB located?</b>	<b>name of area containing split tax lots</b>	<b>Plat, Survey, or land use decision</b>

The following section is added just before the "17-03-14" section:

<b>17-03-10</b>				
1703100002400	split	split by I-5		

The following section is removed:

<b>17-03-15</b>				
170315	in	maple island slough, unknown lot #	Gateway	tax lot contains public drainage facility
1703150000801	split	City limits and UGB are coincident	Gateway	
1703150001000	in	UGB, city limits and tax lot lines are coincident		
1703154000100	in	UGB, city limits and tax lot lines are coincident		
1703154000200	in	UGB, city limits and tax lot lines are coincident		
1703154000400	split	split by city limits; mostly outside the UGB, only the "leg" portion is inside	Gateway	

and replaced with the following section:

<b>17-03-15</b>				
1703154000400	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River	Gateway	

Metro Plan Amendment  
Springfield Ordinance \_\_\_\_\_, Lane County Ordinance \_\_\_\_\_

# SPRINGFIELD 2030 COMPREHENSIVE PLAN

## URBANIZATION ELEMENT

**Commentary:** After approval of the Urbanization Element, the following section will be formatted and numbered to be consistent with 2030 Residential and Economic Elements that list policies and implementation strategies under the corresponding **2030 Plan Urbanization Goals**. For discussion purposes, policies are numbered and implementation strategies are bulleted. **Green font = 2030 Urbanization Element Planning Goals** **Blue font = Metro Plan policies carried over into the 2030 Plan.**

**Commentary:** The Springfield 2030 Comprehensive Plan (2030 Plan) is currently being developed as Springfield’s new land use comprehensive plan policy document applicable to Springfield’s jurisdictional area of the Metro Plan.

Oregon’s statewide planning goals are achieved through local comprehensive planning. State law requires each city and county to have a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. The local comprehensive plan guides a community’s land use, conservation of natural resources, economic development, and public facilities, and must be consistent with statewide planning goals.

Comprehensive plans contain 1) sections of background, data, inventories and analysis — the factual base describing a community’s resources and features; and 2) the policy “elements” of the plan setting forth the community’s long-range objectives and the policies by which it intends to achieve them. The policy element of each community’s plan is adopted by ordinance and has the force of law [Oregon Statewide Planning Goals, DLCD, March 12, 2010].

The 2030 Plan is Springfield’s local comprehensive plan to demonstrate compliance with applicable Oregon Land Use Planning Statutes, Goals and Administrative Rules for the specific land use planning goals that it addresses. The City and Lane County are co-adopting separate chapters — called “elements” — of the 2030 Plan on an incremental basis to replace or refine existing policies in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). After local adoption and approval by the State, the 2030 Plan Elements become the “acknowledged” land use policies that control land use planning for the area within the Springfield Urban Growth Boundary.

Springfield’s Residential Land Use and Housing Element was acknowledged in 2011 to address Springfield’s housing needs for the 2010-2030 planning period. The Economic and Urbanization Elements are being forwarded for adoption at this time to address employment and economic development land use needs and the urban transition process. Other elements of Metro Plan remain in effect for Springfield until they are replaced or otherwise addressed by local adoption of future Springfield 2030 Comprehensive Plan elements or other Metro plan changes initiated by Metro Plan partners. During this period of transition from Metro area to local plans, Springfield’s “comprehensive plan” consists of the Metro Plan *and* the Elements of the Springfield 2030 Comprehensive Plan.

### OVERVIEW

The Springfield 2030 Comprehensive Plan (2030 Plan) is currently being developed as Springfield's new land use comprehensive plan policy document applicable to Springfield's jurisdictional area of the Metro Plan. The Springfield Comprehensive Plan **Urbanization Element** is the chapter of the 2030 Plan that guides future development in Springfield by describing how and where land will be developed and infrastructure provided to meet long term growth needs while maintaining and improving community livability. The purpose of the **Urbanization Element** is to inform and guide long range land use and public facilities planning to address Springfield's land needs for the planning period 2010-2030 in compliance with Statewide Planning Goal 14, Urbanization.

**Goal 14. Urbanization – To provide for an orderly and efficient transition from rural to urban land use, to accommodate population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.**

Oregon law requires cities and counties to establish and maintain urban growth boundaries (UGBs) for urban areas to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land. The land within the UGB includes "urban" lands within the incorporated City and "urbanizable lands" — those lands that are within the UGB but have not yet been annexed to the City. Urbanizable lands are considered to be available for urban development consistent with plans for the provision of urban facilities and services. The City and Lane County are required to co-adopt comprehensive plan policies, zoning, and development code provisions to regulate land uses and land divisions of urbanizable lands to maintain their potential for planned urban development until adequate public facilities and services necessary for urban level of development are available or planned.

The **Urbanization Element** establishes the comprehensive plan policies and zoning applicable to urbanizable lands within Springfield's Urban Growth Boundary (UGB) that are necessary to efficiently and effectively plan and manage the land supply as land uses transition from rural to urban. This policy direction is based on the need to:

- Designate a 20-year supply of urbanizable land to accommodate population and employment growth.
- Allow and regulate interim land uses that do not impede future development of planned urban land uses and densities.

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<sup>1</sup> Oregon's Statewide Planning Goals & Guidelines define "urbanizable land" as "Urban land that, due to the present unavailability of urban facilities and services, or for other reasons, either: (a) Retains the zone designations assigned prior to inclusion in the boundary, or (b) Is subject to interim zone designations intended to maintain the land's potential for planned urban development until appropriate public facilities and services are available or planned."

- Plan for the orderly and efficient extension of public facilities and services.
- Designate land for community open space and recreational needs.
- Designate land to provide and manage the public facilities and environmental services needed to serve Springfield’s urban area.
- Manage growth and improve community livability through increasingly efficient use of land consistent and compatible with the community’s needs, resources, opportunities and advantages within the broader Southern Willamette Valley region.

The policy direction provided by the **Urbanization Element** guides comprehensive planning coordination, zoning and land use regulation within the UGB, including:

- future refinement planning and zoning at the more detailed level of neighborhood, district (e.g. Gateway), or corridor;
- future regional and local transportation, infrastructure and capital improvement planning;
- future comprehensive plan, zoning and Springfield Development Code amendments;
- review of property owner-initiated land use proposals; and
- review of property owner-initiated land use applications including annexation requests.

### **SPRINGFIELD URBANIZATION PLANNING GOALS**

The following **Urbanization Element** Planning Goals express the desired community development outcomes and benefits the City aspires to achieve by planning and managing land in new growth areas of the City.

**UG-1 Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city, and to urbanizable lands where future annexation and development may occur.**

**UG-2 Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — within and between neighborhoods and districts.**

**UG-3 Provide adequate level of urban services, including but not limited to public water, wastewater, stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.**

**UG-4 As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City’s land development patterns and infrastructure design.**

**UG-5 Increase Springfield’s capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.**

### **MANAGING URBAN TRANSITION**

Springfield manages the orderly and efficient transition of land from rural to urban to implement the Urbanization Planning Goals through application of the following planning policies, implementing ordinances, tools and procedures:

- The Urban Growth Boundary
- Comprehensive plan designations and policies
- Springfield Zoning Map
- Springfield Development Code land use regulations and development standards — including the Annexation process
- Planned provision of urban facilities and services:
  - Metropolitan Public Facilities and Services Plan
  - Springfield Wastewater and Stormwater Master Plans
  - Springfield Transportation System Plan
  - Springfield Capital Improvement Program

### **SPRINGFIELD URBAN GROWTH BOUNDARY**

The Springfield UGB establishes a 20-year supply of land based on demonstrated need to accommodate long range population growth and demonstrated need for housing, employment

opportunities, livability and uses such as public facilities, streets and roads, schools, parks or open space.

The UGB is mapped and specifically delineated along its entire circumnavigation of the city.

The UGB is graphically depicted in the “Springfield Urban Growth Boundary map.” The UGB Technical Supplement<sup>2</sup> to the **Urbanization Element** provides documentation to more precisely describe the parcel-specific boundary location — a description of the methodology used by Springfield to prepare the precise UGB location using contemporary Geographic Information Systems (GIS) technology, previous urban growth boundary location descriptions, surveys, applicable sections of the ORS and OARs and related land use decisions; and a list of tax lots that are split by the UGB. **Where existing and planned right-of-way comprise portions of the UGB, the full width of that right-of-way lies within the UGB, except along the western track where the boundary is mapped and described as the center line of Interstate Highway 5 between the north-bound and south-bound lanes.**

Springfield’s urban and urbanizable area extends approximately 5 miles from north (Gateway) to south (Glenwood McVay corridor) along the Interstate Highway 5 corridor as it travels through the Eugene-Springfield metro area; and approximately 8.6 miles from west to east as measured along the Franklin Boulevard-Main Street Corridor-McKenzie Highway from the Interstate Highway 5 Willamette River bridge to the easternmost point of the UGB. The Springfield UGB includes most but not all land between the McKenzie River on the north and the Middle Fork Willamette River on the south. The eastern portion of the UGB includes the Thurston South Hills and follows the ridgeline south and west to Jasper Road to encompass the area known locally as Jasper-Natron.

**INSERT FOLDOUT MAP** 11 x 17 size Springfield Urban Growth Boundary

## **SPRINGFIELD UGB AMENDMENTS 2011-2016**

Prior to 2011, Springfield and Eugene shared one Metro Area UGB. Oregon Revised Statute 197.304 (2007) required both cities to independently conduct housing needs analyses and to establish separate UGBs to meet those needs. In 2007, Springfield began an evaluation of the UGB for two categories of land need: housing and employment.

The Springfield UGB was first acknowledged in 2011, designating a land supply to meet the City’s residential land and housing needs for the 2010-2030 planning period.<sup>3</sup> The Springfield UGB included all of the lands and waters within the previously acknowledged Eugene-

<sup>2</sup> Springfield Ordinance [redacted], Lane County Ordinance [redacted], Exhibit C-2 UGB Technical Supplement

<sup>3</sup> Springfield Ordinance No. 6268, Lane County Ordinance No. PA 1274

Springfield Metropolitan Area General Plan Boundary located east of the centerline of Interstate Highway 5. The UGB provides sufficient land designated to meet all residential land needs through the year 2030 without expanding the UGB — through implementation of plan and zoning amendments and Springfield Development Code land use efficiency measures.

The UGB was subsequently amended in 2016 to designate a 20-year land supply for employment and natural resource protection, and to designate public land for parks, open space and public/semi-public facilities.<sup>4</sup> With the exception of seven needed employment sites larger than five acres, the City’s employment land inventory was found to be sufficient to meet all employment land needs for the planning period without expanding the UGB. The employment land UGB expansion added approximately 257 suitable and developable acres to provide sites for target industries and uses that require sites larger than 5 acres.<sup>5</sup> The public land UGB expansion added approximately 455 acres of publicly-owned land to the UGB. The Springfield UGB as amended and acknowledged in 2016 contains approximately 15,411 acres of land.

## **RELATIONSHIP TO THE METRO PLAN, FUNCTIONAL PLANS AND REFINEMENT PLANS**

The Springfield Comprehensive Plan **Urbanization Element** was adopted by the City of Springfield and Lane County as a city-specific comprehensive plan policy element to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan.<sup>6</sup> The **Urbanization Element** goals, policies and implementation actions replace the more general Metro Area-wide goals, findings and policies contained in Metro Plan sections entitled “Growth Management Goals, Findings and Policies” (Metro Plan II-C) and “Urban and Urbanizable Land” (Metro Plan II-E) for lands within the Springfield UGB.

The Metro Plan establishes a broad regional framework for Eugene, Springfield, and Lane County to coordinate comprehensive planning within the Eugene-Springfield Metropolitan planning area. Metro Plan Chapter I explains the relationship between city-specific comprehensive plans, the broad policy framework of the Metro Plan and the regionally-coordinated functional plans. The Springfield Comprehensive Plan elements — including this **Urbanization Element** — explicitly supplant the relevant portion of the Metro Plan. Should inconsistencies occur between the Springfield Comprehensive Plan and a refinement or

<sup>4</sup> Springfield Ordinance \_\_\_\_\_, Lane County Ordinance \_\_\_\_\_, Exhibit A-2

<sup>5</sup> *Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis, 2015*

<sup>6</sup> Metro Plan pp. iii-iv and Chapter II describes the incremental Metro planning area shift towards separate Springfield and Eugene UGBs and city-specific comprehensive plans.

functional plan, or references in the Springfield Development Code that refer to Metro Plan policies, the Springfield Comprehensive Plan is the prevailing policy document.<sup>7</sup>

## **RESPONSIBILITIES FOR LAND USE PLANNING AND DEVELOPMENT WITHIN THE SPRINGFIELD URBAN GROWTH BOUNDARY**

Metro Plan Chapter II and Chapter IV describe jurisdictional responsibilities within the Eugene-Springfield Metropolitan planning area. The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Springfield, Eugene and Lane County are required to co-adopt a UGB or Metro Plan boundary change that crosses the Interstate 5 Highway. For purposes of other amendments and implementation of the Metro Plan, Lane County has joint responsibility with Springfield between the city limits and the Metro Plan Boundary east of the Interstate 5 Highway.

Metro Plan Chapter IV describes the procedures for review, amendments and refinements of the Metro Plan, including amendments of the Metro Plan adopting singular or multiple Elements of the Springfield Comprehensive Plan that explicitly supplant relevant portions of the Metro Plan. Metro Plan amendments that are being considered in conjunction with a city-specific plan adoption or amendment follow the procedures described in Metro Plan Chapter IV.

Land use planning and development within the Springfield City Limits is the sole responsibility of the City of Springfield. Land development within Springfield's urbanizable areas is planned and cooperatively administered by the City of Springfield in coordination with Lane County in accordance with the policies in this Plan and as described in the ORS 190 Intergovernmental Agreement (1987) between the City of Springfield and Lane County.<sup>8</sup> The Agreement delegated building, zoning, and planning administration and decision making authority for services for the land between Springfield's UGB and the city limits from the County to the City of Springfield and describes criteria and procedures for land regulation and management.

[Planning for regionally significant public investments within Springfield's UGB is coordinated on a metropolitan-wide basis by utilizing the regional transportation planning and public facilities](#)

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<sup>7</sup> During the period of transition from Metro Plan to local comprehensive plans, Springfield's "comprehensive plan" consists of the acknowledged Metro Plan and the acknowledged Elements of the Springfield 2030 Comprehensive Plan.

<sup>8</sup> *Agreement Regarding the Transfer of Building and Land Use Responsibilities within the Urbanizable Portion of the Springfield Urban Growth Boundary*, January 1, 1987.

planning processes<sup>9</sup> as described in the Metro area functional plans — including the Eugene-Springfield Public Facilities and Services Plan and the Regional Transportation System Plan. Some of Springfield’s neighborhood refinement plans (such as the Glenwood Refinement Plan) may include a refined level of policy guidance for urbanization in specific locations within Springfield’s UGB.

## **PLAN DESIGNATION AND ZONING OF UNINCORPORATED “URBANIZABLE” LANDS IN THE UGB**

The unincorporated land within the Springfield UGB is urbanizable and is considered part of Springfield’s land base for housing and employment as identified in the most recent buildable land inventories. It is assumed that buildable<sup>10</sup> lands will eventually be included in the City’s incorporated area and developed to accommodate designated urban uses and densities.

Urbanizable lands exist in various areas of the Springfield UGB and are designated for a variety of land uses as shown in Table 1. The land use designation determines the applicable zoning, both before after annexation. In addition to the plan designation, zoning and the applicable policies of this **Urbanization Element**, Springfield is required by Oregon law to implement land use controls regulating interim development on unincorporated land to prevent land divisions and uses that would preclude future development of planned urban uses and densities. As shown in Table 1, Springfield Zoning implements this provision of the law through two different zoning mechanisms in the Springfield Development Code: 1) the Agriculture - Urban Holding Area Zoning District (AG) was established and applied to land after 2015 to implement the Urban Holding Area -Employment and Natural Resource plan designations; and 2) the Urbanizable Fringe Overlay Zoning District (UF-10) was established and applied to lands prior to 2015 and is a zoning overlay placed over multiple plan designations. Both zoning mechanisms were established to implement the goal of compact growth through provisions that maintain the supply of land for urban development in areas between the City limits and the UGB. Unincorporated public land designated Government and Education or Public/Semi Public is zoned Public Land and Open Space on the Springfield Zoning Map.

<sup>9</sup> For other related policy discussion, see the [Public Facilities and Services Element in Metro Plan Chapter III-G](#). The Springfield Comprehensive Plan does not address service districts.

<sup>10</sup> Some lands have absolute development constraints that for inventory purposes are not assumed to be buildable. See Findings section this Element for more information.

**Table 1: Urbanizable Land  
Plan Designations and Applicable Zoning Districts**

<b>Metro Plan Designation</b>	<b>Springfield Zoning District(s) applicable before annexation</b>	<b>Springfield Zoning District(s) applicable after annexation</b>
Urban Holding Area — Employment	Agriculture — Urban Holding Area (AG) Zoning District	Employment zoning such as: Employment Mixed Use <sup>11</sup> Campus Industrial Employment
Special Heavy Industrial Light Medium Industrial	Urbanizable Fringe Overlay District (UF-10)	Special Heavy Industrial <sup>12</sup> Light Medium Industrial
Commercial	Urbanizable Fringe Overlay District (UF-10)	Community Commercial
Low Density Residential  Medium Density Residential High Density Residential	Urbanizable Fringe Overlay District (UF-10)	Low Density Residential Small Lot Residential <sup>13</sup>  Medium Density Residential High Density Residential
Glenwood Residential Mixed Use Glenwood Commercial Mixed Use Glenwood Office Mixed Use Glenwood Employment Mixed Use	Urbanizable Fringe Overlay District (UF-10) and Glenwood Riverfront Mixed-use Plan District	Glenwood Residential Mixed Use Glenwood Commercial Mixed Use Glenwood Office Mixed Use Glenwood Employment Mixed Use
Glenwood Refinement Plan: Low Density Residential	Urbanizable Fringe Overlay District (UF-10)	Low Density Residential Special Density Residential <sup>14</sup>
Glenwood Refinement Plan: Light Medium Industrial	Urbanizable Fringe Overlay District (UF-10)	Light Medium Industrial <sup>15</sup>
Glenwood Refinement Plan: Parks and Open Space	Public Land and Open Space (PLO)	Public Land and Open Space (PLO)
Public – Semi Public	Public Land and Open Space (PLO)	Public Land and Open Space (PLO)
Natural Resource	Agriculture — Urban Holding Area (AG) Zoning District	Natural resource protection zoning such as: Natural Resource Public Land and Open Space Natural Resource Overlay
Government and Education	Public Land and Open Space (PLO) <sup>16</sup>	Public Land and Open Space (PLO)

<sup>11</sup> Zoning to be determined through subsequent Springfield 2030 Comprehensive Plan or refinement plan updates

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid. Springfield Comprehensive Plan Residential Land Use and Housing Element Policy H.7, Implementation Action 7.4 requires analysis to determine applicability of small lot zoning in Glenwood south of Franklin Blvd.

<sup>15</sup> Zoning to be determined through subsequent Springfield 2030 Comprehensive Plan or refinement plan updates

<sup>16</sup> Ibid.

## Urban Holding Area - Employment (UHA-E) Metro Plan Designation

Lands brought into Springfield's UGB to address 2010-2030 land needs for suitable large employment sites are designated Urban Holding Area – Employment (UHA-E) as an interim plan designation to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur.

The Urban Holding Area – Employment (UHA-E) plan designation reserves suitable large employment sites to meet Springfield's long term employment land needs for the 2010-2030 planning period. Lands within the UHA-E designation are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that are well located and viable for industry and not easily replicable elsewhere. The Springfield 2030 Comprehensive Plan designates suitable large sites for employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector<sup>17</sup> industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.

The City expanded the UGB in 2016 to support diversification of the economy by increasing opportunities for siting target industry employers that require large sites. The expansion was based on the lack of vacant or potentially redevelopable parcels larger than five acres in the City's 2008 inventory of employment land and the need for large parcels identified in the Economic Opportunities Analysis.<sup>18</sup> In 2008-2016, the City conducted an Urban Growth Boundary Alternatives Analysis and discovered that few viable options exist for bringing in suitable large parcels of employment land close enough to the City's urban area to maintain a compact urban form. This is due to Springfield's geography and topography. The City is situated between the McKenzie and Willamette Rivers and their floodplains, and surrounded by steeply sloped hills on three sides, thus suitable, serviceable, close-in land is in scarce supply. The Urban Holding Area - Employment (UHA-E) designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E provides adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to all parcels within the UHA.

The UHA-E plan designation and Agriculture – Urban Holding Area Zoning District work together to serve important purposes in the 2030 Comprehensive Plan. Land suitable for large employers is identified, reserved and protected from incompatible interim development.

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<sup>17</sup> ORS 285A.010(9)

<sup>18</sup> Springfield Commercial and Industrial Buildable Land Inventory and Economic Opportunities Analysis, Table 5-4

Bringing these lands into the UGB as designated holding areas subject to the policies of this Urbanization Element and the regulations of the Springfield Development Code establishes the first step for the City — in cooperation with Lane County — to comprehensively plan the urbanizable land supply to accommodate long range employment site needs and to protect natural resources. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process. Lands designated UHA-E and zoned AG are located in two areas of the UGB:<sup>19</sup>

**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
<b>North Gateway UHA -E</b>	139.4 gross acres (includes right of way)	193	132.1 suitable acres	North of Gateway/International Way, east of I-5
<b>Mill Race District UHA-E</b>	133 gross acres (includes right of way)	135	125 suitable acres	South of Main Street, via South 28 <sup>th</sup> and M Streets

Insert 11 x 17 plan designation maps

### **Springfield Development Code Agriculture – Urban Holding Area (AG) Zoning District Implements the UHA-E Plan Designation**

Lands within the UHA-E designation are zoned Agriculture – Urban Holding Area<sup>20</sup> to retain large parcel sizes and current predominant farm uses until land is planned and zoned to allow urban development.

The Springfield Development Code Agriculture – Urban Holding Area Zoning District (AG) is established to implement the goal of compact growth through provisions that control the potential for premature or incompatible development on large sites added to the UGB to diversify the economy. The AG District includes provisions to limit the division of land and prohibit urban development. A 50-acre minimum lot size is applied to lots/parcels greater than 50 acres and a 20-acre minimum lot size is applied to lots/parcels less than 50 acres to protect undeveloped sites from inefficient piecemeal development until land is planned and zoned to allow annexation and site development with urban employment uses and densities.

All interim development in the AG District must be designed to City standards.

<sup>19</sup> Springfield Ordinance \_\_\_\_\_, Lane County Ordinance \_\_\_\_\_, Exhibit A-2

<sup>20</sup> Springfield Ordinance \_\_\_\_\_, Lane County Ordinance \_\_\_\_\_, Exhibit A-3

### Natural Resource (NR) Metro Plan Designation - North Gateway Site

Land in North Gateway brought into Springfield’s UGB to address 2010-2030 land needs for suitable large employment sites includes portions of properties within the floodway of the McKenzie River. Floodway is identified as an “absolute constraint” in the City’s land inventories. Land within the floodway is not considered suitable to meet employment land needs and is not counted as developable in the inventory. The City and County included the floodway portion of the site in the UGB to allow 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.

<b>Name of Area</b>	<b>Acres Designated Natural Resource</b>	<b>Acres Zoned AG</b>	<b>Location</b>
<b>North Gateway Natural Resource (NR)</b>	53	53	North of Gateway/International Way, east of I-5

### Springfield Development Code Agriculture – Urban Holding Area (AG) Zoning District Implements the Natural Resource Plan Designation

Lands within the Natural Resource designation are zoned Agriculture – Urban Holding Area to retain predominant farm uses and to direct development towards the unconstrained portions of the property that are designated UHA-E for employment uses.

## Springfield Development Code Agriculture – Urbanizable Fringe Zoning Overlay District (UF-10) Implements Varied Plan Designations

The UF-10 Overlay District is applied over multiple plan designations as shown in Table 1, and includes unincorporated land in the following eight geographic areas of the UGB:

West Centennial	Thurston South Hills
Gateway-Hayden Bridge	Jasper-Natron
Clearwater	South 2 <sup>nd</sup> Street
Thurston	Glenwood

The UF-10 Overlay District includes provisions to limit the division of land and prohibit urban development. All interim development in the UF-10 Overlay District must be designed to City standards. The UF-10 Overlay is removed automatically when annexation to the City is approved through the City’s land use review process, as described in the Springfield Development Code Annexation chapter.

### **SPRINGFIELD ANNEXATION PROCESS**

The annexation process — as articulated in the Springfield Development Code — guides the efficient transition of land from rural to urban uses to accommodate population and urban employment growth within Springfield’s UGB by:

- Providing land to accommodate future urban development;
- Providing land to accommodate necessary public facilities or services; and
- Ensuring that land designated to accommodate population and urban employment growth is developed to achieve its planned urban uses, densities and economic potential in a manner consistent with the urban development standards of the Springfield Development Code.

Oregon law grants Springfield City Council the authority to review and approve or deny petitions to annex territory located within Springfield’s UGB to the City. Statutory requirements for annexation are implemented through the Springfield Development Code. The Code prescribes the City’s land use process and criteria for approving annexation petitions.

The intent is that annexation will occur incrementally as property owners desire to develop or redevelop land. Annexation is required when unincorporated property is proposed to be developed or redeveloped with planned urban uses and densities or where necessary to abate public health hazards<sup>21</sup> such as failed septic systems.

### **Key Urban Services Required for Annexation to the City of Springfield**

The policies and implementation strategies in the **Urbanization Element** ensure that urban facilities and services directly related to land use planning and the efficient transition of land from urbanizable to urban pursuant to Goal 14 Urbanization are provided to urbanizable lands in a timely, orderly, and efficient manner to serve planned land uses within Springfield's urban growth boundary and within the metropolitan area. The Springfield Comprehensive Plan **Urbanization Element** retains the long-standing Metro area urbanization policy criteria for approving annexations:

#### **Springfield Comprehensive Plan Urbanization Element Policy 30:**

Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City's infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.

Oregon law includes requirements that must be met prior to annexation approval to ensure orderly growth, such as prohibiting non-contiguous annexations and providing information about properties' contribution to offsite public systems. Oregon Administrative Rules establish policies to protect public waters from human health hazards, including standards and permitting requirements for onsite wastewater treatment systems construction, alteration and repair. These rules require connection to a sewerage system that can serve the proposed sewage flow when such a system is physically and legally available within the distances specified in the OARs. The City of Springfield requires annexation before wastewater services are extended as planned in the Metropolitan Public Facilities and Services Plan.

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<sup>21</sup> Oregon Revised Statutes Chapter 222 Health Hazard Abatement

For the purposes of land use planning and annexation, the Springfield Comprehensive Plan defines **key urban facilities and services as those services and facilities that are necessary to serve planned urban uses and densities in accordance with applicable Statewide Planning Goals, statutes and administrative rules:** wastewater service; stormwater service; transportation; solid waste management; water service; fire and emergency medical services; police protection; citywide park and recreation programs; electric service; land use controls; communication facilities; and public schools on a district-wide basis. All references to Metro Plan policies regarding “key urban services” in Springfield refinement plans and the Springfield Development Code shall be amended to reference Springfield Comprehensive Plan Urbanization Element Policy 30. This plan does not address facilities and services provided by Lane County<sup>22</sup>, the State of Oregon, or the Federal government, and does not preclude provision of those services within Springfield.

The availability of key urban services is determined by Springfield and/or applicable public and private service providers at the time of the annexation request, based on a determination of existing and planned capacity, existing and proposed uses, and costs. The land use application process for annexation is described in the Springfield Development Code. If key urban services are not available to serve the site at the time the annexation request is made, the Code requires an Annexation Agreement to ensure that services will be provided in a timely manner. The Annexation Agreement states the terms, conditions, and obligations of the property owner and the service providers regarding the fiscal and service impacts to Springfield associated with the annexation, provision of infrastructure, and future development of the property.

### **URBAN HOLDING AREA – EMPLOYMENT DESIGNATION: REQUIRED PLAN AMENDMENT PROCEDURES TO DESIGNATE URBANIZABLE LAND FOR URBAN DEVELOPMENT BEFORE ANNEXATION AND DEVELOPMENT APPROVAL**

Lands designated Urban Holding Area – Employment (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

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<sup>22</sup> Lane County provides the following services on a county-wide basis: sheriff and corrections, criminal prosecution, parole and probation; elections; regional transportation; mental health and public health services; workforce assistance; animal services; and regional parks and facilities.

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 Urban Holding Area – Employment Districts.

### **Planning Requirements in Urban Holding Areas**

District, refinement plan or master plan approval is required prior to or concurrent with annexation of land designated Urban Holding Area- Employment as shown in Table 3. Urban Holding Areas are zoned Agriculture - Urban Holding Area (AG) prior to plan amendment approval and prior to annexation.

<b>Table 5: Pre-Development Approval Process Steps – Urban Holding Areas</b>	
<b>City-initiated Planning Process</b>	<b>Owner-initiated Planning Process</b>
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and 2030 Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and 2030 Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, Employment ). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Master Plan	4. Applicant prepares and submits Master

and annexation applications with demonstration of key urban service provision.	Plan with proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.
5. 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.

DRAFT

## URBANIZATION ELEMENT GOALS, POLICIES AND IMPLEMENTATION STRATEGIES

**Commentary:** Draft policies were prepared with the input of the Springfield City Council, City of Springfield and Lane County staff, Springfield Utility Board staff, and City and Lane County attorneys to address the policies necessary to demonstrate and ensure that development within the UGB is consistent with applicable Statewide planning goals, statutes and administrative rules, applicable Metro Plan policies, and the City’s existing annexation policies. The draft policies also address input received from the public and from public agencies through the 2010 Springfield and Lane County Planning Commission public hearing process and subsequent public facilities analysis by staff and service providers.

**Commentary:** After approval of the Urbanization Element, the following section will be formatted and numbered to be consistent with 2030 Residential and Economic Elements that list policies and implementation strategies under the corresponding **2030 Plan Urbanization Goals**. For discussion purposes, policies are numbered and implementation strategies are bulleted. **Green font = 2030 Urbanization Element Planning Goals** **Blue font = Metro Plan policies carried over into the 2030 Plan.**

The **Springfield 2030 Urbanization Element** Planning Goals express the desired community development outcomes and benefits the City aspires to achieve by planning and managing land in new growth areas before the land is annexed to become part of the City.

The **Springfield 2030 Urbanization Element** Policies and Implementation Strategies are the City’s agreements and commitments to manage urban growth in ways that provide and sustain a healthy, prosperous and equitable environment aligned with Springfield’s interests, values and assets. The adopted policy statements and implementation strategies in this plan provide a consistent course of action, moving the community toward attainment of its goals. Some policies and strategies call for immediate action; others require additional studies or community planning processes to develop more detailed or specific area plans or policy updates.

**UG-1 Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city and to urbanizable lands where future annexation and development may occur.**

1. Urbanizable lands within the 2030 UGB shall be converted to urban uses as shown in the Metro Plan Diagram and as more particularly described in neighborhood refinement plans, other applicable area-specific plans, and the policies of this Plan.
2. Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.
  - Continue to provide public policy and financial support when possible for redevelopment in Springfield.
  - Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.
  - Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.
  - Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.
  - Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships.
3. [Any development taking place within the City’s urbanizable area shall be designed to the development standards of the Springfield Development Code.](#)

Policies: Development within the Urban Holding Area- Employment Designation

4. Urbanizable lands added to Springfield’s acknowledged UGB by **Ordinance X, date X** to meet employment needs are designated “Urban Holding Area- Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in

the UGB.<sup>23</sup> The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area.

5. Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:
  - A significant capital investment;
  - Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector<sup>24</sup> industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.
6. Lands designated “Urban Holding Area-Employment” are zoned “Agriculture – Urban Holding Area” (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District.

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

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

The following policy retains large parcels. The area’s existing Lane County zoning is EFU-25 (25-acre minimum).

<sup>23</sup> 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.

<sup>24</sup> ORS 285A.010(9)

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

The following policy suggests one way the City Council could provide an incentive for development.

9. As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization.
10. Refinement Plans, District Plans, Master Plans and zoning for land within the UHA-E designation shall support cohesive design and development of innovative Employment districts that provide attractive sites for economic development in convenient proximity to natural and recreational amenities and infrastructure systems designed to integrate and protect water quality, Springfield's Drinking Water Source Areas, riparian, wetland and groundwater resources, aquifer recharge, and floodplain functions with compatible employment uses.
11. Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing<sup>25</sup> 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.

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<sup>25</sup> 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.

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

The following policies (in blue font) are existing Metro Plan policies applicable to unincorporated land within the existing UGB. The UF-10 overlay is an existing Springfield zone applied to these lands until they are annexed.

Policies: Development within the Urbanizable Fringe (UF-10) Overlay Zoning District

13. Unless the following conditions are met, the minimum lot size for campus industrial designated areas in the UF-10 Zoning District shall be 50 acres and the minimum lot size for all other designations in the UF-10 Zoning District shall be 10 acres. Land division in the UF-10 Zoning District will be subject to the following requirements:
  - a. The approval of a conceptual plan for ultimate development at urban densities in accordance with applicable plans and policies. The conceptual plan shall remain in effect until superseded by other plans or actions required to enable full urban density development.
  - b. Proposed land uses and densities conform to applicable plans and policies.
  - c. The owner of the property has signed an agreement with the city which provides that the owner and his or her successors in interest are obligated to not remonstrate against annexation proceedings should the city, at its option, initiate annexation.
14. Any proposed land division in the UF-10 District that creates any lot under five acres in size will require utilizing the following additional standards:
  - a. The property will be owned by a governmental agency or public utility.
  - b. A majority of parcels located within 100 feet of a boundary of the property are smaller than five acres.
  - c. The land division does not result in more than 3 parcels.
15. The siting of all residences on urbanizable lots served by on-site sewage disposal systems shall be reviewed by Lane County to ensure the efficient future conversion of these lots to urban densities according to *Plan* assumptions and minimum density requirements.

16. The Development and Public Works Director may accept the use of on-site sewage disposal systems as a temporary measure for approval of industrial and commercial development proposals within Campus Industrial designated areas in conjunction with annexation to a city provided:
  - a. It is in the City's interest to encourage economic diversification; and
  - b. Extension of the public wastewater system is imminent or is identified as part of an approved capital improvement program; and
  - c. An annexation agreement establishes the timeframe for connecting to the public wastewater system.

**UG-2 Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — both within and between neighborhoods and districts.**

The following policies suggest ways the City Council could provide incentives to prepare sites for development to meet employment land needs.

17. In new growth and redevelopment areas throughout the City, plan and support the transition to transportation-efficient land use patterns by providing incentives such as City-initiated plan and zoning updates, technical assistance, implementation of design standards, and permit processing assistance to guide the development of well-designed neighborhoods, efficient and economically viable mixed use districts and corridors.
18. Within districts and neighborhoods currently characterized by a limited range of land uses and activities, pursue comprehensive planning and zoning code updates to allow for mixed-use development at appropriate locations as one method of providing additional land use diversity and choices — as described in the Economic and Residential Land Use Elements of this plan.
19. Support new development and redevelopment in mixed use areas to address Springfield's needs for housing, employment, and shopping opportunities in connected, walkable neighborhood locations served by the region's frequent transit network (FTN).
20. Plan and zone land to support transit-oriented land use patterns and development, including but not limited to higher intensity development in the City's employment and

commercial centers and along major transit corridors; employment uses located within ¼ mile of transit stations or stops; and residential development within ½ mile of transit stations or stops.

21. As permitted under Oregon law, [require improvements in new commercial, public, mixed use, and multi-unit residential development that encourage walking, bicycling and the use of transit.](#)
22. Plan and zone the North Gateway UHA-E area to guide development of a well-designed employment district adjacent to the Interstate 5 economic corridor to support diversification and improvement of the local, regional and state economies and to make efficient use of existing and planned public transportation systems and infrastructure. Applicant-initiated plan designation and zoning changes shall address logical extension of transportation and public facilities to serve the entire North Gateway UHA-E district. Development within the North Gateway District shall be zoned and designed to enhance the distinctive physical surroundings and natural resources of the area while accommodating growth and change through implementation of attractive building exteriors and low impact development practices.
23. Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area.
24. Lands added to the UGB in 2016 for employment, public facilities, parks, open space and recreation in the Mill Race area shall be comprehensively planned in the context of a larger Mill Race District that includes the Booth Kelly Mixed Use site and the industrially-zoned lands south of the railroad corridor. The plan shall identify opportunities for integrating economic development, recreation, arts, culture, historic interpretation, and pedestrian/bicycle connectivity between the Middle Fork Willamette River and Downtown District; and shall identify development standards that protect Drinking Water Source Areas and other natural resources from incompatible development.
25. As depicted in Ordinance        Exhibit A-2, lands developed with and occupied by Springfield Utility Board and Rainbow Water District public drinking water wells and wellfields included in the 2015 UGB expansion are designated Public/Semi Public to

accommodate and protect Springfield's public water system facilities and Drinking Water Source Areas and shall not be re-designated to allow for other urban uses.

26. As depicted in Ordinance [REDACTED] Exhibit A-2, certain Willamalane Park and Recreation District lands, parks and facilities are included in the 2016 UGB expansion and are designated Public/Semi Public to accommodate community needs for open space and recreation and shall not be re-designated to allow for other urban uses.

**UG-3 Provide an adequate level of urban services, including but not limited to public water, wastewater, and stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.**

27. The coordinated, timely provision of urban services is a central element of the City's comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.
- Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City's financial resources.
28. Regionally significant public investments within Springfield's UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.
29. Annexation shall continue to be a prerequisite for urban development and the delivery of City services in accordance with the Springfield Comprehensive Plan and Springfield Development Code.
30. Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City'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.

31. For the purposes of land use planning and annexation approval, the Springfield Comprehensive Plan defines key urban facilities and services as: wastewater service; stormwater service; transportation; solid waste management; water service; fire and emergency medical services; police protection; citywide park and recreation programs; electric service; land use controls; communication facilities; and public schools on a district-wide basis.<sup>26</sup>
32. Urban services provided by the City upon annexation to Springfield include storm and sanitary sewer; water; transportation systems; police and fire protection; planning, building, code enforcement and library services; and public infrastructure maintenance of City-owned or operated facilities.
33. Springfield Utility Board (SUB) is the water service provider within the Springfield City Limits. SUB will be the electrical service provider within the UGB as provided or permitted under Oregon law.
34. When unincorporated territory within the UGB is provided with any new urban service, that service shall be provided by one of the following methods in this priority order:
  - a. Annexation to City; or
  - b. Contractual annexation agreements with City
35. The City shall not extend water or wastewater service outside city limits to serve a residence or business without first obtaining a valid annexation petition, a consent to annex agreement, or when a health hazard abatement annexation is required.
36. The City may approve construction of urban transportation and public infrastructure facilities prior to or concurrently with development proposals provided that such infrastructure construction is consistent with the Public Facilities and Services Plan, Springfield Wastewater and Stormwater Master Plans, the regional and local transportation system plans, or the Capital Improvement Program.

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<sup>26</sup> This plan does not address facilities and services provided by Lane County, the State of Oregon, or the Federal government, and does not preclude provision of those services within Springfield.

- The City shall continue to seek funding opportunities and public-private partnerships to allow construction of key urban infrastructure elements to support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin Corridor multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.

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

NOTE: Policies 38-40 are intended to address Metro Plan Chapter III-F Eugene-Springfield Metropolitan Area Transportation Element, to address the applicable Statewide planning Goal 12 and Goal 12 administrative rules requirements.

38. To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.
39. The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.

40. Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.

**Note:** For other related policy discussion, see the [Public Facilities and Services Element in Metro Plan Chapter III-G](#). The Springfield 2030 Comprehensive Plan Urbanization Element does not address service districts or the financing or management of services that are provided; and does not preclude dissolution, merger, expansion or creation of special districts by public agencies.

**UG-4 As the City grows and as land develops, maintain and reinforce Springfield's identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City's land development patterns and infrastructure design.**

41. Protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of the McKenzie and Willamette River and waterway corridors as Springfield grows and develops.

The following policies are adapted from existing Metro Plan policies as noted. They are included here to update existing policies applicable to urbanizable lands within Springfield's UGB.

42. Land use regulations and acquisition programs along river corridors and waterways shall take into account the concerns and needs of the community, such as recreation, resource protection, wildlife habitat, enhancement of river corridor or waterway environments, potential for public access, and opportunities for river-oriented urban development and infrastructure design. [\(Adapted from Greenway, River Corridors and Waterways Metro Plan D.2 p III-D-4\)](#)
43. The City of Springfield and Willamalane shall continue to cooperate in expanding water-related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors. [\(Adapted from Greenway, River Corridors and Waterways Metro Plan D.3, p III-D-4\)](#)
44. New development that locates along river corridors and waterways shall be designed to enhance natural, scenic and environmental qualities of those water features. [\(Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4\)](#)

45. Continue efforts to restore, enhance and manage the Springfield Mill Race to fulfill multiple community objectives. Partner with Willamalane and Springfield Utility Board to provide public access to the Mill Race where appropriate. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4)
46. Continue efforts to provide increased opportunities for public access to the Willamette River Greenway and the McKenzie River through comprehensive planning, development standards, annexation agreements, the land use permitting process, and through partnerships with Willamalane, Springfield Utility Board and property owners.
47. Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.
48. Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.
49. Employment lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing<sup>27</sup> 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.

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<sup>27</sup> 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.

50. The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB through the provisions of the Springfield Development Code.

**UG-5 Increase Springfield's capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.**

51. Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.

- Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.
- Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.
- Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.

52. Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles

(SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.

- Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.
- Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.
- Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.

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## **FINDINGS**

### **POPULATION AND EMPLOYMENT FORECASTS FOR THE 2010-2030 PLANNING PERIOD**

In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007) Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County co-adopted the following coordinated population forecasts into the Metro Plan for Springfield’s jurisdictional areas:

	<b>2030</b>	<b>2031</b>	<b>2032</b>	<b>2033</b>	<b>2034</b>	<b>2035</b>
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
<b>Total</b>	<b><u>81,608</u></b>	<b><u>82,252</u></b>	<b><u>82,896</u></b>	<b><u>83,541</u></b>	<b><u>84,184</u></b>	<b><u>84,828</u></b>

These figures effectively provide coordinated projections for years ending 2030 through 2035 and were used as the basis for the Springfield 2030 UGB and plan policies adopted to meet residential and employment land needs for the 20-year planning period 2010-2030. The 2030 UGB relied on the 2006 employment forecast <sup>29</sup>of 13,440 new employees for Springfield in the year 2030 to project employment land needs.

### **LAND INVENTORIES AND ANALYSES FOR THE 2010-2030 PLANNING PERIOD**

The Springfield Comprehensive Plan is supported by the following land inventories and technical analyses which are adopted as technical supplements to this Plan:

Goal 10: Springfield Residential Land and Housing Needs Analysis (acknowledged in 2011)<sup>30</sup>

Goal 9: Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (acknowledged in 2016)<sup>31</sup>

**Definitions of constrained and unconstrained land.** The land area included in the Springfield 2030 Urban Growth Boundary includes land constrained by natural features, natural hazards, natural resource protection buffers, and 230KV transmission line easements. Constraints are

<sup>29</sup> The employment forecast in the adopted Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, Appendix C.

<sup>30</sup> Adopted as a Technical Supplement to the Springfield 2030 Residential Land Use and Housing Element

<sup>31</sup> Adopted as a Technical Supplement to the Springfield 2030 Economic Element

factors that preclude land development or affect the desirability of land for development. Constraints reduce the development capacity of land.

OAR 660-009-0005(2) defines “development constraints” as factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. Assumptions about constraints affect the amount of suitable, buildable land in the City’s inventories, and thus the amount of land Springfield needs to designate to meet housing and employment needs for the planning period. Table 1 shows constraints that were considered unbuildable for the purpose of the 2010-2030 land inventories.

<b>Table 6: Development Constraints Springfield 2030 Comprehensive Plan Land Inventories (2010-2030)</b>	
<p style="text-align: center;"><b>Assumed Constraints Employment Land<sup>32</sup></b></p> <p><u>Absolute Development Constraints.</u> The following factors are considered absolute development constraints which make employment land <u>unsuitable</u> for development:</p> <ul style="list-style-type: none"> <li>▪ Floodway</li> <li>▪ Wetlands</li> <li>▪ Riparian resource areas</li> <li>▪ Slopes greater than 15%</li> </ul> <p>Springfield’s Natural Resources Inventory and Lane County Rural Comprehensive Plan Natural Resources Inventory identify wetlands and riparian resource areas protected from development by City Ordinance in compliance with Goal 5, the Federal Clean Water Act and the federal Endangered Species Act.</p>	<p style="text-align: center;"><b>Assumed Constraints Residential Land<sup>33</sup></b></p> <p><u>Unbuildable, Not Serviceable Land:</u> Tax lots or areas within tax lots with one or more of the following attributes:</p> <ul style="list-style-type: none"> <li>▪ Floodway</li> <li>▪ Wetlands</li> <li>▪ Riparian resource areas and setbacks</li> <li>▪ Areas with severe landslide potential (DOGAMI map)</li> <li>▪ Slopes greater than 25%</li> <li>▪ Easements containing a 230KV transmission line</li> <li>▪ Small irregularly shaped lots</li> <li>▪ Publicly owned land</li> </ul>

<sup>32</sup> Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis, page 14.

<sup>33</sup> Springfield Residential Land and Housing Needs Analysis, page 10, Map 3-4.

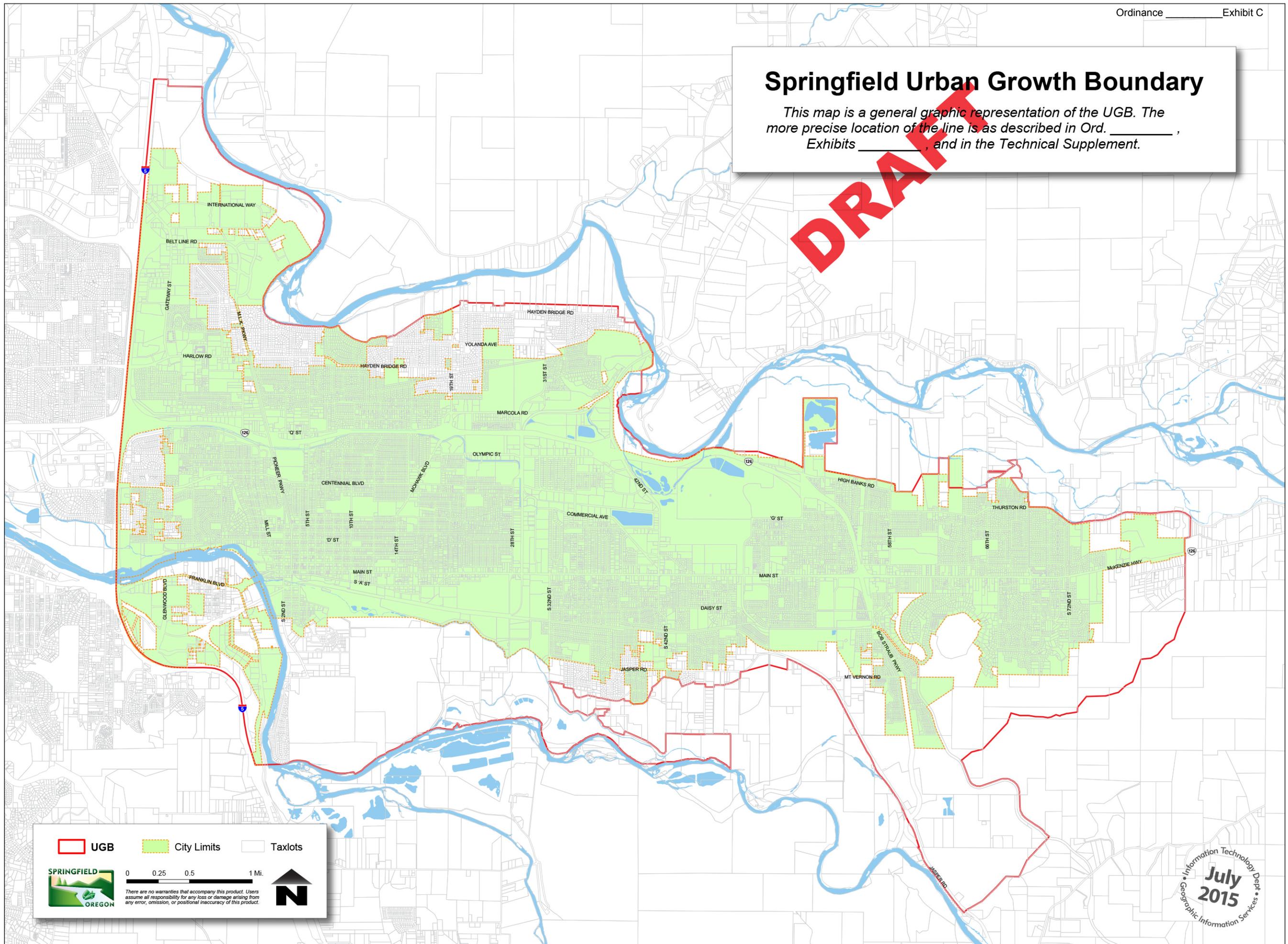
Commentary: After approval, this document will be formatted to be consistent with the Economic and Residential Elements of this Plan

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# Springfield Urban Growth Boundary

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

**DRAFT**



UGB
  City Limits
  Taxlots



0 0.25 0.5 1 Mi.

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



Information Technology Dept.  
**July 2015**  
 Geographic Information Services

Ordinance \_\_\_\_\_, Exhibit D

**Proposed amendments to Eugene-Springfield  
Metropolitan Area General Plan (Metro Plan) Text**

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

- 1. Amendment to Chapter II, Section G. Metro Plan Land Use Designations to add a new land use designation applicable to Springfield’s jurisdictional area of responsibility: Urban Holding Area – Employment.**
- 2. Amendment to Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G- 8 to delete a Springfield–specific reference to the Natron site.**
- 3. Amendment to Metro Plan Chapter II, Section G, footnotes 11 and 12 to add a reference to the subject UGB amendment ordinance.**
- 4. Amendment to Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies.**
- 5. Amendment to Chapter II, Section E Metro Plan Urban and Urbanizable Land.**
- 6. Amendment to Chapter III, Section B Metro Plan Economic Element.**
- 7. Amendment to Preface to correct scrivener’s error in ordinance numbers at end of preface and adding text to identify significant plan amendments and adopted elements of Springfield’s city-specific comprehensive plan.**

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.

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.<sup>2</sup> 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.

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. 20519  
 Springfield City Council, Ordinance No. 6304  
 Lane County Board of Commissioners, Ordinance No. PA 1300

In 2013, Lane County initiated an amendment of the Metro Plan Boundary east of Interstate Highway 5 to make the plan boundary coterminous with the Springfield UGB.

Eugene City Council, Ordinance No. 20511  
 Springfield City Council, Ordinance No. 6288  
 Lane County Board of Commissioners, Ordinance No. PA 1281

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<sup>2</sup> 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.

## **Springfield's Comprehensive Plan**

Springfield has begun a series of Metro Plan amendments to create a city-specific comprehensive plan. In 2011, the City of Springfield and Lane County adopted the Springfield 2030 Residential Land Use and Housing Element and established a separate UGB for Springfield pursuant to ORS 197.304 (Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274). In 2014, the City of Springfield 2035 Transportation System Plan was adopted to serve as Springfield's local Transportation System Plan (Springfield Ordinance No. 6314 and Lane County Ordinance No. PA 1303). In 2016, the Metro Plan was amended to reflect adoption of the Economic and Urbanization Elements and expansion of the Springfield UGB and Metro Plan Boundary to designate land for employment, public facilities, parks and open space, and natural resources (Springfield Ord. xxxx and Lane County Ord. PA 1304).

## C. Growth Management Goals, Findings, and Policies

To effectively control the potential for urban sprawl and scattered urbanization, compact growth within the urban growth boundary (UGB) is, and will remain, the primary growth management technique for directing geographic patterns of urbanization in the metropolitan community. In general, this means the filling in of vacant and underutilized lands, as well as redevelopment inside the UGB.

Outward expansion of the UGB will occur only when the home city and Lane County determine such expansion is proven necessary according to state law and applicable *Metro Plan* and city-specific comprehensive plan provisions.

Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. PA 1304, as part of 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.

### Goals

1. Use urban, urbanizable, and rural lands efficiently.
2. Encourage orderly and efficient conversion of land from rural to urban uses in response to urban needs, taking into account metropolitan and statewide goals.
3. Protect rural lands best suited for non-urban uses from incompatible urban encroachment.

### Findings and Policies

#### Findings

1. Many metropolitan areas within the United States that have not implemented geographic growth management techniques suffer from scattered or leapfrog urban growth that leaves vacant and underutilized land in its path and encourages isolated residential developments far from metropolitan centers. Until adoption of the *1990 Plan's* urban service area concept, portions of this metropolitan area were characterized by these phenomena.
2. Beneficial results of compact urban growth include:
  - a. Use of most vacant leftover parcels where utilities assessed to abutting property owners are already in place.

## E. Urban and Urbanizable Land

This section addresses the need to allow for the orderly and economic extension of public services, the need to provide an orderly conversion of urbanizable to urban land, and the need to provide flexibility for market forces to operate in order to maintain affordable housing choices. For the definitions of urban and urbanizable lands, as well as rural lands and the urban growth boundary (UGB) as used in this section, refer to the *Metro Plan* Glossary.

Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. PA 1304, as part of 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.

The undeveloped (urbanizable) area within the metropolitan UGB, separating urban and urbanizable land from rural land, was carefully calculated to include an adequate supply to meet demand for a projected population of 286,000 through the end of the planning period (2015). When the metropolitan UGB was established for the 1995-2015 planning period, Lane County, Eugene and Springfield realized, however, that unless the community consciously decided to limit future expansions of the UGB, one of several ways to accommodate growth, that boundary would need to be expanded in future plan updates. The jurisdictions anticipated that before 2015, the metropolitan UGB would include more urbanizable area reflecting metro-wide population and employment needs of populations beyond those in 2015. Periodic updates of land use needs and revision of the metropolitan UGB to reflect extensions of the planning period were expected to ensure that adequate surplus urbanizable land was always available.

With the transition mandated in 2007 by ORS 197.304, the shared metropolitan UGB will be replaced with two separate UGBs (the Eugene UGB and the Springfield UGB). This changed the land use work programs for the three jurisdictions. Evaluation of the sufficiency of the 2015 metropolitan UGB was replaced with an in-depth analysis of each city's independent needs and the supplies of land that exist with respect to the separate areas of jurisdictional responsibility. That process began with the three jurisdictions' adoption of city-specific population forecasts in Chapter I of the *Metro Plan*. In 2011, the City of Springfield, with co-adoption by Lane County, amended the *Metro Plan* to establish its own UGB consistent with ORS 197.304.<sup>7</sup>

The three jurisdictions continue to agree that the key to addressing the needs stated at the beginning of this section is not so much the establishment of a UGB, but maintaining an adequate and reasonable supply of available undeveloped land at any point in time. The "adequate" and "reasonable" tests are the key to the related phasing and surplus land issues.

In order to maintain an "adequate" supply of available surplus land to allow development to occur, annexation must take place in advance of demand in order to allow for the provision of public capital improvements, such as wastewater trunk lines, arterial streets, and water trunk lines. Most capital improvement programs are "middle-range" type plans geared three to six

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<sup>7</sup> Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274.

for processing, preparing, and storing raw materials, such as timber, agriculture, aggregate, or by-products or waste products from other manufacturing processes.

Land divisions in these areas shall be controlled to protect large parcels (40-acre minimum parcel size). Because city services are not available to these areas in the short-term, terms may be allowed to provide on-site the necessary minimum level of key urban facilities and services subject to standards applied by Lane County and subject to applicable state, federal, and local environmental standards.

This designation accommodates industrial developments that need large parcels, particularly those with rail access. Although a primary purpose of this designation is to provide sites for heavy industries, any industry which meets the applicable siting criteria may make use of this designation.

One area is designated Special Heavy Industrial. Listed below are the applicable land division standards, use limitations, and annexation and servicing provisions.

North of Awbrey Lane (north of Eugene)

The minimum level of key urban facilities and services is available or can be readily available to this area. Annexation shall be assured prior to development. Lane County and the City of Eugene shall cooperate to apply the appropriate industrial zoning specifying the minimum parcel size and setting forth performance standards.

This site was added to the industrial land inventory to provide a large (200+ acre) site for a special heavy industrial park. The minimum parcel size for lots in the industrial park shall be 40 acres. Prior to subdivision, it shall be demonstrated that the comprehensive development plan ensures compatibility among planned uses within the park as well as with adjacent properties and that access to both the Union Pacific and Burlington Northern railroads has been extended into the area or that a surety sufficient to secure such extension has been posted with the city.

The comprehensive development plan shall include the layout of lots, railroad right-of-way, streets, utilities and performance and site development standards. It shall also consider the provisions of a "public team track." The comprehensive development plan shall be designed to protect and enhance the site for special heavy industrial users requiring a campus-like setting and rail access. Uses in this area shall be limited to industries which are rail dependent or require a minimum site of 100 acres.

**Small-Scale Light Industry** (not shown on *Metro Plan* Diagram)

This category is characterized by industrial uses that emit no smoke, noise, glare, heat, dust, objectionable odors, or vibrations beyond property boundaries; pursue their activities within buildings; and do not generate a large amount of vehicular trips for employees, customers, or freight movements. Depending on the local situation, in some instances such industrial uses may be incorporated into mixed use areas. To enhance compatibility with adjacent non-

industrial areas, local governments should apply development standards to specific proposals. Such standards should address building height, setbacks, adequate off-street parking areas, landscaping, and safe and efficient access. The determination of the appropriateness of specific sites and uses or additional development standards is left to the local jurisdictions. Minimum locational standards and site criteria include:

1. Access to arterial streets, normally without use of residential streets.
2. Up to five acres, with sufficient parking areas and frontage to accommodate structures, parking areas, and access in character with adjacent non-industrial properties.

### **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.

### **Nodal Development Area (Node)**

Areas identified as nodal development areas in *TransPlan* are considered to have potential for this type of land use pattern. Other areas, not proposed for nodal development in *TransPlan*, may be determined to have potential for nodal development.

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;

The compact urban growth and sequential development principles embodied in the *Metro Plan* text and *Metro Plan* Diagram allow for retention of the most productive agricultural lands when balanced with other planning goals.

Factor 7. “Compatibility of the proposed urban uses with nearby agricultural activities.”

Again, the *Metro Plan* Diagram adheres to the compact urban growth form and sequential development. The separation between urban and urbanizable lands and rural lands formed by the UGB creates a sharp distinction between ultimate urban uses and agricultural uses on rural lands.

While urban development may create problems from an agricultural production standpoint, the compact urban growth form is, in many ways, compatible with nearby agricultural activities.

First, as urban densities increase, the close proximity of productive agricultural areas provides the potential to access larger markets for their products, thereby increasing their economic return. Second, close proximity can reduce transportation costs for agricultural products grown near metropolitan population concentrations, enabling local farmers to remain or become competitive with more distant markets. Third, retention of productive agricultural lands immediately adjacent to urban development can provide possible social and psychological benefits to urban residents. Fourth, the compact urban growth form and sequential development avoids the problem of leapfrogging and the problem of surrounding an area of agricultural development with urban areas.

Since the most productive agricultural lands are typified by Class I agricultural soils located in the floodway fringes, the boundary of the floodway fringe often serves as the location of the UGB. When the floodway fringe follows a natural bench or when a road creates a dike which defines the floodway fringe, the boundary between urban uses and agricultural uses may be abrupt. In other instances, the transition from urban to rural is not as easily definable on the ground.

Recognizing inevitable problems for agricultural production and retention of small isolated pockets of agricultural land that are or would be surrounded by urban uses was not considered a high priority in drawing the UGB.

On the east side of Interstate 5, the location of the UGB is either tax lot-specific (coterminous with tax lot boundaries) or specifically identified by a metes and bounds description.<sup>11</sup> On the

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<sup>11</sup> The location of the Springfield UGB is graphically depicted in the Springfield Urban Growth Boundary Map and further described in the table entitled “List of tax lots which are adjacent to and inside, or split by the UGB” and the document entitled “Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary.” The table and methodology document were added to the *Metro Plan* in 2011 as part of the adoption of the City of Springfield’s city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011; and revised as part of the adoption of the UGB amendment in 2016 (through Springfield Ordinance No. XXXX and Lane County Ordinance No. PA 1304, Exhibit C-2).

## Urban Growth Boundary Location Description Keyed to *Metro Plan* Plan Boundaries Map

For up-to-date information regarding the areas west of Interstate 5 where the UGB is tax lot-specific (i.e., where the UGB and city limits are the same, through annexations or to the outside edge of existing rights-of-way), contact the planning offices of the City of Eugene or Lane County. As explained in Chapter II-G, the metropolitan UGB was developed considering the seven factors that were then set out in LCDC Statewide Planning Goal 14: Urbanization. The following matrix outlines key factors that will be considered to determine the location of the metropolitan UGB west of Interstate 5 Highway where it is not tax lot-specific.

### *Metro Plan* Metropolitan Urban Growth Boundary Map Key

Map Key	Protect Agricultural Lands	Protect Forest Lands	Ridgeline (Drainage Basin)	Orderly and Economic Public Services	Floodway Fringe	Protect Wetlands	Protect Sand and Gravel Resources	Airport Protection	Existing Development and Services (City Limits)	Meet Economic Goals	Meet Housing Goals
A-B		•	•	•					•		•
B-C <sup>12</sup>					•						•
P-Q	•				•	•	•				•
Q-R	•				•	•	•		•		•
R-S	•			•					•	•	•
S-T	•								•	•	
T-U	•									•	
U-V	•							•	•		
V-W	•							•	•		•
W-X	•							•			•
X-Y	•							•		•	•
Y-Z		•		•							•
Z-A		•		•						•	•

<sup>12</sup> UGB segments C-P are now specifically identified on the table entitled “List of tax lots which are adjacent to and inside, or split by the UGB” and the document entitled “Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary.” The table and methodology document were added to the Metro Plan in 2011 as part of the adoption of the City of Springfield’s city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011; and revised as part of the adoption of the UGB amendment in 2016 (through Springfield Ordinance No. XXXX and Lane County Ordinance No. PA 1304, Exhibit C-2.

## **METRO PLAN**

### **Eugene-Springfield Metropolitan Area General Plan**

#### **Eugene, Springfield, and Lane County**

For information about the *Eugene-Springfield Metropolitan Area General Plan (Metro Plan)*, contact the following planning agencies:

City of Eugene  
Eugene Planning Division  
99 West 10<sup>th</sup> Avenue, Suite 240  
Eugene, Oregon 97401  
1-541-682-5481

City of Springfield  
Development and Public Works Department  
225 5<sup>th</sup> Street  
Springfield, Oregon 97477  
1-541-726-3753

Lane County  
Land Management Division  
3050 North Delta Highway  
Eugene, Oregon 97408  
1-541-682-4061

Lane Council of Governments  
859 Willamette Street, Suite 500  
Eugene, Oregon 97401-2910  
1-541-682-4283

*Text updated through December 31, 2015*



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## Preface

### Adoption History

In 1980, Eugene, Springfield, and Lane County adopted updated versions of the *Eugene-Springfield Metropolitan Area General Plan (Metro Plan)*. The *Metro Plan* replaced the *Eugene-Springfield Metropolitan Area 1990 General Plan (1990 Plan)*, which was adopted in 1972.

The Eugene City Council and the Springfield City Council adopted identical versions of the *Metro Plan* in 1980:

Eugene City Council, Ordinance No. 18686, July 28, 1980  
Springfield City Council, Ordinance No. 4555, August 4, 1980

The Lane County Board of Commissioners adopted a different version of the *Metro Plan* in 1980:

Original adoption, Ordinance No. 9-80, adopted August 27, 1980  
Amended adoption, Ordinance No. 9-80-A, adopted October 14, 1980

The two versions of the *Metro Plan* and supporting documents were forwarded to the Oregon Land Conservation and Development Commission (LCDC) with a request for acknowledgment of compliance with the 15 applicable statewide planning goals. In reports dated June 25-26, 1981, and September 24-25, 1981, and adopted by LCDC on August 6 (amended version of June 25-26 report) and September 24, 1981, respectively, LCDC outlined the requirements necessary to bring the August 1980 versions of the *Metro Plan* into conformance with state standards.

From September 1980 to February 1982, Eugene, Springfield, and Lane County cooperated, with coordination and technical assistance from the Lane Council of Governments (LCOG), to amend the August 1980 versions of the *Metro Plan*. The three general purpose governments used the Elected Officials Coordinating Committee (two elected representatives each as voting members and one ex-officio Planning Commission member from each government) to work out informal compromises and provide policy direction to staff.

In response to LCDC's requirements, 10 working papers were prepared and draft *Metro Plan* amendments were released for public review.

After a joint public hearing by the Eugene, Springfield, and Lane County Planning Commissions on November 17, 1981, and joint public hearings by the Eugene City Council, Springfield City Council, and Lane County Board of Commissioners on December 15, 1981, and January 12, 1982 (Goal 5), the three governing bodies informally agreed to a set of amendments to constitute the first version of the identical *Metro Plan* adopted by Eugene, Springfield and Lane County.

Following the January 12, 1982, joint meeting, each governing body adopted the mutually agreed upon amendments:

Lane County, Ordinance No. 856, adopted February 3, 1982  
City of Eugene, Ordinance No. 18927, adopted February 8, 1982  
City of Springfield, Ordinance No. 5024, adopted March 1, 1982

In February 1982, the City of Eugene began work on the *Willow Creek Special Area Study* (Study). The Study resulted in proposed amendments to the *Metro Plan* Diagram. With those amendments, as approved by Eugene, Springfield, and Lane County, the three governments had a common version of the *Metro Plan*.

After completing other LCDC required work specific to each jurisdiction, the amended *Metro Plan* and supporting documents were resubmitted to LCDC with a second request for acknowledgment with the 15 applicable goals. After conducting a hearing in Salem on August 19, 1982, the LCDC granted acknowledgment for the portion of the *Metro Plan* within the urban growth boundary.

Although the *Metro Plan* was acknowledged by LCDC in August, the rural portions of the *Metro Plan* were segmented and continued in order to correct deficiencies under Goals 2, 4, 5, and 15. The appropriate corrections were made and on September 13, 1985, LCDC acknowledged the rural portion of the *Metro Plan*.

### ***Metro Plan* Updates**

The *1990 Plan* stated that a review should be conducted between major five-year updates by the Metropolitan Area Planning Advisory Committee (MAPAC), planning commissions, and governing bodies. In September 1984, a work program for a two and one-half year mid-period review for the *Metro Plan* was adopted by the Metropolitan Policy Committee (MPC). In accordance with the Post Acknowledgment plan review procedures of ORS 197.610-650, proposed amendments to the *Metro Plan* were transmitted to the Department of Land Conservation and Development (DLCD) on October 21, 1985. DLCD presented the metropolitan area with a Post Acknowledgment Review Report on the proposed amendments on December 9, 1985. Governing bodies of Lane County, Springfield, and Eugene took final unanimous action on the proposed amendments to the *Metro Plan* on June 11, May 5, and April 23, 1986, respectively. The amendments were enacted through:

Lane County, Ordinance No. 709  
City of Eugene, Ordinance No. 19382  
City of Springfield, Ordinance No. 5329

## Periodic Review

Pursuant to ORS 197.610-650, local governments are required to update their comprehensive plans and land use regulations through the Periodic Review process in order to bring plans into compliance with new state law and administrative rules and to ensure that the plans address changing local conditions. The DLCD initiated the first Periodic Review of the *Metro Plan* and land use regulations on June 28, 1985. The second Periodic Review process was initiated in May 1995. This *Metro Plan* is also subject to citizen- and government-initiated amendments which are incorporated into the document via *Metro Plan* replacement pages. This *Metro Plan* and replacement pages are available at LCOG and [www.lcog.org](http://www.lcog.org).

The Eugene City Council, the Springfield City Council, and the Lane County Board of Commissioners adopted identical Periodic Review amendments to the *Metro Plan* in 2004:

Eugene City Council, Ordinance No. 20319, April 21, 2004

Springfield City Council, Ordinance No. 6087, May 17, 2004

Lane County Board of Commissioners, Ordinance No. PA 1197, June 2, 2004

## 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.<sup>1</sup>

The three jurisdictions anticipate that the implementation of ORS 197.304 will result in a regional land use planning program that continues to utilize the *Metro Plan* and regional functional plans for land use planning responsibilities that remain regional in nature. City-specific plans will be used to address those planning responsibilities that the cities address independently of each other.

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<sup>1</sup> 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.

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.

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.<sup>2</sup> 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.

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. 20519  
 Springfield City Council, Ordinance No. 6304  
 Lane County Board of Commissioners, Ordinance No. PA 1300

In 2013, Lane County initiated an amendment of the Metro Plan Boundary east of Interstate Highway 5 to make the plan boundary coterminous with the Springfield UGB.

Eugene City Council, Ordinance No. 20511  
 Springfield City Council, Ordinance No. 6288  
 Lane County Board of Commissioners, Ordinance No. PA 1281

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<sup>2</sup> 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.

## Springfield's Comprehensive Plan

Springfield has begun a series of Metro Plan amendments to create a city-specific comprehensive plan. In 2011, the City of Springfield and Lane County adopted the Springfield 2030 Residential Land Use and Housing Element and established a separate UGB for Springfield pursuant to ORS 197.304 (Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274). In 2014, the City of Springfield 2035 Transportation System Plan was adopted to serve as Springfield's local Transportation System Plan (Springfield Ordinance No. 6314 and Lane County Ordinance No. PA 1303). In 2016, the Metro Plan was amended to reflect adoption of the Economic and Urbanization Elements and expansion of the Springfield UGB and Metro Plan Boundary to designate land for employment, public facilities, parks and open space, and natural resources (Springfield Ord. xxxx and Lane County Ord. PA 1304).

# Chapter I

## Introduction

### Background

The 2004 *Eugene-Springfield Metropolitan Area General Plan (Metro Plan)* is the third update of the *1990 Plan*. The *1990 Plan*, adopted in 1972, provided that a major update of the comprehensive plan should be initiated every five years. This reflects the fact that comprehensive plans must be adaptable to the changing needs and circumstances of the community if they are to retain their validity and usefulness.

Therefore, this *Metro Plan* is not an entirely new product, but rather has evolved from and reflects needed changes to the original *1990 Plan*.

The *Metro Plan* was acknowledged by the Land Conservation and Development Commission (LCDC) in 1982 for the area inside the urban growth boundary (UGB). The remaining area was acknowledged in September 1985. The *Metro Plan* was updated in 1987 and in 2004 through periodic review.

As explained in the Preface and below, the *Metro Plan* will continue to evolve.

### Purpose

The *Metro Plan* was created to serve as the sole official long-range comprehensive plan (public policy document) of metropolitan Lane County and the cities of Eugene and Springfield. As Eugene and Springfield carry out their obligations under ORS 197.304, including the establishment of separate UGBs and land supplies for their individual populations, more comprehensive planning is taking place on a city-specific basis, through city-specific plans adopted by each jurisdiction. The *Metro Plan* will continue to include some of the regional land use planning that is collaboratively addressed by Lane County, Eugene and Springfield. It will also refer its readers to jointly adopted functional land use plans and Eugene and Springfield city-specific comprehensive land use planning documents.

The *Metro Plan* was intended to designate a sufficient amount of urbanizable land to accommodate the need for further urban expansion within the shared metropolitan UGB, taking into account the growth policy of the area to accommodate a population of 286,000 within the metropolitan UGB by the year 2015.<sup>3</sup> The *Metro Plan* also was intended to identify the major public facilities required to meet the land use needs designated within that metropolitan UGB.

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<sup>3</sup> The population projection range for the Residential Land Use and Housing Element in Chapter III-A is 291,700 to 311,100. The expected population for the year 2015 is 301,400. This projection is for the Metropolitan Study Area, a census tract area much larger than the UGB. The projection was used as the basis for deriving the population figure of 286,000 for the metropolitan UGB for the year 2015 for the residential lands analysis performed in the 1999 Residential Lands and Housing Study. The 1999 Residential Lands and Housing Study no longer applies to the City of Springfield as a result of Springfield Ordinance No. 6268 (2011) and Lane County Ordinance No. PA 1274 (2011).

## Population Forecast

In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007), the Cities of Eugene and Springfield and Lane County adopted the following forecasts for their respective jurisdictional areas:

	2030	2031	2032	2033	2034	2035
Eugene – City Only	194,314	195,964	197,614	199,264	200,914	202,565
Metro Urban Area West of I-5	17,469	17,274	17,079	16,884	16,689	16,494
Total	<u>211,783</u>	<u>213,238</u>	<u>214,693</u>	<u>216,148</u>	<u>217,603</u>	<u>219,059</u>
Springfield – City Only	74,814	75,534	76,254	76,974	77,693	78,413
Metro Urban Area East of I-5	6,794	6,718	6,642	6,567	6,491	6,415
Total	<u>81,608</u>	<u>82,252</u>	<u>82,896</u>	<u>83,541</u>	<u>84,184</u>	<u>84,828</u>

These figures effectively provide coordinated projections for each city and the respective metro urban area east or west of I-5 for years ending 2030 through 2035, enabling them to meet state requirements concerning the beginning and ending years of the 20-year planning period.

## Planning Functions

More specifically, the *Metro Plan* provides the overall framework for the following planning functions. The *Metro Plan* was created to serve as the document that:

1. Guides all governments and agencies in the metropolitan area in developing and implementing their own activities which relate to the public planning process.
2. Establishes the policy basis for a general, coordinated, long-range approach among affected agencies for the provision of the facilities and services needed in the metropolitan area.
3. Makes planning information available to assist citizens to better understand the basis for public and private planning decisions and encourages their participation in the planning process.
4. Provides the public with general guidelines for individual planning decisions. Reference to supplemental planning documents of a more localized scope, including neighborhood refinement plans, is advisable when applying the *Metro Plan* to specific parcels of land or

individual tax lots.

5. Assists citizens in measuring the progress of the community and its officials in achieving the *Metro Plan's* goals and objectives.
6. Provides continuity in the planning process over an extended period of time.
7. Establishes a means for consistent and coordinated planning decisions by all public agencies and across jurisdictional lines.
8. Serves as a general planning framework to be augmented, as needed, by more detailed planning programs to meet the specific needs of the various local governments.
9. Provides a basis for public decisions for specific issues when it is clear that the *Metro Plan* serves as the sole planning document on the issue and that it contains a sufficient level of information and policy direction.
10. Recognizes the social and economic effects of physical planning policies and decisions.
11. Identifies the major transportation, wastewater, stormwater, and water projects needed to serve future UGB populations.

### **Use of the *Metro Plan***

The *Metro Plan* is a policy document intended to provide the three jurisdictions and other agencies and districts with a coordinated guide for change over a long period of time. Throughout the *Metro Plan*, there may be statements indicating that certain provisions are inapplicable to a jurisdiction because that jurisdiction has replaced those *Metro Plan* provisions with local plan provisions. The major components of this policy document are: the written text, which includes goals, objectives, findings, and policies; the *Metro Plan* Diagram; and other supporting materials. These terms are defined below:

- A goal is a broad statement of philosophy of the jurisdictions to which the goal applies. A goal describes the hopes of the people of the community for the future of the community. A goal may never be completely attainable, but is used as a point to strive for.
- An objective is an attainable target that the jurisdictions to which the objective applies attempt to reach in striving to meet a goal. An objective may also be considered as an intermediate point that will help fulfill the overall goal.
- A finding is a factual statement resulting from investigation, analysis, or observation regarding the jurisdictions to which the finding applies.

- An assumption is a position, projection, or conclusion considered to be reasonable. Assumptions differ from findings in that they are not known facts.
- A policy is a statement adopted as part of the *Metro Plan* to provide a consistent course of action for the jurisdictions to which the policy applies, moving the community toward attainment of its goals.
- The *Metro Plan* Diagram is a graphic depiction of: (a) the broad allocation of projected land use needs; and (b) goals, objectives, and policies embodied in the text of the *Metro Plan*. The *Metro Plan* Diagram depicts land use designations, the cities' urban growth boundaries, the *Metro Plan* Plan Boundary (Plan Boundary), and major transportation corridors.

The revised goals, objectives, and policies contained in this *Metro Plan* are not presented in any particular order of importance. The respective jurisdictions recognize that there are apparent conflicts and inconsistencies between and among some goals and policies. When making decisions based on the *Metro Plan*, not all of the goals and policies can be met to the same degree in every instance. Use of the *Metro Plan* requires a balancing of its various components on a case-by-case basis, as well as a selection of those goals, objectives, and policies most pertinent to the issue at hand.

The policies in the *Metro Plan* vary in their scope and implications. Some call for immediate action; others call for lengthy study aimed at developing more specific policies later on; and still others suggest or take the form of policy statements. The common theme of all the policies is acceptance of them as suitable approaches toward problem-solving and goal realization. Other valid approaches may exist and may at any time be included in the *Metro Plan* through plan amendment procedures. Adoption of the *Metro Plan* does not necessarily commit the jurisdictions to immediately carry out each policy to the letter, but does put them on record as having recognized the validity of the policies and the decisions or actions they imply. The jurisdictions can then begin to carry out the policies to the best of their ability, given sufficient time and resources.

In addition, it is important to recognize that the written text of the *Metro Plan* takes precedence over the *Metro Plan* Diagram where apparent conflicts or inconsistencies exist. The *Metro Plan* Diagram is a generalized map which is intended to graphically reflect the broad goals, objectives, and policies. As such, it cannot be used independently from or take precedence over the written portion of the *Metro Plan*.

The degree to which the *Metro Plan* provides sufficient detail to meet the needs of each jurisdiction will have to be determined by the respective jurisdictions. Where conflicts exist among the *Metro Plan*, local comprehensive plans, refinement plans, and existing zoning, each jurisdiction will have to establish its own schedule for bringing the zoning and refinement plans into conformance with the *Metro Plan* or the applicable local comprehensive plan.

It is recognized that the needs, priorities, and resources vary with each jurisdiction and that the methods and timing used to implement the *Metro Plan* or to conduct city-specific comprehensive planning will also vary.

### **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.

The following Metro Plan appendices are available at Lane Council of Governments (LCOG):

- Appendix A Public Facility Plan Project Lists and Maps for Water, Stormwater, Wastewater, Electricity, and Transportation [These lists and maps are located in Chapter II of the 2001 *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan* and 2001 *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)*]
- Appendix B List of Refinement and Functional Plans and Map of Refinement Plan Boundaries
- Appendix C List of Exceptions and Maps of Site-Specific Exception Area Boundaries
- Appendix D Auxiliary Maps showing the following:
  - Fire station locations
  - Urban growth boundary
  - Greenway boundary
  - Schools
  - Parks

### **Relationship to Lane County Rural Comprehensive Plan**

The Plan Boundary shown on the *Metro Plan* Diagram in Chapter II is adjacent to the boundaries of the *Lane County Rural Comprehensive Plan* that surround the Eugene-Springfield metropolitan area. There is no overlap between the boundaries of the *Metro Plan* and the *Lane County Rural Comprehensive Plan*. Lane Code Chapter 16 is applied in the area between the UGB and the Plan Boundary to implement the *Metro Plan*.

Adjustments to boundaries may occur in the future so that areas previously a part of one plan are covered under another plan. These adjustments may occur using the *Metro Plan* review and amendment procedures described in Chapter IV.

### **Relationship to Statewide Planning Goals**

The *Metro Plan* has been developed in accordance with the statewide planning goals adopted by the Oregon Land Conservation and Development Commission (LCDC). These goals provide the standards and set the framework for the planning programs of all governmental agencies and bodies in the metropolitan area. Through the *Metro Plan* and the jurisdictions' own land use plans, the cities and county address the applicable LCDC goals (as well as local goals). In response to the statutorily mandated adoption of separate urban growth boundaries for Eugene and Springfield, each city will independently address some of the statewide planning goals in their city-specific plans. For example, each city will provide the type and quantity of land needed to support its own population as required by Statewide Planning Goals 9 (Employment), 10 (Housing) and 14 (Urbanization).

### **General Assumptions and Findings**

The following general assumptions and findings relate to the entire *Metro Plan*. They are included in the Introduction because of their general application.

#### **General Assumptions<sup>4</sup>**

1. A population of 286,000 is expected to reside within the metropolitan UGB by the year 2015. This is a 29 percent increase from the estimated 2000 census population of 222,500. Since this *Metro Plan* is designed to accommodate the expected population rather than remain static until 2015, it can be adjusted periodically as changes in population trends are detected.
2. Based on recent trends, the rate of population growth and the rate of in-migration are projected to decrease.
3. In addition to population growth, increasing household formation rates (i.e., decreasing average household size) will increase the demand for housing.
4. In addition to population growth, increasing labor force participation rates will increase the resident labor force, thereby increasing the demand for employment opportunities.
5. The metropolitan area will experience continuing growth of the local economy.
6. Based on projections of recent population and economic trends, there will be sufficient land within the urban growth boundary, depicted on the *Metro Plan* Diagram in Chapter

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<sup>4</sup> These General Assumptions no longer apply within Springfield's UGB (east of Interstate 5) as a result of Springfield's establishment of its separate UGB and 20-year supply of residential land. Springfield Ordinance No. 6268 (June 20, 2011); Lane County Ordinance No. PA 1274 (July 6, 2011).

II, to ensure reasonable choices in the market place for urban needs to serve a metropolitan UGB area population of 286,000, provided periodic updates of the *Metro Plan* are conducted and the area designated for urbanization on the *Metro Plan Diagram* is updated to assure that the supply remains responsive to demand.

7. Public policies controlling the Eugene-Springfield metropolitan area's growth pattern will continue to be effective. For example, compact urban growth will continue to enhance the opportunity to preserve important natural assets, such as rural open space and agricultural land.
8. Additional urban development will take place within incorporated cities.

### **General Findings**

1. Orderly metropolitan growth cannot be accomplished without coordination of public investments. Such coordination can be enhanced through use of the *Public Facilities and Services Plan* and scheduling of priorities.
2. When urban growth is allowed to occur without consideration for the physical characteristics of the land, it creates problems that are then difficult to solve.
3. The development and implementation of planning policies have social and economic impacts.
4. Financial and taxing inequities are generated when urban development is allowed to occur in unincorporated areas on the periphery of Springfield and Eugene because many residents of such developments are at least partially dependent on streets, parks, and other non-direct fee facilities and services provided by those cities and financed from their revenues.



## **Chapter II**

### **Fundamental Principles and Growth Management Policy Framework**

This chapter contains Fundamental Principles that reflect the overall themes of the *Metro Plan*. The chapter also contains: Metropolitan Goals; Growth Management Goals, Findings, and Policies; Eugene and Springfield Jurisdictional Responsibility; Urban and Urbanizable Land; River Road and Santa Clara Goals, Findings and Policies; and *Metro Plan* Diagram.

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 this Chapter II 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. When both the Springfield UGB and the Eugene UGB have been established, the metropolitan UGB will cease to exist.

#### **A. Fundamental Principles**

There are seven principles that are fundamental to the entire *Metro Plan*. They are implicitly included in the various individual *Metro Plan* components. These Fundamental Principles are:

1. The *Metro Plan* is a long-range policy document providing the framework within which more detailed plans are prepared. This concept is discussed in more detail in the Introduction (Chapter I).
2. To be meaningful, the *Metro Plan* requires cooperation by all general purpose, special district, and special function agencies in the community. This reflects its comprehensive nature encompassing physical land use, social, and economic implications for the metropolitan area. Examples where cooperation is essential include planning and implementation of a transportation system and development of a metropolitan-wide energy plan, metropolitan-wide analysis and resolution of certain housing issues, and planning for areas outside the urban growth boundary (UGB) and within the Plan Boundary.<sup>5</sup>
3. The *Metro Plan* and most of its elements are oriented to and require that urban development occur in a compact configuration within the UGB. Elaboration of this principle is treated in the other sections of this chapter, and in the Public Facilities and Services Element in Chapter III.

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<sup>5</sup>As a result of actions taken by all three jurisdictions in 2013, there are no lands outside the UGB within the *Metro Plan* boundary on the east side of Interstate 5. Lane County Ordinance No. PA 1281 (June, 2013); Springfield Ordinance No. 6288 (March, 2013), Eugene Ordinance No. 20511 (May, 2013).

4. Comprehensive plans identify and establish the plan-zoning consistency concept and recognize the importance of timing concerning implementation techniques. Implementation techniques, including zoning, shall generally be consistent with the precepts established in the *Metro Plan*, which is the broad policy document for the metropolitan area and in the applicable city-specific comprehensive plan. The consistency test shall continuously be applied to implementation measures and public actions taken to rectify inconsistencies when the general direction provided by the *Metro Plan* or the city-specific comprehensive plan is modified. A variety of potential solutions to consistency problems exist, including modification to the *Metro Plan*, the city-specific comprehensive plan or to the implementation techniques themselves.
5. The zoning process shall be monitored and adjusted to meet current urban land use demands through the planning period for all land use categories.
6. The *Metro Plan* is based on the premise that Eugene and Springfield, the two existing cities, are the logical providers of services accommodating urban levels of development within the UGB.
7. The *Metro Plan* was developed to meet the supporting facilities and services necessary to serve a population of 286,000 within the metropolitan UGB by the year 2015.

## **B. Metropolitan Goals**

Metropolitan Goals are listed under the applicable section in this chapter or in Chapter III (*Metro Plan Elements*) and Chapter IV (*Metro Plan Review, Amendments, and Refinements*).



## C. Growth Management Goals, Findings, and Policies

To effectively control the potential for urban sprawl and scattered urbanization, compact growth within the urban growth boundary (UGB) is, and will remain, the primary growth management technique for directing geographic patterns of urbanization in the metropolitan community. In general, this means the filling in of vacant and underutilized lands, as well as redevelopment inside the UGB.

Outward expansion of the UGB will occur only when the home city and Lane County determine such expansion is proven necessary according to state law and applicable *Metro Plan* and city-specific comprehensive plan provisions.

Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. PA 1304, as part of 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.

### Goals

1. Use urban, urbanizable, and rural lands efficiently.
2. Encourage orderly and efficient conversion of land from rural to urban uses in response to urban needs, taking into account metropolitan and statewide goals.
3. Protect rural lands best suited for non-urban uses from incompatible urban encroachment.

### Findings and Policies

#### Findings

1. Many metropolitan areas within the United States that have not implemented geographic growth management techniques suffer from scattered or leapfrog urban growth that leaves vacant and underutilized land in its path and encourages isolated residential developments far from metropolitan centers. Until adoption of the *1990 Plan's* urban service area concept, portions of this metropolitan area were characterized by these phenomena.
2. Beneficial results of compact urban growth include:
  - a. Use of most vacant leftover parcels where utilities assessed to abutting property owners are already in place.

- b. Protection of productive forest lands, agricultural lands, and open space from premature urban development.
  - c. More efficient use of limited fuel energy resources and greater use of bicycle and pedestrian facilities due to less miles of streets and less auto dependence than otherwise would be required.
  - d. Decreased acreage of leapfrogged vacant land, thus resulting in more efficient and less costly provision and use of utilities, roads, and public services such as fire protection.
  - e. Greater urban public transit efficiency by providing a higher level of service for a given investment in transit equipment and the like.
3. The disadvantages of a too-compact UGB can be a disproportionately greater increase in the value of vacant land within the Eugene-Springfield area, which would contribute to higher housing prices. Factors other than size and location of the UGB and city limits affect land and housing costs. These include site characteristics, interest rates, state and federal tax laws, existing public service availability, and future public facility costs.
  4. Periodic evaluation of land use needs compared to land supply provides a basis for orderly and non-excessive conversion of rural land to urbanizable land and provides a basis for public action to adjust the supply upward in response to the rate of consumption.
  5. Prior to the late 1960s, Eugene and Springfield had no growth management policy and, therefore, growth patterns were generally dictated by natural physical characteristics.
  6. Mandatory statewide planning goals adopted by the Land Conservation and Development Commission (LCDC) require that all communities in the state establish UGBs to identify and separate urbanizable land from rural land.
  7. Between 1970 and 1983, Springfield's population increased about 4 percent and Eugene's about 2.5 percent a year, but unincorporated portions of the metropolitan area experienced a population decline. About 17 percent of the total increase in the population was related to annexations. This indicates that growth is occurring in cities, which is consistent with the compact urban growth concept, and limitations on urban scatteration into unincorporated areas, as first embodied in the *1990 Plan*.
  8. In addition to Finding 7 above, evidence that the metropolitan UGB was an effective growth management tool included the following:
    - a. Consistent reduction over time of vacant land within the metropolitan UGB.
    - b. Reduction of vacant residential zoned land in Springfield and Eugene.

- c. Greater value of vacant land within Springfield and Eugene than similar land outside incorporated areas but within the metropolitan UGB.
  - d. Increase since 1970 of the proportionate share of residential building permits issued within city limits.
9. Reduction in the use of zoning provisions and regulatory processes that favor single-family detached dwellings on standard size parcels would increase the opportunity to realize higher net residential densities than are presently occurring, particularly in newly developing areas.
  10. A variety of public services are provided by Lane County and special service districts to unincorporated portions of the Eugene-Springfield metropolitan area.
  11. In 1986, the Cities of Eugene and Springfield entered into Urban Transition Agreements with Lane County which transferred from the County to the Cities administration for building and land use within the urbanizable portion of the UGB.

### **Objectives**

1. Continue to minimize urban scatteration and sprawl by encouraging compact growth and sequential development.
2. Insure that land supply is kept in proper relationship to land use needs.
3. Conserve those lands needed to efficiently accommodate expected urban growth.
4. Protect rural land and open space from premature urbanization.
5. When necessary to meet urban needs, utilize the least productive agricultural lands for needed expansion, in accordance with state statutes, Statewide Planning Goal 14, and the Land Conservation and Development Commission's administrative rules.
6. Encourage new and maintain existing rural land uses where productive or beneficial outside the urban growth boundary.
7. Shape and plan for a compact urban growth form to provide for growth while preserving the special character of the metropolitan area.
8. Encourage development of suitable vacant, underdeveloped, and redevelopable land where services are available, thus capitalizing on public expenditures already made for these services.
9. Protect life and property from natural hazards and natural disasters.

10. Allow smaller outlying communities the opportunity to plan for their own futures without being engulfed by unlimited outward expansion of the metropolitan area.
11. Identify methods of establishing an urban transition program which will eventually reduce service delivery inefficiencies by providing for the provision of key urban services only by cities.

## **Policies**

1. The UGB and sequential development shall continue to be implemented as an essential means to achieve compact urban growth. The provision of all urban services shall be concentrated inside the UGB.
2. The Metropolitan UGB was mapped and described to lie along the outside edge of existing and planned rights-of-way that form a portion of the UGB so that the full right-of-way is within the UGB.
3. Control of location, timing, and financing of the major public investments that directly influence the growth form of the metropolitan area shall be planned and coordinated on a metropolitan-wide basis.
4. Lane County shall discourage urban development in urbanizable and rural areas and encourage compact development of outlying communities.
5. To maintain the existing physical autonomy of the smaller outlying communities, urban development on agricultural and rural lands beyond the UGB shall be restricted and based on at least the following criteria:
  - a. Preservation and conservation of natural resources
  - b. Conformity with the policies and provisions of the *Lane County Rural Comprehensive Plan* that borders the metropolitan area
  - c. Conformance with applicable mandatory statewide planning goals.
6. Outlying communities close to Springfield and Eugene shall be encouraged to develop plans and programs in support of compact urban development.
7. Conversion of rural and rural agricultural land to urbanizable land through *Metro Plan* amendments expanding the UGB shall be consistent with mandatory statewide planning goals.
8. Land within the UGB may be converted from urbanizable to urban only through annexation to a city when it is found that:

- a. A minimum level of key urban facilities and services can be provided to the area in an orderly and efficient manner.
  - b. There will be a logical area and time within which to deliver urban services and facilities. Conversion of urbanizable land to urban shall also be consistent with the *Metro Plan*.
9. A full range of key urban facilities and services shall be provided to urban areas according to demonstrated need and budgetary priorities.
10. Annexation to a city through normal processes shall continue to be the highest priority.
11. The tax differential concept, as provided for in ORS 222.111 (2), shall be one mechanism that can be employed in urban transition areas.
12. Police, fire and emergency medical services may be provided through extraterritorial extension with a signed annexation agreement or initiation of a transition plan and upon concurrence by the serving jurisdiction.
13. Both Eugene and Springfield shall examine potential assessment deferral programs for low-income households.
14. Creation of new special service districts or zones of benefit within the Plan Boundary of the *Metro Plan* shall be considered only when all of the following criteria are satisfied:
  - a. There is no other method of delivering public services which are required to mitigate against extreme health hazard or public safety conditions.
  - b. The three metropolitan area general purpose governments concur with the proposal to form the service district or zone of benefit.
  - c. The district or zone of benefit is an interim service delivery method, and there are legal assurances, such as annexation agreements, to ensure that annexation to the appropriate city occurs within the planning period.
  - d. The servicing city is not capable of providing the full range of urban facilities and services in the short term, although it is recognized that urban facilities and services will be provided by a city consistent with adopted public facilities plans and capital improvement programs.
  - e. The district or zone of benefit will contract with the appropriate city for interim service delivery until annexed to the appropriate city.
15. Ultimately, land within the UGB shall be annexed to a city and provided with the required minimum level of urban facilities and services. While the time frame for

annexation may vary, annexation should occur as land transitions from urbanizable to urban.

16. Eugene and Springfield and their respective utility branches, Eugene Water & Electric Board (EWEB) and Springfield Utility Board (SUB), shall be the water and electrical service providers within the UGB.
17. As annexations to cities occur over time, existing special service districts within the UGB shall be dissolved. The cities should consider developing intergovernmental agreements, which address transition issues raised by annexation, with affected special service districts.
18. The realignment (possible consolidation or merger) of fringe special service districts shall be examined to:
  - a. Promote urban service transition to cities within the UGB.
  - b. Provide continued and comprehensive rural level services to property and people outside the UGB.
  - c. Provide more efficient service delivery and more efficient governmental structure for serving the immediate urban fringe.
19. Annexation of territory to existing service districts within the UGB shall occur only when the following criteria are met:
  - a. Immediate annexation to a city is not possible because the required minimum level of key urban facilities and services cannot be provided in a timely manner (within five years, as outlined in an adopted capital improvements program);
  - b. Except for areas that have no fire protection, affected property owners have signed consent to annex agreements with the applicable city consistent with Oregon annexation law.

Such annexations shall be considered as interim service delivery solutions until ultimate annexation to a city occurs.

20. When unincorporated territory within the UGB is provided with any new urban service, that service shall be provided by the following method (in priority order).
  - a. Annexation to a city;
  - b. Contractual annexation agreements with a city;
  - c. Annexation to an existing district (under conditions described previously in Policy #19); or

- d. Creation of a new service district (under conditions described previously in Policy #14).
21. Cities shall not extend water or wastewater service outside city limits to serve a residence or business without first obtaining a valid annexation petition, a consent to annex agreement, or when a health hazard annexation is required.
22. Regulatory and fiscal incentives that direct the geographic allocation of growth and density according to adopted plans and policies shall be examined and, when practical, adopted.
23. To accomplish the Fundamental Principle of compact urban growth addressed in the text and on the *Metro Plan* Diagram, overall metropolitan-wide density of new residential construction, but not necessarily each project, shall average approximately six dwelling units per gross acre over the 1995-2015 planning period addressed in the 1999 Residential Lands and Housing Study.<sup>6</sup>
24. When conducting metropolitan planning studies, particularly the *Public Facilities and Services Plan*, consider the orderly provision and financing of public services and the overall impact on population and geographical growth in the metropolitan area. Where appropriate, future planning studies should include specific analysis of the growth impacts suggested by that particular study for the metropolitan area.
25. Based upon direction provided in Policies 4, 8, and 23 of this section, any development taking place in an urbanizable area shall be designed to the development standards of the city which would be responsible for eventually providing a minimum level of key urban services to the area. Unless the following conditions are met, the minimum lot size for campus industrial designated areas shall be 50 acres and the minimum lot size for all other designations shall be 10 acres. Creation of new parcels in the urbanizable area will comply with the following standards:
  - a. The approval of a conceptual plan for ultimate development at urban densities in accord with applicable plans and policies.
  - b. Proposed land uses and densities conform to applicable plans and policies.
  - c. The owner of the property has signed an agreement with the adjacent city which provides:
    - (1) The owner and his or her successors in interest are obligated to support annexation proceedings should the city, at its option, initiate annexation.

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<sup>6</sup> This policy no longer applies to the City of Springfield. For the City of Springfield, the 1995-2015 planning period for the accommodation of the metropolitan area's residential land need and the 1999 Residential Lands and Housing Study that addressed that planning period have been supplanted by the 2010-2030 planning period addressed in the 2011 "Springfield 2030 Refinement Plan Residential Land Use and Housing Element." Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274.

- (2) The owner and his or her successors in interest agree not to challenge any annexation of the subject property.
  - (3) The owner and his or her successors in interest will acquire city approval for any subsequent new use, change of use, or substantial intensification of use of the property. The city will not withhold appropriate approval of the use arbitrarily if it is in compliance with applicable plans, policies, and standards, as interpreted by the city, as well as the conceptual plan approved under subsection a above.
26. Any lot under five acres in size to be created in an urbanizable area will require utilizing the following additional standards:
  - a. The property will be owned by a governmental agency or public utility.
  - b. A majority of parcels located within 100 feet of the property are smaller than five acres.
  - c. No more than three parcels are being created.
27. The siting of all residences on urbanizable lots served by on-site sewage disposal systems shall be reviewed by Lane County to ensure the efficient future conversion of these lots to urban densities according to *Metro Plan* assumptions and minimum density requirements.
28. The approval of on-site sewage disposal systems for rural and urbanizable area uses and developments shall be the responsibility of Lane County, subject to: (a) applicable state law; (b) the criteria for the creation of new lots in Policies 25, 26 above; (c) the requirement for the siting of residences in Policy 27 above; (d) requirements of Policy 29; and (e) the requirements for special heavy industrial designated areas.
29. In order to encourage economic diversification, on-site sewage disposal systems shall be allowed for industrial development and for commercial development allowed within Campus Industrial designated areas in conjunction with annexation to a city, when extension of the public wastewater system is imminent or is identified as part of an approved capital improvement program.
30. Eugene, Springfield, and Lane County shall continue to involve affected local governments and other urban service providers in development of future, applicable *Metro Plan* revisions, including amendments and updates.
31. If expansion of the UGB is contemplated, all other options should be considered and eliminated before consideration of expanding the UGB in the area west of Highway 99 and north of Royal Avenue.

Note: For other related policy discussion, see the Public Facilities and Services Element in Chapter III-G.

## **D. Jurisdictional Responsibility**

The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Chapter IV provides that all three jurisdictions would need to approve a UGB or Metro Plan boundary change that crosses Interstate 5. For purposes of other amendments and implementation of the Metro Plan, Lane County has joint responsibility with Eugene between the city limits and the *Metro Plan* Boundary (Plan Boundary) west of the Interstate 5 Highway and with Springfield between the city limits and the Plan Boundary east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction.

ORS 197.304 requires Eugene and Springfield to establish separate UGBs “consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan.”



## E. Urban and Urbanizable Land

This section addresses the need to allow for the orderly and economic extension of public services, the need to provide an orderly conversion of urbanizable to urban land, and the need to provide flexibility for market forces to operate in order to maintain affordable housing choices. For the definitions of urban and urbanizable lands, as well as rural lands and the urban growth boundary (UGB) as used in this section, refer to the *Metro Plan* Glossary.

Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. PA 1304, as part of 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.

The undeveloped (urbanizable) area within the metropolitan UGB, separating urban and urbanizable land from rural land, was carefully calculated to include an adequate supply to meet demand for a projected population of 286,000 through the end of the planning period (2015). When the metropolitan UGB was established for the 1995-2015 planning period, Lane County, Eugene and Springfield realized, however, that unless the community consciously decided to limit future expansions of the UGB, one of several ways to accommodate growth, that boundary would need to be expanded in future plan updates. The jurisdictions anticipated that before 2015, the metropolitan UGB would include more urbanizable area reflecting metro-wide population and employment needs of populations beyond those in 2015. Periodic updates of land use needs and revision of the metropolitan UGB to reflect extensions of the planning period were expected to ensure that adequate surplus urbanizable land was always available.

With the transition mandated in 2007 by ORS 197.304, the shared metropolitan UGB will be replaced with two separate UGBs (the Eugene UGB and the Springfield UGB). This changed the land use work programs for the three jurisdictions. Evaluation of the sufficiency of the 2015 metropolitan UGB was replaced with an in-depth analysis of each city's independent needs and the supplies of land that exist with respect to the separate areas of jurisdictional responsibility. That process began with the three jurisdictions' adoption of city-specific population forecasts in Chapter I of the *Metro Plan*. In 2011, the City of Springfield, with co-adoption by Lane County, amended the *Metro Plan* to establish its own UGB consistent with ORS 197.304.<sup>7</sup> The three jurisdictions continue to agree that the key to addressing the needs stated at the beginning of this section is not so much the establishment of a UGB, but maintaining an adequate and reasonable supply of available undeveloped land at any point in time. The "adequate" and "reasonable" tests are the key to the related phasing and surplus land issues.

In order to maintain an "adequate" supply of available surplus land to allow development to occur, annexation must take place in advance of demand in order to allow for the provision of public capital improvements, such as wastewater trunk lines, arterial streets, and water trunk lines. Most capital improvement programs are "middle-range" type plans geared three to six

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<sup>7</sup> Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274.

years into the future. The time between annexation and the point of finished construction usually involves several steps:

1. The actual annexation and rezoning of the land.
2. Filing and approval of a subdivision or planned unit development (with accompanying public hearing processes).
3. Extension of public capital improvements (in accordance with programming and funding availability).
4. Construction of the private development (including local extension of streets, sidewalks, wastewater, water, electricity, and construction of dwelling units or businesses).

The time period between initiating annexation and sale of a home or opening of a business varies but can easily take from two to six years.

Large-scale and timely annexations of undeveloped and underdeveloped areas should be encouraged to enhance the opportunity for compact urban growth, an efficient land use pattern, and a well-planned supporting arterial street system.

The approach is to allow the cities to develop annexation programs which will ensure a six- to ten-year surplus of land. Such a range will allow the maintenance of an adequate surplus of land at any point in time. The six- to ten-year surplus is suggested as a reasonable range which will not only allow for the conversion of urbanizable to urban land through annexation but will allow the cities the opportunity and flexibility to plan for and provide urban facilities and services on a large scale. The six-year minimum will allow the cities and other providers of urban services to develop coordinated capital improvement programs in accordance with the applicable comprehensive plan. Such coordinated capital improvement programs can and should be closely related to implementation of annexation plans.

Comprehensive plans will be updated before undeveloped surplus urban lands are exhausted.

The six- to ten-year low density residential land surplus should be based on the amount of development over the previous six to ten years. For other land use categories, annexation programs should be based on past trends, *Metro Plan* assumptions, and *Metro Plan* Goals, particularly those goals dealing with promotion of economic development and diversity. Improved monitoring techniques made possible by the Regional Land Information Database of Lane County (RLID) formerly referred to as the Geographic Information System (GIS) should allow such monitoring to occur. The monitoring information should be provided on a jurisdictional basis.

In summary, the cities should continually monitor the conversion of urbanizable land to urban and pursue active annexation programs based on local policies and applicable provisions of this *Metro Plan* including, for example:

1. Orderly economic provision of public facilities and services (maintenance and development of capital improvement programs).
2. Availability of sufficient land to ensure a supply responsive to demand.
3. Compact urban growth.
4. Cooperation with other utilities and providers of urban services to ensure coordination with their respective capital improvement programs.



## **F. River Road and Santa Clara Goals, Findings, Objectives, and Policies**

The River Road and Santa Clara portions of the Eugene-Springfield metropolitan area are important components of the metropolitan community. Both River Road and Santa Clara have:

- Unique and distinctive neighborhood identities
- Experienced considerable private investment in the past years
- Experienced considerable public investments; e.g., transmission facilities by the Eugene Water & Electric Board (EWEB) and educational facilities by public school systems
- A sound housing stock

In Santa Clara, relatively large parcels of vacant land exist which, with adequate urban services, can be developed at increased densities; in River Road, relatively large developed lots exist which could be further developed by their owners.

The future of both the River Road and Santa Clara areas will play a critical role in the growth of the metropolitan area. For some years, officials of Lane County and Eugene have cooperatively discussed methods of delivering services to these neighborhoods.

These discussions have continually focused on two sides of a single, critical issue:

How can the short-range costs and benefits to the residents and other service providers be balanced against, and what are the long-range costs and benefits to the residents and the entire metropolitan area of logical growth and increased densities?

Inflation has drastically increased the need to balance these two potentially divergent objectives. The effects of continued inflation can be mitigated by identifying and implementing a solution to the servicing issue.

A unique set of circumstances has occurred which lends direction to resolution of the service delivery questions for both River Road and Santa Clara.

1. As part of the acknowledgement process for the *Metro Plan*, the Land Conservation and Development Commission (LCDC) directed that a servicing plan be developed for both River Road and Santa Clara and that Eugene provide those services.
2. Discussions between Eugene officials and state and county representatives of the River Road and Santa Clara area have led to reconsideration of Eugene's policy to provide services to these neighborhoods only after annexation to the City of Eugene of both areas has occurred.
3. Preliminary review of Eugene's comprehensive capital improvement program suggested a full range of services could not be provided immediately even if the areas were annexed at one time.

Based on these three conditions, a situation evolved which led to a set of findings, objectives, and policies for inclusion in the *Metro Plan* and ultimately will lead to delivery of urban services to the River Road and Santa Clara areas in cooperation with the residents of these neighborhoods. That situation is as follows.

The City of Eugene constructed and owns the main wastewater system that serves the River Road and Santa Clara neighborhoods. Eugene has altered its policies pertaining to the service delivery to both River Road and Santa Clara to allow incremental annexation. Annexation must, however, be consistent with state law and other applicable local policies (e.g., the ability of the city to deliver key urban facilities and services in a timely manner). Eugene will pursue annexation only in accordance with applicable state laws and will not use these mechanisms to circumvent the process. In every case, Eugene will make every reasonable attempt to provide for annexation only on a voluntary basis and in accord with previous individual property annexation agreements. The City, in conjunction with Lane County and the citizens of both River Road and Santa Clara, developed a *River Road-Santa Clara Urban Facilities Plan* which is responsive to the basic service infrastructure which is either in place or contemplated for these areas. An integral part of the implementation phase of the *River Road-Santa Clara Urban Facilities Plan* is a financing mechanism which takes into account the financial abilities of residents/property owners and the City of Eugene to pay for service delivery in that area.

The following findings, objectives, and policies reflect the situation that evolved.

## **Findings, Objectives, and Policies**

### **Findings**

1. Land supply in the River Road and Santa Clara areas is of metropolitan-wide significance.
2. In order to achieve urban densities, urban services, including public wastewater service, must be provided.
3. For a long period of time, officials of Lane County and Eugene have made great efforts to resolve the service delivery problems for both River Road and Santa Clara.
4. The history and pattern of development in River Road and Santa Clara have resulted in the creation of two unique metropolitan neighborhoods.
5. The most cost-effective method of service delivery is through annexation.
6. An urban facilities plan is the best method of providing a framework for capital improvements programming in the River Road and Santa Clara areas.
7. Because of the substantial public investments already made in both neighborhoods, it is most cost-efficient to achieve urban densities in River Road and Santa Clara prior to

- accommodating new development needs in totally undeveloped areas.
8. The 1970 CH2M Hill *Sewerage System Study, River Road-Santa Clara* publication demonstrates the feasibility of providing wastewater service to the River Road and Santa Clara area in a manner consistent with the *Eugene-Springfield Metropolitan Waste Treatment Alternatives Report (208 Facilities Plan)* and the *Metro Plan*.
  9. The CH2M Hill publication defined study boundaries and made population projections which are different than those contained in the *Metro Plan*; modifications to these factors is occurring as part of the required system design work prior to construction.
  10. The detailed design work which will occur as part of development of the system will allow discussion of various system concepts with the residents and property owners of the River Road and Santa Clara areas.
  11. The *River Road-Santa Clara Urban Facilities Plan* has been completed.
  12. Based on the *River Road/Santa Clara Groundwater Study, Final Technical Report, February, 1980* by Sweet, Edwards, and Associates, Inc., the Oregon Environmental Quality Commission (EQC) found on April 18, 1980, that:
    - a. The River Road-Santa Clara shallow aquifer is generally contaminated with fecal coliform organisms in excess of drinking water and body contact standards.
    - b. Existing nitrate-nitrogen concentrations within the area exceed the planning target on the average.
    - c. About 73 percent of the nitrate-nitrogen pollutants (and, by analogy, a similar share of the fecal coliform contaminations) result from septic tank effluent. Septic tank pollutants can migrate rapidly to the groundwater from drainfields via macropore travel.
  13. The EQC concluded that a public health hazard exists based on fecal coliform data for people using the aquifer for domestic (drinking) or irrigation and that a health hazard similarly exists in several areas based on nitrate-nitrogen levels.
  14. To remedy the groundwater pollution problem, the Environmental Protection Agency (EPA) awarded Eugene a grant to build a wastewater system to replace the individual septic systems in use throughout River Road and Santa Clara according to a prescribed time frame.
  15. Efforts toward incremental and voluntary annexation of River Road and Santa Clara properties to Eugene and connection to the wastewater system according to the EPA's time frame have not been successful.

## Objectives

1. Ensure the availability of land in River Road and Santa Clara for urban levels of development.
2. Capitalize on existing public expectations by providing further public services which will allow the River Road and Santa Clara areas to achieve urban densities.
3. Deliver a full range of urban services to the River Road and Santa Clara areas through annexation.
4. Consider the unique situation of the residents of River Road and Santa Clara by providing financing mechanisms which will take into account the financial ability of the residents to pay for service delivery and the City of Eugene's ability to provide these services.
5. Guide capital improvements in the River Road and Santa Clara areas through the *River Road-Santa Clara Urban Facilities plan* developed cooperatively by Lane County, the City of Eugene, and the residents and property owners of the two areas.
6. Eliminate groundwater pollution from individual septic tank disposal systems in River Road and Santa Clara.

## Policies

1. Eugene shall develop methods of financing improvements in the River Road and Santa Clara areas which are responsive to the unique situation of residents and property owners, as well as the City of Eugene.
2. Eugene will plan, design, construct, and maintain ownership of the entire wastewater system that services the River Road and Santa Clara areas. This will involve extraterritorial extension which will be supported by Lane County before the Lane County Local Government Boundary Commission and all other applicable bodies.
3. Annexation of the River Road and Santa Clara areas will occur only through strict application of state laws and local policies (e.g., ability to extend key urban facilities and services in a timely manner). In each case, Eugene will make every reasonable attempt to provide for annexation only on a voluntary basis and according to prior individual property annexation agreements.
4. The City of Eugene shall provide urban services to the River Road and Santa Clara neighborhoods upon annexation. In the meantime, to reduce the groundwater pollution problem, Eugene will extend wastewater service to developed properties.
5. Using the CH2M Hill report as a foundation, efforts to prepare more detailed engineering studies which will provide the basis for a capital improvement program to sewer the River Road and Santa Clara areas in a manner consistent with the above policy direction

shall proceed.

6. No particular section of the *Metro Plan* shall be interpreted as prohibiting the process of incorporation of a new city in River Road and Santa Clara in accordance with ORS 199 and 221. This means that:
  - a. As a comprehensive planning document, no particular section of the *Metro Plan* shall be used in isolation to evaluate different courses of action.
  - b. The phrase “process of incorporation” refers to the specific steps of incorporation outlined in ORS 199 and 221.
  - c. This policy does not negate the requirement of public wastewater service as a minimum level of key urban facilities and services. Any institutional solution to providing urban services in the River Road and Santa Clara areas must provide public wastewater service to address LCDC requirements and to protect public health and safety in resolving groundwater pollution problems. Public wastewater service is also required to achieve higher than septic tank level of urban residential densities and to utilize efficiently valuable metropolitan-scale buildable land.



## G. *Metro Plan* Diagram

The *Metro Plan* Diagram is a generalized map and graphic expression of the goals, objectives, and recommendations expressed in the applicable provisions of the *Metro Plan* and city-specific plans. Rather than an accurate representation of actual size and shape, the arrangement of existing and, to an even greater degree, projected land uses illustrated on the *Metro Plan* Diagram, is based on the various elements and principles embodied in the *Metro Plan* and city-specific plans. Likewise, statements in this section that prescribe specific courses of action regarding the community's future should be regarded as policies.

Projections indicated a population of approximately 286,000 was expected to reside in the metropolitan area around the year 2015. The allocation of living, working, and recreational areas and supporting public facilities that were shown on the *Metro Plan* Diagram when the 2004 Metro Plan Update was conducted and on the Public Facilities Maps in Appendix A generally responded to that metro-wide projection. After Springfield and Eugene have (pursuant to ORS 197.304 (2007)) established their separate city-specific UGBs and designated land supplies for their new 20-year planning horizons, the *Metro Plan* Diagram will be bifurcated. The area shown east of Interstate 5 will represent the land use needs and supporting facilities necessary to serve Springfield's future population. The area shown west of Interstate 5 within the UGB will represent the land use needs and supporting facilities necessary to serve Eugene's future population. Until both cities, with co-adoption by Lane County, have taken action to establish their independent UGBs and land supplies, the Metro Plan Diagram will serve different purposes for the two cities.<sup>8</sup>

Finally, the *Metro Plan* Diagram is drawn at a metropolitan scale, necessitating supplementary planning on a local level. The original *Metro Plan* Diagram adopted in the 1982 *Metro Plan* and subsequently amended was not tax lot-specific, although exception areas were site specific, with exact designation boundaries shown in supporting working papers. The use of the Regional Land Information Database (RLID) data for long-range planning studies led to the decision to base the *Metro Plan* Diagram on RLID data, as described below. The *Metro Plan* Diagram and text provide the overall framework within which more detailed planning occurs on the local level.

In practice, the Metro Plan amendment process described in Chapter IV will ensure that issues of metropolitan significance are addressed cooperatively by all three jurisdictions.

### Major Influences

The *Metro Plan* Diagram reflects the influence of many sources. Particularly noteworthy are the following:

1. The Land Conservation and Development Commission's (LCDC) Statewide Planning Goals, as published in April 1977, and subsequently amended.

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<sup>8</sup> As part of the adoption of the City of Springfield's city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011, the Metro Plan Diagram was amended so that the area west of Interstate 5 is no longer included in Springfield's UGB.

2. The *1990 Plan*, predecessor of the Metro Plan; particularly the concept of compact urban growth.
3. Adopted neighborhood refinement and city-specific plans.
4. Adopted special purpose and functional plans.
5. Information generated through preparation of working papers (1978 and 1981) used in the early updates. Those papers are on file in the planning departments of Eugene, Springfield, and Lane County, as well as the Lane Council of Governments (LCOG). Their most significant provisions are contained in the *Technical Supplement* of the *Metro Plan*, printed and available under separate cover. Subjects examined include public services and facilities; environmental assets and constraints, including agricultural land, the economy, housing, and residential land use, and energy, all in terms of existing conditions and projected demand.

## Land Use Designations

Land use designations shown in the *Metro Plan* Diagram are depicted at a metropolitan scale. Used with the text and local plans and policies, they provide direction for decisions pertaining to appropriate reuse (redevelopment), urbanization of vacant parcels, and additional use of underdeveloped parcels. Since its initial adoption in 1982, the Metro Plan Diagram designations have been transitioning to a parcel-specific diagram. As part of this transition, the boundaries of Plan designation areas within a UGB are determined on a case-by-case basis, where no parcel-specific designation has been adopted.

Certain land uses are not individually of metropolitan-wide significance in terms of size or location because of their special nature or limited extent. Therefore, it is not advisable to account for most of them on the *Metro Plan* Diagram. The Diagram's depiction of land use designations is not intended to invalidate local zoning or land uses which are not sufficiently intensive or large enough to be included on the Metro Plan Diagram.

The Plan designation of parcels in the Metro Plan Diagram is parcel-specific in the following cases:

1. Parcels shown on the Metro Plan Diagram within a clearly identified Plan designation, i.e., parcels that do not border more than one Plan designation;
2. Lands outside the UGB within the Metro Plan boundary;<sup>9</sup>
3. Parcels with parcel-specific designations adopted through the Plan amendment process;
4. Parcels shown on a parcel-specific refinement plan map that has been adopted as an amendment to the Metro Plan Diagram.

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<sup>9</sup> As a result of actions taken by all three jurisdictions in 2013, there are no lands outside the UGB within the *Metro Plan* boundary on the east side of Interstate 5. Lane County Ordinance No. PA 1281 (June, 2013); Springfield Ordinance No. 6288 (March, 2013), Eugene Ordinance No. 20511 (May, 2013).

There is a need for continued evaluation and evolution to a parcel-specific diagram. The Metro Plan designation descriptions below, Metro Plan policies, adopted buildable lands inventory analyses, refinement plans, and local codes provide guidance to local jurisdictions in determining the appropriate Plan designation of parcels that border more than one Plan designation.

## **Residential**

This category is expressed in gross acre density ranges. Using gross acres, approximately 32 percent of the area is available for auxiliary uses, such as streets, elementary and junior high schools, neighborhood parks, other public facilities, neighborhood commercial services, and churches not actually shown on the *Metro Plan* Diagram. Such auxiliary uses shall be allowed within residential designations if compatible with refinement plans, zoning ordinances, and other local controls for allowed uses in residential neighborhoods. The division into low, medium, and high densities is consistent with that depicted on the *Metro Plan* Diagram. In other words:

- Low density residential—Through 10 units per gross acre
- Medium density residential—Over 10 through 20 units per gross acre
- High density residential—Over 20 units per gross acre

These ranges do not prescribe particular structure types, such as single-family detached, duplex, mobile home, or multiple-family. That distinction, if necessary, is left to local plans and zoning ordinances.

While all medium and high density allocations shown on the *Metro Plan* Diagram may not be needed during the planning period, their protection for these uses is important because available sites meeting pertinent location standards are limited.

As of January 1, 1977, density of all existing residential development within the *1990 Plan* projected urban service area was about 3.64 dwelling units per gross acre. For new dwelling units constructed during 1986 to 1994, the net density was 7.05 dwelling units per acre in the UGB based on the RLID data. The estimated overall residential net density for all residential development has climbed from 5.69 dwelling units per are in 1986 to 5.81 dwelling units per acre in 1994. This *Metro Plan*, including the *Metro Plan* Diagram, calls for an overall average of about six dwelling units per gross acre for new construction through 2015, the planning period. By realizing this goal, the community will benefit from more efficient energy use; preservation of the maximum amount of productive agricultural land; use of vacant leftover parcels where utilities are already in place; and more efficient, less costly provision of utilities and services to new areas. This higher overall average density can only be achieved if the cities explore, and when feasible, in light of housing costs and needs, adopt new procedures and standards including those needed to implement the policies in the Residential Land Use and Housing Element.

The UGBs will be modified, as necessary, to ensure an on-going, adequate, available land supply to meet needs. See also Urban and Urbanizable Land in this section.

## **Commercial**

This designation on the *Metro Plan* Diagram includes only the first two categories:

### **Major Retail Centers**

Such centers normally have at least 25 retail stores, one or more of which is a major anchor department store, having at least 100,000 square feet of total floor space. They sometimes also include complimentary uses, such as general offices and medium and high density housing. Presently there are two such developed centers in the metropolitan area: the Eugene central business district and Valley River Center.

### **Community Commercial Centers**

This category includes more commercial activities than neighborhood commercial but less than major retail centers. Such areas usually develop around a small department store and supermarket. The development occupies at least five acres and normally not more than 40 acres. This category contains such general activities as retail stores; personal services; financial, insurance, and real estate offices; private recreational facilities, such as movie theaters; and tourist-related facilities, such as motels. When this category is shown next to medium- or high-density residential, the two can be integrated into a single overall complex, local regulations permitting.

Existing strip commercial is in the Community Commercial Centers plan designation when it is of sufficient size to be of more than local significance. Development and location standards for (additional) strip commercial, as well as neighborhood commercial uses, are discussed below.

### **Neighborhood Commercial Facilities** (not shown on *Metro Plan* Diagram)

Oriented to the day-to-day needs of the neighborhood served, these facilities are usually centered on a supermarket as the principal tenant. They are also characterized by convenience goods outlets (small grocery, variety, and hardware stores); personal services (medical and dental offices, barber shops); laundromats; dry cleaners (not plants); and taverns and small restaurants. The determination of the appropriateness of specific sites and uses or additional standards is left to the local jurisdiction. Minimum location standards and site criteria include:

1. Within convenient walking or bicycling distance of an adequate support population. For a full-service neighborhood commercial center at the high end of the size criteria, an adequate support population would be about 4,000 persons (existing or anticipated) within an area conveniently accessible to the site. For smaller sites or more limited services, a smaller support population or service area may be sufficient.
2. Adequate area to accommodate off-street parking and loading needs and landscaping, particularly between the center and adjacent residential property, as well as along street frontages next door to outdoor parking areas.

3. Sufficient frontage to ensure safe and efficient automobile, pedestrian and bicycle access without conflict with moving traffic at intersections and along adjacent streets.
4. The site shall be no more than five acres, including existing commercial development. The exact size shall depend on the numbers of establishments associated with the center and the population to be served.

Neighborhood commercial facilities may include community commercial centers when the latter meets applicable location and site criteria as listed above, even though community commercial centers are generally larger than five acres in size.

In certain circumstances, convenience grocery stores or similar retail operations play an important role in providing services to existing neighborhoods. These types of operations which currently exist can be recognized and allowed to continue through such actions as rezoning.

### **Strip or Street-Oriented Commercial Facilities**

Largely oriented to automobile traffic, the need for this type of facility has diminished with the increasing popularity of neighborhood, community, and regional shopping centers with self-contained off-street parking facilities. Strip commercial areas are characterized by commercial zoning, or at least, commercial uses along major arterials; i.e., portions of River Road and West 11<sup>th</sup> Avenue, part of Willamette Street, Highway 99N, Franklin Boulevard in Eugene, Main Street in Springfield, and others. Such uses often create congestion in adjacent travel lanes, are generally incompatible with abutting non-commercial uses, and are not as vital to the community as previously because of the existence of retail, office, and service complexes with off-street parking facilities. They should be limited to existing locations and transformed into more desirable commercial patterns, if possible.

To mitigate negative external characteristics, unless it is not in the interest of the public, efforts should be made in connection with existing strip commercial areas to:

1. Landscape perimeters, especially when adjacent to residential properties.
2. Direct lights and signs away from residential areas.
3. Control and consolidate points of access and off-street parking to minimize safety hazards and congestion in connection with adjacent streets.

### **Industrial**

This designation includes the following, only the first four being shown on the *Metro Plan* Diagram:

### **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. Activities are generally located indoors, although there may be some outdoor storage. This designation may also accommodate supporting offices and light industrial uses, local regulations permitting.

### **Campus Industrial**

The primary objective of this designation is to provide opportunities for diversification of the local economy through siting of light industrial firms in a campus-like setting. The activities of such firms are enclosed within attractive exteriors and have minimal environmental impacts, such as noise, pollution, and vibration, on other users and on surrounding areas. Large-scale light industrial uses, including regional distribution centers and research and development complexes, are the primary focus of this designation. Provision should also be made for small- and medium-scale industrial uses within the context of industrial and business parks which will maintain the campus-like setting with minimal environmental impacts. Complementary uses such as corporate office headquarters and supporting commercial establishments serving primary uses may also be sited on a limited basis.

Conceptual development planning, performance standards, or site review processes shall be applied to ensure adequate circulation, functional coordination among uses on each site, a high quality environmental setting, and compatibility with adjacent areas. A 50-acre minimum lot size shall be applied to ownerships of 50 or more acres to protect undeveloped sites from piecemeal development until a site development plan has been approved by the responsible city.

### **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.

Land divisions in these areas shall be controlled to protect large parcels (40-acre minimum parcel size). Because city services are not available to these areas in the short-term, terms may be allowed to provide on-site the necessary minimum level of key urban facilities and services subject to standards applied by Lane County and subject to applicable state, federal, and local environmental standards.

This designation accommodates industrial developments that need large parcels, particularly those with rail access. Although a primary purpose of this designation is to provide sites for heavy industries, any industry which meets the applicable siting criteria may make use of this designation.

One area is designated Special Heavy Industrial. Listed below are the applicable land division standards, use limitations, and annexation and servicing provisions.

North of Awbrey Lane (north of Eugene)

The minimum level of key urban facilities and services is available or can be readily available to this area. Annexation shall be assured prior to development. Lane County and the City of Eugene shall cooperate to apply the appropriate industrial zoning specifying the minimum parcel size and setting forth performance standards.

This site was added to the industrial land inventory to provide a large (200+ acre) site for a special heavy industrial park. The minimum parcel size for lots in the industrial park shall be 40 acres. Prior to subdivision, it shall be demonstrated that the comprehensive development plan ensures compatibility among planned uses within the park as well as with adjacent properties and that access to both the Union Pacific and Burlington Northern railroads has been extended into the area or that a surety sufficient to secure such extension has been posted with the city.

The comprehensive development plan shall include the layout of lots, railroad right-of-way, streets, utilities and performance and site development standards. It shall also consider the provisions of a “public team track.” The comprehensive development plan shall be designed to protect and enhance the site for special heavy industrial users requiring a campus-like setting and rail access. Uses in this area shall be limited to industries which are rail dependent or require a minimum site of 100 acres.

**Small-Scale Light Industry** (not shown on *Metro Plan* Diagram)

This category is characterized by industrial uses that emit no smoke, noise, glare, heat, dust, objectionable odors, or vibrations beyond property boundaries; pursue their activities within buildings; and do not generate a large amount of vehicular trips for employees, customers, or freight movements. Depending on the local situation, in some instances such industrial uses may be incorporated into mixed use areas. To enhance compatibility with adjacent non-

industrial areas, local governments should apply development standards to specific proposals. Such standards should address building height, setbacks, adequate off-street parking areas, landscaping, and safe and efficient access. The determination of the appropriateness of specific sites and uses or additional development standards is left to the local jurisdictions. Minimum locational standards and site criteria include:

1. Access to arterial streets, normally without use of residential streets.
2. Up to five acres, with sufficient parking areas and frontage to accommodate structures, parking areas, and access in character with adjacent non-industrial properties.

### **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.

### **Nodal Development Area (Node)**

Areas identified as nodal development areas in *TransPlan* are considered to have potential for this type of land use pattern. Other areas, not proposed for nodal development in *TransPlan*, may be determined to have potential for nodal development.

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.

## **Willamette River Greenway**

The Willamette River Greenway Boundary is shown on the Metro Plan Diagram as an overlay. Refer to Chapter III-D for information, findings, and policies related to the Greenway.

## **Public and Semi-Public**

This designation contains three categories:

**Government** (includes major office complexes and facilities and lodges)

**Education** (includes high schools and colleges)

### **Parks and Open Space**

This designation includes existing publicly owned metropolitan and regional scale parks and publicly and privately owned golf courses and cemeteries in recognition of their role as visual open space. This designation also includes other privately owned lands in response to *Metro Plan* policies, such as the South Hills ridgeline, the Amazon corridor, the “Q” Street Ditch, and buffers separating sand and gravel designations from residential lands.

Where park and open space is designated on privately owned agricultural land, those lands shall be protected for agricultural use in accordance with *Metro Plan* policies.

Where park and open space is designated on forest lands inside the UGB, other values have primary importance over commercial forest values and those park and open space areas shall be protected for those primary values.

Where park and open space is designated on forest lands outside the UGB, commercial forest values shall be considered as one of many primary values.

In addition to those not shown at a neighborhood scale but automatically included in the gross allocation of residential acres, there is a need for public facilities and open space at a non-local level, such as regional/metropolitan parks. Several are shown on the *Metro Plan* Diagram. Those not yet in public ownership are based on environmental constraints, such as excessive slopes or assets, such as unique vegetation associations. They should be preserved, if possible, through public acquisition or tax relief programs. If that is not possible, development should be required to respond to their unique conditions through clustering in areas of least value as open space, locating circulation and access points in a manner that will result in minimal disturbance of natural conditions and other similar measures particularly sensitive to such sites.

## **Agriculture**

These lands outside the UGB include: Class I through IV agricultural soils, other soils in agricultural use, and other lands in proximity to Class I through IV soils or agricultural uses on

Class V through VIII soils. Designated agricultural lands are protected to preserve agricultural resource values.

### **Sand and Gravel**

This category includes existing and future aggregate processing and extraction areas. Aggregate extraction and processing is allowed in designated areas subject to *Metro Plan* policies, applicable state and federal regulations, and local regulations. For new extraction areas, reclamation plans required by the State of Oregon and Lane County provide a valuable means of assuring that environmental considerations, such as re-vegetation, are addressed. It is important to monitor the demand for aggregate to ensure an adequate supply of this vital non-renewable resource is available to meet metropolitan needs.

### **Rural Residential, Rural Commercial, and Rural Industrial**

The prefix rural refers to the location of these designations on rural portions of the *Metro Plan* outside the UGB.<sup>10</sup> The actual uses may or may not be rural in nature. These rural designations reflect existing patterns of development or commitment to rural lifestyle and have been carefully documented and described with appropriate findings as exceptions to agricultural or forest resource goals. Development on vacant or underdeveloped rural residential, rural commercial, or rural industrial designated parcels is permissible when rural level services are approved and when such development is done in accordance with other applicable policies.

The rural industrial uses in adopted exception areas are light-medium industrial in nature. Application of Lane County's M-2, Light Industrial zoning district, is appropriate to implement the *Metro Plan's* Rural Industrial designation.

Commercial or industrial development shall take place within the UGB, unless such development:

- Is necessary for the continuation of existing commercial or industrial operations, including plant or site expansion;
- Will be located in an adopted exception area; and
- Can be adequately served with rural level services (defined in Policy G.27 in Chapter III-G).

The minimum lot size for rural residential areas shall be five acres.

### **Exceptions**

All new exceptions to, or expansion of, adopted exceptions onto rural resource lands or residential, commercial, industrial, or government non-resource *Metro Plan* Diagram designations or uses outside the UGB require application of *Metro Plan* amendment procedures

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<sup>10</sup> As a result of actions taken by all three jurisdictions in 2013, there are no lands outside the UGB within the *Metro Plan* boundary on the east side of Interstate 5. Lane County Ordinance No. PA 1281 (June, 2013); Springfield Ordinance No. 6288 (March 2013), Eugene Ordinance No. 20511 (May, 2013).

in Chapter IV. Those new or expanded exceptions must meet requirements of statewide planning goals and administrative rules and must comply with applicable *Metro Plan* policies. Background information on all adopted exception areas is detailed in the *Exceptions Working Paper* and its *Addendum*.

Within adopted exception areas, uses and densities must be consistent with zoning and *Metro Plan* designations and policies. Changes to use, density, or zone which are not consistent with the *Metro Plan* require a *Metro Plan* amendment following the process in Chapter IV. Such amendments must be accompanied by an explanation of the reason for the amendment (proposed use, intensity, size, timing, available and proposed service and facility improvements) and must be in compliance with other applicable *Metro Plan* policies and the following criteria:

- Compatibility with existing development pattern and density;
- Adequacy of on-site sewage disposal suitability or community sewerage;
- Domestic water supply availability;
- Adequate access;
- Availability of rural-level services (refer to Policy G.27 in Chapter III-G);
- Lack of natural hazards; and
- Compatibility with resource lands adjacent to the exception area.

The list of exceptions and site-specific maps, which are amendments to the *Metro Plan*, are contained in Appendix C.

### **Airport Reserve**

Lands which may be acquired by Eugene at some future time in connection with the Eugene Airport, and for which an exception to statewide planning goals must be taken, if the zoning is changed from Exclusive Farm Use/Commercial Airport Safety Combining (E-40/GAS zone).

### **University/Research**

This category represents property which is located in proximity to the University of Oregon campus. It is primarily intended to accommodate light industrial, research and development, and office uses related to activities, research, and programs of the University of Oregon. The designation also allows for mixed use development, including a limited range of retail and service uses and multiple-family dwellings. Commercial activities in this category are intended to serve the day-to-day needs of employees working in and near university/research areas. Activities, such as general retail and office, will continue to be located in other appropriately designated areas.

Development of land in this category can play a critical role in the diversification of the metropolitan area's economy by providing an opportunity to develop industrial activities which support and utilize programs of the University of Oregon.

### **Forest Lands**

These lands designated outside the UGB include soils with potential forest productivity and lands with existing forest cover. Designated forest lands are protected to preserve multiple forest resource values, including commercial timber harvest, livestock grazing, scenic resources, watershed and soil protection, fish and wildlife habitat, and recreational opportunities.

### **Mixed Uses**

This category represents areas where more than one use might be appropriate, usually as determined by refinement plans on a local level. (For example, the *Whiteaker Refinement Plan* includes several areas where a mix of compatible uses, based in part on existing development, are designated.) In the absence of a refinement plan, the underlying plan designation shall determine the predominant land use.

### **Natural Resource**

This designation applies to privately and publicly owned lands where development and conflicting uses shall be prohibited to protect natural resource values. These lands shall be protected and managed for the primary benefit of values, such as fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space. Where agricultural or forest practices have been identified as a conflicting use incompatible with protection of the primary values of the identified natural resource, those practices shall be prohibited.

Local governments shall apply appropriate implementation measures to protect these areas and to direct development toward “buildable” lands adjacent to natural resource areas (planned unit development application is a suitable technique for balancing conservation of natural resources and need for housing).

### **Urban Growth Boundary**

Urban growth boundaries separate urban and urbanizable lands from rural lands. For the metropolitan UGB, the expected UGB population was 286,000 by the year 2015. The location of the metropolitan UGB resulted from environmental, social, and economic analysis in terms of supply and demand, which is basic to this entire *Metro Plan*. Accordingly, LCDC Goal 14’s establishment of UGB criteria was employed with the following results (for more detail, see the *Technical Supplement*):

Factor 1. “Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals;”

Population projections, employment projections, and housing projections were prepared representing the best available technical information about long-range urban growth in the metropolitan area. These projections were translated into

total land use needs. The *Metro Plan* Diagram was then constructed to accommodate projected residential growth, assuming new residential construction over the planning period would, on an overall metropolitan-wide basis, average approximately six dwelling units per gross acre.

Factor 2. “Need for housing, employment opportunities, and livability;”

The population and employment projections were translated into need for residential, commercial, and industrial land in response to local and statewide goals, objectives, and policies. Extreme care has been taken to consider the demand (projections) when analyzing the land supply in an effort to provide adequate housing and employment opportunities.

Translation of the identified natural assets and constraints into limitations and prohibitions to development, in most instances, was done to preserve the livability of the metropolitan area. These prohibitions and limitations were considered as refinements to the vacant land supply.

Factor 3. “Orderly and economic provision for public facilities and services;”

The UGB is based partly on the cost of providing urban services to the metropolitan area (for example, ridgelines and other topographic features were considered). The *Metro Plan* Diagram reflects the concept of compact urban growth, sequential development, and opportunities for the least costly provision of public services and facilities.

Factor 4. “Maximum efficiency of land uses within and on the fringe of the existing urban area;”

Again, the *Metro Plan* Diagram reflects compact urban growth which, in turn, should achieve maximum efficiency of land uses within and on the fringe of the existing urban area.

Factor 5. “Environmental, energy, economic, and social consequences;”

The *Metro Plan* Diagram represents a balancing of all environmental, energy, economic, and social impacts, as addressed by LCDC goals and the *Metro Plan* text. For example, decidedly lower residential densities and a much larger land supply may result in lower land costs, but energy savings may very well be sacrificed through need for longer transportation routes and accompanying fuel consumption.

Factor 6. “Retention of agricultural land, as defined, with Class I being the highest priority for retention and Class VI the lowest priority;”

The compact urban growth and sequential development principles embodied in the *Metro Plan* text and *Metro Plan* Diagram allow for retention of the most productive agricultural lands when balanced with other planning goals.

Factor 7. “Compatibility of the proposed urban uses with nearby agricultural activities.”

Again, the *Metro Plan* Diagram adheres to the compact urban growth form and sequential development. The separation between urban and urbanizable lands and rural lands formed by the UGB creates a sharp distinction between ultimate urban uses and agricultural uses on rural lands.

While urban development may create problems from an agricultural production standpoint, the compact urban growth form is, in many ways, compatible with nearby agricultural activities.

First, as urban densities increase, the close proximity of productive agricultural areas provides the potential to access larger markets for their products, thereby increasing their economic return. Second, close proximity can reduce transportation costs for agricultural products grown near metropolitan population concentrations, enabling local farmers to remain or become competitive with more distant markets. Third, retention of productive agricultural lands immediately adjacent to urban development can provide possible social and psychological benefits to urban residents. Fourth, the compact urban growth form and sequential development avoids the problem of leapfrogging and the problem of surrounding an area of agricultural development with urban areas.

Since the most productive agricultural lands are typified by Class I agricultural soils located in the floodway fringes, the boundary of the floodway fringe often serves as the location of the UGB. When the floodway fringe follows a natural bench or when a road creates a dike which defines the floodway fringe, the boundary between urban uses and agricultural uses may be abrupt. In other instances, the transition from urban to rural is not as easily definable on the ground.

Recognizing inevitable problems for agricultural production and retention of small isolated pockets of agricultural land that are or would be surrounded by urban uses was not considered a high priority in drawing the UGB.

On the east side of Interstate 5, the location of the UGB is either tax lot-specific (coterminous with tax lot boundaries) or specifically identified by a metes and bounds description.<sup>11</sup> On the

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<sup>11</sup> The location of the Springfield UGB is graphically depicted in the Springfield Urban Growth Boundary Map and further described in the table entitled “List of tax lots which are adjacent to and inside, or split by the UGB” and the document entitled “Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary.” The table and methodology document were added to the *Metro Plan* in 2011 as part of the adoption of the City of Springfield’s city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011; and revised as part of the adoption of the UGB amendment in 2016 (through Springfield Ordinance No. XXXX and Lane County Ordinance No. PA 1304, Exhibit C-2.

west side of I-5, the UGB is tax lot-specific where it is coterminous with city limits, where it has been determined through the annexation process, and where it falls on the outside edge of existing or planned rights-of-way. In other places on the west side of I-5, the UGB is determined on a case-by-case basis through interpretation of the *Metro Plan* Plan Boundaries Map in this *Metro Plan* and the following factors (see *Metro Plan* Plan Boundaries Map Key):

- Protection of Agricultural Lands
- Protection of Forest Lands
- Ridgeline (Drainage Basin)
- Orderly and Economic Public Services
- Floodway Fringe
- Protection of Wetlands
- Protection of Sand and Gravel Resources
- Airport Protection
- Existing Development and Services (City Limits)
- Meet Economic Goals
- Meet Housing Goals

### **Metro Plan Plan Boundary**

The *Metro Plan* Plan Boundary (Plan Boundary) defines that area shown on the *Metro Plan* Diagram that includes Springfield, Eugene, and unincorporated urban, urbanizable, rural, and agricultural lands exclusive of areas encompassed in the *Lane County Rural Comprehensive Plan*. The Plan Boundary represents the interface between the area encompassed in the *Metro Plan* and areas subject to the *Lane County Rural Comprehensive Plan*. At some future date, these boundaries may require further adjustment, reflecting increasing need for urban land in the metropolitan area. The county and the two cities should recognize this possibility in their respective planning programs.

Insert Metro Plan Diagram

Insert *Metro Plan* Boundaries Map

## Urban Growth Boundary Location Description Keyed to Metro Plan Plan Boundaries Map

For up-to-date information regarding the areas west of Interstate 5 where the UGB is tax lot-specific (i.e., where the UGB and city limits are the same, through annexations or to the outside edge of existing rights-of-way), contact the planning offices of the City of Eugene or Lane County. As explained in Chapter II-G, the metropolitan UGB was developed considering the seven factors that were then set out in LCDC Statewide Planning Goal 14: Urbanization. The following matrix outlines key factors that will be considered to determine the location of the metropolitan UGB west of Interstate 5 Highway where it is not tax lot-specific.

### Metro Plan Metropolitan Urban Growth Boundary Map Key

Map Key	Protect Agricultural Lands	Protect Forest Lands	Ridgeline (Drainage Basin)	Orderly and Economic Public Services	Floodway Fringe	Protect Wetlands	Protect Sand and Gravel Resources	Airport Protection	Existing Development and Services (City Limits)	Meet Economic Goals	Meet Housing Goals
A-B		•	•	•					•		•
B-C <sup>12</sup>					•						•
P-Q	•				•	•	•				•
Q-R	•				•	•	•		•		•
R-S	•			•					•	•	•
S-T	•								•	•	
T-U	•									•	
U-V	•							•	•		
V-W	•							•	•		•
W-X	•							•			•
X-Y	•							•		•	•
Y-Z		•		•							•
Z-A		•		•						•	•

<sup>12</sup> UGB segments C-P are now specifically identified on the table entitled “List of tax lots which are adjacent to and inside, or split by the UGB” and the document entitled “Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary.” The table and methodology document were added to the Metro Plan in 2011 as part of the adoption of the City of Springfield’s city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011; and revised as part of the adoption of the UGB amendment in 2016 (through Springfield Ordinance No. XXXX and Lane County Ordinance No. PA 1304, Exhibit C-2.

## Chapter III Specific Elements

### A. Metropolitan Residential Land Use and Housing Element

The *Metro Plan* Residential Land Use and Housing Element addresses the housing needs of current and future residents of the entire Eugene-Springfield metropolitan area through 2015. In 2011, the City of Springfield and Lane County adopted a Residential Land Use and Housing Element that addresses Springfield's city-specific residential land needs through 2030.<sup>13</sup> This Springfield-specific action was based on the mandates set out in ORS 197.304, described in more detail in the *Metro Plan* Preface and Chapter 1. In adopting its city-specific update in 2011, Springfield made it clear that the regional housing *goals* and *policies* in this Metropolitan Residential Land Use and Housing Element would continue to apply to Springfield. However, the *findings* in this *Metro Plan* element no longer apply on the east side of Interstate 5. The entirety of this element will continue to apply on the west side of Interstate 5 until such time as the City of Eugene adopts its Residential Land Use and Housing Element, addressing its city-specific residential land needs.

Land in residential use occupies the largest share of land within the metropolitan area. The existing housing stock and residential land supply and its relationship to other land uses and infrastructure are critical to the future needs of all residents.

This element addresses Statewide Planning Goal 10: Housing, "To provide for the housing needs of the citizens of the state." Housing demand originates with the basic need for shelter but continues into the realm of creating communities. The policies contained in this element are based on an analysis of the metropolitan area's land supply and housing demand, existing housing problems, and the demographic characteristics of the expected future population. Factors that were reviewed to develop a projection of the 2015 metropolitan housing demand were: projected number of metro area households; household income, age, size, and type; and special housing needs. The background material for this analysis is contained in two documents, the *1999 Supply and Demand Technical Analysis* and the *1999 Site Inventory Document*.<sup>14</sup>

The policies in this *Metro Plan* element provide direction for the local jurisdictions in preparing zoning and development regulations to address future housing needs. Each jurisdiction will be responsible to implement the policies contained in the *Metro Plan* Residential Land Use and Housing Element. At the time of the annual monitoring report, information on progress made to realize this policy direction will be made available. As local jurisdictions implement this

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<sup>13</sup> See the "Springfield 2030 Refinement Plan Residential Land Use and Housing Element" adopted by Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274.

<sup>14</sup> The background material for the City of Springfield's 2030 Residential Land and Housing Element Needs Analysis is contained in its "Technical Supplement: Springfield Residential Land and Housing Needs Analysis" adopted by Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 and the findings that accompanied those ordinances.

element of the *Metro Plan*, they will analyze the suitability of residential designations in terms of density and location and, based on this analysis, may propose changes to the *Metro Plan* Diagram.

## Goal

Provide viable residential communities so all residents can choose sound, affordable housing that meets individual needs.

## Findings<sup>15</sup> and Policies

The findings and policies in this element are organized by the following seven topics related to housing and residential land:

- Residential Land Supply and Demand
- Residential Density
- Housing Type and Tenure
- Design and Mixed Use
- Existing Housing Supply and Neighborhoods
- Affordable, Special Need, and Fair Housing
- Coordination

### **Residential Land Supply and Demand**

#### Findings

1. By 2015, the Eugene-Springfield Metropolitan UGB is projected to reach a population of 286,000. This is a 29 percent increase from the estimated 2000 census population of 222,500.
2. Average household size has been declining both nationally and locally due to a variety of factors. This trend will result in the need for more dwelling units to house population growth.
3. Based on the 2015 projected population and average household size, there is a need for between 40,000 and 49,000 new housing units in the Eugene-Springfield UGB between 1992 and 2015.
4. There is sufficient buildable residential land within the existing UGB to meet the future housing needs of the projected population. In fact, the 1992 residential buildable land supply exceeds the 1992-2015 residential land demand in all residential categories.

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<sup>15</sup> The findings in this element, which relate to the metropolitan land supply and demand considering a 2015 population forecast, are no longer relevant on the east side of Interstate 5, which now relies on the “Springfield 2030 Refinement Plan Residential Land Use and Housing Element” based on Springfield’s 2030 population forecast. See Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274.

Assuming land is consumed evenly over the period, by 1999, there will be at least a 20-year supply of residential land remaining inside the UGB.

5. Undeveloped residential land is considered unbuildable and removed from the supply if it is within 230 KV powerline easements, the floodway, protected wetlands or wetland mitigation sites in Eugene, wetlands larger than 0.25 acres in Springfield or buffers around Class A and B streams and ponds. The remaining buildable residential land is located primarily on the outer edge of the UGB and some of the buildable residential land has development constraints such as slopes, floodplain, hydric soils and wetlands. Development potential is reduced in Springfield on floodplain areas and in Eugene on remaining potential wetlands due to moderate constraints that can support a less intense level of development.
6. Anticipated federal regulations affecting fish habitats in the Pacific Northwest and new applications for regulating under-designated, saturated, hydric soils by Oregon's Division of State Lands, as well as other factors, make a definitive calculation of the buildable land supply difficult. The adopted buildable land supply inventory represents the local jurisdiction's best assessment of the amount of buildable land that will be available within the UGB until the year 2015.

<b>Supply and Demand Analysis in Acres</b>				
	<b>Low Density</b>	<b>Medium Density</b>	<b>High Density</b>	<b>Total</b>
<b>SUPPLY</b>				
<b>Total Net Buildable Acres for Housing</b>	<b>4,780</b>	<b>828</b>	<b>195</b>	<b>5,802</b>
<b>Flat Buildable Acres</b>	<b>3,159</b>	<b>777</b>	<b>192</b>	<b>4,129</b>
<b>15-25 Percent Sloped Land</b>	<b>913</b>	<b>41</b>	<b>1</b>	<b>955</b>
Eugene	605	39	1	645
Springfield	307	2	1	310
<b>Steep Sloped (&gt;25 percent) Buildable Acres</b>	<b>708</b>	<b>9</b>	<b>1</b>	<b>718</b>
Eugene	341	2	0	343
Springfield	367	6	1	374
<b>DEMAND</b>				
Low-High Range Residential Demand Remaining After Subtracting Demand Met by Buildable Lots	3,298-4,225	523-641	120-147	3,941-5,013
Land Demand for Housing Displaced by Redevelopment	27	0	0	27
<b>Total Expected Residential Land Demand – 1992-2015</b>	<b>3,840</b>	<b>589</b>	<b>135</b>	<b>4,564</b>
<b>Low-High Range Residential Land Demand – 1992-2015</b>	<b>3,325-4,252</b>	<b>523-641</b>	<b>120-147</b>	<b>3,968-5,040</b>
<b>Difference between Total Buildable Supply and Expected Residential Land Demand in Acres*</b>	<b>940</b>	<b>239</b>	<b>60</b>	<b>1,238</b>

Notes: Totals may differ due to rounding. Assumptions are estimates based on available data.

\* Housing is not allocated to commercial and mixed use designated land due to Oregon Administrative Rules, although it is known that some housing will be built on commercial and mixed use land.

<b>Supply and Demand Analysis in Units</b>				
	<b>Low Density</b>	<b>Medium Density</b>	<b>High Density</b>	<b>Total</b>
<b>SUPPLY</b>				
Total Units on Buildable Acres	<b>28,681</b>	<b>13,078</b>	<b>6,760</b>	<b>48,519</b>
<b>Units on Flat Buildable Acres</b>	<b>21,797</b>	<b>12,432</b>	<b>6,720</b>	<b>40,949</b>
<b>Units on 15-25 Percent Sloped Land</b>	<b>5,403</b>	<b>632</b>	<b>39</b>	<b>6,074</b>
Eugene (same density as flat)	4,175	624	35	4,834
Springfield (@ 4 DU/acre)	1,228	8	4	1,240
<b>Units on Steep (&gt;25 percent) Sloped Buildable Acres</b>	<b>1,482</b>	<b>14</b>	<b>1</b>	<b>1,497</b>
Eugene (@ 3 DU/acre)	1,023	6	0	1,029
Springfield (@ 1.25 DU/acre)	459	8	1	468
<b>DEMAND</b>				
Low-High Range Residential Demand Remaining After Subtracting Demand Met by Buildable Lots & Infill	<b>22,873-29,042</b>	<b>8,384-10,270</b>	<b>4,200-5,145</b>	<b>35,457-44,457</b>
Unit Demand for Housing Displaced by Redevelopment	149	0	0	149
<b>Total Expected Residential Unit Demand – 1992-2015</b>	<b>26,449</b>	<b>9,432</b>	<b>4,725</b>	<b>40,606</b>
<b>Low-High Range Residential Unit Demand – 1992-2015</b>	<b>23,022-29,191</b>	<b>8,384-10,270</b>	<b>4,200-5,145</b>	<b>35,606-44,606</b>
<b>Difference between Total Buildable Supply and Expected Residential land Demand in Units*</b>	<b>2,232</b>	<b>3,646</b>	<b>2,035</b>	<b>7,913</b>

Note: Totals may differ due to rounding. Assumptions are estimates based on available data.

\*Housing is not allocated to commercial and mixed use designated land due to Oregon Administrative Rules although it is known that some housing will be built on commercial and mixed use land.

7. In 1995, approximately 28 percent of the buildable residential land supply did not have public services, primarily wastewater. Of this total, 1,136 acres or 12 percent will not be served for ten or more years; 521 acres (5.5 percent) will be served in five to ten years; 476 acres (5 percent) in three to four years, and 520 acres (5.5 percent) in one to two years.
8. In the aggregate, non-residential land uses consume approximately 32 percent of buildable residential land. These non-residential uses include churches, day care centers, parks, streets, schools, and neighborhood commercial.
9. Some of the residential land demand will be met through redevelopment and infill. Residential infill is occurring primarily in areas with larger, single-family lots that have surplus vacant land or passed-over small vacant parcels. Redevelopment is occurring primarily in the downtown Eugene and West University areas, where less intensive land

uses, such as parking lots and single-family dwellings are being replaced with higher density, multi-family development.

10. Since the last Periodic Review of the *Metro Plan* in 1987, there have been only two minor expansions of the UGB for residentially designated land. Each expansion was less than one acre in size.
11. The UGB defines the extent of urban building and service expansion over the planning period. There are geographic and resource constraints that will limit expansion of the UGB in the future. At such time that expansion is warranted, it will be necessary to cross a river, develop agricultural land, or cross over a ridge where the provision of public services and facilities will be expensive.
12. Since adoption of the *Metro Plan*, the supply of residential lands has been reduced as a result of compliance with federal, state, and local regulations to protect wetlands, critical habitat of endangered/threatened species, and other similar natural resources. This trend is likely to continue in order to meet future Statewide Planning Goal 5 and stormwater quality protection requirements.
13. Springfield charges a system development charge for stormwater, wastewater, and transportation. Willamalane Park and Recreation District charges a system development charge for parks. Springfield Utility Board (SUB) charges for water. Eugene charges for stormwater, wastewater, parks, and transportation. Eugene Water & Electric Board (EWEB) charges for water. These charges could be increased in some cases. Currently, state law does not include local systems development charges for fire and emergency medical service facilities and schools. Depending on market conditions, residents of newly constructed housing also pay for services and facilities they receive through local assessment districts, connection charges, direct investment in public infrastructure, and property taxes.

## **Policies**

- A.1 Encourage the consolidation of residentially zoned parcels to facilitate more options for development and redevelopment of such parcels.
- A.2 Residentially designated land within the UGB should be zoned consistent with the *Metro Plan* and applicable plans and policies; however, existing agricultural zoning may be continued within the area between the city limits and the UGB until rezoned for urban uses.
- A.3 Provide an adequate supply of buildable residential land within the UGB for the 20-year planning period at the time of Periodic Review.
- A.4 Use annexation, provision of adequate public facilities and services, rezoning, redevelopment, and infill to meet the 20-year projected housing demand.

- A.5 Develop a monitoring system that measures land consumption, land values, housing type, size, and density. Reports should be made to the community on an annual basis.
- A.6 Eugene, Springfield, and Lane County shall encourage a community dialogue, when the annual monitoring report on land supply and housing development is made public, to address future Periodic Review requirements that relate to meeting the residential land supply needs of the metropolitan area.
- A.7 Endeavor to provide key urban services and facilities required to maintain a five-year supply of serviced, buildable residential land.
- A.8 Require development to pay the cost, as determined by the local jurisdiction, of extending public services and infrastructure. The cities shall examine ways to provide subsidies or incentives for providing infrastructure that support affordable housing and/or higher density housing.

### **Residential Density**

#### **Findings**

- 14. Housing costs are increasing more rapidly than household income. With rising land and housing costs, the market has been and will continue to look at density as a way to keep housing costs down.
- 15. Recently approved subdivisions are achieving lot sizes on flat land averaging 7,400 square feet in Eugene and 7,800 square feet in Springfield. Comparing the net density<sup>16</sup> of all Eugene-Springfield metropolitan single family-detached units in 1986 and 1994 indicates that in 1986 the net density was 4.12 units per acre which equates to a 10,573 square foot lot while in 1994, the net density was 4.18 units per acre or a 10,410 square foot lot. These trends indicate that development in low-density is achieving assumed density expectations.
- 16. Although single-family detached lot sizes are decreasing, the *Metro Plan* targeted residential densities for all new development are not being achieved at this time. The *Metro Plan* assumes a net density of 8.57 units per acre (note: translation from 6 units per gross acre<sup>17</sup>) for new development over the planning period. For new dwelling units constructed during 1986 to 1994, the net density was 7.05 units per acre based on the Regional Land Information Database of Lane County (RLID). The estimated average overall residential net density for all residential development has climbed from 5.69 units per acre in 1986 to 5.81 units per acre in 1994.

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<sup>16</sup> Density (Net): The number of dwelling units per each acre of land, excluding areas devoted to dedicated streets, neighborhood parks sidewalks, and other public facilities.

<sup>17</sup> Density (Gross): The number of dwelling units per each acre of land, including areas devoted to dedicated streets, neighborhood parks, sidewalks, and other public facilities.

17. Both Springfield and Eugene have adopted smaller minimum lot size requirements to allow increased density in low-density residentially designated areas. Even so, density in low-density residentially designated areas does not routinely achieve the higher range of low-density zoning (near 10 units/gross acre) due to the current market and the area requirements for other site improvements such as streets.
18. Offering incentives (e.g., reduced parking requirements, tax abatements) for increased density has not been completely successful in this metro area. In areas where some increase in density is proposed, there can be neighborhood opposition.

## **Policies**

- A.9 Establish density ranges in local zoning and development regulations that are consistent with the broad density categories of this plan.

Low density: Through 10 dwelling units per gross acre (could translate up to 14.28 units per net acre depending on each jurisdictions implementation measures and land use and development codes)

Medium density: Over 10 through 20 dwelling units per gross acre (could translate to over 14.28 units per net acre through 28.56 units per net acre depending on each jurisdictions implementation measures and land use and development codes)

High density: Over 20 dwelling units per gross acre (could translate to over 28.56 units per net acre depending on each jurisdiction's implementation measures and land use and development codes)

- A.10 Promote higher residential density inside the UGB that utilizes existing infrastructure, improves the efficiency of public services and facilities, and conserves rural resource lands outside the UGB.
- A.11 Generally locate higher density residential development near employment or commercial services, in proximity to major transportation systems or within transportation-efficient nodes.
- A.12 Coordinate higher density residential development with the provision of adequate infrastructure and services, open space, and other urban amenities.
- A.13 Increase overall residential density in the metropolitan area by creating more opportunities for effectively designed in-fill, redevelopment, and mixed use while considering impacts of increased residential density on historic, existing and future neighborhoods.
- A. 14 Review local zoning and development regulations periodically to remove barriers to higher density housing and to make provision for a full range of housing options.

- A.15 Develop a wider range of zoning options such as new zoning districts, to fully utilize existing *Metro Plan* density ranges.
- A. 16 Allow for the development of zoning districts which allow overlap of the established *Metro Plan* density ranges to promote housing choice and result in either maintaining or increasing housing density in those districts. Under no circumstances, shall housing densities be allowed below existing *Metro Plan* density ranges.

### **Housing Type and Tenure**

#### **Findings**

19. Based on 1990 Census data for the Eugene area, there is a relationship between household income, size of household, age of household head, and housing choices people make regarding type and tenure. The trends established are as follows: lower income and increasingly moderate-income, primarily young and single-person households tend to be renters. Ownership increases as income and family size increase. Older households predominately remain in owner-occupied, single-family housing, but as the age of the head of household reaches 65, ownership rates begin to decline.
20. Based on the ECO Northwest/Leland Study, *What is the Market Demand for Residential Real Estate in Eugene/Springfield?* (October 1996) a larger share of the future population will be composed of smaller, older, and less affluent households. This will alter housing market demand in many ways over the next 20 years. Married couple families with children will no longer be the predominate household type of the residential market. Singles, childless couples, divorcees, and single parents will be a much larger proportion of the market than in the past. To meet the needs of these households, more choices in housing types (both for sale and for rent) than currently exist will be necessary.
21. Based on Lane County assessment data, in the 1980s and 1990s, there was a shift to larger, single-family detached homes, even though the average number of persons per household has been declining.
22. Between 1989 and 1998, 45 percent of all new housing was single-family detached including manufactured units on lots. As of 1998, about 59 percent of all dwelling units were single-family detached. This represents a decrease in the share of single-family detached from 61 percent in 1989.

#### **Policies**

- A.17 Provide opportunities for a full range of choice in housing type, density, size, cost, and location.
- A.18 Encourage a mix of structure types and densities within residential designations by reviewing and, if necessary, amending local zoning and development regulations.

- A.19 Encourage residential developments in or near downtown core areas in both cities.
- A.20 Encourage home ownership of all housing types, particularly for low-income households.
- A.21 Allow manufactured dwelling parks as an outright use in low-density residential zones if the local jurisdiction's prescribed standards are met.

### **Design and Mixed Use**<sup>18</sup>

#### **Findings**

- 23. Mixed-use development (residential with commercial or office) has the potential to reduce impacts on the transportation system by minimizing or eliminating automobile trips.
- 24. Mixed use may be seen as a threat to predominantly residential development. Standards on siting and use and design review are seen as ways to mitigate negative impacts.
- 25. In-home business and telecommuting are becoming more common. The market for combining home and office uses will continue to increase.
- 26. While people generally are open to the concept of higher density, they are still concerned about how density will affect their neighborhood in terms of design, increased traffic, and activity. With higher densities, people need more local parks and open space.
- 27. The metropolitan area enjoys a wide variety of open spaces, natural areas, and livable neighborhoods. As density increases, design and landscaping standards and guidelines maybe necessary to maintain community livability and aesthetics, as well as making density more acceptable.

#### **Policies**

- A.22 Expand opportunities for a mix of uses in newly developing areas and existing neighborhoods through local zoning and development regulations.
- A.23 Reduce impacts of higher density residential and mixed-use development on surrounding uses by considering site, landscape, and architectural design standards or guidelines in local zoning and development regulations.
- A.24 Consider adopting or modifying local zoning and development regulations to provide a discretionary design review process or clear and objective design standards, in order to address issues of compatibility, aesthetics, open space, and other community concerns.

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<sup>18</sup> Mixed use: A building, project or area of development that contains at least two different land uses such as housing, retail, and office uses

## **Existing Housing Supply and Neighborhoods**

### **Findings**

28. Accommodating residential growth within the current UGB encourages in-fill, rehabilitation, and redevelopment of the existing housing stock and neighborhoods.
29. As the age of the housing stock reaches 25 years, the need for rehabilitation, weatherization, and major system upgrades increases. Approximately 59 percent of the single-family housing stock was built prior to 1969.
30. More renters than owners live in sub-standard housing conditions. Based on the *1995 Eugene/Springfield Consolidated Plan*, about 16 percent of all occupied rental units of the metropolitan housing stock are considered to be in sub-standard condition.
31. Local government has had and will continue to have a role in preserving the aging housing stock. Preserving the housing stock has numerous benefits to the community because much of the older housing stock represents affordable housing. In addition, upgrading the aging housing stock provides benefits that help stabilize older neighborhoods in need of revitalization.

### **Policies**

- A.25 Conserve the metropolitan area's supply of existing affordable housing and increase the stability and quality of older residential neighborhoods, through measures such as revitalization; code enforcement; appropriate zoning; rehabilitation programs; relocation of existing structures; traffic calming; parking requirements; or public safety considerations. These actions should support planned densities in these areas.
- A.26 Pursue strategies that encourage rehabilitation of existing housing and neighborhoods.

## **Affordable<sup>19</sup>, Special Need<sup>20</sup>, and Fair Housing**

### **Finding**

32. Substantial and continued federal funding reductions for housing assistance are increasing the burden on local governments. The high cost of housing for low-income

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<sup>19</sup> Affordable housing: Housing priced so that a household at or below median income pays no more than 30 percent of its total gross income on housing and utilities. [U.S. Department of Housing and Urban Development's (HUD) figure for 1997 annual median income for a family of three in Lane County is \$33,900; 30 percent = \$847/month.]

<sup>20</sup> Special need housing: Housing for special needs populations. These populations represent some unique sets of housing problems and are usually at a competitive disadvantage in the marketplace due to circumstances beyond their control. These subgroups include, but are not limited to, the elderly, persons with disabilities, homeless individuals and families, at-risk youth, large families, farm workers, and persons being released from correctional institutions.

families directly correlates with an increasing demand for other support services such as food supplement programs and utility assistance. The high cost of housing results in homelessness for some households. Homelessness directly and indirectly negatively impacts public health, public safety, and public education systems in multiple, measurable ways.

33. The next 20 years are expected to see increased need for apartments and single family housing for low<sup>21</sup> and very low<sup>22</sup> income households. Based on the 1990 Census, approximately 20 percent of all households are currently classified as very low-income.
34. There is a shortage of unconstrained medium and high density zoned sites, for sale, that are flat and serviced with utilities. This is particularly true in Eugene. Low income projects frequently must use density bonuses or other land use incentives that require additional land use processes such as public hearings, which exposes the project to longer timelines and appeals.
35. Based on the *1995 Eugene/Springfield Consolidated Plan*, in Eugene and Springfield, 35 percent of households experience housing problems (defined by HUD as overcrowded, substandard, or the household is paying over 30 percent of its income for housing and utilities). The predominate housing problem is that households are paying more than they can afford for housing.
36. The de-institutionalization of people with disabilities, including chronic mental illness, has continued since the 1980's and adds to the number of homeless, poorly housed, and those needing local support services and special need housing.
37. Based on the annual one-night Lane County shelter/homeless counts, the number of homeless people is increasing and a third of the homeless are children.
38. Demographics point to an increasing proportion of the population over 65 years of age in the future. This will require more housing that can accommodate the special needs of this group.
39. Construction of housing with special accommodations or retrofitting existing housing drives up the occupancy costs for the tenant. Tenants with special needs typically have low incomes and are less able to pay increased rents.
40. Existing land use regulations do not easily accommodate the establishment of alternative and innovative housing strategies, such as group recovery houses and homeless shelters.

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<sup>21</sup> Low income housing: Housing priced so that a household at or below 80 percent of median income pays no more than 30 percent of its total gross household income on housing and utilities. (HUD's figure for 1997 annual 80 percent of median for a family of three in Lane County is \$27,150; 30 percent = \$678/month.)

<sup>22</sup> Very low income housing: Housing priced so that a household at or below 50 percent of median income pays no more than 30 percent of its total gross household income on housing and utilities. (HUD's figure for 1997 annual 50 percent of median of a family of three in Lane County is \$16,950; 30 percent = \$423/month.)

41. Existing emergency shelters do not have the capability to serve the entire homeless population. This results in people illegally inhabiting residential neighborhoods and non-residentially zoned areas. The challenges facing homeless people are increased when they are forced far out of the urban areas where resources, training, treatments, and job opportunities are less available.
42. Practices of some cultures, such as Latino and Asian households, conflict with existing public policies that limit a household to five unrelated adults, and private rental practices that limit occupancy to two people per bedroom.
43. Fair housing issues typically impact renters more often than homebuyers and discrimination tends to increase when the vacancy rate decreases.

### **Policies**

- A.27 Seek to maintain and increase public and private assistance for low- and very low-income households that are unable to pay for shelter on the open market.
- A.28 Seek to maintain and increase the supply of rental housing and increase home ownership options for low- and very low-income households by providing economic and other incentives, such as density bonuses, to developers that agree to provide needed below-market and service-enhanced housing in the community.
- A.29 Consider public purposes such as low- and very low-income housing when evaluating UGB expansions.
- A.30 Balance the need to provide a sufficient amount of land to accommodate affordable housing with the community's goals to maintain a compact urban form.
- A.31 Consider the unique housing problems experienced by special needs populations, including the homeless, through review of local zoning and development regulations, other codes and public safety regulations to accommodate these special needs.
- A.32 Encourage the development of affordable housing for special needs populations that may include service delivery enhancements on-site.
- A.33 Consider local zoning and development regulations impact on the cost of housing.
- A.34 Protect all persons from housing discrimination.

### **Coordination**

### **Findings**

44. All three general purpose governments in the metropolitan area implement housing programs and coordinate their housing planning and implementation activities.

45. In the Eugene-Springfield metropolitan area, public, private non-profit and private for profit developers work closely with the cities to develop low-income housing.

### **Policies**

- A.35 Coordinate local residential land use and housing planning with other elements of this plan, including public facilities and services, and other local plans, to ensure consistency among policies.
- A.36 Coordinate public, private, and consumer sectors of the area's housing market, including public-private partnerships, to promote housing for low- and very low- income households and to increase housing density and types.
- A.37 Consider the suggested implementation measures in the *Residential Lands and Housing Study* and other measures in order to implement the policy directives of the Residential Land Use and Housing Element of the *Metro Plan*.

## **B. Economic Element**

Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. XXXX and Lane County Ordinance No. PA 1304, as part of Springfield's comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to addresses Springfield's land needs for economic development and employment growth for the 2010-2030 planning period.

In recent years, there has been a strong structural shift in the Eugene-Springfield metropolitan area's economy. This shift is characterized by four trends: (a) a decline in the lumber and wood products industry as a source of employment; (b) limited increase in employment in other manufacturing activities; (c) diversification of the non-manufacturing segments of the local economy, primarily in trade, services, finance, insurance, and real estate; and (d) the development of this metropolitan area as a regional trade and service center serving southern and eastern Oregon.

The decline in lumber and wood products and diversification of the non-manufacturing sectors are consistent with changes that are occurring in other portions of the state and throughout the nation as a result of rising real incomes and higher productivity of labor in manufacturing. The increase in employment in other manufacturing activities in this area has lagged behind other portions of the state, particularly the Portland area, and many other places in the nation.

Given the projected growth in this area's economy, it is essential that an adequate supply (quantitatively and qualitatively) of commercial and industrial land be available. An adequate supply of land includes not only sites sufficient in size to accommodate the needs of the commercial or industrial operations (including expansion), but also includes sites which are attractive from the standpoint of esthetics, transportation costs, labor costs, availability of skilled labor, natural resource availability, proximity to markets, and anticipated growth of local markets.

In striving toward the Land Conservation and Development Commission's (LCDC) Statewide Planning Goal 9: Economic Development, "To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens," the Eugene-Springfield metropolitan area must take advantage of and encourage the further diversification of this area's economic activities and role as a regional center.

This diversification and growth can improve the opportunities for presently underutilized human resources and generally raise the standard of living for metropolitan area residents.

Implicit in the goals and objectives that follow is the premise that the economic health of the area is integrally related to the quality of life for residents. Improved welfare of the residents of the metropolitan area, measured by increases in employment opportunities and reductions in unemployment, increases in real incomes, and improved environmental quality are the ultimate

goals of all economic efforts. Economic growth or industrial expansion is acceptable when it is consistent with these goals and objectives.

## **Goal**

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

## **Findings, Objectives, and Policies**

### **Findings**

1. The structure of the Eugene-Springfield metropolitan area economy is undergoing a shift away from lumber and wood products manufacturing (and other heavy industrial activities) and towards a more diverse economic base characterized by growth in light manufacturing activities and the non-manufacturing activities of trade, commercial and professional services, finance, insurance, and real estate.
2. The lumber and wood products sector is the metropolitan area's dominant manufacturing activity; and in this respect, Lane County's forest is the area's most important natural resource utilized as a factor of production.
3. Major institutions in the metropolitan area including the University of Oregon and Sacred Heart Hospital, have had a stabilizing influence on the local economy.
4. The Eugene-Springfield metropolitan area is developing as a regional center for activities, such as tourism, distribution, and financial services, serving the southwestern and central Oregon area.
5. Based on data from the 2000 U.S. Census, the per capita income in 1999 for the Eugene-Springfield metropolitan area was lower than for Oregon as a whole and the Portland metropolitan area.
6. In 2000, the unemployment rate in the Eugene-Springfield metropolitan area was comparable to Oregon and higher than the national rate.
7. Historically, heavy-manufacturing industries, including primary metals, chemicals and paper, have been characterized by high levels of pollution or energy consumption. Changes in technology and environmental regulations have reduced the potential environmental impacts of these industries. Heavy manufacturing industries provide benefits, such as relatively high wage scales and the potential for generating secondary manufacturing activities.
8. Both expansion of existing businesses through use of local capital and entrepreneurial skills and the attraction of new employers offer realistic opportunities for economic

development.

9. The healthful environment of the metropolitan area can help attract industrial development, hold workers, and attract convention- and tourist-related economic activities. The concern for clean air and water is high priority with area residents.
10. The provision of adequate public facilities and services is necessary for economic development.
11. There are presently inefficiently used resources in the metropolitan area, including land, labor, and secondary waste products.
12. Major employment areas include the Eugene and Springfield central business districts, the University of Oregon area, Sacred Heart Hospital, the west Eugene industrial area, the north (Gateway) and south Springfield industrial areas, the Highway 99N industrial area, Country Club Road, Chad Drive, and the Mohawk-Northgate area.
13. The metropolitan economy is made up of a number of interrelated and important elements, one of which is construction and construction-related activities. Construction, for example, is essential for all sectors of the economy, as well as for the provision of an adequate supply of affordable housing.
14. The mixture of commercial and office uses with industrial uses can reduce or enhance the utility of industrial areas for industrial purposes, depending upon circumstances. Uncontrolled mixing creates problems of compatibility and traffic congestion, and may limit the area available for industrial development. Limited mixing, subject to clear and objective criteria designed to minimize or eliminate incompatibility, traffic problems, and which preserve the area for its primary purpose, can make an industrial area more pleasant, convenient, economical, and attractive as a place to work or locate.
15. Campus industrial firms prefer city services.
16. Campus industrial firms have varied site location requirements, prefer alternative sites to choose from, and usually benefit from location of other special light industrial firms within the community and within the same industrial development.

### **Objectives**

1. Improve the level, stability, and distribution of per-capita income for metropolitan residents.
2. Reduce unemployment in the resident labor force, especially chronic long-term unemployment.

3. Encourage local residents to develop skills and other educational attributes that would enable them to obtain existing jobs.
4. Promote industrial and commercial development with local capital, entrepreneurial skills, and experience of the resident labor force, as well as with new light manufacturing companies from outside the metropolitan area.
5. Supply an adequate amount of land within the urban growth boundary to accommodate: (a) the diversifying manufacturing sector (especially low polluting, energy-efficient manufacturing uses); and (b) the expansion of the metropolitan area as a regional distribution, trade, and service center.
6. Maintain strong central business districts to provide for office-based commercial, governmental, and specialized or large-scale retail activities.
7. Ensure compatibility between industrial lands and adjacent areas.
8. Reserve enough remaining large parcels for special developments requiring large lots.
9. Increase the potential for convention- and tourist-related economic activities.
10. Provide the necessary public facilities and services to allow economic development.
11. Attempt to find ways to more effectively use inefficiently used resources such as land, labor, and secondary waste products.
12. Provide for limited mixing of office, commercial, and industrial uses subject to clear, objective criteria which: (a) do not materially reduce the suitability of industrial, office, or commercial areas for their primary use; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.

### **Policies**

- B.1 Demonstrate a positive interest in existing and new industries, especially those providing above average wage and salary levels, an increased variety of job opportunities, a rise in the standard of living, and utilization of our existing comparative advantage in the level of education and skill of the resident labor force.
- B.2 Encourage economic development, which utilizes local and imported capital, entrepreneurial skills, and the resident labor force.
- B.3 Encourage local residents to develop job skills and other educational attributes that will enable them to fill existing job opportunities.
- B.4 Encourage the continuance of career preparation and employment orientation for metropolitan area residents by the community's educational institutions, labor unions,

businesses, and industry.

- B.5 Provide existing industrial activities sufficient adjacent land for future expansion.
- B.6 Increase the amount of undeveloped land zoned for light industrial and commercial uses correlating the effective supply in terms of suitability and availability with the projections of demand.
- B.7 Encourage industrial park development, including areas for warehousing and distributive industries and research and development activities.
- B.8 Encourage the improvement of the appearance of existing industrial areas, as well as their ability to serve the needs of existing and potential light industrial development.
- B.9 Encourage the expansion of existing and the location of new manufacturing activities, which are characterized by low levels of pollution and efficient energy use.
- B.10 Encourage opportunities for a variety of heavy industrial development in Oregon's second largest metropolitan area.
- B.11 Encourage economic activities, which strengthen the metropolitan area's position as a regional distribution, trade, health, and service center.
- B.12 Discourage future *Metro Plan* amendments that would change development-ready industrial lands (sites defined as short-term in the metropolitan *Industrial Lands Special Study*, 1991) to non-industrial designations.
- B.13 Continue to encourage the development of convention and tourist-related facilities.
- B.14 Continue efforts to keep the Eugene and Springfield central business districts as vital centers of the metropolitan area.
- B.15 Encourage compatibility between industrially zoned lands and adjacent areas in local planning programs.
- B.16 Utilize processes and local controls, which encourage retention of large parcels or consolidation of small parcels of industrially or commercially zoned land to facilitate their use or reuse in a comprehensive rather than piecemeal fashion.
- B.17 Improve land availability for industries dependent on rail access.
- B.18 Encourage the development of transportation facilities which would improve access to industrial and commercial areas and improve freight movement capabilities by implementing the policies and projects in the *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)* and the *Eugene Airport Master Plan*.

- B.19 Local jurisdictions will encourage the allocation of funds to improve transportation access to key industrial sites or areas through capital budgets and priorities.
- B.20 Encourage research and development of products and markets resulting in more efficient use of underutilized, renewable, and nonrenewable resources, including wood waste, recyclable materials, and solar energy.
- B.21 Reserve several areas within the UGB for large-scale, campus-type, light manufacturing uses. (See *Metro Plan* Diagram for locations so designated.)
- B.22 Review local ordinances and revise them to promote greater flexibility for promoting appropriate commercial development in residential neighborhoods.
- B.23 Provide for limited mixing of office, commercial, and industrial uses under procedures which clearly define the conditions under which such uses shall be permitted and which:  
(a) preserve the suitability of the affected areas for their primary uses; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.
- B.24 Continue to evaluate other sites in and around Springfield and Eugene for potential light-medium industrial and special light industrial uses, as well as potential residential uses.
- B.25 Pursue an aggressive annexation program and servicing of designated industrial lands in order to have a sufficient supply of “development ready” land.
- B.26 In order to provide locational choice and to attract new campus industrial firms to the metropolitan area, Eugene and Springfield shall place as a high priority service extension, annexation, and proper zoning of all designated special light industrial sites.
- B.27 Eugene, Springfield, and Lane County shall improve monitoring of economic development and trends and shall cooperate in studying and protecting other potential industrial lands outside the urban boundary.
- B.28 Recognize the vital role of neighborhood commercial facilities in providing services and goods to a particular neighborhood.
- B.29 Encourage the expansion or redevelopment of existing neighborhood commercial facilities as surrounding residential densities increase or as the characteristics of the support population change.
- B.30 Industrial land uses abutting the large aggregate extraction ponds north of High Banks Road in Springfield shall demonstrate that they require the location next to water to facilitate the manufacture of testing of products made on-site.

## C. Environmental Resources Element

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.

Numerous local efforts reflect a positive attitude by the community toward the natural environment. For example, the Eugene-Springfield metropolitan area has a long history of commitment to local programs directed toward problems of air and water quality. Examples of regional parks that provide significant public open space areas for metropolitan residents include Eugene's Skinner Butte, Spencer Butte, Alton Baker, and Hendrick's Parks and Whilamut Natural Area; Lane County's Howard Buford Recreation Area (Mt. Pisgah); and Willamalane Park and Recreation District's Clearwater Park, Eastgate Woodlands, and Dorris Ranch. Eugene has focused special planning efforts toward controlling development and maintaining the scenic and environmental assets in the South Hills of the city. A tax levy passed by Eugene voters is resulting in additions to the park and open space system in the metropolitan area. Lane County, Springfield, and Eugene all contribute to the local success of the Willamette River Greenway (Greenway) program.

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.

Air and water resources are especially vital in an urban area. Internal and external factors contribute to problems associated with air quality and water quality and quantity, but techniques are available to help reduce these problems and make the environment more livable.

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.<sup>23</sup> Planning can ensure the coexistence of city and nature; one example is the Greenway.

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<sup>23</sup> 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 this Environmental Resources Element of the

The Environmental Resources Element provides broad direction for maintaining and improving our natural urban environment. Other elements in the *Metro Plan* that provide more detail with particular aspects of the natural environment: Greenway, River Corridors and Waterways; Environmental Design; Public Facilities and Services; and Parks and Recreation Facilities. The emphasis in the Environmental Resources Element is the protection of waterways as a valuable and irreplaceable component of the overall natural resource system important to the metropolitan area. Waterways are also addressed in the “Greenway and Public Facilities and Services elements.” While some overlap repetition is unavoidable, the Greenway element emphasizes the intrinsic value of the Willamette River waterway for enjoyment and active and passive use by residents of the area. The public facilities element deals with components of the natural resource system in the context of the water and stormwater systems. The public facilities element includes findings and policies related to waterways, groundwater, drinking water protection, the Clean Water Act, and the Endangered Species Act.

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.

Lane County and the Cities of Springfield and Eugene completed the Goal 5 requirements for wetlands, riparian corridors, and wildlife habitat for the area between the UGB and the *Metro Plan* Plan Boundary (Plan Boundary). The three local governments jointly adopted *Metro Plan* text and policy amendments to the Environmental Resources Element to implement the Goal 5 requirements in 2004. Lane County adopted amendments to the riparian protection ordinance (Class I Stream Riparian Protection regulations, Lane Code Chapter 16.253) to implement Goal 5 in the area outside the UGB and inside the Plan Boundary in 2004. In 2004, Springfield and Eugene were undertaking work to comply with Goal 5 requirements for wetlands, riparian corridors, and wildlife habitat within their respective urban growth boundaries for adoption by the applicable jurisdictional land use authorities.

This element of the *Metro Plan* organizes the findings and policies into categories related to Statewide Planning Goals 3, 4, 5, 6, and 7.

- Agricultural Lands (Goal 3)
- Forest Lands (Goal 4)
- Riparian Corridors, Wetlands, and Wildlife Habitat (Goal 5)
- Mineral and Aggregate Resources (Goal 5)
- Open Space (Goal 5)
- Noise (Goal 6)
- Air, Water, and Land Resources Quality (Goal 6)
- Natural Hazards (Goal 7)

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*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.

## Goals

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.

## Findings and Policies

### Agricultural Lands (Goal 3)

#### Findings

1. The statewide goal definition for agriculture is based upon: (a) U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) agricultural soil capability classification system for Class I through IV soils, (b) other agricultural uses on Class V through VIII soils, and (c) proximity of other lands to (a) and (b). The majority of land in the metropolitan area is located on agricultural soils rated Classes I through IV, and much of this area is developed with urban uses. The hillside soils are generally Classes VI through VIII soils, and some are suited for grazing and other agricultural uses.
2. The most productive agricultural lands in the metropolitan area are located on Class I through IV soils on bottomlands along the McKenzie River and the Middle Fork of the Willamette River.
3. Where urban and agricultural lands abut, farm use management problems are frequently created.

#### Policies

- C.1 Where agricultural land is being considered for inclusion in future amendments to the UGB, least productive agricultural land shall be considered first. Factors other than agricultural soil ratings shall be considered when determining the productivity of agricultural land. Relevant factors include suitability for grazing, climatic conditions, existing and future availability of water for farm irrigation, ownership patterns, land use patterns, proximity to agricultural soils or current farm uses, other adjacent land uses, agricultural history, technological and energy inputs required, accepted farming practices, and farm market conditions.

- C.2 Designated agricultural lands shall be protected for agricultural uses through zoning for exclusive farm use or equivalent acceptable zoning and through application of other protective measures.
- C.3 During the next *Metro Plan* update, a study should be initiated to examine ways of buffering and protecting agricultural lands on the urban fringe from the effects of urban development. The study should also evaluate approaches to use in order to maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities.
- C.4 In addition to any of the above policies, these policies apply to agricultural lands within the Plan Boundary of the *Metro Plan* but outside the UGB. Lands within the UGB with agricultural soils or that are used for agricultural purposes are not entitled to protection under these policies.
- a. Encourage agricultural activities by preserving and maintaining agricultural lands through the use of an exclusive agricultural zone which is consistent with ORS 215 and OAR 660 Division 033.
  - b. In Agricultural Rent Zones 1 and 2 preference will be given to Goal 3. In Rent Zone 3, unless commercial agricultural enterprises exist, preference will be given to Goal 4.
  - c. Reserve the use of the best agricultural soils exclusively for agricultural purposes.
  - d. To ensure that zoning districts applied to agricultural lands encourage valid agricultural practices in a realistic manner emphasis shall be placed on minimum parcel sizes which are based upon a countywide inventory and which are adequate for the continuation of commercial agriculture. As minimum parcel sizes decrease to accommodate more specialized commercial agricultural activities, the burden of proof upon the applicant shall increase in order to substantiate the proposed agricultural activity and restrictions shall increase in order to obtain a residence on the commercial farm unit. Deviation from minimum parcel sizes of the Exclusive Farm Use (EFU/RCP) land for the creation of a parcel not smaller than 20 acres may be allowed when at least 19 acres of the parcel being created are currently managed or planned to be managed by a farm management plan for a farm operation consisting of one or more of the following: berries, grapes, or horticultural specialties.
  - e. Use planning and implementation techniques that reflect appropriate uses and treatment for each type of land.
  - f. Encourage irrigation, drainage and flood control projects that benefit agricultural use with minimum environmental degradation in accordance with existing state and federal regulations.

- g. Some agricultural land is not suitable or available for agricultural use by nature of being built upon, committed to or needed for nonagricultural uses, by using applicable comprehensive plan policies and the exceptions process of Goal 2, Part II.
- h. Provide maximum protection to agricultural activities by minimizing activities, particularly residential, that conflict with such use. Whenever possible, planning goals, policies, and regulations should be interpreted in favor of agricultural activities.
- i. Agricultural lands shall be identified as high value farm lands and farm lands in other soil classes in accordance with OAR 660 Division 033.
- j. Such minimum lot sizes or land division criteria as are used in EFU/RCP zones shall be appropriate for the continuation of the existing commercial agricultural enterprise in the region. The commercial agricultural minimum field or parcel sizes and corresponding farming regions identified in the *Addendum to Working Paper: Agricultural Lands* shall be used to determine the appropriate division requirements for lands zoned EFU/RCP.
- k. Conversion of rural agricultural land to urbanizable land shall follow the process and criteria set forth in Goals 3 and 14.
- l. Regard non-agricultural uses within or adjacent to agricultural lands as being subject to the normal and accepted agricultural practices of that locality.
- m. No policy shall be construed to exclude permitted and specially permitted non-farm uses, as defined in ORS 215.213 and OAR 660 Division 033, from the EFU/RCP zones. Implementing ordinances shall provide for such uses, consistent with the statutory and OAR 660 Division 033 requirements. Special permits for commercial uses in conjunction with farm use shall have the same effect as making the use an outright permitted use on the affected parcel.
- n. Land may be designated as marginal land if it complies with the requirements of ORS 197.247 (1991 Edition).
- o. Lane County recognizes ORS 215.253 shall apply on land-zoned EFU and Marginal Lands.
- p. Recreational activities in the Park and Recreation (PR/RCP) zone district within agricultural areas that are outside lands for which a built or committed exception to a statewide planning goal has been taken shall be limited to those uses consistent with Statewide Planning Goals 3 and 4.

## **Forest Lands (Goal 4)**

### **Findings**

4. Forest lands are those lands acknowledged by the Land Conservation and Development Commission (LCDC) as forest lands as of the date of adoption of the 1993 amendments to Goal 4. When a plan amendment involving forest lands is proposed, forest land shall include lands which are suitable for commercial forest uses including adjacent or nearby lands which are necessary to permit forest operations or practices and other forested lands that maintain soil, air, water, and fish and wildlife resources.
5. Forest lands provide multiple values in the metropolitan area including: scenic resources; watershed and soil protection, recreational opportunities; fish and wildlife habitat; commercial timber harvest; livestock grazing; and other urban uses, such as buffering. Within the UGB, and particularly within cities, timber harvest has less value to the general public than do other values.

### **Policies**

- C.5 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.
- C.6 The Oregon Forest Practices Act shall control commercial forest practices when commercial forest uses are the primary or one of two or more primary uses identified on forest lands outside the UGB. When other policies of the *Metro Plan* establish a greater importance for uses other than commercial forests, Lane County shall protect those other values by applying appropriate implementation measures.
- C.7 In addition to any of the above policies, these policies apply to forest lands within the Plan Boundary of the *Metro Plan* but outside the UGB:
  - a. Conserve forest lands by maintaining the forest land base and protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.
 

Forest land shall include lands which are suitable for commercial forest uses including adjacent or nearby lands which are necessary to permit forest operations or practices and other forested lands that maintain soil, air, water, and fish and wildlife resources.
  - b. Forest lands will be separated into two zoning categories, Non-impacted and Impacted, and these categories shall be defined and mapped by the general

characteristics specified in the Non-impacted Forest Land (F-1/RCP) and Impacted Forest Land (F-2/RCP) zones general characteristics.

- c. Forest lands that satisfy the requirements of ORS 197.247 (1991 Edition), may be designated as Marginal Lands. Uses and land divisions allowed on Marginal Lands shall be those allowed by ORS 197.247 (1991 Edition).
- d. Forest operations, practices and auxiliary uses shall be allowed on forest lands and shall be subject only to such regulation of uses as are found in the Oregon *Forest Practices Act*, ORS 527.722.
- e. Prohibit residences on F-1/RCP zone lands except for the maintenance, repair, or replacement of existing residences.
- f. Dwellings shall be allowed in the F-2/RCP zoning district as provided in Lane Code 16.211.
- g. The minimum land division size for the F-1/RCP zone and the F-2/RCP zone shall comply with Lane Code 16.210 and 16.211.
- h. New structures must comply with the *Siting and Fire Safety Standards* of Lane Code 16.210 and 16.211.
- i. Recreational activities in the Park and Recreation (PR/RCP) zone district within resource areas that are outside lands for which a built or committed exception to a statewide planning goal has been taken shall be limited to those uses consistent with Statewide Planning Goals 3 and 4.
- j. The effects of a projected shortfall in timber supplies within the near future are of considerable concern to Lane County. Lane County supports efforts by state and federal agencies in developing plans that will address the situation. Lane County intends to be an active, committed participant in such plan development.
- k. Encourage the consolidation of forest land ownership in order to form larger, more viable forest resource units.
- l. Encourage the conversion of under productive forest lands through silvicultural practices and reforestation efforts.
- m. Encourage the development of assistance programs, tax laws, educational programs, and research that will assist small woodland owners with the management of their forest land.
- n. Lane County recognizes that the Oregon Forest Practices Act shall be the only mechanism regulating the growing and harvesting of forest tree species on commercial forest lands unless Goal 5 resource sites have been recognized and

identified as being more important through an analysis of the environmental, social, economic, and energy (ESEE) consequences and conflict resolution as per Goal 5. No other findings, assumptions, goal policy, or other planning regulation shall be construed as additional regulation of forest management activities.

- o. Lands designated within the *Metro Plan* as forest land shall be zoned F-1/RCP or F-2/RCP. A decision to apply one of the above zones or both of the above zones in a split zone fashion will be based upon a conclusion that characteristics of the land correspond more closely to the characteristics of the proposed zoning than the characteristics of the other forest zone. The zoning characteristics referred to are specified below in subsections (1) and (2). This conclusion shall be supported by a statement of reasons explaining why the facts support the conclusion.
  - (1) Non-impacted Forest Land (F-1/RCP) zone characteristics:
    - (a) Predominantly ownerships not developed with residences or non-forest uses.
    - (b) Predominantly contiguous ownerships of 80 acres or larger in size.
    - (c) Predominantly ownerships contiguous to other lands utilized for commercial forest or commercial farm uses.
    - (d) Accessed by arterial roads or roads intended primarily for forest management.
    - (e) Primarily under commercial forest management.
  - (2) Impacted Forest Land (F-2/RCP) zone characteristics:
    - (a) Predominantly ownerships developed with residences or non-forest uses.
    - (b) Predominantly ownerships 80 acres or less in size.
    - (c) Ownerships generally contiguous to tracts containing less than 80 acres and residences and/or adjacent to developed or committed areas for which an exception has been taken in the *Metro Plan*.
    - (d) Provided with a level of public facilities and services, and roads intended primarily for direct services to rural residences.

## **Riparian Corridors, Wetlands, and Wildlife Habitat (Goal 5)**

### **Findings**

6. Data from the Oregon Natural Heritage Program (acquired in 2000) and interviews with specialists resulted in the identification of sites with species of concern, or endangered and threatened (as recognized on existing and proposed state and federal lists) plant and wildlife species whose normal or historic range includes the metropolitan area.
7. Natural resources may be identified within the metropolitan area after acknowledgment of the *Metro Plan*. Statewide Planning Goal 5 requires that these resources, if determined to be significant, be subject to a conflict resolution process.
8. Lane County, Springfield, and Eugene jointly completed the Goal 5 requirements for riparian corridors for the area between the UGB and the Plan Boundary. The inventory consisted of data from the Oregon Department of Forestry stream classification maps, U.S. Geological Service 7.5 minute quadrangle maps, Statewide Wetlands Inventory maps, and aerial photographs. The boundaries of significant riparian corridors were determined using the standard setback distance from all fish-bearing lakes and streams shown on the inventory as follows: 75 feet upland from the top of each bank along all streams with average annual stream flow greater than 1000 cubic feet per second; and 50 feet upland from the top of each bank along all streams with average annual stream flow less than 1000 cubic feet per second.
9. Lane County, Springfield, and Eugene jointly completed the Goal 5 requirements for wetlands for the area between the UGB and the Plan Boundary. The inventory consisted of data from the Statewide Wetlands Inventory.
10. Lane County, Springfield, and Eugene jointly completed the Goal 5 requirements for wildlife habitat for the area between the UGB and the Plan Boundary. The inventory consisted of data from the Oregon Natural Heritage Program and the Oregon Department of Fish and Wildlife, which included: threatened, endangered, and sensitive wildlife species habitat information; sensitive bird site inventories; and wildlife species of concern and/or habitats of concern identified and mapped by the Oregon Department of Fish and Wildlife. The Goal 5 wetland and riparian corridor requirements for the area between the UGB and the Plan Boundary adequately address fish habitat. Consequently, for purposes of applying Goal 5 requirements to this portion of the metro area, wildlife does not include fish habitat. Significant wildlife habitat includes only those sites where one or more of the following conditions exist: the habitat has been documented to perform a life support function for wildlife species listed by the federal government as a threatened or endangered species or by the State of Oregon as a threatened, endangered, or sensitive wildlife species; the habitat has documented occurrences of more than incidental use by a threatened, endangered, or sensitive wildlife species; the habitat has been documented as a sensitive bird nesting, roosting, or watering resource site for osprey or great blue herons; the habitat has been documented to be essential in achieving

policies or population objectives specified in a wildlife species management plan adopted by the Oregon Fish and Wildlife Commission; or the area is identified and mapped by the Oregon Department of Fish and Wildlife as habitat for a wildlife species of concern.

11. Springfield and Eugene are required to complete Goal 5 requirements for wetlands, riparian corridors, and wildlife habitat within their respective urban growth boundaries for adoption by the applicable jurisdictional land use authorities.

### **Policies**

- C.8 Local governments shall develop plans and programs which carefully manage development on hillsides and in water bodies, and restrict development in wetlands in order to prevent erosion and protect the scenic quality, surface water and groundwater quality, forest values, vegetation, and wildlife values of those areas.
- C.9 Each city shall complete a separate study to meet its requirements under the Goal 5 Rule for wetlands, riparian corridors, and wildlife habitat within the UGB. Lane County and the respective city jointly will adopt the inventory and protection measures for the area outside the city limits and inside the UGB.
- C.10 Local governments shall encourage further study (by specialists) of endangered and threatened plant and wildlife species in the metropolitan area.
- C.11 Local governments shall protect endangered and threatened plant and wildlife species, as recognized on a legally adopted statewide list, after notice and opportunity for public input.
- C.12 Property owners may pursue efforts to protect natural vegetation and wildlife habitat areas on their land to conserve these areas, e.g., through conservation easements, public acquisition, donation, land trusts, etc.; and local governments are encouraged to assist in these efforts.
- C.13 Wetland, riparian corridor, or wildlife habitat sites inside the UGB identified after adoption of the applicable Goal 5 inventory of significant sites, that have not been previously considered for inclusion in the inventory, shall be addressed in the following manner:
  - a. The jurisdiction within which the natural resource is located shall study the site according to the requirements in the Goal 5 administrative rule.
  - b. Upon the completion of the study, the affected jurisdiction shall determine whether the identified natural resource is significant according to the adopted significance criteria of the affected jurisdiction.

- c. If the newly identified site is determined significant, the affected jurisdiction shall complete the Goal 5 requirements for the site, which includes adoption of protection measures for sites identified for protection.
- d. The affected jurisdiction will notify affected property owners and interested parties throughout the process.

C.14 These policies apply to the Confluence Heronry on the Willamette River.

- a. The heronry shall be protected by a Natural Resource designation on the *Metro Plan* Diagram, protective zoning, and the application of restrictions identified below.
- b. The operational buffer shall extend 1,000 feet from the southerly nesting tree. Operational restrictions shall be in effect for the area contained within the 1,000-foot buffer between February 1 and July 15. These restrictions shall include: no tree felling, no aggregate extraction, and no operation of any mechanized equipment or motorized vehicle for recreation use or for the purpose of farm and forest activities. Upon on-site verification from the Oregon Department of Fish and Wildlife that fledging is completed, the period of operational restrictions may be shortened.
- c. Permits from the state and county are an appropriate mechanism for addressing details of sand and gravel operations. Specifically, flood hazard concerns and associated erosion potential will have to be addressed.
- d. Protection of riparian habitat on the periphery of the island shall be achieved by maintaining an adequate Willamette River Greenway vegetative fringe in order to address erosion, scenic, and wildlife habitat concerns.
- e. Park use on the island should be discouraged by the state.
- f. Controls on sand and gravel extraction should be developed between the operator and the Oregon Department of Fish and Wildlife through the mining permit procedures in order to protect the heronry resource.
- g. Property owners and the state shall be encouraged to exchange land to place the Confluence Island Heronry and buffer in perpetual ownership by the public. The state may then protect and manage the heronry resource with compensation to the property owners.

C.15 The Statewide Wetland Inventory as shown on the map titled *Goal 5 Wetlands for the area inside the Metro Plan Boundary and outside the UGB*, dated January 2004, adopted and incorporated here, shall be used to identify wetlands for purposes of notifying the Division of State Lands concerning applications for development permits or other land

use decisions affecting Goal 5 wetlands in the area outside the UGB and inside the Plan Boundary. The map is on file at the Lane County Land Management Division.

- C.16 The map titled *Goal 5 Significant Wildlife Habitat for the area inside the Metro Plan Boundary and outside the UGB*, dated January 2004, adopted and incorporated here, shall be used to identify significant wildlife habitat for purposes of notifying the Oregon Department of Fish and Wildlife concerning applications for development permits or other land use decisions affecting significant wildlife habitat on the Goal 5 inventory for areas outside the UGB and inside the Plan Boundary. The map is on file at the Lane County Land Management Division.
- C.17 The map titled *Goal 5 Significant Riparian Corridors for the area inside the Metro Plan Boundary and outside the UGB*, dated January 2004, adopted and incorporated here, shall be used to identify significant riparian corridors for purposes of applying Goal 5 riparian protection provisions in Lane Code Chapter 16 for areas outside the UGB and inside the Plan Boundary. The map is on file at the Lane County Land Management Division.

## **Mineral and Aggregate Resources (Goal 5)**

### **Findings**

12. Total land designated and zoned for sand and gravel extraction in the metropolitan area and immediately adjacent sub-areas appears adequate for demand through the planning period.
13. Sand and gravel deposits are an important natural resource necessary for construction in the metropolitan area. Nevertheless, the extraction of sand and gravel can conflict with other open space and recreation values associated with water resources, vegetation, wildlife habitat, and scenic quality. Proper rehabilitation and reuse of abandoned sand and gravel sites results in the return of valuable land for urban uses, including open space.
14. Lane County addressed the Goal 5 requirements in effect at the time of *Metro Plan* designation, zoning or permitting for mineral and aggregate operations outside the UGB including potential conflicts with inventoried wetlands, riparian corridors, and wildlife habitat. The permitting process of the Department of Geology and Mineral Industries (DOGAMI) will require necessary and adequate protections for inventoried wetlands, riparian corridors, and wildlife habitat for these existing operations. Future *Metro Plan* amendment, rezoning, or permitting processes for new mineral and aggregate operations not already authorized or permitted will be subject to applicable requirements of Goal 5 and DOGAMI regulations.

### **Policy**

- C.18 Sand and gravel sites identified as significant by the *Metro Plan* shall be protected in accordance with the requirements of the Goal 5 Rule.

## **Open Space (Goal 5)**

### **Findings**

15. While development and in-filling have decreased the amount of open space (and associated vegetation and wildlife habitat) within the urban service area, the compact urban growth form has protected open space on the urban fringe and in rural areas within the Plan Boundary.
16. Compact urban growth results in pressure on open space within the current UGB. Programs for preserving quality open space within the projected UGB become more important as the area grows.
17. Open space provides many benefits in an urban area, including: retention of habitat for wildlife; filtration of polluted water, absorption of storm runoff flow; protection of scenic

quality; provision of recreation opportunities; reduction of atmospheric temperatures, and personal well-being.

18. Urban agriculture, in other words, backyard and community gardens, and interim use of vacant and underdeveloped parcels, provides economic, social, and environmental benefits to the community.

### **Policies**

- C.19 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.
- C.20 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.
- C.21 When planning for and regulating development, local governments shall consider the need for protection of open spaces, including those characterized by significant vegetation and wildlife. Means of protecting open space include but are not limited to outright acquisition, conservation easements, planned unit development ordinances, streamside protection ordinances, open space tax deferrals, donations to the public, and performance zoning.

### **Noise (Goal 6)**

#### **Findings**

19. Noise sources of a nuisance nature (such as barking dogs, lawn mowers, loud parties, noisy mufflers, and squealing tires) are best addressed through nuisance ordinances rather than land use policies.
20. Major sources of noise in the metropolitan area are airplanes, highway traffic, and some industrial and commercial activities.
21. The Eugene Airport *Noise Exposure Analysis*, April 2000, was found to be in compliance with state airport noise standards by the State of Oregon Department of Environmental Quality.
22. Federal Highway Administration noise standards apply whenever federal funds are used in the construction or reconstruction of a highway. A noise study is required if the construction will add a through-lane of traffic or significantly alter either the horizontal or vertical alignment of the highway. The significance of a change in alignment has to do with the effect that the alignment change has on noise levels. State funded Oregon Department of Transportation projects are generally developed in conformance with the federal noise standards.

## **Policies**

- C.22 Design of new street, highway, and transit facilities shall consider noise mitigation measures where appropriate.
- C.23 Design and construction of new noise-sensitive development in the vicinity of existing and future streets and highways with potential to exceed general highway noise levels shall include consideration of mitigating measures, such as acoustical building modifications, noise barriers, and acoustical site planning. The application of these mitigating measures must be balanced with other design considerations and housing costs.
- C.24 Local governments shall continue to monitor, to plan for, and to enforce applicable noise standards and shall cooperate in meeting applicable federal and state noise standards.

## **Air, Water and Land Resources Quality (Goal 6)**

### **Findings**

23. The high value placed on clean air and water by local residents is reflected in local commitments to plans and programs directed toward reducing air and water pollution.
24. The Eugene-Springfield metropolitan area has a strong potential for elevated levels of air pollution due to the surrounding mountains, which provide a barrier to ventilation and contribute to periodic episodes of stable atmospheric conditions. These conditions effectively limit dilution and dispersion of air pollutants, resulting in the build-up of concentrations near the ground.
25. Some pollutants affecting metropolitan air and water quality originate outside the metropolitan area.
26. Based on monitoring work performed by the Lane Regional Air Pollution Agency (LRAPA), the Lane Council of Government (LCOG) and LRAPA submitted documentation demonstrating that the area meets the carbon monoxide standards since a violation of the eight-hour standard has not occurred since 1980. In 1988, LRAPA and LCOG formally requested redesignation of the area as an attainment area for carbon monoxide. The Oregon Department of Environmental Quality (DEQ) forwarded the reclassification request to the U.S. Environmental Protection Agency (EPA) Regional Office in Seattle. In January 1994, EPA redesignated the Eugene-Springfield area to attainment status for carbon monoxide. The area is currently in a 20-year maintenance period. Since redesignation, there have been no violations of the carbon monoxide standards.

LRAPA has developed a plan for meeting the new standards for fine particulates (the PM10 standard). The LRAPA Board has approved the plan. The PM10 plan boundary is

coterminous with *Metro Plan* UGB as it existed on the date the PM10 standard was adopted. A majority of the unpaved streets identified as high priorities to address PM10 problems have now been paved. The PM10 plan approved by the LRAPA Board concluded that no transportation-related control measures were necessary for compliance with the PM10 Standard. LRAPA is currently in the process of seeking redesignation to attainment status for PM10.

27. Section 110 of the federal Clean Air Act requires state and local air pollution control agencies to adopt federally approved control strategies to minimize air pollution. The resulting body of regulations is known as a *State Implementation Plan* (SIP). SIPs generally establish limits or work practice standards to minimize emissions of air pollutants or their precursors. SIPs also include special control strategies for those areas not meeting *National Ambient Air Quality Standards* (non-attainment areas). Most of the regulations developed by LRAPA for controlling the emissions of air pollutants in Lane County are included in the Oregon SIP. The original SIP was adopted in the early 1970s in response to the 1970 federal Clean Air Act. It is amended periodically to respond to current issues.
28. Reduction of open space, removal of vegetative cover, and development that increases the amount of impervious surfaces (paved streets, roofs, parking lots) contribute significantly to increases in the peak volume (quantity) of urban storm runoff entering stormwater system and natural drainageways.
29. Water pollution in the metropolitan area results from both “point sources” (municipal and industrial wastewater discharges) and “non-point sources” (pollutants such as oil, dust, and debris which are carried into streams by storm runoff). Water pollution is most acute in streams that have low water flow conditions during the summer months (such streams include Amazon Creek and the “Q” Street ditch).
30. Offsetting measures can reduce the negative effects of urban development on water quality and quantity problems. Examples include on-site retention of stormwater, inclusion of landscaped “buffer strips” adjacent to new developments and conservation and improvement of streamside vegetation along water courses.
31. The Willamette and McKenzie Rivers run through many jurisdictions, necessitating cooperative water management planning and consideration for downstream effects of actions taken by a single jurisdiction.
32. The Eugene-Springfield area is currently in compliance with national standards for carbon monoxide. The region will continue to be in compliance with the carbon monoxide standard in the future. Vehicle fleet turnover and stricter emission controls on newer vehicles are factors that will contribute to lower emissions in the future.

## **Policies**

- C.25 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.
- C.26 Local governments shall continue to monitor, to plan for, and to enforce applicable air and water quality standards and shall cooperate in meeting applicable federal, state, and local air and water quality standards.
- C.27 Local governments shall continue to cooperate in developing and implementing programs necessary to meet air quality standards. This effort should include but not be limited to:
- a. Review of all major public capital expenditure projects for potential air quality impacts.
  - b. Integration of air quality concerns into the comprehensive land use plan.
  - c. Active participation in developing and implementing additional controls, as needed.
- C.28 Local governments shall encourage changes to state and federal air quality regulations relating to development of fine particulate standards and related monitoring techniques.
- C.29 Prior to the completion of the next *Metro Plan* update, the air, water, and land resource quality of the metropolitan area will be reassessed.

## **Natural Hazards (Goal 7)**

### **Findings**

33. Due to the general nature of soils and geologic mapping, site specific analysis is often necessary to determine the presence of geologic hazards and the severity of soil problems which are constraints to development. Such geologic hazards exist when certain combinations of slope, soil conditions, and moisture conditions render land unstable.
34. Unless special precautions are taken, development within the floodway fringe (that portion of the floodplain having a one percent per year chance of occurrence, also known as a 100-year flood) is subject to hazards to life and property from flooding.
35. Many portions of the floodway fringe contain natural assets, such as significant vegetation, wildlife and scenic areas, and productive agricultural lands and are thus, valuable for open space and recreation. On the other hand, because of their central location, some floodway fringe areas within the urban service area are important lands for urban development.

**Policies**

- C.30 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.
- C.31 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.
- 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 be taken to offset the soil and geologic constraints present, to protect life and property, public investments, and environmentally-sensitive areas.
- C.33 Eugene shall maintain and improve hillside development regulations.

## **D. Willamette River Greenway, River Corridors, and Waterways Element**

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.

On December 6, 1975, the Land Conservation and Development Commission (LCDC) adopted Statewide Planning Goal 15: Willamette River Greenway. The goal sets forth the overall framework within which state and local governments carry out protection and maintenance of the Willamette River Greenway.

The goal requires Eugene, Springfield, and Lane County to adopt Greenway boundaries, to specify uses permitted within those boundaries, and indicate areas of potential acquisition along the Greenway. In making these determinations, local jurisdictions must gather information and inventory the nature and extent of all natural resources associated with the Willamette River Greenway. Local jurisdictions are also mandated to adopt provisions, by ordinance, requiring a compatibility review permit for any intensification, change of use, or development within Greenway boundaries. The jurisdictional area of the *Metro Plan* (i.e., Metro Plan Boundary) was found to be in compliance with Goal 15 on September 12, 1982.

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. Future proposed park acquisitions, such as the Goodpasture Island gravel ponds, will further expand the opportunity for public access and enjoyment of the river area. 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. This system includes five bike bridges across the river.

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. Residential uses along the Greenway can provide the residents with access to the river area. 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.

Finally, in rural agricultural areas, isolated access points can work to the detriment of the Greenway program. In these areas, trespass and vandalism can cause a detraction in the general Greenway environment and create problems for private landowners.

The Greenway boundaries, as adopted by the three jurisdictions, have been digitized in the Regional Land Information Database (RLID) and are shown as an overlay on Plan Diagram. Future acquisition areas and uses allowed within the Greenway remain the primary responsibility

of the local jurisdictions. This element, however, provides the basis for a coordinated effort by Eugene, Springfield, and Lane County.

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.

## **Goal**

To protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of river and waterway corridors.

## **Findings, Objectives, and Policies**

### **Findings**

1. The Willamette and McKenzie Rivers are recognized as valuable natural assets to the entire community.
2. In addition to the Willamette and McKenzie Rivers, a number of waterways are important environmental features in the metropolitan area. These include, for example, the Springfield Millrace, Amazon Creek, Fern Ridge Reservoir, and the Eugene Millrace.
3. Recently, the community has begun to realize the potential of inland waterway corridors to contribute to the livability of the area.
4. In addition to its significance to agriculture, flood control, and fish and wildlife, Fern Ridge Reservoir continues to grow in importance as a recreational water facility.
5. Statewide Planning Goal 15 mandates local governments to establish the Greenway boundaries, allowed uses within the Greenway and potential acquisition areas.
6. Eugene, Springfield, and Lane County have received final Greenway boundary approval by the LCDC.
7. The jurisdictional area of the *Metro Plan* was found to be in compliance with Goal 15 on September 12, 1982.

8. The following permits are required by Eugene, Springfield, and Lane County to implement Statewide Planning Goal 15 within their respective areas of jurisdiction as defined in Chapter II-D:
  - a. The City of Eugene requires Greenway Permits for any activity in the Willamette Greenway involving intensification of use, change in use, or development.
  - b. 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.”
  - c. Lane County requires a Greenway Development Permit for intensification or change of use or development allowed in applicable zones, including public improvements and including partitions and subdivisions as defined in LC 13.020 for lands within the boundaries of the Willamette River Greenway.
9. Local jurisdictions retain the primary responsibility for implementation of the Willamette River Greenway goal.
10. The metropolitan area’s river and waterway corridors require protection to maintain and enhance natural, scenic, environmental, and economic qualities of these waterways.
11. The three jurisdictions have cooperatively developed a public park system and bicycle-pedestrian trails along the Willamette River Greenway.
12. Residential and commercial development along the Willamette River Greenway provides greater opportunity for public access and enjoyment of the river area than does industrial development.
13. Rural agricultural areas along river and waterway corridors can be damaged by isolated public access points because of vandalism and/or trespass on private lands.
14. Experience in other communities indicates that carefully planned and designed residential and commercial development at designated locations along inland water corridors can be compatible with adjacent areas and the corridors themselves.
15. The current unpleasant and unsightly condition of many inland waterway systems results from neglect and uncoordinated waterway planning.

### **Objectives**

1. Encourage use of river and waterway corridors to fulfill open space, recreation, and resource protection needs.

2. Ensure that development occurring within river and waterway corridors is responsive to and provides protection of these valuable natural assets.
3. Encourage, where appropriate and in keeping with Greenway goals, development that respects the quality of rivers and waterways and provides a variety of opportunities for enjoyment of those resources by the public.
4. Encourage coordinated water planning and the development of the area's waterways, where appropriate, as part of the area's open space and park system.

### **Policies**

- D.1 Periodically, local governments shall review Greenway boundaries, uses, and potential acquisition areas to ensure continued compliance with state and local Greenway goals.
- D.2 Land use regulations and acquisition programs along river corridors and waterways shall take into account all the concerns and needs of the community, including recreation, resource, and wildlife protection; enhancement of river corridor and waterway environments; potential for supporting non-automobile transportation; opportunities for residential development; and other compatible uses.
- D.3 Eugene, Springfield, and Lane County 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.
- D.4 Lane County, Springfield, and Eugene shall continue to participate in efforts to determine the feasibility of an urban canal that would connect Eugene's historic Millrace to Amazon Creek. Likewise, Springfield's efforts to improve the scenic quality of its Millrace should be encouraged.
- D.5 New development that locates along river corridors and waterways shall be limited to uses that are compatible with the natural, scenic, and environmental qualities of those water features.
- D.6 New industrial development that locates along the Willamette and McKenzie Rivers shall enhance natural, scenic, and environmental qualities.
- D.7 Potential public access points in rural agricultural areas shall be carefully reviewed to ensure preservation of the Willamette River Greenway environment, with special emphasis on problems of vandalism and trespass.
- D.8 Within the framework of mandatory statewide planning goals, local Willamette River Greenway plans shall allow a variety of means for public enjoyment of the river, including public acquisition areas, residential areas, and commercial areas.

- D.9 Local and state governments shall continue to provide adequate public access to the Willamette River Greenway.
- D.10 Aggregate extraction may be permitted when compatible with purposes of Statewide Planning Goal 15. Local governments shall continue, through land use planning and special regulations, to control aggregate extraction to minimize adverse effects of extraction on water quality, fish and wildlife, vegetation, bank stabilization, stream flow, scenic quality, noise, and safety.
- D.11 The taking of an exception shall be required if a non-water-dependent transportation facility requires placing of fill within the Willamette River Greenway setback.

An exception to Statewide Planning Goal 15 Willamette River Greenway was approved for Oregon Department of Transportation (ODOT) for purposes of removing and replacing the decommissioned 1-5 Bridge, the temporary detour bridge and the Canoe Canal bridge with two new parallel bridges (one southbound and one northbound) within the 1-5 right-of-way crossing the Willamette River and Canoe Canal and within the Willamette River Greenway Setback Line. The exception authorizes construction and later removal of one or more temporary work bridges; demolition of the decommissioned 1-5 Willamette River Bridge, Canoe Canal Bridge, and detour bridges; construction of the two replacement bridges; reconstruction of the roadway approaches to the bridges (1-5 and ramps); rehabilitation of the project area; and completion of any required mitigation of project impacts. In association with these tasks, the exception further authorizes within the Willamette River Greenway Setback Line the addition and removal of fill within ODOT right-of-way and the removal of fill within a temporary slope easement east of 1-5. This exception satisfies the criteria of Oregon Administrative Rule (OAR) 660-004-0022(6) Willamette Greenway and the exception requirements of OAR 660-004-0020 Goal 2, Part II (c) for a “reasons” exception, and pursuant to OAR 660-004-0015, is hereby adopted as an amendment to the *Metro Plan* text, Policy D.11, Chapter III, Section D.

An exception to Statewide Planning Goal 15 Willamette River Greenway was approved by the cities of Eugene and Springfield and by Lane County authorizing construction of a bike path viaduct beneath the I-5 bridges, along the south bank of the Willamette River. The exception authorizes construction of the bike path viaduct including the fill and removal of fill necessary to build the structure. This exception satisfies the criteria of Oregon Administrative Rules (OAR) 660-004-0022 (6) Willamette Greenway and the exception requirements of OAR 660-004-0020 Goal 2, Part II (c) for a “reasons” exception. Pursuant to OAR 660-004-0015, this exception is hereby adopted as an amendment to the *Metro Plan* text, Policy D.11, Chapter III, Section D.



## **E. Environmental Design Element**

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.

### **Goals**

1. Secure a safe, clean, and comfortable environment which is satisfying to the mind and senses.
2. 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.
3. Create and preserve desirable and distinctive qualities in local and neighborhood areas.

## Findings, Objectives, and Policies

### Findings

1. Present and continued emphasis on compact growth increases the need for attention to detailed, specific environmental design components, such as site planning and landscaping of development.
2. Decisions are constantly being made which affect the form and design of the metropolitan area.
3. The location and design of public and private facilities play an important role in giving distinctive identity and character to an area. For example, an area's character may be developed through association with a particular park, a land form, a public building, an area of older homes, vegetation, or a distinctive type of subdivision design.
4. Natural land features, waterways, and native vegetation provide distinctive and easily identifiable components to the metropolitan area environment.
5. The metropolitan area presently offers a variety of naturally distinctive topographic features, waterways, and vegetation that are both visually and personally accessible to residents.
6. Ridgelines and water areas provide the greatest concentration of scenic sites in the metropolitan area.
7. Landscaping with trees and other vegetation provides a pleasant, distinctive, and permanent atmosphere for the metropolitan area.
8. The use of buffer strips and other design features can minimize the negative environmental impact of certain uses, such as roadways and parking areas, while protecting adjacent land uses.
9. Local residents are concerned about the livability and aesthetic quality of residential development that changes the character of their neighborhoods.
10. Compatibility, visual quality, and safety are important elements to preserve and promote in mixed-use area.

### Objectives

1. Provide the facilities and services needed to maintain our quality of life. Examples include educational, housing, medical, public transportation, and recreational facilities.
2. Encourage a greater diversity of living experiences and environments.

3. Establish or maintain a sense of identity and character for local and neighborhood areas.
4. Shape development to suit natural conditions as much as possible.
5. Enhance views and public use of river corridors, drainageways, and prominent topographic features, such as ridgelines and buttes, within the jurisdiction of the Metropolitan Plan, when consistent with other planning policies.
6. Coordinate development to achieve compatibility in mixed-use areas (with and without refinement plans) through the adoption and administration of design standards.

### **Policies**

- E.1 In order to promote the greatest possible degree of diversity, a broad variety of commercial, residential, and recreational land uses shall be encouraged when consistent with other planning policies.
- E.2 Natural vegetation, natural water features, and drainage-ways shall be protected and retained to the maximum extent practical. Landscaping shall be utilized to enhance those natural features. This policy does not preclude increasing their conveyance capacity in an environmentally responsible manner.
- E.3 The planting of street trees shall be strongly encouraged, especially for all new developments and redeveloping areas (where feasible) and new streets and reconstruction of major arterials within the UGB.
- E.4 Public and private facilities shall be designed and located in a manner that preserves and enhances desirable features of local and neighborhood areas and promotes their sense of identity.
- E.5 Carefully develop sites that provide visual diversity to the urban area and optimize their visual and personal accessibility to residents.
- E.6 Local jurisdictions shall carefully evaluate their development regulations to ensure that they address environmental design considerations, such as, but not limited to, safety, crime prevention, aesthetics, and compatibility with existing and anticipated adjacent uses (particularly considering high and medium density development locating adjacent to low density residential).
- E.7 The development of urban design elements as part of local and refinement plans shall be encouraged.
- E.8 Site planning standards developed by local jurisdictions shall allow for flexibility in design that will achieve site planning objectives while allowing for creative solutions to design problems.

- E.9 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.

## F. Transportation Element

The Transportation Element addresses surface and air transportation in the metropolitan area. The *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)* provides the basis for the surface transportation portions of this element and the *Eugene Airport Master Plan* provides the basis for the air transportation portions.

*TransPlan* guides regional transportation system planning in the metropolitan area to serve the transportation planning needs of a projected population of 296,500 in the TransPlan Study Area. The TransPlan Study Area is an area extending beyond the UGB and Metro Plan boundary that is used for transportation modeling purposes. *TransPlan* establishes the framework upon which all public agencies can make consistent and coordinated transportation planning decisions. Goals and policies in *TransPlan* are contained in this Transportation Element and are part of the adopted *Metro Plan*. *TransPlan* project lists and project maps are also adopted as part of the *Metro Plan*.

This element complies with Statewide Planning Goal 12: Transportation, “To provide and encourage a safe, convenient, and economic transportation system.” 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.

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.

### 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.

## **Findings and Policies**

The findings and policies in this element are organized by the following four topics related to transportation:

- Land Use
- Transportation Demand Management
- Transportation System Improvements
  - System-Wide
  - Roadways
  - Transit
  - Bicycle
  - Pedestrian
  - Goods Movement
  - Other Modes
- Finance

### **Land Use**

#### **Findings**

1. The *Oregon Transportation Plan (OTP)* (1992) states that Oregon's land use development patterns have tended to separate residential areas from employment and commercial centers, requiring people to drive almost everywhere they go; that the results have been increased congestion, air pollution, and sprawl in the metropolitan areas and diminished livability; that these auto-dependent land use patterns limit mobility and transportation choices; and that reliance on the automobile has led to increased congestion, travel distances, and travel times.
2. Studies annotated in the *Land Use Measures Task Force Report Bibliography* have found that land use development patterns have an impact on transportation choices; that separation of land uses and low-density residential and commercial development over large areas makes the distance between destinations too far apart for convenient travel by means other than a car; and that people who live in neighborhoods with grid pattern

streets, nearby employment and shopping opportunities, and continuous access to sidewalks and convenient pedestrian crossings tend to make more walking and transit trips.

3. The *Oregon Highway Plan* (OHP) (January 1999) states that focusing growth on more compact development patterns can benefit transportation by: reducing local trips and travel on state highways; shortening the length of many vehicle trips; providing more opportunities to walk, bicycle, or use available transit services; increasing opportunities to develop transit, and reducing the number of vehicle trips to shop and do business.
4. OTP policies emphasize reducing reliance on the automobile and call for transportation systems that support mixed-land uses, compact cities, and connections among various transportation modes to make walking, bicycling, and the use of public transit easier. The OTP provides that the state will encourage and give preference to projects and grant proposals that support compact or infill development or mixed use projects. The OTP also contains actions to promote the design and development of infrastructure and land use patterns that encourage alternatives to the single-occupant automobile.
5. 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.
6. A 24-member Citizen Task Force (Task Force), representing a broad range of interests in the Eugene-Springfield area, created, evaluated, and refined the nodal development land use strategy over a seven-month period as part of the update of *TransPlan*. The Task Force intended the strategy to encourage development patterns that will support a multi-modal transportation system.
7. Nodal development is 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.

8. Nodal development is consistent with the Special Transportation Area designation defined in the draft OHP. The designation is intended to guide planning and management decisions for state highway segments inside nodal development areas.
9. Nodal development supports the fundamental principles, goals, and policies of the adopted *Metro Plan* to achieve compact urban growth, increase residential densities, and encourage mixed-use developments in designated areas. The *Land Use Measures Strategies Document* found that nodal development also supports increased 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.
10. Based on an analysis of the *Regional Travel Forecasting Model* results, an overall outcome of nodal development implementation will be that the percentage of person trips under one mile can be increased to approximately 16.1 percent of all trips; and, on a regional basis, that trip lengths will be slightly shorter in 2015 than under existing conditions, due, in part, to reduced trip lengths within nodal development areas.
11. Based on an analysis of the *Regional Travel Forecasting Model* results, investments in non-auto modes, particularly Bus Rapid Transit (BRT), and implementation of nodal development strategies will improve transportation choices by helping to increase the percentage of non-auto trips from 14.4 percent to 17.0 percent by the year 2015. Increases in the percentage of households and workers with access to ten-minute transit service will result in a 49 percent increase in the percent of trips taken by bus.
12. 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.
13. 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.

## Policies

- 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.<sup>24</sup>
- F.2 Support application of the nodal development strategy in designated areas through information, technical assistance, or incentives.

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<sup>24</sup> See Glossary for the definition of nodal development.

- 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.
- F.4 Require improvements that encourage transit, bicycles, and pedestrians in new commercial, public, mixed use, and multi-unit residential development.
- F.5 Within three years of *TransPlan* adoption, apply the ND, Nodal Development, designation to areas selected by each jurisdiction, adopt and apply measures to protect designated nodes from incompatible development and adopt a schedule for completion of nodal plans and implementing ordinances.

### **Transportation Demand Management**

#### **Findings**

- 14. TDM addresses federal *Transportation Equity Act for the 21<sup>st</sup> Century* (TEA 21) and state TPR requirements to reduce reliance on the automobile, thus helping to postpone the need for expensive capital improvements. The need for TDM stems from an increasing demand for and a constrained supply of road capacity, created by the combined effects of an accelerated rate of population growth (41 percent projected increase from 1995 to 2015) and increasing highway construction costs; for example, the City of Eugene increased the transportation systems development charge by a total of 15 percent to account for inflation from 1993-1996.
- 15. The *Regional Travel Forecasting Model* estimates that average daily traffic on most major streets is growing by 2-3 percent per year. Based on *1994 Commuter Pack Survey* results, half of the local residents find roads are congested at various times of the day; and the vast majority finds roads are congested during morning and evening rush hours.
- 16. The *COMSIS TDM Strategy Evaluation Model*, used in August 1997 to evaluate the impact of TDM strategies, found that vehicle miles traveled (VMT) and vehicle trips are reduced up to 3 percent by voluntary strategies (e.g., employer-paid bus pass program) and up to 10 percent by mandatory strategies (e.g., mandatory employer support); that requiring employers to increase the cost of employee parking is far more effective than reducing employee transit costs; and that a strong package of voluntary strategies has a greater impact on VMT and vehicle trips than a weak package of mandatory strategies.
- 17. Transit system ridership has increased 53 percent since the first group pass program was implemented in 1987 (with University of Oregon students and employees).

18. The OHP recognizes that TDM strategies can be implemented to reduce trips and impacts to major transportation facilities, such as freeway interchanges, postponing the need for investments in capacity-increasing projects.
19. *An Evaluation of Pricing Policies for Addressing Transportation Problems* (ECONorthwest, July 1995) found that implementation of congestion pricing in the Eugene-Springfield area would be premature because the level of public acceptance is low and the costs of implementation are substantial; and that parking pricing is the only TDM pricing strategy that would be cost-effective during the 20-year planning period.

### **Policies**

- F.6 Expand existing TDM programs and develop new TDM programs. Establish TDM bench marks and if the bench marks are not achieved, mandatory programs may be established.
- F.7 Increase the use of motor vehicle parking management strategies in selected areas throughout the Eugene-Springfield metropolitan area.
- F.8 Implement TDM strategies to manage demand at congested locations.

### **Transportation System Improvements: System-Wide**

#### **Findings**

20. The number of vehicles, VMT, and use of the automobile are all increasing while use of alternatives is decreasing. Between 1970 and 1990, the number of vehicles in Lane County increased by 83 percent, while the number of households increased by 62 percent. Between 1980 and 1990, VMT grew at a rate seven times that of the population growth. The *Regional Travel Forecasting Model* projects that, by the year 2015, without implementation of proposed *TransPlan* projects, non-commercial VMT will increase 52 percent while the percentage who bike will drop from 3.7 percent to 3.3 percent, walk from 8.9 percent to 7.9 percent, and the percentage who bus will increase only slightly from 1.8 percent to 1.9 percent.
21. The OHP 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.
22. OHP policy supports investment in facilities that improve intermodal linkages as a cost-effective means to increase the efficient use of the existing transportation system.
23. Current literature and research speaks to the relationship between street design and travel behavior, finding that neighborhood impacts, such as through-traffic and speeding on

neighborhood streets, are affected by street design. For example, research by Richard Dowling and Steven Colman reported in the article, *Effects Of Increased Highway Capacity: Results of a Household Travel Behavior Survey* (1998) found that drivers' number one preferred response to congestion was to find a faster route if the current one becomes congested; and Calthorpe and Duany/Platter-Zybecks and Anton Nelleson have found that the layout and design of buildings and streets will influence user behavior and that streets can be designed to reduce travel speeds and reduce cut-through trips.

### **Policies**

- F.9 Adopt by reference, as part of the *Metro Plan*, the 20-Year Capital Investment Actions project lists contained in *TransPlan*. Project timing and estimated costs are not adopted as policy.
- F.10 Protect and manage existing and future transportation infrastructure.
- F.11 Develop or promote intermodal linkages for connectivity and ease of transfer among all transportation modes.
- F.12 Preserve corridors, such as rail rights-of-way, private roads, and easements of regional significance, that are identified for future transportation-related uses.
- F.13 Support transportation strategies that enhance neighborhood livability.

### **Transportation System Improvements: Roadways**

#### **Findings**

- 24. The *Regional Travel Forecasting Model* forecasted increased traffic congestion on roadways over the next 20 years, ranging from almost two to over four times the existing congestion levels.
- 25. Level of service (LOS) standards are a nationally accepted means for measuring the performance of roadway facilities. LOS analysis methods are standardized through the Transportation Research Board's *Highway Capacity Manual*.
- 26. The OHP establishes performance standards for all state highways in Oregon. OAR 660-012-0015 requires coordination of transportation system plans with the state.

#### **Policies**

- F.14 Address the mobility and safety needs of motorists, transit users, bicyclists, pedestrians, and the needs of emergency vehicles when planning and constructing roadway system improvements.
- F.15 Motor vehicle level of service policy:

- a. Use motor vehicle level of service standards to maintain acceptable and reliable performance on the roadway system. These standards shall be used for:
  - (1) Identifying capacity deficiencies on the roadway system.
  - (2) Evaluating the impacts on roadways of amendments to transportation plans, acknowledged comprehensive plans and land-use regulations, pursuant to the TPR (OAR 660-012-0060).
  - (3) Evaluating development applications for consistency with the land-use regulations of the applicable local government jurisdiction.
  
- b. Acceptable and reliable performance is defined by the following levels of service under peak hour traffic conditions:
  - (1) Level of Service F within Eugene’s Downtown Traffic Impact Analysis Exempt Area;
  - (2) Level of Service E within the portion of Eugene’s Central Area Transportation Study (CATS) area that is not within Eugene’s Downtown Traffic Impact Analysis Exempt Area; and
  - (3) Level of Service D elsewhere.
  
- c. Performance standards from the OHP shall be applied on state facilities in the Eugene-Springfield metropolitan area.

In some cases, the level of service on a facility may be substandard. The local government jurisdiction may find that transportation system improvements to bring performance up to standard within the planning horizon may not be feasible, and safety will not be compromised, and broader community goals would be better served by allowing a substandard level of service. The limitation on the feasibility of a transportation system improvement may arise from severe constraints, including but not limited to environmental conditions, lack of public agency financial resources, or land use constraint factors. It is not the intent of TSI Roadway Policy #2: Motor Vehicle Level of Service to require deferral of development in such cases. The intent is to defer motor vehicle capacity increasing transportation system improvements until existing constraints can be overcome or develop an alternative mix of strategies (such as: land use measures, TDM, short-term safety improvements) to address the problem.

- F.16 Promote or develop a regional roadway system that meets combined needs for travel through, within, and outside the region.
  
- F.17 Manage the roadway system to preserve safety and operational efficiency by adopting regulations to manage access to roadways and applying these regulations to decisions related to approving new or modified access to the roadway system.

## **Transportation System Improvements: Transit**

### **Findings**

27. The 1990 Census reported that about 10 percent of all households in the Eugene-Springfield area did not own a vehicle.
28. 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.
29. The role of urban public transit in meeting trip needs has increased within the metropolitan area since 1970. In 1971, there were 2,260 LTD passenger trips on a weekday and, in 1995, ridership had increased to 20,000 per day, or 1.8 percent of all metropolitan trips. The *Regional Travel Forecasting Model* forecasts transit use to increase to 2.7 percent of trips by 2015 with proposed *TransPlan* projects and policy implementation.
30. The *Urban Rail Feasibility Study Eugene/Springfield Area* (July 1995) concluded that projected 2015 ridership for an urban rail system was too low to be competitive with other cities seeking federal rail transit funding; and that BRT could significantly improve transit service for substantially less capital investment and lower operational costs than urban rail.
31. OHP policy supports investment in Park-and-Ride facilities as a cost-effective means to increase the efficient use of the existing transportation system.

### **Policies**

- F.18 Improve transit service and facilities to increase the system's accessibility, attractiveness, and convenience for all users, including the transportation disadvantaged population.
- F.19 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.
- F.20 Implement traffic management strategies and other actions, where appropriate and practical, that give priority to transit and other high occupancy vehicles.
- F.21 Expand the Park-and-Ride system within the metropolitan area and nearby communities.

## **Transportation System Improvements: Bicycle**

### **Findings**

32. In 1995, there were 126 miles of bikeways in the metropolitan area. Implementation of proposed *TransPlan* projects would approximately double the lane miles for bicycles.
33. Over the past 20 years, Eugene and Springfield have built an extensive bikeway system. The focus over the next 20 years is on the construction of “Priority Bikeway Projects” which consist of those projects that are along an essential core route on which the overall system depends, fill in a critical gap in the existing bicycle system, or overcome a barrier where no other nearby existing or programmed bikeway alternatives exist, or significantly improve bicycle users safety in a given corridor.
34. OAR 660-012-0045(3) requires local governments to adopt land use regulations to require bikeways along new and reconstructed arterial and major collector streets and to connect new development with nearby neighborhood activity centers and major destinations.

### **Policies**

- F.22 Construct and improve the region’s bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion.
- F.23 Require bikeways along new and reconstructed arterial and major collector streets.
- F.24 Require bikeways to connect new development with nearby neighborhood activity centers and major destinations.
- F.25 Give funding priority (ideally within the first 3 to 5 years after adoption of *TransPlan*, subject to available funding) to stand-alone bikeway projects that are included in the definition of “Priority Bikeway Miles” and that increase the use of alternative modes.

## **Transportation System Improvements: Pedestrian**

### **Findings**

35. OAR 660-012-0045(3) requires local governments to adopt land use regulations to provide for a pedestrian environment that is well integrated with adjacent land uses and designed to enhance the safety, comfort, and convenience of walking; a continuous pedestrian network with reasonably direct travel routes between destination points; and sidewalks along urban arterial and collector roadways, except freeways.

**Policies**

- F.26 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.
- F.27 Provide for a continuous pedestrian network with reasonably direct travel routes between destination points.
- F.28 Construct sidewalks along urban area arterial and collector roadways, except freeways.

**Transportation System Improvements: Goods Movement****Findings**

36. 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.
37. There are no maritime port or navigation facilities in the metropolitan area.
38. Goods movement is directly supported by system-wide and roadway transportation system improvements.

**Policies**

- F.29 Support reasonable and reliable travel times for freight/goods movement in the Eugene-Springfield region.

**Transportation System Improvements: Other Modes****Findings**

39. The Eugene Airport is located outside the urban growth boundary (UGB) to protect it from incompatible development as well as to reduce airport-related impacts on development within the UGB. The area of the airport designated government and education on the *Metro Plan* Diagram receives municipal water, wastewater, fire, and police services.
40. The *Pacific Northwest High Speed Rail Southern Terminus Study* (Wilbur Smith Associates, 1995) found that rail-related infrastructure improvements needed along the corridor include improved signals, grade crossings, track, and depots. These improvements are important to the success of high speed rail because Eugene-Springfield is the southern terminus to the high speed rail corridor.

41. OTP Policy 1F provides for a transportation system with connectivity among modes within and between urban areas, with ease of transfer among modes and between local and state transportation systems.

## **Policies**

- F.30 Support public investment in the Eugene Airport as a regional facility and provide land use controls that limit incompatible development within the airport environs. Continue to use the *Eugene Airport Master Plan* as the guide for improvements of facilities and services at the airport.
- F.31 Support provision of rail-related infrastructure improvements as part of the Cascadia High Speed Rail Corridor project.
- F.32 Support improvements to the passenger rail station and inter-city bus terminals that enhance usability and convenience.

## **Finance**

### **Findings**

42. Transportation costs are rising while revenues are shrinking and this trend is expected to continue. The 1999 OHP estimated total 20-year highway needs of about \$29 billion, but projected revenues of only about \$14 billion.
43. *TransPlan* estimates that operations, maintenance, and preservation (OM&P) of the metropolitan transportation system will cost \$1.2 billion in 1997 dollars to maintain at current levels to the year 2020. Revenues for OM&P, including a regularly increasing state gas tax and federal forest receipts at current non-guaranteed levels after the guarantee expires, are estimated at \$988 million, leaving a conservative estimated shortfall of about \$212 million over the 20-year period before the implementation of fiscal constraint strategies.
44. The projects proposed in *TransPlan* demonstrate that nearly all of the region's travel over the next 20 years will rely on existing streets, highways, and bicycle and pedestrian facilities, emphasizing the importance of preservation and maintenance of these facilities.
45. Historically, the State Highway Trust Fund (SHTF) and federal forest receipts, significant sources of transportation revenues, have funded OM&P of the regional transportation system. Currently, SHTF revenues are not increasing with inflation and federal forest receipts are declining.
46. According to estimates prepared for the *TransPlan* Finance Committee, about 130 miles of roads (about 15 percent of the system) are currently in need of either resurfacing or reconstruction with an estimated cost of \$61 million in 1995 dollars.

47. Funding allocations of state cigarette tax revenues designated for special need transit services are guided by the Special Transportation Fund Advisory Committee as per ORS 391.800 to 391.830 and OAR 732-005, 732-010, and 732-020 governing the Special Transportation Fund Program.
48. Currently, systems development charge (SDC) methodologies charge new development only for the city's portion of the arterial-collector system; metropolitan area state and county facilities are excluded from the calculation of SDC rates; and assessments only partially fund projects that are improving existing facilities to urban standards.
49. Focus groups convened during the *TransPlan* update process expressed the preference for mixed-use development to be encouraged and facilitated rather than required. Offering financial incentives and other support for nodal development is consistent with focus groups responses.
50. Under the TEA 21, 10 percent of Surface Transportation Program funds allocated to the state must be used for transportation enhancement activities, including construction of facilities for bicycles and pedestrians, but a local match is required. State funding for bikeways is primarily limited to Oregon Department of Transportation (ODOT) highway funds, which are used mainly for adding bicycle lanes to existing and new streets, but may be used for other bicycle projects in the right-of-way. Local jurisdictions may also fund bikeways through the local road construction and maintenance budget and from general funds, park district funds, special bond levies, and SDCs. Regarding transit, *TransPlan* anticipates that discretionary federal grant funds will pay for up to 80 percent of the capital cost of the BRT system, based on trends in federal funding for LTD capital projects over the last ten years.

### **Policies**

- F.33 Support development of a stable and flexible transportation finance system that provides adequate resources for transportation needs identified in *TransPlan*.
- F.34 Operate and maintain transportation facilities in a way that reduces the need for more expensive future repair.
- F.35 Set priorities for investment of ODOT and federal revenues programmed in the region's Transportation Improvement Program (TIP) to address safety and major capacity problems on the region's transportation system.
- F.36 Require that new development pay for its capacity impact on the transportation system.
- F.37 Consider and include among short-term project priorities, those facilities and improvements that support mixed-use, pedestrian-friendly nodal development, and increased use of alternative modes.

F.38 The City of Eugene will maintain transportation performance and improve safety by improving system efficiency and management before adding capacity to the transportation system under Eugene's jurisdiction. (Eugene-specific finance policy)

## G. Public Facilities and Services Element

This 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 (Plan Boundary).

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.

The policies in this element complement *Metro Plan* Chapter II-A, Fundamental Principles, and Chapter II-C, Growth Management. Consistent with the principle of compact urban growth prescribed in Chapter II, the policies in this element call for future urban water and wastewater services to be provided exclusively within the urban growth boundary (UGB).<sup>25</sup> This policy direction is consistent with Statewide Planning Goal 11: Public Facilities and Services, "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." On urban lands, new development must be served by at least the minimum level of key urban services and facilities at the time development is completed and, ultimately, by a full range of key urban services and facilities. On rural lands within the Plan Boundary, development must be served by rural levels of service. Users of facilities and services in rural areas are spread out geographically, resulting in a higher per-user cost for some services and, often, in an inadequate revenue base to support a higher level of service in the future. Some urban facilities may be located or managed outside the urban growth boundary, as allowed by state law, but only to serve development within the UGB.

Urban facilities and services within the UGB are provided by the City of Eugene, the City of Springfield, Lane County, Eugene Water & Electric Board (EWEB), the Springfield Utility Board (SUB), the Metropolitan Wastewater Management Commission (MWMC), electric cooperatives, and special service districts. Special service districts provide schools and bus service, and, in some areas outside the cities, they provide water, electric, fire service or parks and recreation service. This element provides guidelines for special service districts in line with the compact urban development fundamental principle of the *Metro Plan*.

This element incorporates the findings and policies in the *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (Public Facilities and Services Plan)*, adopted as a refinement to the *Metro Plan*. The *Public Facilities and Services Plan* provides guidance for public facilities and services, including planned water, wastewater, stormwater, and electrical

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<sup>25</sup> 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 this Public Facilities and Services 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.

facilities. As required by Goal 11, the *Public Facilities and Services Plan* identifies and shows the general location<sup>26</sup> of the water, wastewater, and stormwater projects needed to serve land within the UGB.<sup>27</sup> The *Public Facilities and Services Plan* also contains this information for electrical facilities, although not required to by law.

The project lists and maps in the *Public Facilities and Services Plan* are adopted as part of the *Metro Plan*. Information in the *Public Facilities and Services Plan* on project phasing and costs, and decisions on timing and financing of projects are not part of the *Metro Plan* and are controlled solely by the capital improvement programming and budget processes of individual service providers.

The policies listed provide direction for public and private developmental and program decision-making regarding urban facilities and services. Development should be coordinated with the planning, financing, and construction of key urban facilities and services to ensure the efficient use and expansion of these facilities.

## 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

The findings and policies in this element are organized by the following four topics related to the provision of urban facilities and services. Policy direction for the full range of urban facilities and services, may be found under any of these topics, although the first topic, Services to Development Within the Urban Growth Boundary, is further broken down into sub-categories.

- Services to Development Within the Urban Growth Boundary
  - Planning and Coordination
  - Water
  - Stormwater
  - Wastewater Treatment
  - Electricity
  - Schools
  - Solid Waste Treatment
- Services to Areas Outside the Urban Growth Boundary
- Locating and Managing Public Facilities Outside the Urban Growth Boundary
- Financing

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<sup>26</sup> The exact location of the projects shown on the *Public Facilities and Services Plan* planned facilities maps is determined through local processes.

<sup>27</sup> Goal 11 also requires transportation facilities to be included in public facilities plans. In this metropolitan area, transportation facilities are addressed in Metro Plan Chapter III-F and in the *Eugene-Springfield Transportation System Plan (Trans Plan)*.

## **Services to Development Within the Urban Growth Boundary: Planning and Coordination**

### **Findings**

1. 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.
2. 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.
3. Urban services within the UGB are provided by the City of Eugene, the City of Springfield, Lane County, EWEB, SUB, the MWMC, electric cooperatives, and special service districts.
4. 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.
5. 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 UGB 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.
6. OAR 660-011-0005 defines projects that must be included in public facility plan project lists for water, wastewater, and stormwater. These definitions are shown in the keys of planned facilities Maps 1, 2, 2a and 3 in the *Public Facilities and Services Plan*.
7. In accordance with ORS 195.020 to 080, Eugene, Springfield, Lane County and special service districts are required to enter into coordination agreements that define how planning coordination and urban services (water, wastewater, fire, parks, open space and recreation, and streets, roads and mass transit) will be provided within the UGB.

8. Large institutional uses, such as universities and hospitals, present complex planning problems for the metropolitan area due to their location, facility expansion plans, and continuing housing and parking needs.
9. Duplication of services prevents the most economical distribution of public facilities and services.
10. 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."

### **Policies**

- 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-C, relevant policies in this chapter, and other *Metro Plan* policies.
- 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.
- 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* planned facilities Maps 1, 2, 2a and 3, requires amending the *Public Facilities and Services Plan* and the *Metro Plan*, except for the following:
  - a. 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
  - b. Technical and environmental modifications to a public facility which are made pursuant to final engineering on a project; or
  - c. 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; or
  - d. Public facility projects included in the PFSP to serve land designated Urban Reserve prior to the removal of the Urban Reserve designation, which projects

shall be removed from the PFSP at the time of the next Periodic Review of the *Metro Plan*.

- 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.
- G.5 The cities shall continue joint planning coordination with major institutions, such as universities and hospitals, due to their relatively large impact on local facilities and services.
- G.6 Efforts shall be made to reduce the number of unnecessary special service districts and to revise confusing or illogical service boundaries, including those that result in a duplication of effort or overlap of service. When possible, these efforts shall be pursued in cooperation with the affected jurisdictions.
- 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.
- G.8 The cities and county shall coordinate with cities surrounding the metropolitan area to develop a growth management strategy. This strategy will address regional public facility needs.

### **Services to Development Within the Urban Growth Boundary: Wastewater**

#### **Findings**

- 11. Springfield and Eugene rely on a combination of regional and local services for the provision of wastewater services. Within each City, the local jurisdiction provides collection of wastewater through a system of sanitary sewers and pumping systems. These collection facilities connect to a regional system of similar sewer collection facilities owned and operated by the Metropolitan Wastewater Management Commission ("MWMC"), an entity formed under an intergovernmental agreement created pursuant to ORS 190. Together these collection facilities (which exclude private laterals which convey wastewater from individual residential or commercial/industrial connections) constitute the primary collection system.
- 12. The primary collection system conveys wastewater to a treatment facilities system owned and operated by MWMC. This system consists of an interconnected Water Pollution Control Facility ("WPCF"), a biosolids facility, and a beneficial reuse facility.

#### **Policies**

- G.9 Wastewater conveyance and treatment shall be provided to meet the needs of projected growth inside the UGB that are capable of complying with regulatory requirements

governing beneficial reuse or discharge of effluent and beneficial reuse or disposal of residuals.

### **Services to Development Within the Urban Growth Boundary: Water**

#### **Findings**

13. Springfield relies on groundwater for its sole source of water. 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.
14. Known and potential groundwater pollution exists in the metropolitan area. Known and potential sources of groundwater pollution include septic tank wastes, industrial, commercial, and residential runoff; leakage from sanitary sewer pipes; leaking from sanitary landfills; agricultural non-point sources (spraying and animal wastes); chemical and petroleum spills, and natural contaminants (arsenic).
15. Beneficial uses of groundwater in the metropolitan area include domestic and municipal water supplies, industrial supplies, and domestic and commercial irrigation. The value and frequency of these uses varies among incorporated, urbanizable, and rural areas.

#### **Policies**

- G.10 Eugene and Springfield and their respective utility branches, EWEB and SUB, shall ultimately be the water service providers within the UGB.
- G.11 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.
- G.12 Ensure that water main extensions within the UGB include adequate consideration of fire flows.
- G.13 SUB, EWEB, and Rainbow Water District, the water providers that currently control a water source, shall examine the need for a metropolitan-wide water master program, recognizing that a metropolitan-wide system will require establishing standards, as well as coordinated source and delivery systems.

## **Services to Development Within the Urban Growth Boundary: Stormwater**

### **Findings**

16. Historically, stormwater systems in Eugene and Springfield were designed primarily to control floods. The 1987 re-authorization of the federal Clean Water Act required, for the first time, local communities to reduce stormwater pollution within their municipal storm drainage systems. These requirements applied initially to the City of Eugene and subsequent amendments to the Act extended these requirements to Springfield and Lane County.
17. 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.”
18. Stormwater quality improvement facilities are most efficient and effective at intercepting and removing pollutants when they are close to the source of the pollutants and treat relatively small volumes of runoff.
19. The Clean Water Act requires states to assess the quality of their surface waters every three years, and to list those waters which 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.
20. 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.
21. 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.
22. An increase in impervious surfaces, without mitigation, results in higher flows during peak storm events, less opportunity for recharging of the aquifer, and a decrease in water quality.

23. 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.
24. 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.
25. 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.

## **Policies**

- G.14 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 and to settle out pollutants prior to discharge into regulated 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.
- G.15 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 ESA.
- G.16 Consider wellhead protection areas and surface water supplies when planning stormwater facilities.
- G.17 Manage or enhance waterways and open stormwater systems to reduce water quality impacts from runoff and to improve stormwater conveyance.
- G.18 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 affects from increases in runoff, and is compatible with *Metro Plan* policies.
- G.19 The cities and Lane County shall adopt a strategy for the unincorporated area of the UGB to: reduce the negative effects of filling in floodplains and prevent the filling of natural drainage channels except as necessary to ensure public operations and maintenance of these channels in a manner that preserves and/or enhances floodwater conveyance capacity and biological function.
- G.20 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.

### **Services to Development Within the Urban Growth Boundary: Electricity**

#### **Finding**

26. According to local municipal utilities, efficient electrical service is often accomplished through mutual back-up agreements and inter-connected systems are more efficient than isolated systems.

#### **Policies**

- G.21 The electric service providers will agree which provider will serve areas about to be annexed and inform the cities who the service provider will be and how the transition of services, if any, will occur.

## **Services to Development Within the Urban Growth Boundary: Schools**

### **Finding**

27. ORS 195.110 requires cities and counties to include, as an element of their comprehensive plan, a school facility plan for high growth districts prepared by the district in cooperation with the city or county; and for the city or county to initiate the planning activity. The law defines high growth districts as those that have an enrollment of over 5,000 students and an increase in enrollment of six percent or more during the three most recent school years. At present, there are no high growth school districts in the UGB.
28. ORS 197.296(4)(a) states that when the UGB is amended to provide needed housing, “As part of this process, the amendment shall include sufficient land reasonably necessary to accommodate the siting of new public school facilities. The need and inclusion of lands for new public school facilities shall be a coordinated process between the affected public school districts and the local government that has the authority to approve the urban growth boundary.”
29. Enrollment projections for the five public school districts in the metropolitan area and the University of Oregon and Lane Community College (LCC) are not consistent. Bethel School District and the University of Oregon expect increases while Springfield and Eugene School Districts and LCC are experiencing nearly flat or declining enrollments. Enrollment is increasing fastest in the elementary and high school attendance areas near new development.
30. Short-term fluctuations in school attendance are addressed through the use of adjusted attendance area boundaries, double shifting, use of portable classrooms, and busing. School funding from the state is based on student enrollment for school districts in the State of Oregon. This funding pattern affects the willingness of districts to allow out-of-district transfers and to adjust district boundaries. Adjustments in district boundaries may be feasible where there is no net loss or gain in student enrollments between districts.
31. Creating or retaining small, neighborhood schools reduces the need for busing and provides more opportunity for students to walk or bike to school. Quality smaller schools may allow more parents to stay in established neighborhoods and to avoid moving out to new subdivisions on the urban fringe or to bedroom communities. However, growth patterns do not always respect school district boundaries. For example, natural cycles of growth and neighborhood maturation result in uneven geographic growth patterns in the metropolitan area, causing a disparity between the location of some schools and school children. This results in some fringe area schools exceeding capacity, while some central city schools are under capacity.
32. Long-range enrollment forecasts determine the need to either build new schools, expand existing facilities, or close existing schools. Funding restrictions imposed by state law and some provisions in local codes may discourage the retention and redevelopment of

neighborhood schools. Limits imposed by state law on the use of bond funds for operations and maintenance make the construction of new, lower maintenance buildings preferable to remodeling existing school buildings. In addition, if existing schools were expanded, some school sites may not meet current local parking and other code requirements.

33. Combining educational facilities with local park and recreation facilities provides financial benefits to the schools while enhancing benefits to the community. The Meadow View School and adjacent City of Eugene community park is an example of shared facilities.

## **Policies**

- G.22 The cities shall initiate a process with school districts within the UGB for coordinating land use and school planning activities. The cities and school districts shall examine the following in their coordination efforts:
- a. The need for new public school facilities and sufficient land to site them;
  - b. How open enrollment policies affect school location;
  - c. The impact of school building height and site size on the buildable land supply;
  - d. The use of school facilities for non-school activities and appropriate reimbursement for this use;
  - e. The impact of building and land use codes on the development and redevelopment of school facilities;
  - f. Systems development charge adjustments related to neighborhood schools; and,
  - g. The possibility of adjusting boundaries, when practical and when total enrollment will not be affected, where a single, otherwise internally cohesive area is divided into more than one school district.
- G.23 Support financial and other efforts to keep neighborhood schools open and to retain schools sites in public ownership following school closure.
- G.24 Support the retention of University of Oregon and LCC facilities in central city areas to increase opportunities for public transit and housing and to retain these schools' attractiveness to students and faculty.

## **Services to Development Within the Urban Growth Boundary: Solid Waste**

### **Finding**

34. Statewide Planning Goal 11 requires that, “To meet current and long-range needs, a provision for solid waste disposal sites, including sites for inert waste, shall be included in each plan.”

### **Policies**

- G.25 The Lane County *Solid Waste Management Plan*, as updated, shall serve as the guide for the location of solid waste sites, including sites for inert waste, to serve the metropolitan area. Industries that make significant use of the resources recovered from the Glenwood solid waste transfer facility should be encouraged to locate in that vicinity.

## **Services to Areas Outside the Urban Growth Boundary**

### **Findings**

35. Providing key urban services, such as water, to areas outside the UGB increases pressure for urban development in rural areas. This can encourage premature development outside the UGB at rural densities, increasing the cost of public facilities and services to all users of the systems.
36. Land application of biosolids, treated wastewater, or cannery waste on agricultural sites outside the UGB for beneficial reuse of treated wastewater byproducts generated within the UGB is more efficient and environmentally beneficial than land filling or other means of disposal.
37. Lane County land use data show that, outside the UGB, land uses consist of:
- a. Those which are primarily intended for resource management; and
  - b. Those where development has occurred and are committed to rural development as established through the exceptions process specified in Statewide Planning Goal 2.

### **Policies**

- G.26 Wastewater and water service shall not be provided outside the UGB except to the following areas, and the cities may require consent to annex agreements as a prerequisite to providing these services in any instance:
- a. The area of the Eugene Airport designated Government and Education on the *Metro Plan* Diagram, the Seasonal Industrial Waste Facility, the Regional Wastewater Biosolids Management Facility, and agricultural sites used for land

application of biosolids and cannery byproducts. These sites serve the entire metropolitan area.

- b. An existing development outside the UGB when it has been determined that it poses an immediate threat of public health or safety to the citizens within the UGB that can only be remedied by extension of the service.

In addition, under prior obligations, water service shall be provided to land within the dissolved water districts of Hillcrest, College Crest, Bethel, and Oakway.

G.27 Plan for the following levels of service for rural designations outside the UGB within the Plan Boundary:

- a. Agriculture, Forest Land, Sand and Gravel, and Parks and Open Space. No minimum level of service is established.
- b. Rural Residential, Rural Commercial, Rural Industrial, and Government and Education. On-site sewage disposal, individual water systems, rural level of fire and police protection, electric and communication service, schools, and reasonable access to solid waste disposal facility.

### **Locating and Managing Public Facilities Outside the Urban Growth Boundary**

#### **Findings**

- 38. In accordance with statewide planning goals and administrative rules, urban water, wastewater, and stormwater facilities may be located on agricultural land and urban water and wastewater facilities may be located on forest land outside the UGB when the facilities exclusively serve land within the UGB, pursuant to OAR 660-006 and 660-033.
- 39. In accordance with statewide planning goals and administrative rules, water, and wastewater facilities are allowed in the public right-of-way of public roads and highways.
- 40. The *Public Facilities and Services Plan* planned facilities maps show the location of some planned public facilities outside the UGB and Plan Boundary, exclusively to serve land within the UGB. The ultimate construction of these facilities will require close coordination with and permitting by Lane County and possible *Lane County Rural Comprehensive Plan* amendments.
- 41. Statewide Planning Goal 5 and OAR 660-023-0090 require state and local jurisdictions to identify and protect riparian corridors.
- 42. In accordance with OAR 660-033-0090, 660-033-0130(2), and 660-033-0120, building schools on high value farm land outside the UGB is prohibited. Statewide planning goals prohibit locating school buildings on farm or forest land within three miles outside the urban growth boundary.

## **Policies**

- G.28 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 UGB only when the facilities exclusively serve land inside the UGB and there is no reasonable alternative.
- G.29 Locate urban water and wastewater facilities in the public right-of-way of public roads and highways outside the UGB, as needed to serve land within the UGB.
- G.30 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 UGB or the Plan Boundary.
- G.31 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 UGB.
- G.32 Measures to protect, enhance, or alter Class F Streams outside the UGB, within the Plan Boundary shall, at a minimum, be consistent with Lane County's riparian standards.
- G.33 New schools within the Plan Boundary shall be built inside the UGB.

## **Financing**

### **Findings**

43. ORS 197.712(2)(e) states that the project timing and financing provisions of public facility plans shall not be considered land use decisions.
44. ORS 223.297 and ORS 223.229(1) do not permit the collection of local systems development charges (SDCs) for fire and emergency medical service facilities and schools, limiting revenue options for these services. Past attempts to change this law have been unsuccessful.
45. Service providers in the metropolitan area use SDCs to help fund the following facilities:
- Springfield: stormwater, wastewater, and transportation;
  - Willamalane Park and Recreation District: parks;
  - SUB, Rainbow Water District: water;
  - Eugene: stormwater, wastewater, parks, and transportation; and,
  - EWEB: water.

46. Oregon and California timber receipt revenues, a federally-funded source of county road funds, have declined over the years and their continued decline is expected.
47. Regular maintenance reduces long term infrastructure costs by preventing the need for frequent replacement and rehabilitation. ORS 223.297 to 223.314 do not allow use of SDCs to fund operations and maintenance.
48. The assessment rates of Eugene, Springfield, and Lane County are each different, creating inequitable financing of some infrastructure improvements in the metropolitan area.

### **Policies**

- G.34 Changes to *Public Facilities and Services Plan* project phasing schedules or anticipated costs and financing shall be made in accordance with budgeting and capital improvement program procedures of the affected jurisdiction(s).
- G.35 Service providers will update capital improvement programming (planning, programming, and budgeting for service extension) regularly for those portions of the UGB where the full range of key urban services and facilities is not available.
- G.36 Require development to pay the cost, as determined by the local jurisdiction, of extending urban services and facilities. This does not preclude subsidy, where a development will fulfill goals and recommendations of the *Metro Plan* and other applicable plans determined by the local jurisdiction to be of particular importance or concern.
- G.37 Continue to implement a system of user charges, SDCs, and other public financing tools, where appropriate, to fund operations, maintenance, and improvement or replacement of obsolete facilities or system expansion.
- G.38 Explore other funding mechanisms at the local level to finance operations and maintenance of public facilities.
- G.39 Set wastewater and stormwater fees at a level commensurate with the level of impact on, or use of, the wastewater or stormwater service.
- G.40 The cities and Lane County will continue to cooperate in developing assessment practices for inter-jurisdictional projects that provide for equitable treatment of properties, regardless of jurisdiction.



## **H. Parks and Recreation Facilities Element**

A parks and recreation program with sufficient diversity to meet the needs of the citizenry is an essential ingredient to enhancing the livability of a community. The Eugene-Springfield metropolitan area has a long history of supporting parks and recreation programs, and this plan further strengthens that commitment. The main types of parks and recreational facilities that have been developed are:

### **Regional-Metropolitan Parks**

Regional-metropolitan parks serve the entire metropolitan population, as well as the surrounding population and provide a variety of recreational opportunities including water areas, trails, picnic areas, recreational facilities, and natural areas (e.g., Alton Baker Park).

### **Community Parks**

Community parks serve surrounding metropolitan residents with a variety of specialized recreational facilities and programs, such as swimming pools, tennis courts, and community centers (e.g., Amazon Park and Willamalane Park).

### **Neighborhood Parks**

Neighborhood parks serve the various neighborhoods within the metropolitan area. Neighborhood parks may include courts and fields for active recreation.

### **Play Lots**

Play lots serve residents of surrounding subdivisions and are normally within walking distance of their users' homes.

### **Community Centers**

Community centers are usually located within community parks. They emphasize recreational activities such as swimming, tennis, art, music, etc.

### **Special Recreational Facilities**

Special recreational facilities include, for example, public and private golf courses, tennis courts, and swimming pools.

Parks and recreation facilities and programs are administered by park and recreation agencies in Eugene and Lane County and by two park and recreation districts (River Road Park and Recreation District and Willamalane Park and Recreation District).

Among these agencies and districts, a wide variety of parks and recreation programs, encompassing those previously mentioned, are provided for the residents they serve.

In addition, the park and recreation agencies and the metropolitan school districts have combined their resources and coordinated efforts to provide open space and parks and recreation facilities in conjunction with the schools.

Also, in recent years, private recreational facilities, such as swimming pools and tennis and racquetball courts, have been developed. Several private golf courses have been in operation in the community for a number of years.

## **Goal**

Provide a variety of parks and recreation facilities to serve the diverse needs of the community's citizens.

## **Findings and Policies**

### **Findings**

1. Increases in leisure time, income, transportation energy costs, and projected population growth indicate that there will continue to be a significant demand for a diversity of park and recreational opportunities in the metropolitan area.
2. Regardless of what standard is used, it is becoming increasingly difficult for local park agencies to meet the demands and needs of the community for parks and recreation facilities. The major problems include:
  - a. Areas developing without parks and recreation facilities available for the residents.
  - b. Competition for limited available financial resources between the need to purchase park land to meet future demands (before the land is no longer available) and the need to develop existing park land to meet current demand.
  - c. Competition for limited financial resources to provide the diversity of parks and recreational programs demanded by the community's citizens.
  - d. Land suitable and available for parks and recreation facilities often competes with other land use activities and needs in the metropolitan area.
3. The level of service for parks and recreation facilities in the metropolitan area was last evaluated in 1989. At that time, regional figures were compared to standards of the National Recreation and Park Association (NRPA). When compared to NRPA standards, there was a gap between community needs for parks and open space and the available supply of parkland. In 2003, the City of Eugene and Willamalane Park & Recreation

District are preparing Parks, Recreation & Open Space Comprehensive Plans. These plans will update the regional parkland inventory and make comparisons to regional standards, which will provide a more detailed analysis of regional park supply and demand.

4. Providing adequate parks and recreation facilities is made more difficult by the lack of a detailed metropolitan-wide parks and recreation analysis and plan that incorporates a methodology reflecting demand characteristics of this local area. Such an analysis and plan would serve a number of essential functions, including:
  - a. The development of a complete inventory of parks and recreation facilities, the development of local standards for use by the local governing bodies in determining the type and level of parks and facilities that are needed, the development of demand effectiveness measurements, and the development of capital improvements programming and other implementation strategies.
  - b. Indication of how much land is needed for each type of park (regional, community, neighborhood, etc.), and indication of what types of activities should be provided in each park (e.g., active recreational opportunities such as ball fields, tennis courts, and playgrounds vs. passive recreational opportunities such as hiking trails).
  - c. Indication of how the resources of the local and state park agencies can be coordinated and maximized in order for each agency to provide the level and type of recreational opportunities for which it is best suited.
  - d. Indication of where the advance purchase of park land should occur in anticipation of future demand.
5. Private recreational facilities supplement and help meet the demand for a variety of recreational opportunities.
6. The Lane County Board of Commissioners adopted the *Howard Buford Recreation Area Master Plan* as a refinement to the *Metro Plan* on June 15, 1994 (Ordinance No. PA 1056).

### **Objectives**

1. Coordinate regional-metropolitan parks planning and development among local and state agencies.
2. Ensure that regional-metropolitan parks planning provides a balanced variety of park and recreational opportunities.

3. Develop local standards, measures, and implementation techniques to determine the level and types of local park and recreation facilities necessary to serve the needs of the residents of each jurisdiction.
4. Develop park sites and recreation facilities in the manner best suited to serve the diverse interests of local residents and in areas of greatest need.
5. Close the gap between the current supply of park and recreation facilities and the projected demand.
6. Expand opportunities for the development of private recreational facilities.

### **Policies**

- H.1 Develop a system of regional-metropolitan recreational activity areas based on a facilities plan for the metropolitan area that includes acquisition, development, and management programs. The *Metro Plan* and system should include reservoir and hill parks, the Willamette River Greenway, and other river corridors.
- H.2 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.
- H.3 Accelerate the acquisition of park land in projected growth areas by establishing guidelines determining where and when developers will be required to dedicate land for park and recreation facilities, or money in lieu thereof, to serve their developments.
- H.4 Encourage the development of private recreational facilities.
- H.5 Develop mechanisms and processes by which residents of an area to be served by a neighborhood park, neighborhood center, or play lot can participate in the design, development, and maintenance of the facility.
- H.6 All metropolitan area parks and recreation programs and districts shall cooperate to the greatest possible extent in the acquisition of public and private funds to support their operations.
- H.7 The City of Eugene shall cooperate with the University of Oregon in the resolution of any loss of recreational facilities associated with development in the Riverfront Park.

## **I. Historic Preservation Element**

The metropolitan area has experienced, and it appears will continue to experience, growth and change. On the other hand, public interest and commitment to historic preservation has been increasing, at least partly due to recognition that historic structures, sites, and areas which provide a tangible physical connection with the past are a nonrenewable resource. This link with previous times provides a sense of permanence, continuity, and perspective to our lives, as well as a context within which change occurs. Historic structures can enrich our lives by offering architectural diversity to the visual environment and provide tangible links to the future.

### **Goal**

Preserve and restore reminders of our origin and historic development as links between past, present, and future generations.

### **Findings, Objectives, and Policies**

#### **Findings**

1. Programs and publications that identify sites, structures, objects, and cultural areas and activities of historic significance serve as a visual and educational experience for the public.
2. Structures and sites of historic significance contribute to an area's ability to attract tourism.
3. The metropolitan area has an important heritage of historic sites, structures, and objects worthy of preservation.
4. When positive measures are not taken, visible evidence of ties to the past and reminders of our heritage disappear.
5. Springfield, Lane County, and Eugene are implementing programs of historic preservation and awareness.
6. There remain many sections of the metropolitan area in which no surveying has been done to locate historic and archaeological sites.
7. Historic preservation programs generally allow continued and changing occupancy of historic structures and sites.
8. Beginning with the Antiquities Act of 1906 and through the present time, both the federal and Oregon state governments have expressed an interest in and enacted laws providing for the protection and preservation of sites, structures, objects, and areas of historic significance.

9. Depending on the nature and condition of an individual structure, rehabilitation, rather than replacement, may be less costly per square foot, more labor-intensive, and less energy-consuming, thereby resulting in net savings.

### **Objectives**

1. Develop and expand public awareness of the metropolitan area's origin, development, and history.
2. Encourage preservation and restoration of sites, structures, objects and areas of cultural, historic, or archaeological significance for the enjoyment and knowledge of present and future generations.

### **Policies**

- I.1 Adopt and implement historic preservation policies, regulations, and incentive programs that encourage the inventory, preservation, and restoration of structures; landmarks; sites; and areas of cultural, historic, or archaeological significance, consistent with overall policies.
- I.2 Institute and support projects and programs that increase citizen and visitor awareness of the area's history and encourage citizen participation in and support of programs designed to recognize and memorialize the area's history.
- I.3 Explore the feasibility of a metropolitan non-profit historic preservation development organization to bring together public and private funding sources.
- I.4 Periodically review state and federal programs intended to assist in preservation of historic and archaeological sites for possible use in connection with local implementation programs.
- I.5 Monitor and evaluate the effect of these actions on other adopted policies and the metropolitan area as a whole.
- I.6 Local governments shall pursue grants from all available sources to assist with the identification and evaluation of historically significant sites.

## **J. Energy Element**

The Energy Element deals with the conservation and efficient use of energy in the metropolitan area and is meant to provide a long-range guide to energy-related decisions concerning physical development and land uses.

The use of energy is essential for the development and operation of the urban area. Many vital processes, such as commercial and industrial activities; transportation of goods; and the lighting, heating, and cooling of buildings depend on energy supplies for their operation. In addition, our daily lives are greatly influenced by the consumption of energy for a vast number of purposes, such as automobile and home appliance use.

As the cost of energy supplies increases and the availability of new energy sources decreases, we will continue to experience a greater need for conserving and efficiently using existing supplies. Many energy supplies are nonrenewable in that they are only produced once, as in the case of metals, or take hundreds of thousands of years to be produced, as in the case of petroleum and other fossil fuels. It is especially important to efficiently use and conserve energy sources in order that future generations will not unnecessarily suffer by their shortage or absence. Conservation makes possible the use of energy sources to serve greater numbers of people and also reduces the immediate need for the development of new centralized facilities, such as those required for the large-scale generation of electricity.

While a number of specific decisions relating to energy can be made using the energy policies in this element, it is not written at the level of detail that would be required for it to serve as a comprehensive energy plan for the metropolitan area. Examples given in this element are used to illustrate statements and are not meant to be inclusive. Other specific examples that reflect the same statement can also be applied by the reader.

As developments and data relating to energy production and conservation are rapidly changing, the findings, objectives, and policies of the Energy Element should be frequently monitored to ensure their relevancy.

### **Goals**

1. Maximize the conservation and efficient utilization of all types of energy.
2. Develop environmentally acceptable energy resource alternatives.

### **Findings, Objectives, and Policies**

#### **Findings**

1. Energy conservation measures can serve as an energy source by making limited energy supplies serve greater numbers of users.

2. Many energy supply and demand factors which influence the metropolitan area are beyond local control. An example is the petroleum supply decisions made by Organization of Petroleum Exporting Countries (OPEC) nations.
3. Energy savings can be obtained by utilizing forms of energy other than electricity or fossil fuels for space heating.
4. Recent trends and analysis indicate that the relative cost of non-renewable energy supplies, such as petroleum, and the relative cost of the majority of the electric power received by the metropolitan area, will increase in the future.
5. Wood fiber presently provides a significant amount of energy to the metropolitan area. The continued utilization of this alternative energy source will be influenced by the economic and resource conditions affecting the lumber industry and by the air quality conditions and regulations affecting the metropolitan area.
6. Municipal waste can serve as an indirect energy source through the energy savings resulting from the recycling of nonrenewable resources such as metals and glass containers.
7. Solar energy can provide a significant amount of the energy used for the metropolitan area hot water heating and can provide cost-effective supplementary space heating when used in basic, simple, passive systems.
8. An electrical generation facility which is powered by part of an industrial process (cogeneration) is presently operating in the metropolitan area. Additional opportunities for cogeneration facilities exist in the region.
9. Waste heat from metropolitan area industrial processes can be used for space heating of nearby buildings.

### **Objectives**

1. Utilize cost-effective energy conservation techniques, as determined by methods which consider initial operating, replacement, and decommissioning costs of facilities--in other words, life cycle costs.
2. Maintain options for the potential use of energy conservation methods, such as increased building weatherization and some forms of public transit, that are not cost-effective at the present time.
3. Minimize negative environmental effects associated with energy production and use and encourage the utilization of energy sources having the least negative environmental impact.

4. Encourage the utilization of renewable energy sources in order to conserve nonrenewable energy resources.
5. Promote the recovery and reuse of nonrenewable resources, such as metals, as an energy conservation measure.
6. Facilitate the permanent use of solar energy and other decentralized energy sources to displace centralized energy supplies and diversify energy production.
7. Continue and intensify efforts to allocate land uses in a manner that creates a compact growth form for the metropolitan area.
8. Promote policies that minimize the energy consumed for heating, cooling, lighting, appliance use, and other processes in commercial, industrial, and residential buildings.
9. Encourage the maximum amount of energy conservation associated with automobile use.
10. Encourage industrial activities that use energy in the most efficient and productive manner.
11. Encourage the minimization of energy consumption in determining the placement, density, and design of all types of urban land uses.
12. Continue and support energy conservation efforts that are being undertaken by the public and private sector.
13. Continue and support efforts to increase public awareness of energy conservation issues and of methods to effectively utilize solar energy and other renewable energy supplies.

## **Policies**

- J.1 It is recommended that the coordinated development of a detailed metropolitan energy management plan or plans be undertaken, recognizing existing related energy documents, with the active participation of local jurisdictions in order to address local energy issues in greater depth than can be attempted in a metropolitan general plan. The products of this additional process would be considered as part of all metropolitan area planning policies in shaping the development of the region and should be continually monitored and reviewed to ensure their continued relevancy. Most of the energy data needed for this planning effort can be best be collected and stored by a unified energy data bank that would, at a minimum, serve the entire metropolitan area.

This effort should at least:

- a. Establish the current demand and projected energy demand for the various sectors of the economy in the metropolitan area.

- b. Inventory the current supply sources of energy for the metro area and include projected sources, renewable and nonrenewable, centralized and decentralized, and the price projections for each source.
  - c. Coordinate the development of a uniform reporting system to be used by the various energy suppliers in the metropolitan area in order to generate an ongoing, accurate data base for energy planning.
  - d. Examine the potential economic impacts to metro area residents resulting from projected energy demand, supply, and price.
  - e. Determine the impact of current land use policies and actions on energy use and reaffirm or point out adjustments to land use policies, regulations, and activities, as necessary, to reflect these considerations.
  - f. Research revisions to regulations which would have a positive effect on the use of renewable, decentralized energy sources, such as solar energy.
  - g. Research land use patterns which would facilitate the use of centralized, small-scale energy generation and storage in residential, commercial, industrial, and mixed use applications.
  - h. Specify implementation processes.
- J.2 Carefully control, through the use of operating techniques and other methods, energy-related actions, such as automobile use, in order to minimize adverse air quality impacts. Trade-offs between air quality and energy actions shall be made with the best possible understanding of how one process affects the other.
- J.3 Land allocation and development patterns shall permit the highest possible current and future utilization of solar energy for space heating and cooling, in balance with the requirements of other planning policies.
- J.4 Encourage development that takes advantage of natural conditions, such as microclimate, and utilizes renewable energy supplies, such as solar energy, to minimize non-renewable and overall energy consumption.
- J.5 Resource recovery facilities may serve as a valuable energy source. Their operation and refinement should be investigated by all metropolitan area jurisdictions. Source separation of recyclable materials from waste should be encouraged as a separate, related energy conservation measure.
- J.6 Local jurisdictions and utilities shall examine methods of expanding existing residential, commercial, and industrial energy conservation programs. One potential method would be offering advice concerning the use of solar water heating systems.

- J.7 Encourage medium- and high-density residential uses when balanced with other planning policies in order to maximize the efficient utilization of all forms of energy. The greatest energy savings can be made in the areas of space heating and cooling and transportation. For example, the highest relative densities of residential development shall be concentrated to the greatest extent possible in areas that are or can be well served by mass transit, paratransit, and foot and bicycle paths.
- J.8 Commercial, residential, and recreational land uses shall be integrated to the greatest extent possible, balanced with all planning policies to reduce travel distances, optimize reuse of waste heat, and optimize potential on-site energy generation.
- J.9 Encourage industrial activities that use the smallest relative amounts of non-renewable energy.
- J.10 Support efforts to develop industries that have a relatively high potential for utilizing renewable energy sources or waste heat.
- J.11 Encourage the use and development of cogenerative and decentralized energy supplies for commercial and industrial purposes in an environmentally beneficial manner.
- J.12 When practical, the government sector should take the lead in demonstrating and implementing:
- a. Cost-effective use of renewable and decentralized energy sources, such as solar space and water heating systems.
  - b. Selection and efficient use of energy-saving vehicles.
- J.13 Continue and encourage cooperation and communication between citizenry, utilities, and local, state, and federal governmental entities concerning energy-related issues, especially as they pertain to service area boundaries and economic development.
- J.14 Continue to encourage efforts at the state level to promote energy conservation, such as in the statewide building code.
- J.15 Continued coordination of information and programs concerning energy conservation shall be a high priority for affected local governments.
- J.16 The Energy Element should be re-evaluated during the *Metro Plan* update in light of the program activities for local governments that were laid out in the *Northwest Conservation and Electric Power Plan*.



## **K. Citizen Involvement Element**

Active, on-going, and meaningful citizen involvement is an essential ingredient to the development and implementation of any successful planning program. Citizens in the Eugene-Springfield metropolitan area have participated in and articulated their concerns on planning activities and decisions as individuals and through various private interest groups, community and neighborhood organizations, and citizen advisory committees.

A citizens advisory committee was established for the *1990 Plan* and was an integral part of that plan's development. The adopted *1990 Plan* included a recommendation that a permanent citizens advisory committee be established. That recommendation was implemented by the three governing bodies when the Metropolitan Area Planning Advisory Committee (MAPAC) was established. (MAPAC consisted of 21 members, seven from each jurisdiction.) MAPAC's responsibilities included monitoring the use and implementation of the *Metro Plan*, serving as the Lane Council of Government (LCOG) advisory committee on natural resources, and reviewing and commenting on planning issues of metropolitan-wide significance. MAPAC's responsibilities for conducting a citizen involvement program for the *Metro Plan* were transferred to the Joint Planning Commission Committee (JPCC) in 1990. The JPCC is made up of two planning commissioners from Eugene, Springfield, and Lane County.

In recent years, citizen advisory committees have also been established to provide the citizen's perspective on a wide variety of specific planning issues (e.g., transportation, Greenway, solid waste management).

This emphasis on citizen participation has been recognized at the state level where the Land Conservation and Development Commission (LCDC) adopted citizen involvement as a mandatory statewide planning goal. Eugene, Springfield, and Lane County, in accordance with LCDC's Statewide Planning Goal 1: Citizen Involvement, have each appointed committees for citizen involvement whose responsibilities include developing, monitoring, and evaluating the citizen involvement programs in their respective jurisdictions and recommending programs and techniques which will increase citizen participation.

For the purposes of future updates of the *Metro Plan*, the three governing bodies designated JPCC as the citizens committee for coordinating and soliciting citizen input on the update process. The functions of JPCC also include the monitoring of the citizen involvement process regarding amendments to and the implementation of the *Metro Plan*.

### **Goal**

Continue to develop, maintain, and refine programs and procedures that maximize the opportunity for meaningful, ongoing citizen involvement in the community's planning and planning implementation processes consistent with mandatory statewide planning standards.

## Findings, Objectives, and Policies

### Findings

1. The Eugene-Springfield metropolitan area has a history of encouraging and recognizing citizen involvement as an essential element in its planning program.
2. Citizen advisory committees have been established to provide the citizen's perspective on a variety of metropolitan-wide planning and related issues.
3. Springfield, Lane County, and Eugene each use either their local planning commission or a committee for citizen involvement in monitoring citizen involvement in the planning process.
4. JPCC has been designated as the citizen organization for developing and conducting a citizen involvement program for the *Metro Plan*, including update processes.
5. The governing bodies have furthered their efforts at citizen involvement through the development and support of community neighborhood organizations, community surveys, citizen involvement advisory committees, and various media techniques for citizen involvement and education.
6. How effective the *Metro Plan* will be depends to a large extent upon how much support is provided by the metropolitan area residents in seeing that the *Metro Plan* is implemented.
7. Successful *Metro Plan* development and implementation is dependent on a joint effort of citizens, public and semi-public agencies, and elected officials.
8. Benefits of an ongoing metropolitan area planning advisory committee to provide citizen perspective include an accumulation of knowledge and experience in the planning process.
9. In 1984, an ongoing metropolitan policy committee, the Metropolitan Planning Committee, was formed to provide policy direction for the *Metro Plan* 2-1/2-Year Mid-Period Review. It was comprised of two elected officials and one Planning Commissioner each from Eugene, Springfield, and Lane County, and one representative of the metropolitan citizen committee participates as a non-voting member.
10. In 1987, the Metropolitan Planning Committee was replaced by the Metropolitan Policy Committee (MPC). The MPC is comprised of two elected officials each from Eugene, Springfield, and Lane County. The chief administrative officers of the three jurisdictions serve as non-voting, ex-officio members of the MPC. When the MPC is considering metropolitan transportation matters, the two members of the Lane Transit District (LTD) Board shall serve as voting members and the General Manager of LTD and the Director

of the Oregon Department of Transportation (ODOT) shall also serve as non-voting, ex-officio members of MPC.

### **Objectives**

1. Promote and strengthen communication and coordination among various citizens organizations; business, industrial, and other groups in the community; and between these groups and government.
2. Insure adequate opportunities and provide adequate support for citizen involvement in metropolitan planning and related issues.
3. Insure that the roles and responsibilities of the various citizen advisory committees remain effective and responsive vehicles for citizen involvement.
4. Maintain a permanent citizens advisory committee to monitor the adequacy of citizen involvement in metropolitan-wide planning processes.

### **Policies**

- K.1 Maintain an ongoing citizen advisory committee to the governing bodies of Springfield, Eugene, and Lane County to monitor the adequacy of citizen involvement in the update, review, and amendments to the *Metro Plan*.
- K.2 Maintain and adequately fund a variety of programs and procedures for encouraging and providing opportunities for citizen involvement in metropolitan area planning issues. Such programs should provide for widespread citizen involvement, effective communication, access to technical information, and feedback mechanisms from policymakers. These programs shall be coordinated with local citizen involvement programs and shall be prepared on the metropolitan level by the JPCC, a committee composed of two representatives from each of the three metropolitan planning commissions.
- K.3 Improve and maintain local mechanisms that provide the opportunity for residents and property owners in existing residential areas to participate in the implementation of policies in the *Metro Plan* that may affect the character of those areas.
- K.4 Maintain an ongoing metropolitan region policy committee, known as the MPC, to provide policy direction on major *Metro Plan* updates, *Metro Plan* amendments, and special studies. MPC shall resolve land use issues and other disagreements at the elected official level among the two cities and the county and fulfill other intergovernmental functions as required by the three metropolitan governments.
- K.5 In addition to its citizen involvement responsibilities, JPCC shall provide guidance for intergovernmental studies and projects and shall provide a forum at the Planning

Commission level for resolving intergovernmental planning issues, including proposed *Metro Plan* amendments.

## **Chapter IV**

### ***Metro Plan Review, Amendments, and Refinements***

The *Metro Plan* is the long-range public policy document which establishes the broad framework upon which Eugene, Springfield, and Lane County make coordinated land use decisions. While the *Metro Plan* is the basic guiding land use policy document, it may require update or amendment in response to changes in the law or circumstances of importance to the community. Likewise, the *Metro Plan* may be augmented and implemented by more detailed plans and regulatory measures.

#### **Goal**

Ensure that the *Metro Plan* is responsive to the changing conditions, needs, and attitudes of the community.

#### **Findings, Objectives, and Policies**

##### **Findings**

1. If the *Metro Plan* is to maintain its effectiveness as a policy guide, it must be adaptable to the changing laws and the needs and circumstances of the community.
2. Between *Metro Plan* updates, changes to the *Metro Plan* may occur through Periodic Review and amendments initiated by the governing bodies and citizens.
3. Refinements to the *Metro Plan* may be necessary in certain geographical portions of the community where there is a great deal of development pressure or for certain special purposes.
4. Refinement plans augment and assist in the implementation of the *Metro Plan*.
5. Enactment of ORS 197.304 required each city to separately establish its own Urban Growth Boundary (UGB) and demonstrate that it has sufficient buildable lands to accommodate its estimated housing needs for twenty years.

##### **Objectives**

1. Maintain a schedule for monitoring, reviewing, and amending the *Metro Plan* so it will remain current and valid.
2. Maintain a current land use and parcel information base for monitoring and updating the *Metro Plan*.
3. Prepare refinement and functional plans that supplement the *Metro Plan*.

## Policies

1. A special review, and if appropriate, *Metro Plan* amendment, shall be initiated if changes in the basic assumptions of the *Metro Plan* occur. An example would be a change in public demand for certain housing types that in turn may affect the overall inventory of residential land.
2. The regional land information database shall be maintained on a regular basis.
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.
4. A Type I amendment requires approval by the home city.
  - a. Type I Diagram Amendments include amendments to the *Metro Plan* Diagram for land inside the city limits.
  - b. Type I Text Amendments include:
    - i. Amendments that are non site specific and apply only to land inside the city limits of the home city;<sup>28</sup>
    - ii. Site specific amendments that apply only to land inside the city limits of the home city;
    - iii. Amendments to a regional transportation system plan, or a regional public facilities plan, when only participation by the home city is required by the amendment provisions of those plans;
    - iv. The creation of new *Metro Plan* designations and the amendment of existing *Metro Plan* designation descriptions that apply only within the city limits of the home city.
5. 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:

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<sup>28</sup> This includes an amendment to *Metro Plan* to specify that a particular provision does not apply within the city limits, 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*.

- 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;<sup>29</sup>
    - ii. Amendments that have a site specific application between a city limit of the home city and the Plan Boundary;
    - iii. Amendments to a jointly adopted regional transportation system plan, or a regional public facilities plan, when only participation by Lane County and one of the cities is required by the amendment provisions of those plans.
6. A Type III Amendment requires approval by all three governing bodies:
- a. Type III Diagram Amendments include:
    - i. Amendments of the Common UGB along I-5; and
    - ii. A UGB or *Metro Plan* Boundary change that crosses I-5.
  - b. Type III Text Amendments include:
    - i. Amendments that change a Fundamental Principle as set forth in Chapter II A. of the *Metro Plan*;
    - ii. Non site specific amendments that apply to all three jurisdictions;
    - iii. Amendments to a regional transportation system plan, or a regional public facilities plan, when the participation of all three governing bodies is required by the amendment provisions of those plans.
7. Initiation of *Metro Plan* amendments shall be as follows:

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<sup>29</sup> 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*.

- a. A Type I amendment may be initiated by the home city at any time. A property owner may initiate an amendment for property they own at any time. Owner initiated amendments are subject to the limitations for such amendments set out in the development code of the home city.
  - b. A Type II amendment may be initiated by the home city or county at any time. A property owner may initiate an amendment for property they own at any time. Owner initiated amendments are subject to the limitations for such amendments set out in the development codes of the home city and Lane County.
  - c. A Type III amendment may be initiated by any one of the three governing bodies at any time.
  - d. Only a governing body may initiate the adoption of a city-specific comprehensive plan, refinement plan, functional plan, special area study or the initiation of a Periodic Review or *Metro Plan* update.
  - e. *Metro Plan* updates shall be initiated no less frequently than during the state required Periodic Review of the *Metro Plan*, although any governing body may initiate an update of the *Metro Plan* at any time.
8. The approval process for *Metro Plan* amendments shall be as follows:
- a. The initiating governing body of any Type I, II, or III *Metro Plan* amendment shall notify all governing bodies of the intended amendment and the Type of amendment proposed. If any governing body disagrees with the Type of the proposed amendment that governing body may refer the matter to the processes provided in 8(d) or (e) as appropriate.
  - b. When more than one governing body participates in the decision, the Planning Commissions of the bodies shall conduct a joint public hearing and forward that record and their recommendations to their respective elected officials. The elected officials shall also conduct a joint public hearing prior to making a final decision.
  - c. If all participating governing bodies reach a consensus to approve a proposed amendment, substantively identical ordinances effecting the changes shall be adopted. When an amendment is not approved, it may not be re-initiated, except by one of the three governing bodies, for one year.
  - d. A Type II amendment for which there is no consensus shall be referred to the Chair of the Lane County Board of Commissioners and the Mayor of the home city for further examination of the issue(s) in dispute and recommendation back to the governing bodies.

- e. A Type III amendment for which there is no consensus shall be referred to the Chair of the Lane County Board of Commissioners and the Mayors of Eugene and Springfield for further examination of the issue(s) in dispute and recommendation back to the governing bodies.
  - f. Adopted or denied *Metro Plan* amendments may be appealed to the Oregon Land Use Board of Appeals (LUBA) or the Department of Land Conservation and Development (DLCD) according to applicable state law.
  - g. The three governing bodies shall develop jointly and adopt *Metro Plan* amendment application procedures.
  - h. A different process, time line, or both, than the processes and timelines specified in 8.b. through 8.g. above may be established by the governing bodies of Eugene, Springfield and Lane County for any government initiated *Metro Plan* amendment.
9. In addition to the update of the *Metro Plan*, refinement studies may be undertaken for individual geographical areas and special purpose or functional elements, as determined appropriate by each governing body.
10. All jointly-adopted, regionally-applicable refinement and functional plans must be consistent with the *Metro Plan*. 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.
11. Local implementing ordinances shall provide a process for zoning lands in conformance with the *Metro Plan*.
12. The amendment process described in this Chapter IV does not apply to the adoption of amendments of city-specific comprehensive plans, but any *Metro Plan* amendments that are being considered in conjunction with a city-specific plan adoption or amendment shall follow the procedures described in this Chapter.



## Chapter V

### Glossary

The purpose of the Glossary is to define commonly used terms in the *Metro Plan*.

1. Affordable housing: Housing priced so that a household at or below median income pays no more than 30 percent of its total gross income on housing and utilities. (The U.S. Department of Housing and Urban Development's (HUD) figure for 1997 annual median income for a family of three in Lane County is \$33,900; 30 percent = \$847/month.)
2. Annexation: An extension of the boundaries of a city or special district. Annexations are governed by Oregon Revised Statutes.
3. Assumption: A position, projection, or conclusion considered to be reasonable. Assumptions differ from findings in that they are not known facts.
4. Best Management Practices (BMPs): Management practices or techniques used to guide design and construction of new improvements to minimize or prevent adverse environmental impacts. Often organized as a list from which those practices most suited to a specific site can be chosen to halt or offset anticipated problems.
5. Buildable residential lands: Land in urban and urbanizable areas that is suitable, available, and necessary for residential uses, as more particularly defined in OAR 660, Division 8 and in adopted buildable lands inventories.
6. Class F Streams (currently Class I Streams in Lane Code): "Streams that have fish use, including fish use streams that have domestic water use," as defined in OAR 629 to 635.
7. Compact Urban Growth: The filling in of vacant and underutilized lands in the UGB, as well as redevelopment inside the UGB.
8. Density: The average number of families, persons, or housing units per unit of land. Density is usually expressed as dwelling units per acre.
9. Density bonus: A mechanism used in incentive-based zoning that allows a developer to build at higher densities in return for providing more open space, building affordable housing, or some other public amenity.
10. Density (gross): The number of dwelling units per each acre of land, including areas devoted to dedicated streets, neighborhood parks, sidewalks, and other public facilities.

11. Density (net): The number of dwelling units per each acre of land in residential use, excluding from the acreage dedicated streets, neighborhood parks, sidewalks, and public facilities.
12. 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.
13. Drinking water protection (source water protection): Implementing strategies within a drinking water protection area to minimize the potential impact of contaminant sources on the quality of water used as a drinking water source by a public water system.
14. Extension of urban facilities: Construction of the facilities necessary for future service provision.
15. Fair housing: Refers to the prevention of discrimination against protected classes of people. Protected classes, as defined by the federal government, refer to race, color, religion, national origin, or sex. Protected classes are disproportionately comprised of very low-income populations.
16. Finding: Factual statement resulting from investigations, analysis, or observation.
17. Floodplain: The area adjoining a river, stream, or watercourse that is subject to 100-year flooding. A 100-year flood has a one-percent chance of occurring in any one year as a result of periods of higher-than-normal rainfall or stream flows, high winds, rapid snowmelt, natural stream blockages, tsunamis, or combinations thereof.
18. Floodway: The normal stream channel and that adjoining area of the floodplain needed to convey the waters of a 100-year flood.
19. Goal: Broad statement of philosophy that describes the hopes of a community for its future. A goal may never be completely attainable but is used as a point towards which to strive.
20. Groundwater: Water that occurs beneath the land surface in the zone(s) of saturation.
21. Impervious surface: Surfaces which prevent water from soaking into the ground. Concrete, asphalt, and rooftops are the most common urban impervious surfaces.
22. In-fill: Development consisting of either construction on one or more lots in an area that is mostly developed or new construction between existing structures. Development of this type can conserve land and reduce sprawl.
23. Infrastructure: The facilities and services that support the functions and activities of a community, including roads, street lights, wastewater lines, storm drainage, power lines, and water lines.

24. Key urban facilities and services:

Minimum level: Wastewater service, stormwater service, transportation, solid waste management, water service, fire and emergency medical services, police protection, city-wide parks and recreation programs, electric service, land use controls, communication facilities, and public schools on a district-wide basis (in other words, not necessarily within walking distance of all students served).

Full range: The minimum level of key urban facilities and services plus urban public transit, natural gas, street lighting, libraries, local parks, local recreation facilities and services, and health services.

25. Low-income housing: Housing priced so that a household at or below 80 percent of median income pays no more than 30 percent of its total gross household income on housing and utilities. (HUD's figure for 1997 annual 80 percent of median income for a family of three in Lane County is \$27,150; 30 percent = \$687/month.)

26. Manufactured dwelling: A structure constructed at an assembly plant and moved to a space in a manufactured dwelling park or a lot. The structure has sleeping, cooking, and plumbing facilities and is intended for residential purposes.

27. Manufactured dwelling park: Any place where four or more manufactured dwellings are located within 500 feet of one another on a lot, tract, or parcel of land under the same ownership, the primary purpose of which is to rent or lease space.

28. Metro Plan Plan Boundary: Defines that area shown on the *Metro Plan* Diagram that includes Springfield, Eugene, and unincorporated urban, urbanizable, rural, and agricultural lands exclusive of areas encompassed in the *Lane County Rural Comprehensive Plan*. (Note: Assumes boundaries between the area of the *Metro Plan* and the *Lane County Rural Comprehensive Plan* will coincide.)

29. Metro Plan Diagram: A graphic depiction in the *Metro Plan* of: (a) the *Metro Plan* Boundary (Plan Boundary); (b) urban growth boundaries; and (c) the land uses planned for the metropolitan area, as described in *Metro Plan* Chapter II-G.

30. Metropolitan area: Generally, an area that includes and surrounds a city or group of cities. The Eugene-Springfield metropolitan area is the area within the *Metro Plan* Plan Boundary (Plan Boundary).

31. Mixed use: A building, project or area of development that contains at least two different land uses such as housing, retail, and office uses.

32. Mode: The transportation system used to make a trip, such as automobile, transit, pedestrian, bicycle, or paratransit.

33. 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.

34. Objective: An attainable target that the community attempts to reach in striving to meet a goal. An objective may also be considered as an intermediate point that will help fulfill the overall goal.
35. Paratransit: The various types of ride sharing programs such as carpooling, vanpooling, taxi service, and subscription bus service.
36. Policy: A statement adopted as part of the *Metro Plan* or other plans to provide a specific course of action moving the community toward attainment of its goals.
37. Public facility projects: Public facility project lists and maps adopted as part of the *Metro Plan* are defined as follows:
- a. Water: Source, reservoirs, pump stations, and primary distribution systems. Primary distribution systems are transmission lines 12 inches or larger for Springfield Utility Board (SUB) and 24 inches or larger for Eugene Water & Electric Board (EWEB).
  - b. Wastewater: Pump stations and wastewater lines 24 inches or larger.
  - c. Stormwater: Drainage/channel improvements and/or piping systems 36 inches or larger; proposed detention ponds; outfalls; water quality projects; and waterways and open systems.
  - d. Specific projects adopted as part of the *Metro Plan* are described in the project lists and their general location is identified in the planned facilities maps in

Chapter II of the *Eugene-Springfield Metropolitan Public Facilities and Services Plan (Public Facilities and Services Plan)*.

38. Redevelopable land: Land on which development has already occurred, but on which, due to present or expected market forces, there is a strong likelihood that existing development will be converted to or replaced by a new and/or more intensive use. This land might have one or more of the following characteristics: low improved value to land value ratio; poor physical condition of the improvement; low improved value; large size; and/or higher zoning potential.
39. Redevelopment: Rebuilding or adaptive reuse of land that has been previously built upon. It may promote the economic development of an area that has been run-down or is no longer needed for its previous use, such as industrial land that is redeveloped as residential.
40. Refinement plan: A detailed examination of the service needs and land use issues of a specific area, topic, or public facility. Refinement plans of the *Metro Plan* can include specific neighborhood plans, special area plans, or functional plans [such as the *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)*] that address a specific *Metro Plan* element or sub-element on a city-wide or regional basis.
41. Refinement planning process: Refinement plans are developed through a process which includes at least the following elements: a predetermined citizen involvement process, preestablished policy direction in locally adopted planning documents, and a planning commission and elected official process. In some cases, these processes would have to be expanded to include review and involvement by citizens and appointed and elected officials.
42. Riparian: The land bordering a stream or river; also pertaining to the vegetation typical of those borders (grasses, shrubs, and trees such as reed canary grass, spiraea, willows, ash, and cottonwoods).
43. Rural lands: Those lands that are outside the UGB. Rural lands are agricultural, forest, or open space lands; or other lands suitable for sparse settlement, small farms, or acreage homesites with limited public services, and which are not suitable, necessary or intended for urban use.
44. Service enhancements: Services and amenities provided (or delivered) to lower income tenants based on individual needs on-site in order to promote empowerment toward self-sufficiency.
45. Single-family detached: A free-standing dwelling unit that does not share any walls or the roof with another dwelling unit.
46. Special need housing: Housing for special needs populations. These populations represent some unique sets of housing problems and are usually at a competitive

disadvantage in the marketplace due to circumstances beyond their control. These subgroups include, but are not limited to: the elderly, persons with disabilities, homeless individuals and families, at-risk youth, large families, farm workers, and persons being released from correctional institutions.

47. Special service district: Any unit of local government, other than a city, county, and association of local governments performing land use planning functions under ORS 195.025 authorized and regulated by statute, or metropolitan service district formed under ORS 268. Special service districts include but are not limited to the following: domestic water districts; domestic water associations and water cooperatives; irrigation districts; regional air quality control authorities; rural fire protection districts; school districts; mass transit districts; sanitary districts; and park and recreation districts.
48. System development charge (SDC): A reimbursement fee, an improvement fee, or a combination thereof assessed or collected at the time of increased usage of a capital improvement, connection to the capital improvement, or issuance of a development permit or building permit.
49. Tax differential: Tax differential is a provision in Oregon city annexation law which provides an opportunity to phase in the city's tax rate over a period not to exceed 10 years. The proposal is specified at the time of annexation and cannot be modified thereafter.
50. Underdeveloped land: The vacant or redevelopable portion of land not having the highest and best use allowed by zoning.
51. Underutilized human resources: Persons who are: (a) unemployed; (b) employed part-time but want to work full-time; or (c) in positions that do not fully utilize their skills.
52. Undeveloped land: Land that is vacant or used for agricultural purposes.
53. Urban growth boundary (UGB): A site-specific line, delineated on a map or by written description, that separates urban and urbanizable lands from rural lands.
  - a. Eugene UGB: The UGB that separates Eugene's urban and urbanizable lands from the urban and urbanizable lands in Springfield along Interstate 5 and from rural lands in Lane County to the north, west, and south.
  - b. Springfield UGB: The UGB that separates the urban and urbanizable lands in Springfield from the urban and urbanizable lands in Eugene along Interstate 5 and from rural lands in Lane County to the north, east, and south.
  - c. Metropolitan UGB: The UGB that encompasses both Eugene and Springfield with no division along Interstate 5, separating the urban and urbanizable lands in both cities from rural lands in Lane County. The Metropolitan UGB will continue

to exist until *both* Eugene and Springfield have adopted, and have in effect, their own separate UGBs (Eugene UGB and Springfield UGB).

54. Urban lands: Lands located within an incorporated city.
55. Urban water and wastewater service provision: The physical connection to the water or wastewater system.
56. Urbanizable land: Urbanizable lands are those unincorporated lands between the city limits and the UGB.
57. Very low income housing: Housing priced so that a household at or below 50 percent of median income pays no more than 30 percent of its total gross household income on housing and utilities. (HUD's figure for 1997 annual 50 percent of median income of a family of three in Lane County is \$16,950; 30 percent = \$423/month.)
58. Zoning: A measure or regulation enacted primarily by local governments in which the community is divided into districts or zones within which permitted and special uses are allowed. Zoning regulations govern lot size, building bulk, placement, and other development standards. A zoning ordinance typically consists of two parts: a text and a map.



Ordinance \_\_\_\_\_, Exhibit E

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

**CHAPTER 3 LAND USE DISTRICTS**

**Section 3.1-100 Official Zoning Maps**

**Section 3.2-100 Base Zoning Districts**

**Section 3.2-200 Residential Zoning Districts**

**Section 3.2-300 Commercial Zoning Districts**

**Section 3.2-400 Industrial Zoning Districts**

**Section 3.2-500 Medical Services Zoning District**

**Section 3.2-600 Mixed-Use Zoning Districts.**

**Section 3.2-700 Public Land and Open Space Zoning District**

**Section 3.2-800 Quarry and Mining Operations Zoning District**

**Section 3.2-900 Agriculture-Urban Holding Area Zoning District**

**Section 3.3-100 Overlay Districts**

**Section 3.3-200 Drinking Water Protection Overlay District**

**Section 3.3-300 Willamette Greenway Overlay District**

**Section 3.3-400 Floodplain Overlay District**

**Section 3.3-500 Hillside Development Overlay District**

**Section 3.3-600 Reserved for Future Use**

**Section 3.3-700 Reserved for Future Use**

**Section 3.3-800 Urbanizable Fringe Overlay District**

**Section 3.3-900 Historic Overlay District**

**Section 3.3-1000 Nodal Development Overlay District**

**Section 3.3-1100 Hospital Support Overlay District**

**Section 3.4-100 Plan Districts**

**Section 3.4-200 Glenwood Riverfront Mixed-Use Plan District**

**Section 3.4-300 Booth-Kelly Mixed-Use Plan District**

**Section 3.5-100 Refinement Plan Policies—Opus**

## **Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District**

### **Subsections**

#### **3.2-905 Establishment of the AG District**

#### **3.2-910 Applicability**

#### **3.2-915 Schedule of Use Categories**

#### **3.2-920 Base Zoning Standards**

#### **3.2-930 Planning Requirements Applicable to Zoning Map Amendments**

### **3.2-905 Establishment of the Agriculture—Urban Holding Area (AG) Zoning District**

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

- A.** The AG District implements the Urban Holding Area-Employment (UHA-E) plan designation and Springfield Comprehensive Plan Urbanization Element policies by preserving an inventory of suitable employment sites — including sites 20 acres and larger — to provide opportunities for economic growth and diversification.
- B.** The AG District is applied concurrently with the UHA-E designation at the time of a Springfield Urban Growth Boundary (UGB) expansion and remains in effect until the land is designated and zoned for urban employment uses through a City or owner-initiated plan or zoning amendment process, as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.
- C.** The AG District implements the Natural Resource (NR) plan designation on private and publicly owned lands within the urbanizable areas to allow continuation of existing agricultural uses while supporting transition to use and management of land to for the primary benefit of values such as fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space.
- D.** The AG District is applied concurrently with the Natural Resource (NR) plan designation at the time of a Springfield Urban Growth Boundary (UGB) expansion, and remains in effect until the land is designated, zoned and master-planned as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.

### **3.2-910 Applicability**

The provisions of the AG District apply to urbanizable lands designated UHA-E or Natural Resource (NR) in the comprehensive plan.

### 3.2-915 Schedule of Use Categories

The AG District implements Springfield Comprehensive Plan Urbanization Element policies by limiting interim uses on urbanizable land designated Urban Holding Area – Employment to only those rural uses that will not impede future annexation, zoning and development of the land to accommodate urban employment uses and densities to meet Springfield’s long range employment land needs. The following uses are permitted in the AG District on an interim basis when developed under the applicable provisions, restrictions and exceptions specified in this Code.

**“P” = PERMITTED USE** subject to the standards of this Code.

**“S” = SPECIAL DEVELOPMENT STANDARDS** subject to special locational and/or siting standards as specified in Section 4.7-100. Note: Some uses in this category may require Site Plan Review and/or Discretionary Use approval.

**“D” = DISCRETIONARY USE** subject to review and analysis under Type III procedure as required in Section 5.9-100 at the Planning Commission or Hearings Official level.

Use Categories/Uses	AG
<b>A. Allowed Interim Uses for Lands Designated Urban Holding Area- Employment</b>	
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. <b>(1),(3),(4)</b>	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. <b>(1)</b>	P
Sales/Display of Produce as specified in Subsection 4.8-125. <b>(1),(4)</b>	S
Signs <b>(5)</b>	P
<b>Accessory Uses</b>	
Community Gardens	P
Replacement of a lawfully existing dwelling or structure as specified in Subsection 5.8-115. <b>(2),(3)</b>	P
Emergency Medical Hardship as specified in Section 5.10-100. <b>(2)</b>	P
<b>Other Commercial Services</b>	
Home Occupation within a lawfully existing dwelling and as specified in Subsection 4.7-165 <b>(4)</b>	S
<b>Utilities and Communication</b>	
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.

<b>B. Allowed Interim Uses for Lands Designated Natural Resource (6),(7)</b>	
Continuation of normal farm practices such as grazing, plowing, planting, cultivating and harvesting. <b>(6)</b>	<b>P</b>
Wetland and/or riparian restoration and rehabilitation activities	<b>P</b>
Vegetation management necessary to control invasive vegetation or to reduce a hazard to life or property.	<b>P</b>
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.	<b>P</b>
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.	<b>P</b>
Waterway restoration and rehabilitation activities such as channel widening, realignment to add meanders, bank grading, terracing, reconstruction of street crossings, or water flow improvements.	<b>P</b>
Emergency stream bank stabilization to remedy immediate threats to life or property. <b>(7)</b>	<b>P</b>
Bioswales or similar water quality improvement projects;	<b>P</b>
Public multi-use paths, access ways, trails, picnic areas, or interpretive and educational displays and overlooks, including benches and outdoor furniture.	<b>P</b>
<b>Utilities and Communication</b>	
High Impact Public Utility Facility as specified in Subsection 4.7-160	<b>S/D</b>
Low Impact Public Utility Facility	<b>D</b>

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

### **3.2-920 Pre-existing and Non-conforming Uses**

- A.** Continuance, expansion, modification or replacement of lawful uses existing on a property at the time of the effective date of this zone are determined and permitted as otherwise specified in Section 5.8-100 of this Code; and
- B.** The Applicant shall submit evidence to demonstrate that the expansion or modification:
  - 1. will not generate vehicle trips exceeding pre-development levels;
  - 2. will not force a significant change in accepted farm practices on surrounding lands devoted to farm or forest use; and
  - 3. will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

### **3.2-925 Standards for Interim Development**

These regulations apply to the development of interim uses as specified in Subsection 3.2-915 and 3.2-920 in the AG District.

- A.** Receive certification from the Lane County Sanitarian that any proposed wastewater disposal system meets Oregon Department of Environmental Quality (D.E.Q.) standards prior to Development Approval.
- B.** Interim uses may not be placed on a site in a manner that would impede future development of land designated Urban Holding Area-Employment with urban employment uses.
- C.** Interim uses may not be placed on a site in manner that would impede extension of infrastructure to serve land designated Urban Holding Area-Employment from developing with urban employment uses.
- D.** To demonstrate compliance with this provision, and in addition to the special provisions listed in Table A, the Applicant shall submit a Future Development Plan that:
  - 1.** Includes a brief narrative explaining the existing and proposed use of the property;
  - 2.** Indicates the proposed development footprint on a scaled plot plan of the property;
  - 3.** Limits the proposed new development footprint to ½ acre or less of the site;
  - 4.** Addresses future street connectivity as shown in the Transportation System Plan, Regional Transportation System Plan, Local Street Network Plan, Springfield Comprehensive Plan, applicable Refinement Plans and this Code;
  - 5.** Addresses the number and type of vehicle trips to be generated by the proposed use;
  - 6.** Addresses the applicable Natural Resources protection, Water Quality Limited Watercourses protection, Floodplain Overlay Development Standards, and Drinking Water Protection Overlay Development Standards of this Code.
- E.** Development shall utilize the following base zone development standards:

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. <b>(1)</b>
Main Building Height	35 feet
Accessory Building Height	35 feet <b>(2)</b>
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.

### 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.

<b>Table 1. Pre-Development Approval Process Steps – Urban Holding Areas</b>	
<b>City-initiated Planning Process</b>	<b>Owner-initiated Planning Process</b>
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).
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 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.

Ordinance \_\_\_\_\_, Exhibit F

**Springfield 2030 Plan Amendments  
Staff Report and Draft Findings**

Ordinance \_\_\_\_\_, Exhibit F

**Springfield 2030 Plan Amendments  
Staff Report and Draft Findings**

# Staff Report and Draft Findings

## Springfield 2030 Metro Plan Amendments

July 28, 2016

<b>Co-applicants:</b>	<b>Local File Numbers:</b>
City of Springfield Lane County	Springfield File Nos. LRP 2009-00014, TYP 413-00007 Lane County File Nos. PA 509-PA13-05393
<b>Request:</b>  Amend the Eugene-Springfield Metropolitan Area General Plan ( <i>Metro Plan</i> ) to adopt the Springfield 2030 UGB amendment; assign plan designations and zoning to newly urbanizable lands; adopt Springfield 2030 Comprehensive Plan Economic and Urbanization policy elements and implementing zoning to establish Springfield's employment land supply for the planning period 2010-2030.  Metro Plan Type II Amendment	<b>Procedure Type:</b>  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 <ul style="list-style-type: none"> <li>• ORS 197.298</li> <li>• HB 4126</li> <li>• Goal 14 ef. April 28, 2006 OAR 660-015-0000(14)</li> <li>• Division 24 Urban Growth Boundaries cert. ef. 4-16-09</li> </ul> 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),<sup>1</sup> Springfield UGB map and UGB Technical Supplement depicting and describing the UGB. Amend Metro Plan Boundary to be coterminous with the UGB. (Lane County will amend the Lane County Rural Comprehensive Plan (RCP) boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.)
  - Expands the Springfield UGB to add approximately 257 suitable acres of employment land on 273 gross acres in two expansion areas – North Gateway and Mill Race.
  - Expands the Springfield UGB to include approximately 455 acres of existing public land, parks and open space.
- Adopt Exhibit D amending Metro Plan text:
  - Amend Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies to add the following paragraph: “Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization

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

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

- Amend Chapter II, Section E Metro Plan Urban and Urbanizable Land to add the following paragraph: “Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.”
  - Amend Metro Plan Chapter III, Section B Metro Plan Economic Element to add the following paragraph: “Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period.”
  - Amend Metro Plan Chapter II, Section G Land Use Designations to add a new land use designation applicable to Springfield’s jurisdictional area of responsibility — the Urban Holding Area-Employment (UHA-E) plan designation;
  - Amend Metro Plan Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G-8 to delete the Springfield-specific reference to the Natron Special Heavy Industrial (SHI) site; and
  - Amend Metro Plan Chapter II, Section G, footnote 7, to add a reference to the subject UGB amendment ordinance.
- Adopt Exhibit A amending Metro Plan Diagram<sup>2</sup> to assign Metro Plan designations to lands added to the UGB:

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

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

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

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

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

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

The 2030 Plan UGB amendment, plan policies, plan designations and land use regulations implement Goal 14 Urbanization by providing urbanizable<sup>3</sup> 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).

<sup>3</sup> 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<sup>4</sup>, 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.<sup>5</sup> Prior to that action, Springfield shared a UGB with Eugene.

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

## Ila. Procedural Requirements for Processing UGB Amendments

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

<sup>4</sup> 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.”*

<sup>5</sup> 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.<sup>6</sup>

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

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

<sup>6</sup> Springfield File No. TYP413-00007

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

The public hearings were conducted jointly by the Springfield City Council and Lane County Board of Commissioners on September 12, 2016 and \_\_\_\_\_, 2016. Local decision dates: X and X.

Description of public hearing procedure here after completion of the local adoption proceedings and closing of the record.

The City and Lane County submitted the Form 4 Notice of Adopted Change to an Urban Growth Boundary to DLCD on \_\_\_\_\_, 2016, after the amendment was adopted by the City of Springfield and Lane County. Both ordinances were attached to DLCD Form 4. EXHIBIT X AND X

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

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

On date X, 2016, the City mailed notice of the decision to a list of persons who participated in local hearings or requested notice of final decision in writing. The mailed notice used sample text provided for local government notice on page 3 of DLCD Form 4 "Sample Notice to Local Parties", and included the content required by OAR 660-025-0140. EXHIBIT X

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

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

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

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

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

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

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

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

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

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

*“A Type II Amendment requires approval by two governing bodies. The governing bodies in a Type II are the home city and Lane County. Eugene is the home city for amendments west of I-5, and Springfield is the home city for amendments east of I-5:*

- a. Type II Diagram Amendments include:*
  - i. Amendments to the Metro Plan Diagram for the area between a city limit and the Plan Boundary;*
  - ii. A UGB or Metro Plan Boundary amendment east or west of I-5 that is not described as a Type III amendment.*
- b. Type II Text Amendments include:*
  - i. Amendments that are non site specific and apply only to Lane County and one of the cities;<sup>7</sup>*
  - 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

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

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

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

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

### III. Applicable Statewide Planning Goals

#### OAR 660-015-0000

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

- **Goal 9 (Economy of the State)** applies to adoption of local economic studies such as the Springfield CIBL/EOA. The Land Conservation and Development Commission (LCDC) adopted the Economic Development administrative rule (OAR Chapter 660, Division 009) to interpret Goal 9 and ORS 197.712.
- **Goal 14 (Urbanization)** governs amendment to urban growth boundaries; the Urban Growth Boundaries administrative rule (OAR Chapter 660, Division 024) provides detailed guidance for making UGB amendments.
- **Goal 1 (Citizen Involvement) and Goal 2 (Land Use Planning)** are procedural goals that require citizen involvement in all phases of the planning process; an adequate factual base for considering alternatives courses of action; coordination among the city, county and state agencies; adoption of ultimate policy choices in the Comprehensive Plan; and consistency between the Comprehensive Plan and implementing land use regulations.
- **Goals 5 (Natural Resources), 7 (Natural Hazards), 8 (Parks and Recreation) and 15 (Willamette River Greenway)** require local governments to address wetland and riparian resource areas, regulate development within the flood plain, plan to meet park and recreational needs, and protect

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

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

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

## IV. Statewide Planning Goal 9: Economy of the State

### OAR 660-015-0000(9)

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

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

As required under Goal 9:

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

### OAR 660-009-0000 Intent and Purpose

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

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

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

The City’s 2030 Plan updates Springfield’s comprehensive plan and land use regulations to provide adequate opportunities for a variety of economic activities, based on information about state and national economic trends.<sup>8</sup> 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<sup>9</sup> 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

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<sup>8</sup> 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.

<sup>9</sup> 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.<sup>10</sup> 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.***

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<sup>10</sup> 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).<sup>11</sup>

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<sup>12</sup>; 2) the City’s comprehensive plan contains policies concerning the economic development opportunities in the community;<sup>13</sup> 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;<sup>14</sup> and 4) the City’s comprehensive plan and land use regulations<sup>15</sup> 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)**

<sup>11</sup> ECONorthwest, Springfield CIBL/EOA Final Report, August 2015, 107-108,170-174.

<sup>12</sup> ECONorthwest, Springfield CIBL/EOA Final Report, August 2015.

<sup>13</sup> Springfield 2030 Comprehensive Plan Economic Element

<sup>14</sup> Metro Plan Diagram, Springfield UGB, and Springfield Development Codes as amended through Springfield Ordinance \_\_\_\_\_ and Lane County Ordinance \_\_\_\_\_

<sup>15</sup> Springfield Development Codes as amended through Springfield Ordinance \_\_\_\_\_ and Lane County Ordinance \_\_\_\_\_

*“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<sup>16</sup>, 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;<sup>17</sup> after consideration of materials and energy availability and cost;<sup>18</sup> after consideration of labor market factors, educational and technical training programs;<sup>19</sup> after consideration of the availability of key public facilities and necessary support facilities;<sup>20</sup> after consideration of current market forces;<sup>21</sup> after consideration of location relative to markets;<sup>22</sup> after consideration of availability of renewable and non-renewable resources;<sup>23</sup> after considering availability of land;<sup>24</sup> and after considering pollution control requirements.<sup>25</sup>

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

<sup>16</sup> CIBL/EOA, pp. 17-39

<sup>17</sup> CIBL/EOA Final report, Chapter 3, pp. 43-54; Appendix A, pp. 110-117; Appendix B & C pp. 139-170

<sup>18</sup> CIBL/EOA Final report, Chapter 3, pp. 54-58.

<sup>19</sup> CIBL/EOA Final report, Appendix B pp. 146-152.

<sup>20</sup> Ibid, pp. 142-146, and City’s Public Facilities Analyses under Goal 14

<sup>21</sup> Ibid, Chapter 3, 4, Appendices A, B and C

<sup>22</sup> Ibid, pp. 54-69

<sup>23</sup> Ibid, pp. 101-109

<sup>24</sup> Ibid, Chapter 2, pp. 5-41

<sup>25</sup> See City’s findings under Goal 14 Location Factors, page xxxx and Public Facilities Analyses, pp. XXXX

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

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.<sup>27</sup>

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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<sup>26</sup> 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.

<sup>27</sup> **Note:** Sections 1, 2, 3, 4, 5, 12 and 13, chapter 564, Oregon Laws 2011

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

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

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

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

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

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

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

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

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

- (1) Facilitate the redevelopment of Downtown Springfield and Glenwood through strategic infrastructure and other investments from programs such as urban renewal and planning for redevelopment.
- (2) Provide sites with a variety of site characteristics to meet both commercial and industrial economic opportunities, including providing sites that are available for relatively fast development. This includes providing large sites for major employers.
- (3) Use land within the existing urban growth boundary efficiently, through promoting redevelopment, infill development, and dense development in nodal areas. The study assumes that 46% of new employment would not require vacant land.
- (4) Provide infrastructure efficiently and fairly by coordinating capital improvement planning with economic development planning.
- (5) Support and assist existing businesses within Springfield by assessing what help businesses need and developing programs to respond to business needs.
- (6) Attract and develop new businesses, especially those related to regional business clusters. The City would like to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses.
- (7) Maintain flexibility in planning through providing efficient planning services and developing flexible planning policies to respond to the changing needs of businesses.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**OAR 660-009-0005 Definitions** states:

*"For purposes of this division, the definitions in ORS chapter 197 and the statewide planning goals apply, unless the context requires otherwise. In addition, the following definitions apply:*

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

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

*(3) "Industrial Use" means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thus, the City's use of the more inclusive definition of "vacant" in the inventory assumes more development can occur on developed land. Use of this definition and application of this assumption to the land inventory was vetted through the City's public involvement process, contributes to land use efficiency, and reduces the overall commercial and industrial land need.

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

- *Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000<sup>28</sup> are considered vacant (not including lands that are identified as having mobile homes).<sup>29</sup> 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.<sup>30</sup> 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.<sup>31</sup> While Springfield expects many buildings and sites of all types to be re-used, re-purposed, revitalized and renovated throughout the city over the planning period, for the purposes of analyzing the capacity of the land base to absorb a portion of employment growth, only redevelopment that increases capacity for accommodating additional employment is a factor in this analysis. Potentially redevelopable land is a subset of developed land that was

<sup>28</sup> Improvement values were from 2008 Lane County Assessment and Taxation data and reflect the County's estimate of the market value of improvements.

<sup>29</sup> Note that this definition is more inclusive than what statewide planning policy requires. OAR 660-009-0005(14) provides the following definition: "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

<sup>30</sup> 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.

<sup>31</sup> This definition is based on the definition in OAR 660-009-0005(1).

identified using improvement to land value ratios and building coverage ratios. For the purpose of the CIBL, “potentially redevelopable” land corresponds with the definition of “developed land” as stated in OAR 660-009-0005(1) as described in Table 2-2. The City’s study included a detailed evaluation of developed land to determine its redevelopment potential. Lands that were determined to be potentially redevelopable were classified as such. (emphasis added)

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

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

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

**Conclusion OAR 660-009-0005:** The City’s CIBL/EOA complies with the definitions set out in the Goal 9 Administrative Rules and uses a more inclusive definition of ‘vacant land’ that results in including more land in the City’s developable land inventory inside the UGB.

## IVa. Economic Opportunities Analysis

**OAR 660-009-0015 Economic Opportunities Analysis** states:

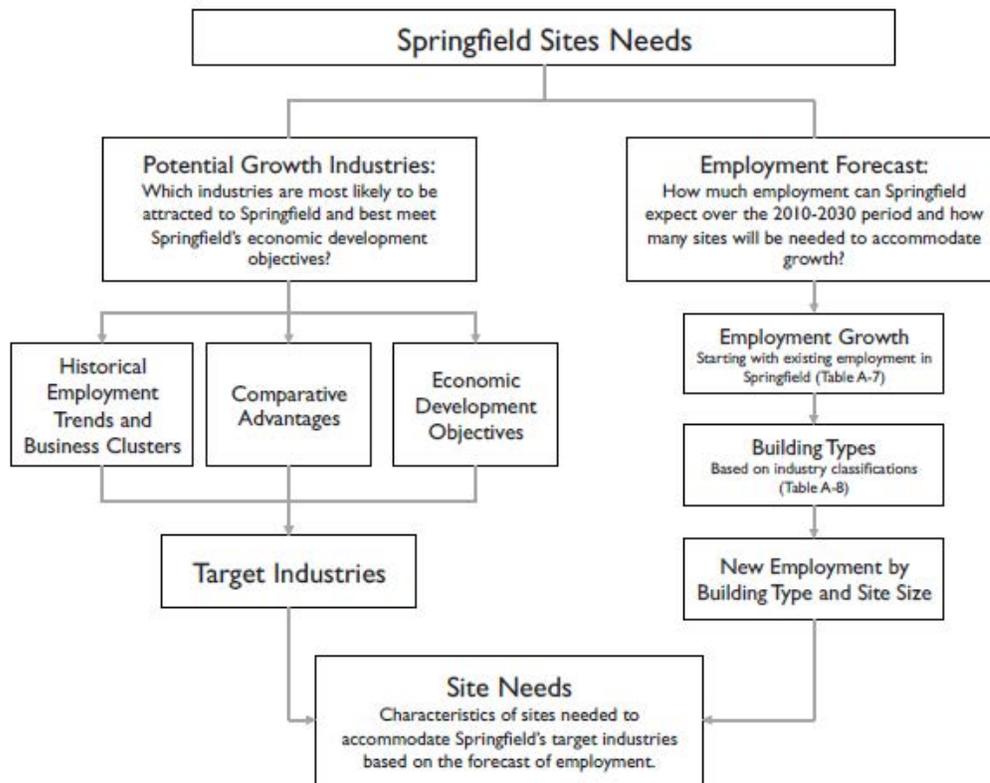
*“Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing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

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

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

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

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



Source: ECONorthwest

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

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

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

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

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

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

- (a) Location, size and buying power of markets;*
- (b) Availability of transportation facilities for access and freight mobility;*
- (c) Public facilities and public services;*
- (d) Labor market factors;*
- (e) Access to suppliers and utilities;*
- (f) Necessary support services;*
- (g) Limits on development due to federal and state environmental protection laws; and*
- (h) Educational and technical training programs.”*

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

The State forecasts that employment will continue growing in Lane County at 1.4% average annual growth, compared with the State average of 1.3% average annual growth.<sup>32</sup>

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.<sup>33</sup>

*“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.<sup>34</sup> These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County.”<sup>35</sup>*

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.<sup>36</sup> Since the City’s CIBL/EOA was prepared, several new hotels have been built in Glenwood and Gateway, and more are in the planning stages in early 2016.

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

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<sup>32</sup> CIBL/EOA, p. 70-71

<sup>33</sup> In 2006

<sup>34</sup> “Economic Data Packet, May 2008,” Oregon Economic And Community Development Department

<sup>35</sup> CIBL/EOA, p. 53

<sup>36</sup> 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)<sup>37</sup>; 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,*

<sup>37</sup> 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.<sup>38</sup> 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.<sup>39</sup>

*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.*

<sup>38</sup> CIBL/EOA p. 48-49

<sup>39</sup> 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.*<sup>40</sup>

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:

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<sup>40</sup> 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.)<sup>41</sup>

*“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.”*

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<sup>41</sup> CIBL/EOA, p. 49

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

- *“Growth in the Services sector has matured and should track more closely with overall employment and population growth rather than continuing to gain a substantial share of total employment.*
- *The decline in Manufacturing was due, in part, to decreased timber harvests and the outsourcing of production to facilities in countries with lower costs. Timber harvests are expected to level off and increase in the future as commercial forests that were replanted since the 1970s grow to a harvestable size. While outsourcing will continue, much of what can be outsourced has already gone. Remaining Manufacturing firms are tied to their region to be near supplies or markets, or manufacture specialized goods were small production quantities, fast turn-around times, and the need for quality limit the ability to outsource.”*
- *The mix of Manufacturing jobs in the Eugene-Springfield Region changed over the past twenty years with declines in Wood Products and the growth of employment in Recreational Vehicle (RV) manufacturing, machinery manufacturing, metals manufacturing, and high-tech industries, such as Computer and Electronics Manufacturing.”<sup>42</sup>*

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

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

Based on this analysis and verified by input received through the public involvement process,<sup>43</sup> 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

<sup>42</sup> CIBL/EOA pp. 49, 61-62

<sup>43</sup> 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.<sup>44</sup>

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<sup>45</sup> 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<sup>46</sup> firms with potential growth in Springfield include:

- Food processing<sup>47</sup>
- High-tech electronics<sup>48</sup>
- 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.<sup>49</sup>

ECONorthwest’s methods and rationale for assessing existing and potential growth industries and business clusters in Springfield with employment potential and “secondary employment” businesses

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<sup>44</sup> CIBL/EOA p. 62-63

<sup>45</sup> “Top Thirty Springfield Employers”, employment data, 2015

<sup>46</sup> Information about the local/regional manufacturing: Livability Lane Cluster Analysis: Manufacturing Cluster Report, 2014.

<sup>47</sup> 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.

<sup>48</sup> Information about the local/regional tech industry is in the record: Livability Lane Cluster Analysis: EduTech Cluster Report, 2014.

<sup>49</sup> 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.”*<sup>50</sup>

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.

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<sup>50</sup> 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 .<sup>51</sup>

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

**Table 4-2. Target Industries and Plan Designations**

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

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

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

<sup>51</sup> CIBL/EOA p. 78, Table 5-2 Average size of needed sites based on average sizes of sites with employment in Springfield, ECONorthwest based on QCEW data

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

The City’s 2030 Plan amendments assume that future industrial or other employment uses will locate within lands inside the existing UGB that are designated as shown in Table 4-2 above, and on sites to be added to the UGB to accommodate the City’s deficit of sites larger than 5 acres. Appendix C explains how the employment forecast was converted to site needs by site size and type of building. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.<sup>52</sup>

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.<sup>53</sup> 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.<sup>54</sup> 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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<sup>52</sup> CIBL/EOA p. 73

<sup>53</sup> Springfield is part of Oregon Employment Department’s Region 5, which includes Lane County.

<sup>54</sup> Springfield submitted notice to adopt Economic Opportunities Analysis policy amendments and a UGB amendment to DLCD on December 31<sup>st</sup>, 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
<b>Change 2010 to 2030</b>	
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.<sup>55</sup>

<sup>55</sup> 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.<sup>56</sup> 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”<sup>57</sup> 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.*

<sup>56</sup> CIBL/EOA p. 71-72

<sup>57</sup> 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 25<sup>th</sup> 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,<sup>58</sup> 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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<sup>58</sup> International Economic Development Council. "Economic Development Reference Guide," <http://www.iedonline.org/hotlinks/SiteSel.html>. 10/25/02.

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

Site needs data. CIBL/EOA Table C-6 through Table C-11 present data from a range of sources describing site needs attributes of businesses that either considered locating in Oregon (including in the Eugene-Springfield area) or are industries within one or more of Springfield's target growth sectors or clusters. These examples are presented in the CIBL/EOA to illustrate that businesses have a wide range of need for site size, location, and characteristics based on the business's individual operational needs. "The site needs of businesses vary from business to business, even within the same industry. As a result, one business's site needs may be different and potentially even conflicting with another business's site needs."<sup>59</sup>

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*

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<sup>59</sup> CIBL/EOA, p. 170-178. The record provides additional evidence to describe the characteristics of sites needed to accommodate industrial and other employment growth target industries, including industries that require sites 20-acres and larger.

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

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

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

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

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

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

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

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

### **OAR 660-009-0015(3) Inventory of Industrial and Other Employment**

**Lands** states:

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

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

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

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

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

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

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

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

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

- *Assemble and document datasets.* ECO identified data from the Regional Land Information Database (RLID) and GIS data from the City of Springfield and the Lane Council of Governments as primary datasets on which the inventory and analysis was built. RLID includes assessment and taxation data maintained by Lane County.
- *Preliminary analysis.* ECO conducted a preliminary analysis with the GIS and data tables selected for inclusion in the database. The purpose of this task was to work with City staff and the TAC to determine the optimal definitions and supporting methodology to base the final analysis and database structure.

- *Data processing and GIS analysis.* In this step ECO performed the GIS analysis and data processing steps necessary to populate the database. Table 2-1<sup>60</sup> shows plan designations that were included in the commercial and industrial buildable lands inventory.<sup>61</sup> All of the designations included in the inventory allow employment outright. The inventory, however, includes several mixed use designations that allow both employment and housing. The inventory generally uses the 2004 Metro Plan designations with two exceptions: (1) Glenwood, where a 2005 plan amendment changed the designation on approximately 47 acres from Light Medium Industrial Mixed Use to Mixed Use; (2) the PeaceHealth site where land was redesignated from residential to designations that allow employment; and (3) the Marcola Meadows site that included a plan designation change from Campus Industrial to Medium Density Residential/Nodal Development, Mixed-Use Commercial/Nodal Development, and Community Commercial. The implication of these exceptions was to include land that would not have otherwise been included in the inventory. The intent of this step was to increase the accuracy of the inventory.

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

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

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

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

<sup>60</sup> CIBL/EOA p. 7.

<sup>61</sup> 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.<sup>62</sup>

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].<sup>63</sup> The policies of the comprehensive plan, as implemented through the City's development standards in SDC Chapter 3 and 4 provide descriptions of land planned and zoned for employment uses, including physical and operational requirements that influence the development area size and configuration needed to operate a use and the placement of development on a site in relationship to public rights of way and abutting land uses.

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

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

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

CIBL/ EOA Chapter 2, (pp. 5-41) provides explanation of the systematic process ECO employed to complete Springfield's inventory. Pages 8-12 provide explanation of how ECO classified each tax lots as "vacant", "developed" or "potentially redevelopable." The City's definition of vacant

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<sup>62</sup> 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.

<sup>63</sup> For example, SDC 4.1-100 regulates street width, block length, site access and driveways, intersections, vision clearances, sidewalks, street trees, bikeways, and accessways. SDC 4.3-110 to 117 regulates on-site stormwater management, water quality and natural resource protection.

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

CIBL/ EOA Map 2-1<sup>64</sup> 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.

### **ORAR 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. ORAR 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 ORAR 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:<sup>65</sup>*

- *Wetlands – Source: City of Springfield Local Wetland Inventory. File used: wet\_lwi.shp, accessed 2008*
- *Floodway – Source: Army Corps of Engineers digital “FIRM” maps. File used: fld\_way.shp, accessed 2008*
- *Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes\_over\_15.shp, accessed 2008*

<sup>64</sup> CIBL/EOA, p. 13.

<sup>65</sup> Each of these files was provided to ECONorthwest by the City in 2008.

- *Riparian resource areas – Source: City of Springfield. File used: Riparian\_resource\_areas.shp, accessed 2008*  
*The following factors were assumed “partial development constraints” in the CIBL/EOA. Partial constraints are factors that may create difficulties in development, but do not preclude development. Partial constraints were not deducted from the inventory. Land with these constraints is classified as “constrained” on employment land. Development can occur on “constrained” land and no deductions were made from the inventory for these factors.*<sup>66</sup>
- *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”<sup>67</sup> (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.”<sup>68</sup>*

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

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

As shown in CIBL/EOA Map 2-3 Vacant Commercial and Industrial Land, and CIBL/EOA pp. 21-26, portions of this land base are vacant. The City’s definition of “vacant” is stated on CIBL/EOA p.

<sup>66</sup> Each of these files was provided to ECONorthwest by the City in 2008.

<sup>67</sup> 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.”

<sup>68</sup> CIBL/EOA pp. 11-12

9. Springfield’s inventory included more land in the inventory that required by rule. Lands with improvement values under \$10,000 were considered vacant.

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

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

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

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

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

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

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

The CIBL/EOA pp. 39-41 addresses the requirement for cities within MPOs to make commitments to provide competitive short-term supplies of land. The CIBL/EOA provides an assessment of Springfield’s short-term land supply. With the exception of the southern extent of the Jasper-Natron area, all commercial and industrial lands within the existing UGB can be

considered to technically meet the Goal 9 rule criteria of “engineering feasibility.” [OAR 660-009-0020(1)(b), OAR 660-009-0025]. Thus more than 91% of the vacant commercial and industrial land is considered available as short term supply, and more the 85%.

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

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

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

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

The City’s CIBL/EOA identifies a need for suitable employment land to accommodate uses with “special siting characteristics,”<sup>69</sup> 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<sup>70</sup>, 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.

<sup>69</sup> 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.

<sup>70</sup> CIBL/EOA Table 5-1, p. 78 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption, Springfield concludes that all land needs on sites smaller than 5 acres would be accommodated through redevelopment, including the 6-acre deficit of 2-5 acre sites shown in Table 5-3, p. 79.

The City and Lane County adopted policies in the 2030 Comprehensive Plan Urbanization Element and land use regulations in the Springfield Development Code<sup>71</sup> to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

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

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

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

- (a) Location, size and buying power of markets;*
- (b) Availability of transportation facilities for access and freight mobility;*
- (c) Public facilities and public services;*
- (d) Labor market factors;*
- (e) Access to suppliers and utilities;*
- (f) Necessary support services;*
- (g) Limits on development due to federal and state environmental protection laws; and*
- (h) Educational and technical training programs.”*

As previously discussed in pp. 31-38 of this report, the CIBL/EOA estimated the types and amounts of industrial and other employment uses likely to occur in the planning area based on information generated in response to sections (1) to (3) of the Goal 9 rule and in consideration of the Springfield planning area's economic advantages and disadvantages. The CIBL/EOA provides assessment of relevant economic advantages and disadvantages including but are not limited to factors (a)-(h) in the CIBL/EOA Chapter 3 and 4, pp. 43-68.

Conclusion OAR 660-009-0015(4). The City's CIBL/EOA provides the required assessment of community economic development potential because it specifically considers several of the

<sup>71</sup> See Ordinance \_\_\_\_\_, Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

factors as suggested by the rule such as location, buying power of markets, transportation and public facilities.

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

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

As explained in CIBL/EOA Appendix D, Economic Development Objectives and Implementation Strategies<sup>72</sup>, 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<sup>73</sup> 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.

<sup>72</sup> The local record contains complete documentation of the survey conducted April 4-May 27, 2008 and workshops.

<sup>73</sup> Community workshops conducted May 20, 2008 and July 31, 2008

## IVb. Industrial and Other Employment Development Policies

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

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

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

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

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

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

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

a statement of City's economic development objectives, based on the Springfield CIBL/EOA analysis prepared pursuant to OAR 660-009-0015.

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

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

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

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

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

Ordinance [REDACTED], Exhibit B Springfield 2030 Comprehensive Plan Economic Element (Exhibit B-1 and Exhibit B-2 Technical Supplement CIBL/EOA) identifies the goals, policies, implementation strategies and analysis that the City of Springfield, in cooperation with Lane County, has adopted to provide an adequate land supply for economic development and employment growth within Springfield's UGB in compliance with Statewide Planning Goal 9, Economic Development. The economic development policy direction established through adoption of the Springfield Economic Element is focused to capitalize on Springfield's strengths and opportunities within the broader Southern Willamette Valley region as identified in the 2015 CIBL/EOA. The Springfield Economic Development Planning goals express the desired community development outcomes and economic benefits the City aspires to achieve as it addresses the needs identified in the CIBL/EOA. Springfield Economic Element provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community's

commercial, industrial and other employment development needs over the 2010-2030 planning period. The City's 2030 comprehensive plan policies support the growth of the local, regional and State economy through designation of suitable, serviceable land for economic development. Implementation of the Plan over the 20-year period will support development patterns that integrate land use, transportation, and public facilities planning to sustain a healthy, prosperous and equitable environment aligned with Springfield's interests, values and assets. The City's 2030 Plan policies guide City-initiated updates to land use refinement plans and zoning at the city-wide, district, corridor, and neighborhood scales, and establish policies applicable to property owner-initiated plan amendment or zoning proposals.

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

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

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

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

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

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

*"...suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of*

*land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.”*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

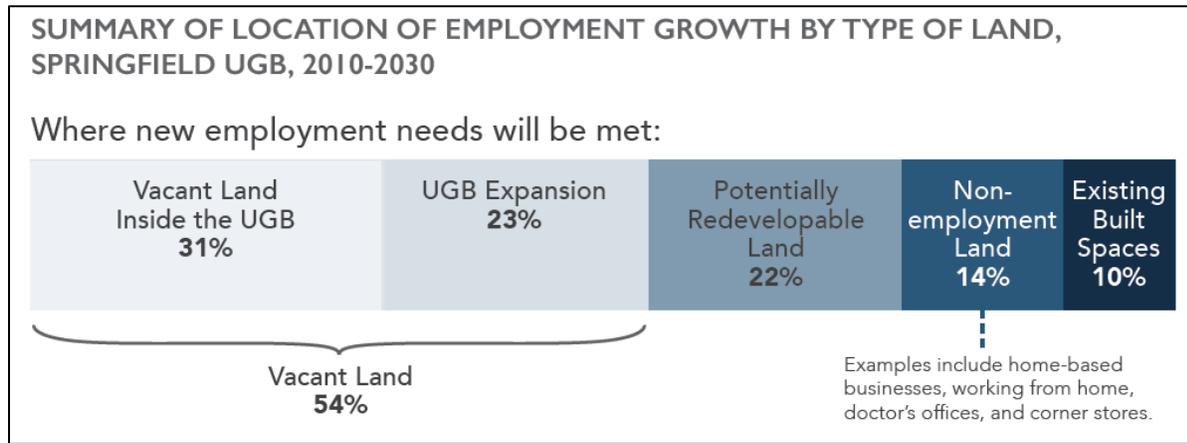
## IVc. Policies committing the city to designate an adequate number of sites of suitable sizes, types and locations

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

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

Designated sites for employment growth. Springfield is required to have comprehensive plan policies that designate "an adequate number of sites of suitable sizes, types and locations" in the Springfield UGB supported by public facilities planning and transportation system planning policies to provide necessary public facilities and transportation facilities for the planning area.

The City's CIBL/EOA and 2030 Plan policies assume growth will be distributed as summarized in the following graphic "Summary of Location of Employment Growth by Type of Land".<sup>74</sup>



Land already designated for employment (including non-employment land that supports home-based businesses, working from home, home occupations and neighborhood commercial uses<sup>75</sup>) will provide sites inside the existing UGB on vacant sites, potentially redevelopable sites, non-employment sites, and existing built space sites.

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

Existing designated and zoned vacant, developed and redevelopable land supply. The City's 2030 Plan adopted inventories, analyses and policies that support employment growth on land already designated for employment uses within the existing UGB. Springfield's inventory of the existing land base designated for commercial and industrial uses is described in CIBL/EOA Chapter 3, (pp. 5-42). Springfield's existing land base designated for commercial and industrial uses is shown and described in the Metro Plan diagram and text and Springfield refinement plans and text. Springfield's existing zoning districts regulate the supply of land for commercial and industrial uses, as listed in the Springfield Development Code Chapter 3 and as described in Sections 3.2-300, 3.2-400, 3.2-500, 3.2-600, 3.3-100, 3.3-200, 3.3-300, 3.3-400, 3.3-500, 3.3-900, 3.3-1000, 3.3-1100, 3.4-100, 3.4-200, 3.4-300. Springfield Development Code development

<sup>74</sup> ECONorthwest, City of Springfield CIBL for the Planning Period 2010-2030, Summary Report, August 2015.

<sup>75</sup> Metro Plan p. II-G-5 to II-G-6 describes neighborhood commercial facilities (not shown on Metro Plan diagram). Springfield Development Code 3.2-305 describes the Neighborhood Commercial Zoning District.

regulations for wastewater and stormwater infrastructure (as described in SDC 4.3-100 and the Engineering Design Standards Manual), and transportation (SDC 4.2-200) implement Metro Public Facilities and Services Plan and Springfield Transportation System Plan policies. Springfield Development Code Chapter 3 regulates site development, parking, loading, landscaping and screening and specific uses (SDC 4.7-100).

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

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

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

Policy commitments to enable and foster redevelopment. Potentially redevelopable land is shown in CIBL/EOA Map 2-6 (p. 32). CIBL/EOA Table 2-11 (p. 31) identified 11 sites 5 acres and larger as being potentially redevelopable. The City conducted a parcel-level evaluation of these sites.<sup>76</sup> As explained in Table 2-12 (p. 33-38), the City assumes that 7 of these 11 potentially redevelopable sites 5 acres and larger offer redevelopment opportunities in the 2010-2030 planning period. The results of the evaluation of tax lots in Table 2-12 show that one of the seven potentially redevelopable sites is larger than 20 acres and six of the potentially redevelopable sites are 5-20 acres in size. The largest potentially redevelopable site is a 47-

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<sup>76</sup> 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.<sup>77</sup> 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<sup>78</sup> 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~~

<sup>77</sup> CIBL/EOA redevelopment analysis, Chapter 2, pp. 9-39.

<sup>78</sup> 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”<sup>79</sup> 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:

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<sup>79</sup> 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<sup>80</sup>, 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.<sup>81</sup>

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.<sup>82</sup>

2030 Policy commitments to redevelopment and designation of additional land for mixed-use development to meet site needs. As previously stated, the CIBL/EOA<sup>83</sup> 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

<sup>80</sup> 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.

<sup>81</sup> See CIBL/EOA Table 5-1, p. 78.

<sup>82</sup> 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

<sup>83</sup> 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.<sup>84</sup> These facts point to the need for ample Springfield policy support for redevelopment — including land designated and zoned to accommodate mixed use development — on sites within the existing UGB. To that end, the City and Lane County adopted a UGB and policy commitments that support and rely upon more mixed-use development in Springfield to meet multiple land use needs within its limited and constrained land supply.

### 2030 Economic Element policies and implementation strategies

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

2030 Economic Element Policy E.1 states:

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

2030 Economic Element Implementation Strategy 1.2 states:

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

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

2030 Economic Element Policy E.6 states:

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<sup>84</sup> 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.”<sup>85</sup>***

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.”<sup>86</sup>***

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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<sup>85</sup> Springfield City Council Resolution 10-57

<sup>86</sup> 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.”<sup>87</sup>***

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:

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<sup>87</sup> 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:

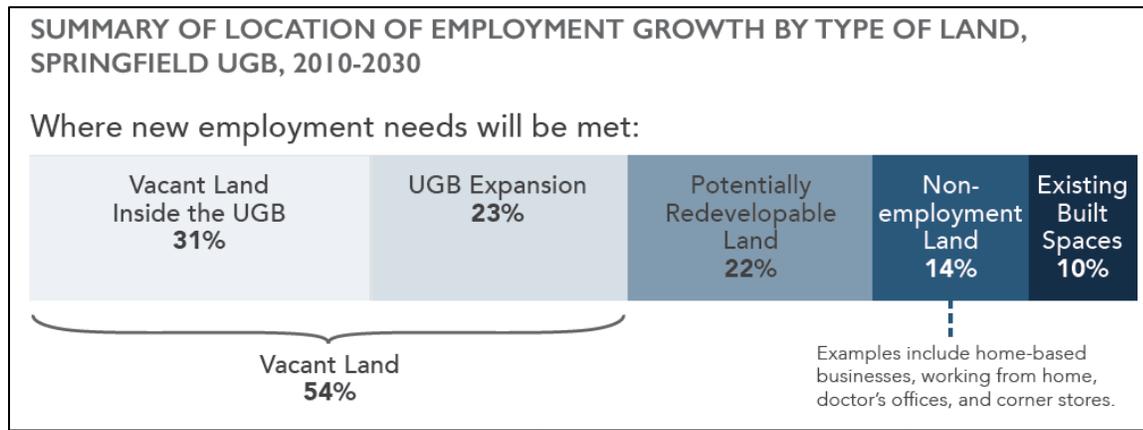
***“Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term 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.”<sup>88</sup>



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       , 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        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.”***

<sup>88</sup> Ordinance       , Exhibit A

2030 Urbanization Element Policy 12 states:

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

2030 Urbanization Element Policy 22 states:

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

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

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

Economic Element Policy E.2 states:

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

2030 Urbanization Element Policy 7 states:

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

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

2030 Urbanization Element Policy 8 states:

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

2030 Economic Element Policy 3 states:

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

2030 Economic Element Implementation Strategy 11.1 states:

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

2030 Economic Element Implementation Strategy 12.4 states:

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

2030 Economic Element Implementation Strategy 12.5 states:

***“Support increased potential for employment in one of the regional industry clusters.”***

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

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

2030 Urbanization Element Policy 9 states:

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

2030 Urbanization Element Policy 23 states:

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

2030 Urbanization Element Policy 27 states:

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

2030 Urbanization Element Policy 28 states:

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

2030 Urbanization Element Policy 37 states:

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

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

2030 Economic Element Policy E.13 states:

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

2030 Economic Element Implementation Strategy 8.3 states:

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

2030 Economic Element Implementation Strategy 8.7 states:

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

2030 Economic Element Implementation Strategy 13.1 states:

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

2030 Economic Element Policy E.21 states:

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

2030 Economic Element Policy E.16 states:

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

2030 Economic Element Implementation Strategy 16.1 states:

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

***development areas; and coordinate with Lane Transit District’s planning for potential transit system improvements.”***

2030 Economic Element Implementation Strategy 16.2 states:

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

2030 Economic Element Implementation Strategy 16.3 states:

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

2030 Economic Element Policy E.17 states:

***“Leverage existing rail facilities and future expansion of rail facilities to achieve economic development objectives.”***

2030 Economic Element Implementation Strategy 17.4 states:

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

2030 Economic Element Implementation Strategy 17.5 states:

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

2030 Economic Element Policy E.18 states:

***“Coordinate transportation and land use corridor planning to include design elements that support Springfield’s economic and community development policies and contribute to community diversity and inclusivity.”***

2030 Economic Element Implementation Strategy 18.3 states:

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

2030 Economic Element Implementation Strategy 18.7 states:

***“Prioritize improvements that would complete local connections to local shopping and service opportunities.”***

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

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

## **OAR 660-009-0020(2)**

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

2030 Economic Element Policy E.5 states:

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

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

Springfield has two urban renewal districts: Glenwood U.D. and Downtown U.D. Both districts have urban renewal plans and financing programs administered by the Springfield Economic Development Agency (SEDA) through the City Manager’s Office Economic Development Department. Programs provide support, as funds become available, to plan and prepare the land supply for redevelopment.

The urban renewal program, as funds allow, supports provision of a competitive short-term supply of land in Springfield providing a range of commercial, industrial and mixed-use site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.<sup>89</sup>

**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.<sup>90</sup>

**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.

<sup>89</sup> 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.

<sup>90</sup> In 2016, the City is updating its Downtown Design and Streetscape Development Standards through amendments to the Springfield Development Code and Engineering Design Standards Manual, with assistance from the Oregon TGM Code Assistance Program.

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

## OAR 660-009-0020(5)

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

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

2030 Plan Economic Element Policy E.27 states:

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

2030 Plan Economic Element Implementation Strategies 27.1 and 27.2 state:

***“Provide public support to identify, assess, clean up and redevelop brownfields as resources become available through grants, SEDA, community partnerships and private investments.”***

***“Seek and leverage funding for brownfield assessment and clean up as one key tool to assist financing for redevelopment.”***

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

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

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

## OAR 660-009-0020(6)

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

## IVd. Employment Land Need - Uses with Special Siting Characteristics

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

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

- (a) Identify sites suitable for the proposed use;*
- (b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and*
- (c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.”*

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

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

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

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

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

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

## **Land Use Designations**

### **Urban Holding Area – Employment** (not shown on *Metro Plan* Diagram)

The Urban Holding Area – Employment (UHA-E) designation identifies urbanizable areas within the Springfield UGB to meet Springfield’s long term employment land needs for the 2010-2030 planning period. The UHA-E designation reserves an adequate inventory of employment sites, including sites 20 acres and larger, that are suitable for industrial and commercial mixed use employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent Springfield economic opportunities analysis and Springfield Comprehensive Plan Economic Element policies.

Lands designated UHA-E are protected from land division and incompatible interim development to maintain the land’s potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process.

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

2030 Plan Urbanization Element Policy 4 states:

***“Urbanizable lands added to Springfield’s acknowledged UGB by Ordinance \_\_\_\_, date \_\_\_\_ to meet employment needs are designated “Urban Holding Area- Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB.<sup>91</sup> 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<sup>92</sup> 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.”***

<sup>91</sup> 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.

<sup>92</sup> 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.<sup>93</sup>

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;

<sup>93</sup> 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.<sup>94</sup> 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<sup>95</sup>, as provided with services pursuant to existing facilities and transportation plans, and as regulated through existing implementation measures, will provide employment growth sites for commercial and industrial uses that require sites smaller than 5 acres.

2030 Urbanization Element Policy 1 states:

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

2030 Urbanization Element Policy 2 states:

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

<sup>94</sup> 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”

<sup>95</sup> 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<sup>96</sup> as described in OAR 660-009-0025(8) including suitable employment sites larger than 5 acres:

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<sup>96</sup> 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 \_\_\_\_\_, date \_\_\_\_\_ to meet employment needs are designated “Urban Holding Area-Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB. 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)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
<b>Warehousing &amp; Distribution</b>	2	2	3	4	1	12
<b>General Industrial</b>	5	5	4	8	2	24
<b>Office</b>	75	12	13	4	1	105
<b>Retail</b>	55	10	6	2		73
<b>Other Services</b>	44	9	4	2		59
<b>Total</b>	<b>181</b>	<b>38</b>	<b>30</b>	<b>20</b>	<b>4</b>	<b>273</b>

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.<sup>97</sup>

<sup>97</sup> See pages 42-43 of this report OAR 660-009-0015(2) Identification of Required Site Types.

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

The city's findings in this report under OAR 660-009-0015(1) Review of Trends, and the City's findings under OAR 660-009-0015(4) Assessment of Community Economic Development Potential describe and reference Springfield's locational factors in relationship to future industrial and other employment uses.<sup>98</sup> The city's findings in this report under OAR 660-009-0015 (2) Identification of Required Site Types, on pages 45-49 addressed site characteristics typical of expected uses. As permitted under OAR 660-009-0015(2) Industrial or other employment uses with compatible site characteristics were grouped together into common site categories.

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

20-year employment land demand compared with land supply. Chapter 5 of the CIBL/EOA Land Capacity and Demand (pp. 77-98) compares the demand for sites with available land in Springfield's inventory. Table 5-1 (p. 78) compares the inventory of vacant and potentially redevelopable sites with Springfield's land need by site size and type (industrial or commercial and mixed use). The City and Lane County adopted the CIBL inventory and policy commitments to support, enable and foster redevelopment, reducing the need to expand the UGB.<sup>99</sup> 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.

<sup>98</sup> See pages 31-45 of this report. Potential growth industries are discussed on p. 43 of this report.

<sup>99</sup> 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.<sup>100</sup>

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

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:

<sup>100</sup> As explained in CIBL/EOA p. 79

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **OAR 660-009-0025(4)**

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

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

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

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

### **OAR 660-009-0025(5) Institutional Uses**

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

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

### **OAR 660-009-0025 (6) Compatibility.**

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

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

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

development standards manage encroachment in the Urban Holding Area – Employment plan designation by prohibiting intrusion of incompatible uses.<sup>101</sup>

### **OAR 660-009-0025(7) Availability**

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

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

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

*“Cities and counties that adopt objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17. Policies and land use regulations for these uses must:*

- (a) Identify sites suitable for the proposed use;*
- (b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and*
- (c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.*

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

*“When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the*

<sup>101</sup> As cited on page 112-113 of this report, Exhibit E, SDC 3.2-915, Table A.

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

Special site needs and characteristics. The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with "special siting characteristics,"<sup>102</sup> 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<sup>103</sup>, 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

<sup>102</sup> 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.

<sup>103</sup> 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<sup>104</sup>:

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

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

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.

<sup>104</sup> 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.<sup>105</sup>

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<sup>106</sup> provides a summary of site characteristics of sites needed by Springfield’s target industries:

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<sup>105</sup> See City’s complete findings under Goal 14 Public Facilities Analysis

<sup>106</sup> 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
<b>Target Industries:</b> Medical Equipment High-tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing <b>Building Type:</b> General Industrial <b>Site Needs for:</b> 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).
<b>Target Industries:</b> High Tech Services Corporate Headquarters Biotech Professional and Technical Services Back office Medical Services <b>Building Type:</b> Commercial and Other <b>Site Needs for:</b> 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 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<sup>107</sup> to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

Metro Plan IV-4, Policy 11 states:

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

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

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

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

#### **Urban Holding Area – Employment**

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

<sup>107</sup> See Ordinance \_\_\_\_\_, Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

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

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

The AG zone purpose statement:

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

The AG District 3.2-915 allows the following uses:

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

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

- (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:

<b>Commentary.</b> 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>B. Allowed Interim Uses for Lands Designated Natural Resource (6),(7)</b>	
Continuation of normal farm practices such as grazing, plowing, planting, cultivating and harvesting. <b>(6)</b>	<b>P</b>
Wetland and/or riparian restoration and rehabilitation activities	<b>P</b>
Vegetation management necessary to control invasive vegetation or to reduce a hazard to life or property.	<b>P</b>
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.	<b>P</b>
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.	<b>P</b>
Waterway restoration and rehabilitation activities such as channel widening, realignment to add meanders, bank grading, terracing, reconstruction of street crossings, or water flow improvements.	<b>P</b>
Emergency stream bank stabilization to remedy immediate threats to life or property. <b>(7)</b>	<b>P</b>
Bioswales or similar water quality improvement projects;	<b>P</b>

<u>Public multi-use paths, access ways, trails, picnic areas, or interpretive and educational displays and overlooks, including benches and outdoor furniture.</u>	<b>P</b>
<b><u>Utilities and Communication</u></b>	
<u>High Impact Public Utility Facility as specified in Subsection 4.7-160</u>	<b>S/D</b>
<u>Low Impact Public Utility Facility</u>	<b>D</b>
<b>(6)</b> <u>Consistent with applicable wetland or land use permits issued by Federal, State or local approving authority with jurisdiction over wetland or riparian resources, including the Water Quality Protection provisions in Subsection 4.3-115 and Section 3.3-400 Floodplain Overlay District.</u>	
<b>(7)</b> <u>Federal, State or local emergency authorization may be needed for in-stream work.</u>	

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

### **3.2-920 Pre-existing and Non-conforming Uses**

- A.** Continuance, expansion, modification or replacement of lawful uses existing on a property at the time of the effective date of this zone are determined and permitted as otherwise specified in Section 5.8-100 of this Code; and
- B.** The Applicant shall submit evidence to demonstrate that the expansion or modification:
- 1.** will not generate vehicle trips exceeding pre-development levels;
  - 2.** will not force a significant change in accepted farm practices on surrounding lands devoted to farm or forest use; and
  - 3.** will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

AG zone 3.2-925 addresses placement of interim uses on a site so as not to impede eventual urban development and extension of infrastructure:

### **3.2-925 Standards for Interim Development**

These regulations apply to the development of interim uses as specified in Subsection 3.2-915 and 3.2-920 in the AG District.

- A.** Receive certification from the Lane County Sanitarian that any proposed wastewater disposal system meets Oregon Department of Environmental Quality (D.E.Q.) standards prior to Development Approval.
- B.** Interim uses may not be placed on a site in manner that would future development of land designated Urban Holding Area-Employment with urban employment uses.
- C.** Interim uses may not be placed on a site in manner that would impede extension of infrastructure to serve land designated Urban Holding Area-Employment from developing with urban employment uses.

**D.** To demonstrate compliance with this provision, and in addition to the special provisions listed in Table A, the Applicant shall submit a Future Development Plan that:

- 1.** Includes a brief narrative explaining the existing and proposed use of the property;
- 2.** Indicates the proposed development footprint on a scaled plot plan of the property;
- 3.** Limits the proposed new development footprint to ½ acre or less of the site;
- 4.** Addresses future street connectivity as shown in the Transportation System Plan, Regional Transportation System Plan, Local Street Network Plan, Springfield Comprehensive Plan, applicable Refinement Plans and this Code;
- 5.** Addresses the number and type of vehicle trips to be generated by the proposed use;
- 6.** Addresses the applicable Natural Resources protection, Water Quality Limited Watercourses protection, Floodplain Overlay Development Standards, and Drinking Water Protection Overlay Development Standards of this Code.

AG zone 3.2-925 E. regulates land division and interim development through the following land use regulations:

<u>Minimum Lot/Parcel Sizes</u>	<u>A 50-acre minimum lot/parcel size is applied to lots/parcels 50 acres or larger. A 20-acre minimum lot/parcel size is applied to lots/parcels less than 50 acres in size. Lots/parcels less than 20 acres in size may not be further divided. (1)</u>
<u>Main Building Height</u>	<u>35 feet</u>
<u>Accessory Building Height</u>	<u>35 feet (2)</u>
<u>Building/structure Setbacks: UHA-E designated parcels 20 acres and larger</u>	<u>20 feet from State, County, City roads, streets and local access roads.  At least 100 feet from the adjoining lines of property zoned EFU; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.</u>
<u>Building/structure Setbacks: UHA-E designated parcels smaller than 20 acres</u>	<u>20 feet from State, County, City roads, streets and local access roads. 10 feet from other property lines.</u>
<u>Minimum Lot/Parcel Frontage</u>	<u>None</u>
<u>Minimum Lot/Parcel Depth</u>	<u>None</u>

**(1)** Exemption: Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel.

(2) Water tanks, silos, granaries, barns and similar accessory structures or necessary mechanical appurtenances may exceed the minimum height standard.

It should be noted that the AG zone, when acknowledged, will be in effect for land currently zoned Exclusive Farm Use (EFU) by Lane County. The property subject to the AG zone is currently zoned EFU 30 and EFU 25 by Lane County, and subject to 30-acre and 25-acre minimum parcel sizes. The AG zone retains a restriction on land division to preserve large employment sites pursuant to the City's Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis and 2030 Comprehensive Plan Economic Element policies.

The existing Lane County EFU Zone setback standards found in Lane County Chapter 16.212 (10)(a)(ii) require dwellings to be sited at least 100 feet from the adjoining lines of property zoned EFU "to minimize impacts upon nearby farm uses or to assure optimal siting of proposed dwellings to minimize adverse impacts on nearby farm and forest lands." The setback standards found in Lane County Chapter 16.212 (10)(b) require 20 foot setbacks from the right of way of a State or County road or a local access public road and 10 foot setbacks from other property lines. Larger setbacks are established for riparian corridors. Other similar codes to the AG zone — such as the City of Redmond for Urban Holding-10 acre zone — require 50-foot front and rear yard setbacks and 10-foot side yard setbacks, and establish a maximum building height of 30 feet.

The City's proposed development standards for the AG zone are reasonable and provide the level of site protection required under OAR 660-009-0025(8).

Planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations. In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, AG zone 3.2-930 Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

### **3.2-930 Planning Requirements Applicable to Zoning Map Amendments**

In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

<b><u>Table 1. Pre-Development Approval Process Steps – Urban Holding Areas</u></b>	
<b><u>City-initiated Planning Process</u></b>	<b><u>Owner-initiated Planning Process</u></b>
<u>1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code</u>	<u>1. Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.</u>

<u>standards.</u>	
<u>2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>	<u>2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).</u>
<u>3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, or Employment). Land is planned and zoned and eligible for annexation.</u>	<u>3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>
<u>4. Applicant prepares and submits Preliminary Master Plan and annexation applications with demonstration of key urban service provision.</u>	<u>4. Applicant prepares and submits Preliminary Master Plan, proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.</u>
<u>5. City approves City approves Master Plan and annexation.</u>	<u>5. City approves Master Plan and Zoning Map Amendment and annexation.</u>
<u>6. Applicant submits Site Plan, Subdivision and other applicable development applications.</u>	<u>6. Applicant submits Site Plan, Subdivision etc. development applications.</u>

**Conclusion OAR 660-009-0025(8):** The City applied the “Urban Holding Area – Employment (UHA-E)” Metro Plan designation and Agriculture – Urban Holding Area (AG) Zoning District to the newly urbanizable lands it added to the UGB. Acting together, the designations serve as an interim “holding zone” to ensure that lands added to the UGB to meet specific large site employment land needs are reserved to meet those needs. The City’s UHA-E designation and AG zone land use regulations ensure that lands added to the UGB to meet specific employment land needs identified in the City’s CIBL/EOA are reserved, planned, zoned and prepared for development to meet those needs, as described in 2030 Urbanization Element policies.

## **OAR 660-009-0030 Multi-Jurisdiction Coordination**

*“(1) Cities and counties are strongly encouraged to coordinate when implementing OAR 660-009-0015 to 660-009-0025.”*

While Springfield and Eugene are no longer sharing a UGB, and have chosen to prepare and develop city-specific economic opportunities analyses, and economic development policies — the cities and Lane

County continue to partner and coordinate through regional economic development planning activities. Regional economic development initiatives are directly reflected in the Springfield 2030 Economic Element.

Goal EG-2 states:

***“Support attainment of the Regional Prosperity Economic Development Plan<sup>108</sup> 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:<sup>109</sup>***

- a. Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.***
- b. Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.***
- c. Regional Identity—Create a strong economic personality that celebrates our region’s attributes and values.***
- d. Be Prepared—Contribute to development of the region’s physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.***
- e. Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.”***

**Conclusion OAR 660-009-0030:** Springfield, Eugene and Lane County have coordinated throughout the Metro Plan transition process and 2030 planning process, sharing information and collaborating to develop direction for the “future” Metro Plan to support respective comprehensive plans within the Eugene-Springfield Metro region.

**Goal 9 Conclusion: For the reasons stated above and based on information found in the Springfield CIBL/EOA, the proposed Comprehensive Plan amendments comply with Goal 9.**

<sup>108</sup> *Regional Prosperity Economic Development Plan* — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010

<sup>109</sup> *Ibid.*

## V. Statewide Planning Goal 14: Urbanization Employment Land Need and Response to Deficiency

ORAR 660-015-0000(14)

**To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.**

### **ORAR 660-015-0000(14), ORAR 660-024-0040(1), ORAR 660-024-0040(5), ORAR 660-024-0050(1), and ORAR 660-024-0050 (4)**

The standards for amending an urban growth boundary (UGB) are found in Statewide Planning Goal 14 (Urbanization), and in ORS 197.298 Priorities for urban growth boundary amendments. The Goal 14 rule (ORAR Chapter 660, Division 024) interprets and clarifies the more general language of Goal 14 and explains the relationship between statutory “priorities” and Goal 14 “location factors.” In the Goal 14 rule findings below, *text shown in italic is quoted directly from the referenced goal, rule or statute.*

Goal 14 describes how land needs — including employment land needs — shall form the basis for changes to UGBs: *“Land Need. Establishment and change of urban growth boundaries shall be based on the following:*

*(1) Demonstrated need to accommodate long range urban population, consistent with a 20-year affected local governments; and*

*(2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).*

*In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.*

*Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.” [ORAR 660-015-0000(14)]*

## Relationship between Goal 9 and Goal 14

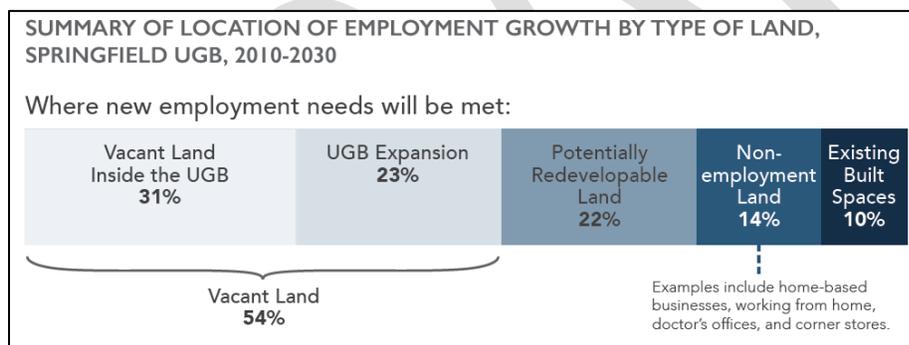
The City is expanding the UGB to provide land to meet specific employment land needs, thus the City’s findings must demonstrate how the City’s analyses of land need and boundary location alternatives properly addressed the relationship between Goals 9 and 14 and balanced compliance with both planning goals. The City does this by demonstrating how the factors in its decisions about land need under Goal 9 and the proposed UGB boundary location were balanced consistent with Goal 14: Urbanization — *“to provide for an orderly and efficient transition from rural to urban land use, to*

*accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.”*

The City’s findings under Goals 11, 12 and OAR 660-024-0060 explain how, in its response to meeting the City’s employment land deficit under Goal 9, the City carefully considered coordination of land use, transportation and public facilities planning [OAR 660-024-0040(7)], based on substantial evidence, to inform its policy choices.

Goal 14 allows cities to specify characteristics necessary for land to be suitable for identified need. As explained and referenced in the City’s findings under Goal 9, the Springfield CIBL/EOA identifies specific parcel size, topographical and proximity characteristics necessary to meet the operational requirements for targeted employment types, including businesses and industries that require industrial and commercial mixed-use sites larger than 5 acres.

Goal 14 requires the City to seek to accommodate the identified 20-year land needs on land already inside the urban growth boundary before expanding the UGB [OAR 660-015-0000(14)]. The City must explain and provide substantial evidence as required by Goal 9 to demonstrate that the existing land supply cannot reasonably provide suitable sites to accommodate the economic opportunities identified in the CIBL/EOA. The City’s 2030 comprehensive plan policies, plan designations and implementation measures provide employment sites within the existing UGB to accommodate 77% of Springfield’s forecast employment.<sup>110</sup>



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 –

<sup>110</sup> CIBL/EOA, Appendix C Employment Forecast and Site Needs for Industrial and Other Employment Uses, pp. 153-160.

Employment (UHA-E)” to provide a 20-year supply of employment land to accommodate the need for large sites.

The 2030 Plan Economic and Urbanization Element policies identify these specific employment site needs and establish special planning requirements and zoning regulations to reserve the sites added to the UGB for the intended large site employment purposes. The proposed Metro Plan diagram plan amendment applies the Urban Holding Area - Employment (UHA-E) plan designation. The proposed Zoning Map amendment applies Agriculture—Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development. Together, these actions plan and zone lands added to the UGB for employment to establish minimum parcel sizes, topographical (flat topography) and proximity characteristics necessary to meet the operational requirements for targeted employment types.

The City’s CIBL/EOA provides substantial evidence to support the City’s policy choice under Goals 9 and 14 — expanding the UGB to add large sites to support economic opportunities and diversification of the economy. As stated in the CIBL/EOA pages 95-97:

- *“Economic growth. Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030 using the OAR 660-024-0040(8)(a)(ii) methodology. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.” (emphasis added)*
- *“Buildable lands. Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield’s UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.” (emphasis added)*
- *Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often traded-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses. While it may not be clear exactly what the business opportunities may be in ten to twenty years, it is clear that these businesses will not locate in Springfield if land is not available for development.” (emphasis added)*
- *“For example, in the past twenty years, most of the Gateway area developed. The area has a mix of uses including the International Way campus employment district, regional mall, apartments, offices, and more recently, the PeaceHealth RiverBend Medical Center Campus. Twenty-years*

ago it would have seemed highly unlikely that PeaceHealth would build their new regional facility in Springfield. If the City had not had desirable, serviceable land available, PeaceHealth would probably not have located their new facility in Springfield. Over the last 20 years, employment and commerce in the Gateway area has become a local and regional economic engine and major employment center. In 2006, the Gateway area had 33% of Springfield's employment (more than 9,800 employees) and 33% of payroll in the city, at \$325 million. By 2009, Gateway accounted for nearly 36% of the city's employment and \$368 million in payroll. In 2013, employment in the Gateway area accounted for 40% of employment in Springfield (more than 10,700 employees) and 43% of payroll in the city."<sup>111</sup>

## Capacity to Absorb Growth within the Existing UGB

Prior to expanding an urban growth boundary, the City analyzed the capacity of land within the existing UGB to provide the needed sites, as required by Goals 9 and 14. As described in the City's findings under Goal 9, and in the CIBL/EOA, the City has demonstrated that the identified need for employment sites larger than 5 acres cannot reasonably be accommodated on land already inside the urban growth boundary. Therefore, the City chose to expand the boundary to include suitable large sites. As stated in the CIBL/EOA pages 95-98, the City determined that the large site need could not reasonably be accommodated through redesignation or site assembly and provided substantial evidence to support the conclusions reached.

- *“Redesignation of Smaller Sites. Springfield's land deficit cannot be met through redesignating a surplus of small industrial- and commercial-designated sites, most of which are smaller than 2 acres. Map 2-3 shows that these sites are scattered throughout the City, generally along Main Street or in Mid-Springfield. There are few opportunities for assembly of a contiguous, unconstrained site with a configuration that makes it developable. These areas do not and are not expected to provide large sites for target employers that require large sites.” (emphasis added)*
- *“Even where small vacant sites are located adjacent to other small vacant sites, there are few places where a site larger than 5 acres could be assembled from small sites. There is probably no place where a 20-acre site could be assembled from small sites.” (emphasis added)*
- *“Site assembly. Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Map 2-3 shows that of industrial- and commercial-designated sites are scattered throughout the City, generally along Main Street or in Mid- Springfield, and the majority of sites are smaller than 2 acres. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of*

<sup>111</sup> Kim Thompson, Oregon Employment Department, “The Gateway Area & Growth in Springfield”, presentation to Gateway Development Committee, October 24, 2014.

*key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners.”* (emphasis added)

- *Need to expand the UGB to accommodate need for large sites. Springfield’s need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway.* (emphasis added)

The CIBL/EOA is the City’s inventory and analysis of commercial and industrial land required under Goal 9. As explained in the CIBL/EOA, and in the City’s findings under Goal 9, the City’s employment land need analysis, prepared by ECONorthwest, used a “site needs” approach, based on ECONorthwest’s expertise, trends and substantial evidence to determine the number of sites and the required characteristics [ORS 197.712(2)(c)<sup>112</sup> 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<sup>113</sup> 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.

<sup>112</sup> ORS 197.712\*\*\**“the Legislative Assembly finds and declares that, in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state. (2) By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following: (a) Comprehensive plans shall include an analysis of the communitys economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends. (b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. (d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses.”* (emphasis added)

<sup>113</sup> 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 28<sup>th</sup> Street in Heavy Industrial
  - 8-acre site on 42<sup>nd</sup> Street in Heavy Industrial
  - 7-acre site at 28<sup>th</sup> and Marcola Road in Heavy Industrial
  - 6.5-acre site on 28<sup>th</sup> Street in Heavy Industrial
  - 6-acre site on Highbanks Road in Heavy Industrial
  
- One site larger than 20 acres in size:
  - 36-acre site in the Jasper-Natron Special Heavy Industrial District

The City assumed that all land needs for sites smaller than 5 acres could be accommodated on land already inside the urban growth boundary.

The City's assumptions, conclusions and policy choices about accommodating 46% of forecast employment growth on land already inside the UGB are reasonable and based on substantial evidence.

The City has conducted the required analysis and has provided sufficient evidence demonstrating that all of its employment needs cannot be accommodated on land already inside the urban growth boundary, thus the City proposed to amend the UGB to provide land designated to provide suitable sites larger than 5 acres and larger than 20 acres to meet those needs.

## 2030 Plan Compliance with Goal 14 [OAR 660-015-0000(14)]

### Urban Growth Boundary and Urbanization Policies

*Urban growth boundaries shall be established and maintained by cities, counties and regional governments to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land.*

*Establishment and change of urban growth boundaries shall be a cooperative process among cities, counties and, where applicable, regional governments. An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located, consistent with intergovernmental agreements...*

Amendment of Springfield’s UGB is a cooperative process between the City of Springfield and Lane County. The City Council adopted the amended UGB on \_\_\_\_\_, Ordinance X; Lane County adopted the amended UGB on \_\_\_\_\_, Ordinance X.

Goal 14 addresses how cities and counties must plan and zone land within urban growth boundaries to manage the long term land supply:

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

The City’s 2030 Plan Economic and Urbanization Element comprehensive policies identify specific industrial site needs and commercial mixed-use employment site needs and establish special planning requirements and zoning regulations to reserve these sites for the intended large site employment purposes.

The City amended the Metro Plan text to establish the Urban Holding Area - Employment (UHA-E) plan designation.

The City amended the Metro Plan diagram to apply the Urban Holding Area - Employment (UHA-E) plan designation to the lands added to the UGB to meet employment land needs.

The City amended the Springfield Development Code to establish the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites added to the UGB to meet employment land needs from land divisions and incompatible interim development.

The City amended the Springfield Zoning Map to apply the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development.

The City’s amendments to the comprehensive plan designate urbanizable lands suitable for employment, and protect those sites from land divisions and incompatible interim development by applying plan designations, comprehensive plan urbanization policies and implementing zoning measures.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land with suitable parcel size, topographical and proximity characteristics that are necessary to meet specific operational required by targeted employment types.

Implementation of the 2030 Plan amendments will function to reserve lands with specific operational required by targeted employment types, as described in the City’s EOA and substantiated with an

adequate factual base in the record, to maintain the land's potential for planned urban development of urban employment uses and densities, as required by Goal 14.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land to maintain the land's potential for planned urban development of urban employment uses and densities until appropriate public facilities and services are available or planned, as required by Goal 14.

The City and Lane County adopted 2030 Urbanization Element policies to replace the more generalized regional policies in the Metro Plan. The 2030 Urbanization Element is the chapter of the 2030 Plan that guides future development in Springfield by describing how and where land will be developed and infrastructure provided to meet long term growth needs while maintaining and improving community livability. The purpose of the Urbanization Element is to inform and guide long range land use and public facilities planning to address Springfield's land needs for the planning period 2010-2030 in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element establishes the comprehensive plan policies and zoning applicable to urbanizable lands within Springfield's Urban Growth Boundary (UGB) that are necessary to efficiently and effectively plan and manage the land supply as land uses transition from rural to urban. This policy direction is based on the need to:

- Designate a 20-year supply of urbanizable land to accommodate population and employment growth.
- Allow and regulate interim land uses that do not impede future development of planned urban land uses and densities.
- Plan for the orderly and efficient extension of public facilities and services.
- Designate land for community open space and recreational needs.
- Designate land to provide and manage the public facilities and environmental services needed to serve Springfield's urban area.
- Manage growth and improve community livability through increasingly efficient use of land consistent and compatible with the community's needs, resources, opportunities and advantages within the broader Southern Willamette Valley region.

The guidelines in Goal 14 state that plans "should" designate sufficient amounts of urbanizable land to accommodate the need for further urban expansion, taking into account (1) the growth policy of the area; (2) the needs of the forecast population; (3) the carrying capacity of the planning area; and (4) open space and recreational needs.

Springfield's 2030 Plan designates sufficient amounts of urbanizable land to accommodate the needs of the forecast population's need for housing and employment; adds land designated Public/Semi-Public to accommodate a portion of the area's open space and recreational needs; and adds land designated Natural Resource and Public/Semi-Public to maintain open space, conserve resources, and conserve the quantity and quality of Springfield's drinking water supply. 2030 Urbanization Element policies require refinement-level comprehensive planning for the

lands designated Urban Holding Area – Employment to ensure that urban uses and densities can be accommodated within the carrying capacity of the planning area.

The guidelines in Goal 14 state: *“The size of the parcels of urbanizable land that are converted to urban land should be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels.”*

The urbanizable land added to the UGB in Springfield’s 2030 Comprehensive Plan is primarily large parcels in single ownership because Springfield’s employment land deficit is sites larger than 5 acres, including 3 sites larger than 20 acres. Parcels are of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels. 2030 Urbanization Element policies require retention of UHA-E designated large parcels (20-acre and 50-acre minimum parcel sizes). The AG District includes provisions to limit the division of land and prohibit urban development. A 50-acre minimum lot size is applied to lots/parcels greater than 50 acres and a 20-acre minimum lot size is applied to lots/parcels less than 50 acres to protect undeveloped sites from inefficient piecemeal development until land is planned and zoned to allow annexation and site development with urban employment uses and densities.

The guidelines in Goal 14 state: *“Plans providing for the transition from rural to urban land use should take into consideration as to a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.”*

The guidelines in Goal 14 state: *“Comprehensive plans and implementing measures for land inside urban growth boundaries should encourage the efficient use of land and the development of livable communities.”*

The 2030 Urbanization Element policies and AG zone land use regulations address the transition from rural to urban land uses and require newly urbanizable areas to be planned comprehensively to address air, land and water resources of the planning area — as required by Oregon and federal law — to ensure that urban uses and densities can provide needed capacity for employment growth and enhance overall community livability. The UGB Alternatives Analysis process addressed and compared the relative ESEE consequences of potentially suitable expansion location alternatives to assess potential threats or benefits to air, land and water resources. To determine capacity issues, the UGB Alternatives Analysis process included planning-level assessments of infrastructure (e.g. wastewater, water, stormwater management) and transportation facilities needed to serve alternate locations. The Metro Wastewater (MWWC) 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.<sup>114</sup>

<b>Name of Area</b>	<b>Acres Designated Natural Resource</b>	<b>Acres Zoned AG</b>	<b>Location</b>
<b>North Gateway Natural Resource (NR)</b>	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.

<sup>114</sup> Ordinance Exhibit C-1, 2030 Plan Urbanization Element, p. 12.

## Division 24 Urban Growth Boundaries

### OAR 660-024-0000 Purpose and Applicability

#### OAR 660-024-0000(4)

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

The 2030 Plan amendment of the UGB was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including ORS 197.298 and Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

The City issued the public notice specified in OAR 660-018-0020 for the proposed plan amendment concerning the evaluation or amendment of the UGB on December 31, 2009, under the rules in Division 24 that were adopted prior to that date, and effective April 16, 2009.

#### OAR 660-024-0000(3)(c)

*“A local government choice whether to apply this division must include the entire division and may not differ with respect to individual rules in the division.”*

As permitted under OAR 660-024-0000(4) the City’s proposal applies Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

**Conclusion OAR 660-024-0000:** The City’s proposal is consistent with OAR 660-024-0000. The City’s findings under Goal 14 are organized under ORS 197.298 and the Division 24 administrative rule effective prior to January 1, 2016.

### OAR 660-024-0010 Goal 14 Definitions Applicable to Springfield’s UGB Analysis

OAR 660-024-0010 Definitions states:

*“In this division, the definitions in the statewide goals and the following definitions apply...”*

The definitions in the statewide goals and the following definitions in Division 24 are applicable to Springfield’s demonstration of compliance with Division 24:

*(2) "EOA" means an economic opportunities analysis carried out under OAR 660-009-0015.*

(7) "Safe harbor" means an optional course of action that a local government may use to satisfy a requirement of Goal 14. Use of a safe harbor prescribed in this division will satisfy the requirement for which it is prescribed. A safe harbor is not the only way or necessarily the preferred way to comply with a requirement and it is not intended to interpret the requirement for any purpose other than applying a safe harbor within this division.

(8) "Suitable vacant and developed land" describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for "developed land," section (12) for "suitable," and section (14) for "vacant land."

The definition of "suitable" as provided in OAR 660-009-0005 section (12) is a key element in Springfield's inventory and analysis of employment land need, in the city's finding that all employment land needs cannot be met on lands within the UGB, and the City's decision to amend the UGB to add suitable land to meet identified employment land needs.

## OAR 660-024-0020 Adoption or Amendment of a UGB

### OAR 660-024-0020(1)

*"All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:*

Pages 17-18 of these findings address the statewide goals and related administrative rules applicable when establishing or amending a UGB.

(a) *The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take an exception to a particular goal requirement, for example, as provided in OAR 660-004-0010(1);*

(b) *Goals 3 and 4 are not applicable;*

(c) *Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;*

Pages 435-448 of these findings address Goal 5 as it applies only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250.

(d) *The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;*

Pages 481-526 of these findings address Goal 12.

*(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary;*

The proposed UGB includes land within the Willamette River Greenway Boundary. Pages 424-428 of these findings address Goal 15.

*(f) Goals 16 to 18 are not applicable to land added to the UGB unless the land is within a coastal shorelands boundary;*

*(g) Goal 19 is not applicable to a UGB amendment.*

As stated on page 18, Goal 10 is not applicable.

**Conclusion OAR 660-024-0020 (1)** The City addressed all applicable statewide goals and related administrative rules when the City and Lane County amended the UGB.

### **OAR 660-024-0020(2)**

*“The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.”*

**Conclusion OAR 660-024-0020(2):** Ordinance Exhibit A includes plan designation and zoning maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C includes the amended UGB map at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C-2 provides more detailed description of the amended boundary, providing sufficient information to determine the precise UGB location.

### **OAR 660-024-0030(1) Coordinated Population Forecast**

*“Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. Cities must adopt a 20-year population forecast for the urban area consistent with the coordinated county forecast, except that a metropolitan service district must adopt and maintain a 20-year population forecast for the area within its jurisdiction. In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.”*

Springfield’s current UGB (acknowledged in 2011) and amended UGB is based on a coordinated population forecast adopted by Lane County. In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007) Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County co-adopted coordinated population forecasts into the Metro Plan for Springfield’s jurisdictional areas. On June 17<sup>th</sup>, 2009, Lane County adopted a coordinated 20-year population forecast for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. The forecast provided separate forecasts for the metro urban area east of I-5 (Springfield) and west of I-5 (Eugene) through 2035. The City of Springfield adopted the 20-year population forecast for the urban area consistent with the coordinated county forecast. As described and demonstrated in the adopted findings for Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006, the forecast was developed by Portland State University using commonly accepted practices and standards for population forecasting used by professional practitioners in the field of demography or economics, and was based on current, reliable and objective sources and verifiable factual information.

The adopted forecast has been included in the comprehensive plan. Eugene–Springfield Metro Plan text Chapter I, Introduction Purpose Section on page I-1 was amended to incorporate the forecast into the comprehensive plan. [Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006].

The following text was inserted as the third paragraph of Metro Plan Chapter I, Introduction Purpose Section on Page I-1:

*“In order to achieve timely compliance with their statutory obligations under 2007 Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County adopt the following forecasts for their respective jurisdictional areas:*

	2030	2035
<i>Eugene - City Only</i>	<i>194,314</i>	<i>202,565</i>
<i>Urban Transition Area West of I-5</i>	<i>17,469</i>	<i>16,494</i>
<i>Total</i>	<i><u>211,783</u></i>	<i><u>219,059</u></i>
<i>Springfield – City Only</i>	<i>74,814</i>	<i>78,413</i>
<i>Urban Transition Area East of I-5</i>	<i>6,794</i>	<i>6,415</i>
<i>Total</i>	<i><u>81,608</u></i>	<i><u>84,828”</u></i>

The 2030 Plan Urbanization Element, page 31 includes the adopted forecast:

	2030	2031	2032	2033	2034	2035
Springfield – City Only	74,814	75,534	76,254	76,974	77,693	78,413
Metro Urban Area East of I-5	6,794	6,718	6,642	6,567	6,491	6,415
Total	<u>81,608</u>	<u>82,252</u>	<u>82,896</u>	<u>83,541</u>	<u>84,184</u>	<u>84,828</u>

Conclusion OAR 660-024-0030. A coordinated population forecast for year 2030 of 81,608 for the City of Springfield and the Metro area east of I-5 was adopted into the comprehensive plan<sup>115</sup> 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<sup>116</sup>, The 2030 UGB amendment relied on the 2006 employment forecast<sup>117</sup> 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

<sup>115</sup> 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.

<sup>116</sup> ECONorthwest, CIBL/EOA, pages 153-158

<sup>117</sup> The employment forecast in the adopted Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, Appendix C.

UGB for housing needs and commercial/industrial land needs. Springfield began the Residential Land Study (RLS) in 2007 and the Commercial and Industrial Buildable Lands Study (CIBL) in 2008. Springfield chose to take actions in response to the simultaneous evaluations separately in order to meet the City's obligation under ORS 197.304 to adopt a separate Springfield UGB to meet its housing needs in a timely manner.

Springfield previously reviewed its UGB in consideration of one category of land need – housing. Springfield's acknowledged comprehensive plan (the Metro Plan) was amended to address Springfield's land need for housing and residential purposes for the planning period 2010-2030. Springfield has demonstrated that its acknowledged Urban Growth Boundary, comprehensive plan Residential Land Use and Housing Element policies and implementation actions will provide sufficient buildable lands for residential purposes within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for the 2010-2030 planning period. [Springfield Ordinance 6268 adopted June 20, 2011, and Lane County PA1274, acknowledged July 25, 2011 (DLCD File Number 009-09)] The subject 2030 Plan amendments were closely coordinated with Springfield's previously acknowledged comprehensive planning actions addressing Goal 10 and do not alter Springfield's existing acknowledged comprehensive plan designations, policies or land use regulations addressing housing needs for 2010-2030.<sup>118</sup>

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<sup>119</sup> land in the Springfield UGB

<sup>118</sup> 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.

<sup>119</sup> Goal 14: ***“Urbanizable Land.*** *Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive*

designated for urban development needs — based on a demonstrated need for employment opportunities, livability, public facilities, parks and open space for the planning period 2010-2030.

## OAR 660-024-0040(2) Establishment of 2010-2030 Planning Period

*“If the UGB analysis or amendment is conducted as part of a periodic review work program, the 20-year planning period must commence on the date initially scheduled for completion of the appropriate work task. If the UGB analysis or amendment is conducted as a post-acknowledgement plan amendment under ORS 197.610 to 197.625, the 20-year planning period must commence either:*

*(a) On the date initially scheduled for final adoption of the amendment specified by the local government in the initial notice of the amendment required by OAR 660-018-0020;”*

The 2010-2030 planning period was established to commence on the 2010 date initially scheduled for final adoption of the amendment as stated in the City’s submittal [“Overview,” document, page 2, submitted to DLCDC December 31, 2009].<sup>120</sup> 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)]*

<sup>120</sup> 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]

<sup>1</sup> “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).<sup>121</sup> Springfield's population is forecast to reach 81,608 by 2030.<sup>122</sup>

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:**

<sup>121</sup> CIBL/EOA Appendix C, p. 153-156.

<sup>122</sup> 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.<sup>123</sup> 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.<sup>124</sup>

**Conclusions: OAR 660-024-0040(7).** The City provided substantial evidence to explain how the 2030 Plan amendments coordinate land use, transportation and public facilities planning to address applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.

The City’s findings under Goals 8 and 11 provide reasonable justification for the **City and Lane County’s policy choice to include approximately 455 acres of existing public parks, open space and water system public facilities in the amended Springfield UGB and Metro Plan boundary**, based on previously

<sup>123</sup> *Willamalane Parks and Recreation Comprehensive Plan and Eugene-Springfield Metropolitan Area Public facilities and Services Plan*

<sup>124</sup> *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.<sup>125</sup> 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
<b>Change 2010 to 2030</b>	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

<sup>125</sup> *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<sup>126</sup> 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."*<sup>127</sup> 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

<sup>126</sup> 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)]

<sup>127</sup> Zimmerman v. LCDC and City of Scappoose, LCDC 13UGB0001829; A153856, p. 524-525 (2014)

best available information at the time of CIBL/EOA preparation (2008-2009) — the pre-hearing formulation of the economic opportunities analysis developed in conjunction with the community visioning process and citizen involvement activities as fully documented in the local record. The employment land assumptions made and conclusions reached in the CIBL/EOA and the city’s policy choices in response to that land inventory and analysis were reasonable and are supported by substantial evidence in the whole record.

### **OAR 660-024-0050(1) Land Inventory and Response to Deficiency**

*“When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040...For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015.”*

**Conclusion OAR 660-024-0050(1):** The City’s findings under Goal 9, OAR 660-009-0015(3) Inventory of Industrial and Other Employment Lands (pages 53-59 of this report); OAR 660-009-0025(1) Identification of Needed Sites (pages 96-101) and under Goal 14 (pages 117-125 of this report) explain how Springfield inventoried land inside the UGB — including potentially redevelopable sites — in accordance with OAR 660-009-0015 to determine that there is not adequate development capacity to accommodate 20-year employment land needs determined in OAR 660-024-0040.

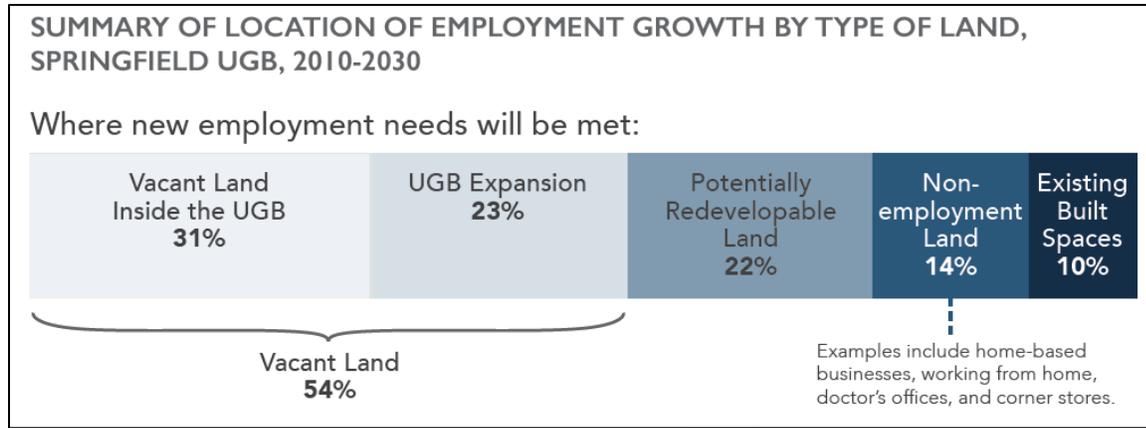
### **OAR 660-024-0050(3) Inventory of vacant land**

*“As safe harbors when inventorying land to accommodate industrial and other employment needs, a local government may assume that a lot or parcel is vacant if it is:*

- (a) Equal to or larger than one-half acre, if the lot or parcel does not contain a permanent building; or*
- (b) Equal to or larger than five acres, if less than one-half acre of the lot or parcel is occupied by a permanent building.”*

The City did not choose to use the safe harbor. The City’s findings under Goal 9, OAR 660-009-0005, (pp. 30-31), and OAR 660-009-0015(3)(a)(B) (p. 57) explain how the CIBL/EOA defined vacant land. “Vacant” is defined in Chapter 2 of the CIBL/EOA as follows:

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



Based on the inventory, the City's CIBL/EOA and 2030 Plan assumes that 31% of forecast employment will be met on vacant land within the existing UGB. CIBL/EOA Maps 2-3, 2-4 and 2-5 p. 24-26 show where these lands are located and where sites with absolute development constraints were deducted from the inventory.

**Conclusion OAR 660-024-0050(3):** The Springfield CIBL/EOA used a definition of "vacant" that is more inclusive than what OAR 600-009-0005(14) requires, with the result that Springfield's inventory includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used. 31% of forecast employment will be met on vacant land within the existing UGB.

**OAR 660-024-0050(4) amending the comprehensive plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both**

*"If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060."*

As explained on pages 53-58 and in pp. 33-62 of this report, the CIBL/EOA inventory is consistent with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report. The City's findings under Goal 9<sup>128</sup> 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.<sup>129</sup>

*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.<sup>130</sup>

The Glenwood and Downtown redevelopment areas that are expected to have the most redevelopment are currently designated and zoned to require Mixed-use Nodal Development. The Glenwood Riverfront and Franklin/McVay corridor has been designated as a Mixed-use Multi-modal Area (MMA) pursuant to the Goal 12 administrative rule. Employment in these areas is currently served or is planned to be served by the region's Frequent Transit Network. The City's allocation of employment growth to land designated and zoned to require Mixed-use Nodal Development contributes to the region's commitments to implement Transportation Planning Rule Alternative Performance Measures to reduce reliance on automobiles and Vehicle Miles Travelled (VMT).

The CIBL/EOA pages 33-38 provides a site-by-site evaluation of "Potentially Redevelopable" sites within the existing UGB that are larger than 5 acre<sup>131</sup>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).

<sup>128</sup> 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.

<sup>129</sup> CIBL/EOA, p. 95-96

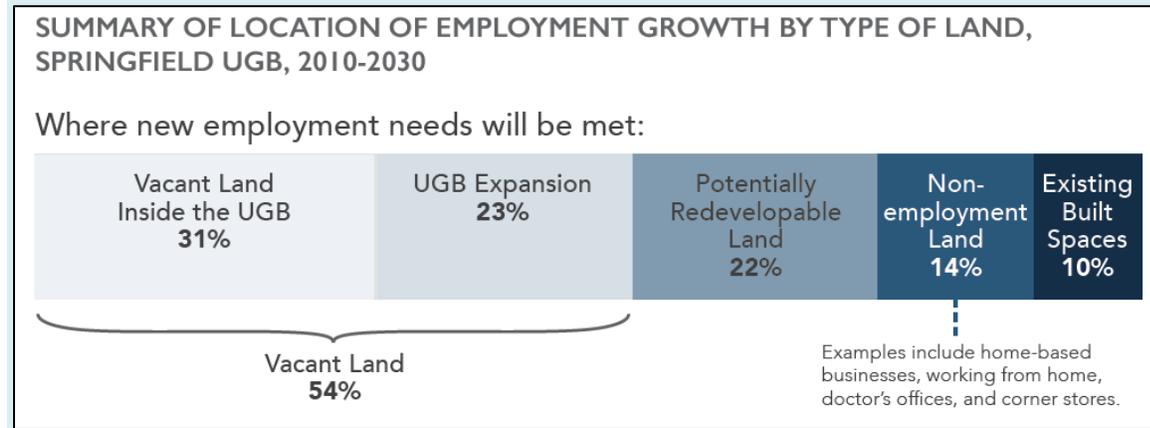
<sup>130</sup> Ibid

<sup>131</sup> Explained on page 68 -69 of this report

Conclusions OAR 660-024-0050(4): The City conducted a thorough commercial and industrial lands inventory in accordance with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report.

The City's findings explain how development capacity inside the UGB was determined, and how the CIBL/EOA assumed that 77% of forecast employment would be accommodated within the existing UGB.



The City and Lane County adopted the inventory into the comprehensive plan (Ordinance Exhibit B-2, CIBL/EOA).

The City and Lane County adopted 2030 Plan Economic Element and Urbanization Element comprehensive plan policies — as described in pages 66-77 of this report — effectively providing land use controls to manage the land supply efficiently in support of these assumptions.

Prior to expanding the UGB, the City demonstrated that the need for larger employment sites cannot reasonably be accommodated on land already inside the UGB.

23% of forecast employment requires expansion of the UGB to provide suitable sites.

The CIBL/EOA demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year land needs for larger industrial and commercial mixed use sites to provide sites for the City's target industry employers that require sites larger than 5 acres, including three sites larger than 20 acres.

Springfield determined there is a need to expand the UGB.

The 2030 Plan amendment expands the UGB to provide 257 acres of land designated for large site employment use to meet the deficit of 223 suitable acres.

Changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.

## OAR 660-024-0050(5) Difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB

*(5) "In evaluating an amendment of a UGB submitted under ORS 197.626, the director or the Commission may determine that a difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment is unlikely to significantly affect land supply or resource land protection, and as a result, may determine that the proposed amendment complies with section (4) of this rule."*

34-acre difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment. The employment land UGB amendment UGB includes a total of 273 gross acres, including right of way and portions of parcels with development constraints. 2030 Urbanization Element, page 11, Table 2 provides the following summary:

Name of Area	Acres Designated UHA-E	Acres Zoned AG	# of Suitable employment acres (UHA-E)	Location
<b>North Gateway UHA -E</b>	139.4 gross acres (includes right of way)	193	132.1 suitable acres	North of Gateway/International Way, east of I-5
<b>Mill Race District UHA-E</b>	133 gross acres (includes right of way)	135	125 suitable acres	South of Main Street, via South 28 <sup>th</sup> 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<sup>132</sup>, 10 of the 14 smaller parcels are located along existing South 28<sup>th</sup>, South M, and South 26<sup>th</sup> streets and right of way that currently provide access to the area and that would likely provide future access and services to the suitable large parcels owned by Johnson and Springfield Utility Board. Thus, including the smaller parcels in the UGB would support efficient and adequate provision of services to the 57-acre and 21-acre sites as the area is planned and developed for urban employment uses.

As shown in the map on the following page, leaving any of the smaller parcels (indicated with a white star) outside of the UGB would result in inefficient “island” of County-administered land use planning; would leave a potentially awkward and confusing “donut hole in the donut” of the Metro Plan Boundary and a somewhat odd configuration of the Lane Rural Comprehensive Plan boundary. In earlier work sessions, County Commissioners and City Councilors requested staff to seek UGB solutions that do not leave County-administered lands between the river the expanded UGB and Metro Plan boundary where possible. The full Mill Race map is included at Ordinance Exhibit A.

As shown in the map on the following page, the Mill Race UGB expansion area includes four waterways. These features are identified and discussed in the City’s findings under Goal 5. “Riparian resources areas” are identified in the City’s CIBL/EOA as an absolute development constraint. Riparian area buffers, as required in the Springfield Development Code, were deducted from the calculation of “unconstrained acres.” If the City is required to increase buffer requirements in response to pending future federal or state legislation, the “extra” acres included in the Mill Race UGB expansion may be needed to accommodate a portion of the 223-acre overall employment land need should the City’s calculation of “unconstrained” acres in the Mill Race area be adversely affected. Thus, the Director and Commission’s approval of the UGB as proposed will enable balancing of employment needs with resource protection needs consistent with Goal 14, as allowed under OAR 660-024-0050(5) and consistent with the City’s 2030 Urbanization Element Goal UG-3:

***“Provide an adequate level of urban services, including but not limited to public water, wastewater, and stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.”***

and 2030 Urbanization Element Goal UG-4:

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<sup>132</sup> Ordinance Exhibit A Map: “Proposed UGB Expansion Area – Mill Race”



**Conclusion OAR 660-024-0050(5).** The City explained its rationale for including 34 “extra” acres of suitable land in excess of the 223-acre 20-year land it added to the UGB and requests approval of its choice.

### **OAR 660-024-0050(6)**

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

Ordinance Exhibit A-2 Maps illustrate the appropriate urban plan designations Springfield and Lane County assigned to lands added to the UGB:

- Proposed Plan Designations – North Gateway shows lands designated Urban holding Area- Employment, Natural Resource and Public/Semi-Public.
- Proposed Plan Designations – Mill Race shows lands designated Urban holding Area- Employment and Public/Semi-Public.
- Proposed Plan Designations – Willamalane Properties shows lands designated Public/Semi-Public.

Ordinance Exhibit A-3 Maps illustrate the appropriate zoning Springfield and Lane County assigned to lands added to the UGB: the interim Agriculture-Urban Holding Area (AG) zoning that maintains the land's potential for planned urban development, and the Public Land and Open Space (PLO) zone.

- Proposed zoning - North Gateway shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Mill Race shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Willamalane Properties shows lands zoned Public Land and Open Space (PLO).

OAR 660-024-0050(6) is addressed in the City’s findings on pages 106-118 of this report.

**Conclusion OAR 660-024-0050(6).** The City and Lane County assigned appropriate urban plan designations to the added land, to meet specific land needs and siting characteristics identified in the employment land need determination and to designate and zone land accommodating existing public facilities, parks and open space with appropriate Metro Plan/Springfield 2030

Plan designations and Springfield zoning. The AG zone is an interim zoning that maintains the land's potential for planned urban development, maintaining the suitable employment as urbanizable land until the land is rezoned for the planned urban uses as described in the policies of the 2030 Plan Urbanization Element and AG Zoning District standards.

Conclusion OAR 660-024-0050. As explained in the City's findings and the CIBL/EOA, the City conducted inventories of 20-year land needs in accordance with the applicable statutes and rules and responded to the identified deficiencies as required under Goals 9 and 14.

## 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 <sup>1</sup> provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030.

OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.”

As explained in the City’s findings under Goal 9, the CIBL/EOA <sup>2</sup> 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:

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<sup>1</sup> CIBL/EOA Table S-5, page ix.

<sup>2</sup> Ibid.

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

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

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<sup>3</sup>.

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.

<sup>3</sup> 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<sup>4</sup> 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<sup>5</sup> 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.<sup>6</sup> 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"<sup>7</sup> 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:

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<sup>4</sup> ECONorthwest, CIBL/EOA, Chapter 4 and 5, Table 5-5, Appendix C

<sup>5</sup> Ibid, pp. 82-95.

<sup>6</sup> CIBL/EOA Chapter 5 and Appendix C.

<sup>7</sup> CIBL/EOA. P. 167-169

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p><b>Target Industries:</b>                      Medical Equipment                      High-tech Electronics and Manufacturing                      Recreational Equipment                      Furniture Manufacturing                      Specialty Food Processing</p> <p><b>Building Type:</b> General Industrial</p> <p><b>Site Needs for:</b> Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 9-12 acre sites for 100,000 square foot buildings to 45-60 acre sites for 500,000 square foot buildings.</p> <p>The average size of existing sites with employment in Springfield is: 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p><b>Target Industries:</b>                      High Tech Services                      Corporate Headquarters                      Biotech                      Professional and Technical Services                      Back office                      Medical Services</p> <p><b>Building Type:</b> Commercial and Other</p> <p><b>Site Needs for:</b> Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 4-6 acre sites for 50,000 square foot buildings to 16-24 acre sites for 200,000 square foot buildings.</p> <p>If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres.</p> <p>The average size of existing sites with employment in Springfield is:</p> <ul style="list-style-type: none"> <li>• 5-20 acre site: 9.3 acres</li> <li>• 20+ acre site: 60 acres</li> </ul>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p> <p>Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

The following section of this report provides evidence to demonstrate how the City conducted the Boundary Location Alternatives Analysis to include land adjacent to the UGB and land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

## **BOUNDARY ALTERNATIVES ANALYSIS STEP TWO: DETERMINE PRIORITY OF LAND AS SPECIFIED IN ORS 198.298 TO DETERMINE PRIORITY OF LAND TO BE INCLUDED IN UGB AMENDMENT**

To determine which lands to add to the UGB to meet the specified land needs, the City evaluated alternative boundary locations in accordance with the priority of land specified in ORS 197.298 and the requirements of the urbanization rule.

### **ORS 197.298 Priority of land to be included within urban growth boundary**

*“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:*

*(a) First priority is land that is designated urban reserve land under ORS [195.145 \(Urban reserves\)](#), rule or metropolitan service district action plan. (emphasis added)*

*(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\)](#).*

*(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS [197.247 \(1991 Edition\)](#).*

*(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.*

*(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.*

*(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to*

accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands. [1995 c.547 §5; 1999 c.59 §56]"

### **OAR 660-024-0060(1)(a)**

*"Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050. "*

### **OAR 660-024-0060(1)(e)**

*"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable." (emphasis added)*

### **OAR 660-024-0060(4)**

*"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."*

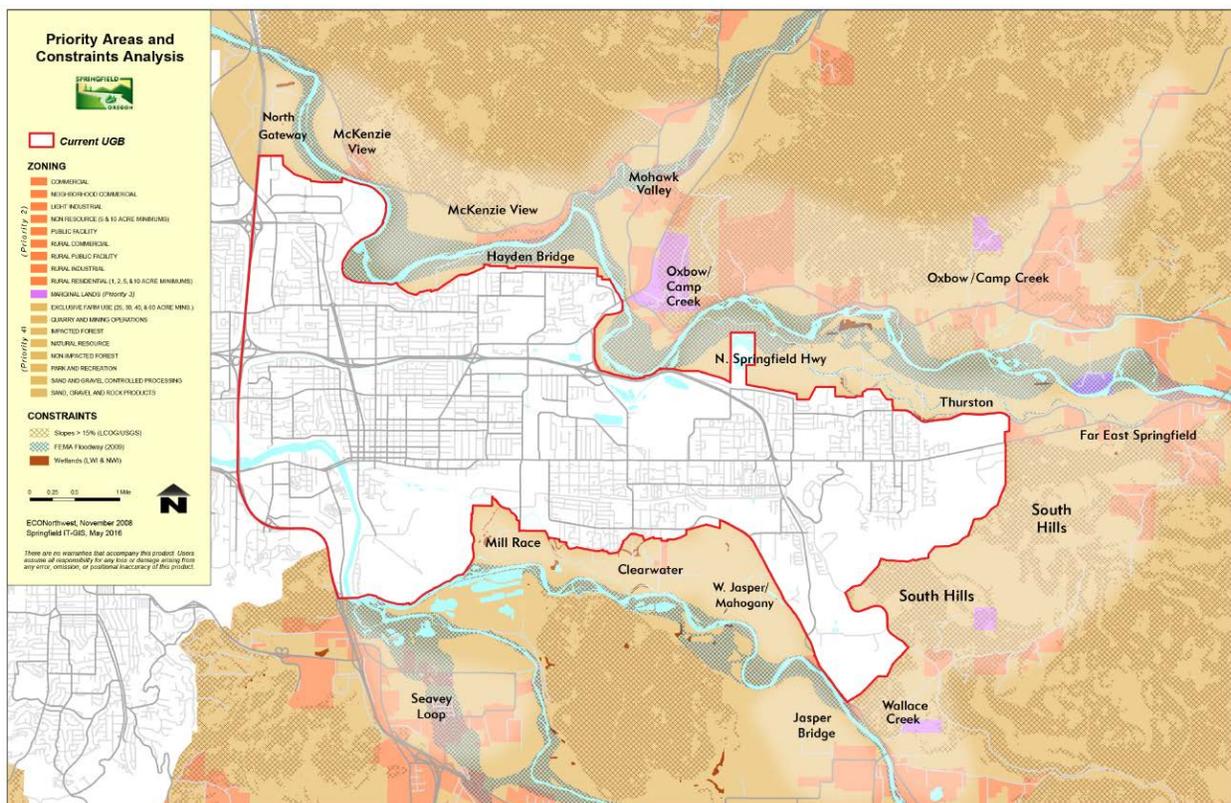
### **OAR 660-024-0060(6)**

*"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group." (emphasis added)*

The following section of this report explains how the City's UGB alternatives analysis addressed ORS 197.298 and OAR 660-024-0060(4) to identify the preliminary UGB study area and to determine which land in the vicinity of the UGB within each priority is/is not suitable and thus has a reasonable potential to satisfy the employment land need deficiency determined under OAR 660-024-0050.

**Methodology Used to identify candidate lands: UGB Study Area.** To determine the priority of land to be included in the UGB to meet Springfield's 2010-2030 land needs, the City established a study area that identified potential candidate lands under the four priorities of ORS 197.298. The City and consultant ECONorthwest conducted initial GIS scans of all land adjacent to and in the vicinity of the existing Springfield portion of the Metropolitan UGB (east of Interstate 5). The Eugene-Springfield Metro Plan identifies Interstate Highway 5 as the boundary between Springfield's and Eugene's jurisdictional areas. The acknowledged Springfield UGB follows the centerline of Interstate Highway 5. The City of Eugene is presently conducting an UGB alternatives analysis for lands located east of Interstate Highway 5.

As shown in Map 1, Priority Areas and Constraints Analysis, the lands surrounding the UGB were divided into 15 general groupings and named for study and communication purposes. The study area included all lands surrounding the UGB east of Interstate Highway 5, lands located along the McKenzie River and its tributaries north of Springfield's UGB, lands in the southeast hills, and lands along the Middle Fork and Coast Fork of the Willamette River. The North Gateway and Seavey Loop study areas are located along Interstate Highway 5 north and south of Springfield respectively.



**Map 1: Priority Areas and Constraints Analysis**



# Priority Areas and Constraints Analysis



**Current UGB**

## ZONING

- COMMERCIAL
- NEIGHBORHOOD COMMERCIAL
- LIGHT INDUSTRIAL
- NON RESOURCE (5 & 10 ACRE MINIMUMS)
- PUBLIC FACILITY
- RURAL COMMERCIAL
- RURAL PUBLIC FACILITY
- RURAL INDUSTRIAL
- RURAL RESIDENTIAL (1, 2, 5, & 10 ACRE MINIMUMS)
- MARGINAL LANDS (Priority 3)
- EXCLUSIVE FARM USE (25, 30, 40, & 60 ACRE MINS.)
- QUARRY AND MINING OPERATIONS
- IMPACTED FOREST
- NATURAL RESOURCE
- NON-IMPACTED FOREST
- PARK AND RECREATION
- SAND AND GRAVEL CONTROLLED PROCESSING
- SAND, GRAVEL AND ROCK PRODUCTS

(Priority 2)

(Priority 4)

## CONSTRAINTS

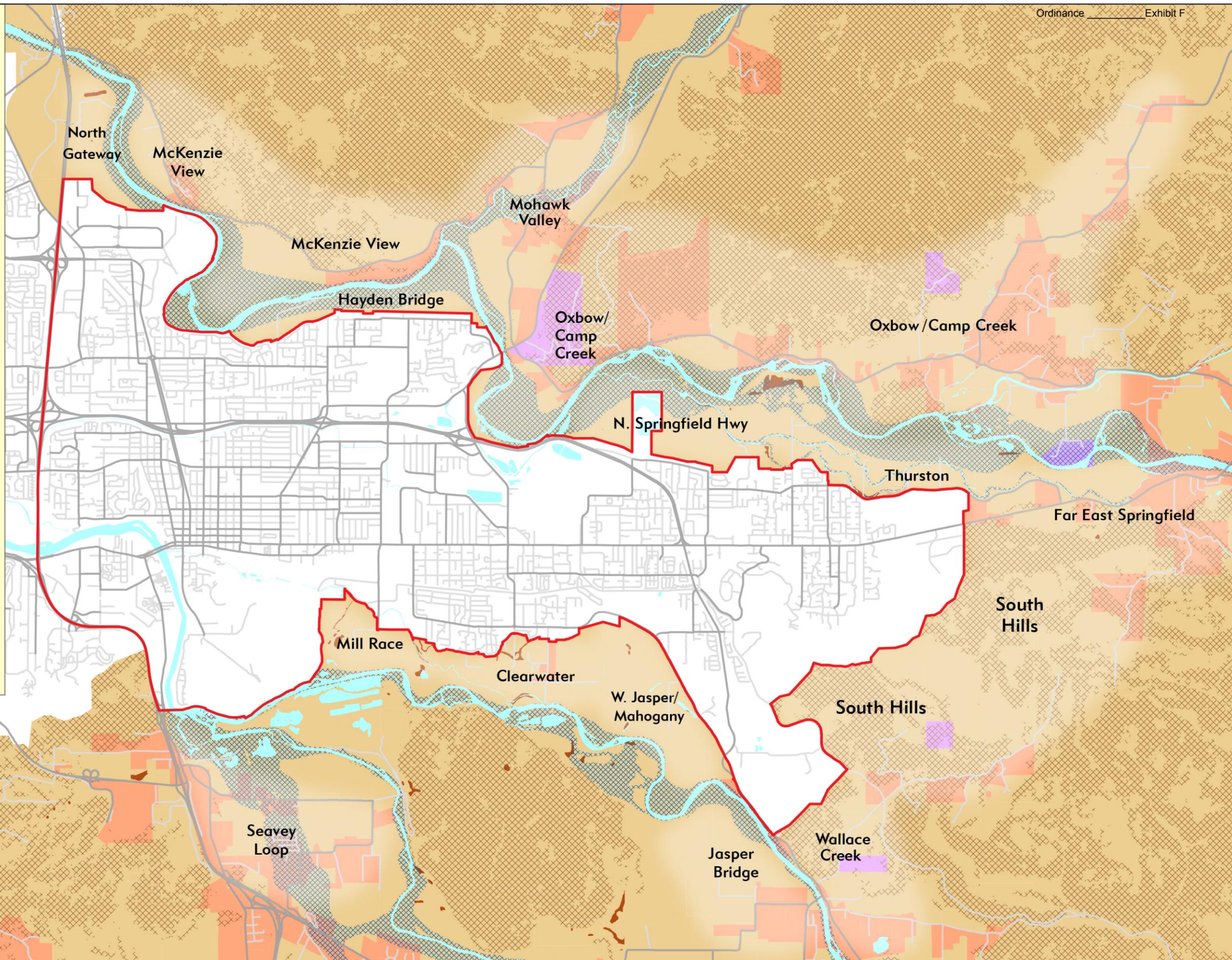
- Slopes > 15% (LCOG/USGS)
- FEMA Floodway (2009)
- Wetlands (LWI & NWI)

0 0.25 0.5 1 Mile



ECONorthwest, November 2008  
Springfield IT-GIS, May 2016

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



### UGB Study Area Groupings

North Gateway	McKenzie View	Hayden Bridge
Oxbow/Camp Creek	Mohawk	North Springfield Highway
Far East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

**Conclusion: UGB Study Area:** The City’s UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands “adjacent to the UGB”, and it includes “land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.” As explained in detail below, the land within the study area was analyzed in accordance with the state statutes and administrative rules that dictate the way in which a city must select lands for a UGB expansion.

### OAR 660-024-0060 Boundary Alternatives Analysis:

*“(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:*

*(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.*

*(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.”*

## IDENTIFY FIRST PRIORITY: URBAN RESERVE.

### ORS 197.298 (1)(a) Priority of land to be included within urban growth boundary

*“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:*

*(a) First priority is land that is designated urban reserve land under ORS 195.145 (Urban reserves), rule or metropolitan service district action plan.”*

The Eugene-Springfield Metro area has no designated urban reserves under ORS 195.145, therefore Springfield’s priority lands analysis begins with second priority land identified in an acknowledged

comprehensive plan as an exception area or nonresource land, and continues through third priority land designated as marginal, to fourth priority land designated as resource land, and finally to resource land in the order of land capability classifications VIII through I.

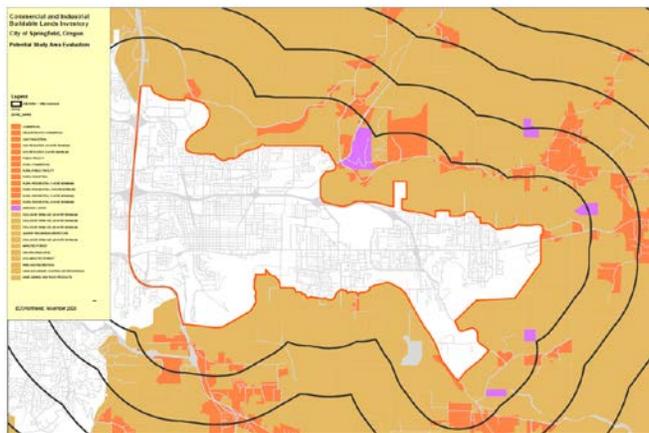
**Conclusion ORS 197.298 (1)(a) First Priority Land:** There are no Urban Reserves in the vicinity of Springfield or the Eugene-Springfield Metro area. No first priority land is available to accommodate the need deficiency determined under OAR 660-024-0050, thus the City looked to second priority land.

## IDENTIFY SECOND PRIORITY: EXCEPTION AREA OR NON-RESOURCE LAND

### ORS 197.298 (1)(b):

*“If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\)](#).”*

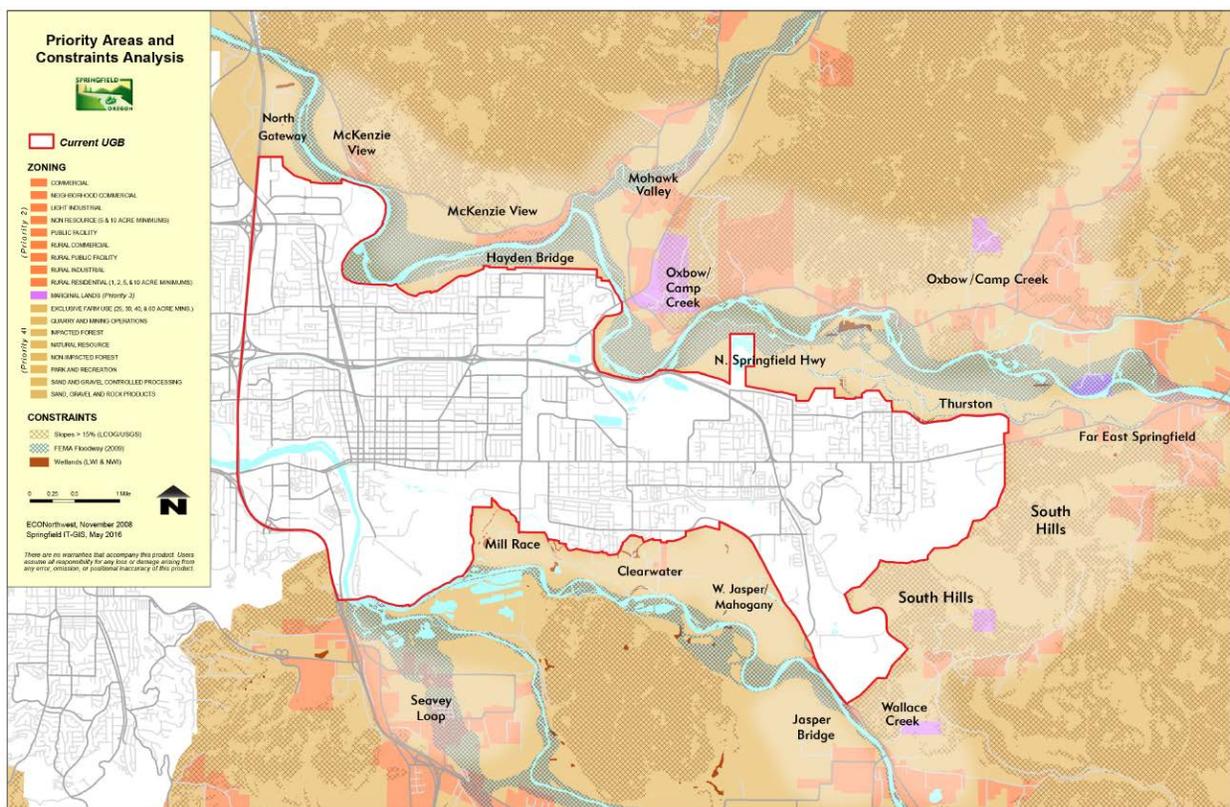
The UGB study area includes land adjacent to the UGB that is identified in the Lane Rural Comprehensive Plan as an exception area or nonresource land. These parcels are identified by orange color in Map 1 Priority Areas and Constraints Analysis.



#### Relative Location of Exception and Marginal Lands to the UGB

This diagram provides a graphic device to show a general distance relationship. The black rings indicate one-mile increments radiating out from the UGB. Direct access between some of the Exception Lands and Marginal Lands and the UGB is not possible because topography and rivers impede access. Proximity to the UGB, public facilities and transportation systems is a factor in subsequent steps of this analysis.

As shown in the map above, Springfield is unlike many Oregon cities in that there are few exceptions areas adjacent to or in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 (e.g. parcels on Clearwater Lane and parcels immediately east of the UGB) and thus not suitable for meeting Springfield’s large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to the natural barriers formed by the McKenzie and Middle Fork Willamette rivers, very steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints that preclude building and site development. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes greater than 15%.



**Table 1 Study Areas Containing Second Priority Exception Lands:**

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Study areas with exception zoning are indicated by orange color

Nine groupings of exception parcels exist in the vicinity of the UGB east of I-5. The City included and evaluated all nine groupings of exception parcels in the UGB Study Area.

The City's UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands "adjacent to the UGB", and it includes "land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

The City's UGB Study Area analysis properly began by identifying the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it established a UGB Study Area to identify candidate lands that may have a reasonable potential to satisfy the identified employment land need deficiency. [OAR 660-024-0060(4)]

## OAR 660-024 0060(4)

*(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:*

*(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.*

To perform the next step in the analysis, the City conducted a parcel-by-parcel analysis of the highest priority of land – second priority exception land — adjacent to and in the vicinity of the UGB. The City compiled data in Table 2 to describe each exception land parcel or grouping of parcels. This step identified all candidate second priority exception areas and parcels that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each exception area in Table 2 includes maps and information to identify existing zoning, parcel sizes, map and tax lots numbers, existing land uses on developed parcels and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) on parcels to provide data to inform its determination of which second priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

The City used industry standard GIS tools and mapping methods to quantify parcel and constraints data for evaluation. For the purposes of the preliminary screening of second priority land in Table 2, the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL/EOA) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable

- Wetlands – areas identified in the national wetlands inventory or Springfield’s local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

In addition, the City’s Boundary Alternatives Analysis reviewed and considered:

- Lane County Plan Designation, Zoning and Goal 5 Natural resources map data
- Hydric Soils maps - to identify areas where potential wetlands may occur in the study area
- Springfield Water Quality Limited Waterways Map
- NRCS Soils data
- BPA facilities data
- RLID Regional Land Information Database – to determine ownership and % of soil map units within a parcel.
- Interviews with public agency staff and service providers to determine and compare the constraints, public service needs, ESEE consequences and economic advantages/disadvantages of study areas within each priority of land (ODOT, Union Pacific Railroad, ODFW, LTD, Willamalane Parks and Recreation District, SUB, EPUD, Lane County staff, OSU Extension Service, Oregon Department of Agriculture, LRAPA, EWEB, Springfield Police, Eugene-Springfield Fire and Life Safety, Rainbow Water District, Goshen Fire District, Willamette Water Company, Business Oregon, Oregon Department of State Lands, DLCD, and Oregon Business Development Dept.
- Information provided by with stakeholders, neighborhoods groups, landowners, McKenzie Watershed Council, Friends of Buford Park, and individual citizens throughout the multi-year planning process.

## OAR 660-009-0005(2)

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

## OAR 660-009-0005(11)

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

The development constraints applied in the City's analysis Table 2 are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

In Table 2, the City applied the "absolute development constraints" to parcels 5 acres or larger to calculate the acreage of unconstrained land within a parcel.

In Table 2, the City identified parcels with 5 or more acres of unconstrained land [OAR 660-009-0050(1)]. The City did not make deductions for existing development on parcels in this "first look" description step.

City appropriately applied constraints and site attributes consistent with OAR 660-009-0005(2) and OAR 660-009-0005(11) to the second priority land within the study area when it evaluated candidate parcels to include for employment purposes and when it identified parcels to exclude from further consideration.

The City's evaluation of constraints and site attributes on second priority land within the study area to inform its determination of which land in that priority is suitable to accommodate the employment land need deficiency is appropriate and consistent with OAR 660-024-0060(1)(a).

The City's analysis properly began with the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it applied its employment land suitability criteria (parcel size greater than 5 acres and land without absolute development constraints) to conduct the screen second priority lands in the preliminary study area.

The City's analysis of UGB alternatives applied parcel size and absolute development constraints uniformly to all second priority exception land in vicinity of the UGB that has a reasonable potential to satisfy the identified employment land need deficiency. (OAR 660-024-0060(4)).

This following section of the report "General Description of Second Priority Exception and Non-Resource Lands" provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5),

OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

## General Description of Second Priority Exception and Non-Resource Lands

Table 2 provides the general descriptive summary of the second priority exception and non-resource lands in the vicinity of the UGB. Table 2 identifies parcels or portions of parcels containing 5 acres or more without slope, wetland, floodway, riparian resource or highly irregular parcel shape configuration constraints that *may* potentially be suitable to accommodate the employment land need. These parcels are indicated by their underlined map and tax lot number in Table 2. OAR 660-009-0005(14) states: *"Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."*

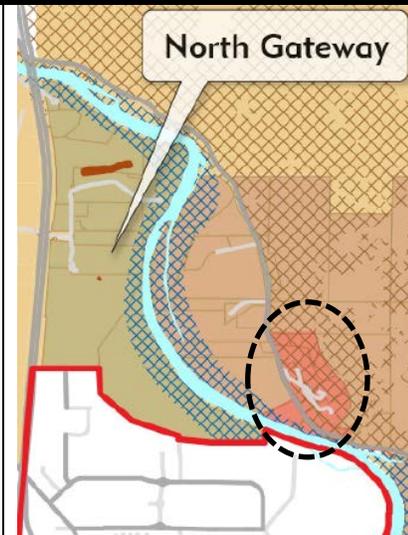
It should be noted that no deductions for existing rural development on parcels were made in Table 2. The few vacant parcels that exist are noted.

The red line in the maps below is the UGB.

**Table 2: Second Priority Exception and Non-Resource Parcels and Constraints**

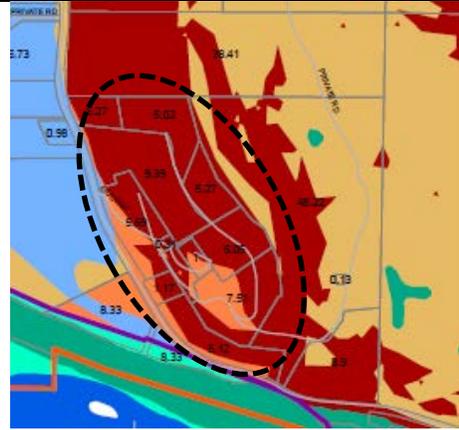
**McKenzie View A<sup>8</sup>**

- 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:



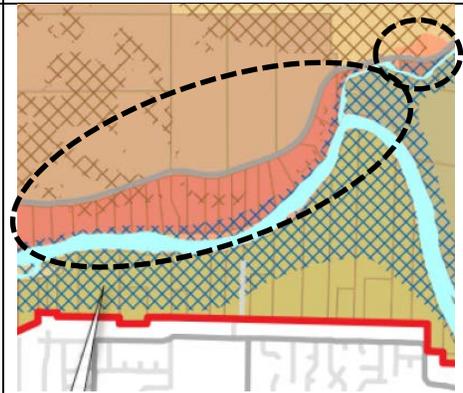
<sup>8</sup> See maps in record "Employment Opportunity Area 1 North Gateway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-03-14-00 with exceptions parcels highlighted.

Slope percentages determined from NRCS data in the Lane County Regional Land Information Database



**McKenzie View B**

- Across the McKenzie River from Springfield
- RR-5 zoning
- Parcelized McKenzie View Estates, developed rural residential uses, 5-acre parcels are constrained by floodway and riparian resources
- Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage
- DOGAMI SLIDO mapped landslide areas Coburg Hills
- Separated from UGB by the river, EFU farmland between the river and the UGB, and the floodway
- (2) parcels with 5 or more unconstrained acres:  
17-02-19-00 3000 (6.7ac.)  
17-02-19-00 3100 (5 ac.)

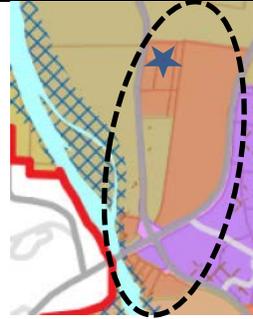


TL 3000, 6.7 ac

TL 3100 5 ac

**Mohawk A**<sup>9</sup>

- 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:
  - 17-02-20-00 202: 5.3 acres, developed with rural residential use.



Star indicates 5-acre parcel

**Mohawk B**<sup>10</sup>

- Across the McKenzie River from Springfield
- Located .75 mile to more than 2 miles from UGB, not adjacent to UGB
- Largest exception parcel 17-02-17-00 1313 (18.3 acres) 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.
  - 17-02-17-00 1500 (5.7 ac., vacant)
  - 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.



<sup>9</sup> 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.

<sup>10</sup> 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.<sup>11</sup>
  - 17-02-17-00 1600 (5.4 ac.)
  - 17-02-17-00 1309 (7 ac.)
  - 17-02-17-00 1316 (5 ac.) – irregular shape
  - 17-02-17-00 1318 (5 ac.) – irregular shape
  - 17-02-17-00 0905 (5 ac. has floodway, and riparian resource constraints)
  - 17-02-17-00 0201 (9.2 ac. has floodway, and riparian resource constraints)
- Smaller parcels east of Marcola Road are constrained by slopes >15% and >25%, contain wetlands, hydric soils.
- Smaller parcels west of Jasper Mt. Center 2.5 to 5 acres contain slopes >15% and >25%
- DOGAMI SLIDO mapped landslide areas
- BPA easement crosses this area
- Separated from UGB by land zoned for Exclusive Farm Use (EFU) including Class I soils.
- Mohawk River flooding
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present.



17-02-17-00 1313  
Jasper Mountain Safe Center



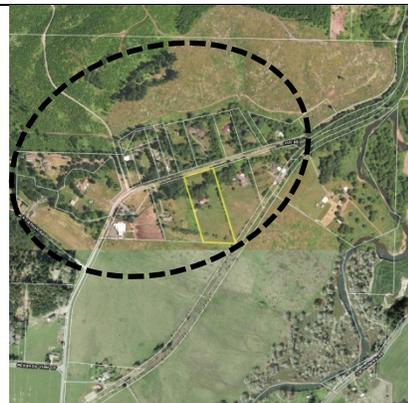
17-02-17-00 1502 1503    17-02-17-00 1501    17-02-01-00 1600



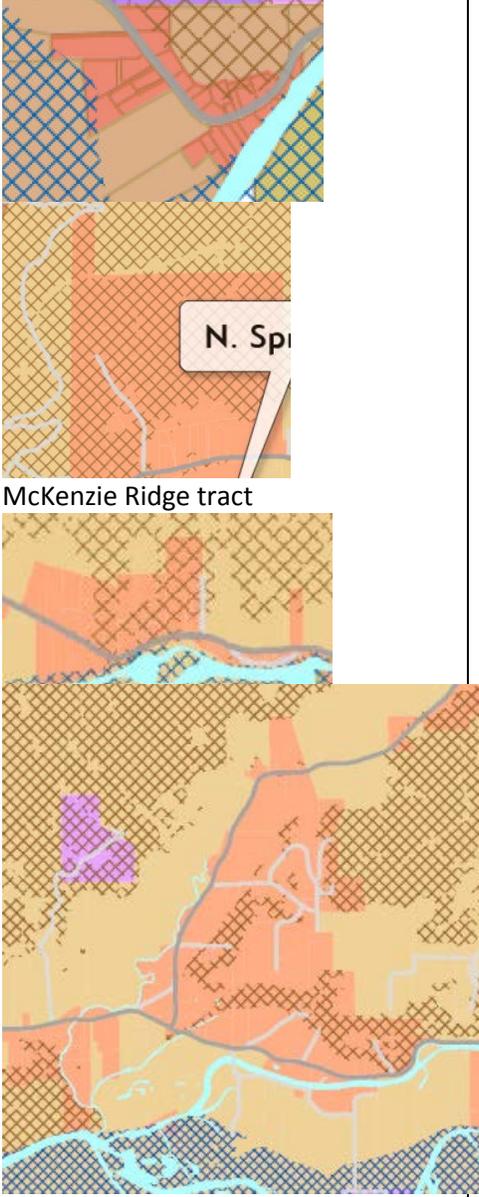
17-02-17-00 1309

**Mohawk C.**

- Across the McKenzie River from Springfield
- Remote and isolated, more than 2 miles from UGB, not adjacent to UGB
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present
- DOGAMI SLIDO mapped landslide areas
- RR5 zoning, parcels 1.1-8.7 ac
- (6) parcels are 5 acres in size, largest is 8.7 acres, all are developed with rural residential uses:
  - 17-02-08-00 0515 (8.7 ac.)
  - 17-02-08-00 0516 (6.7 ac.)



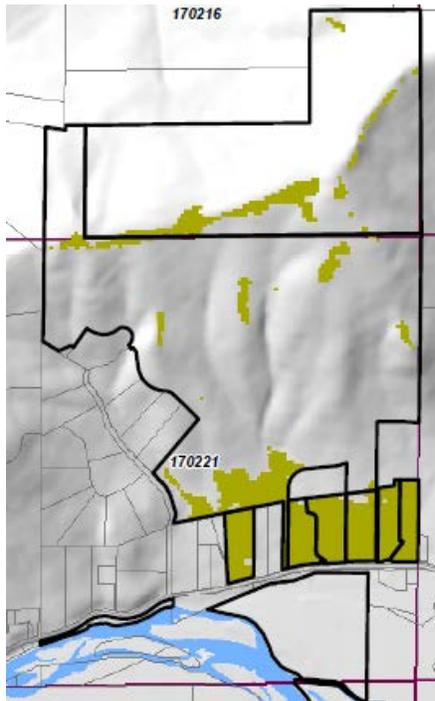
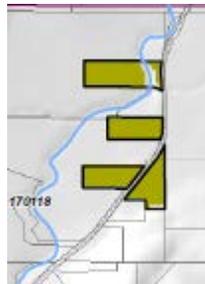
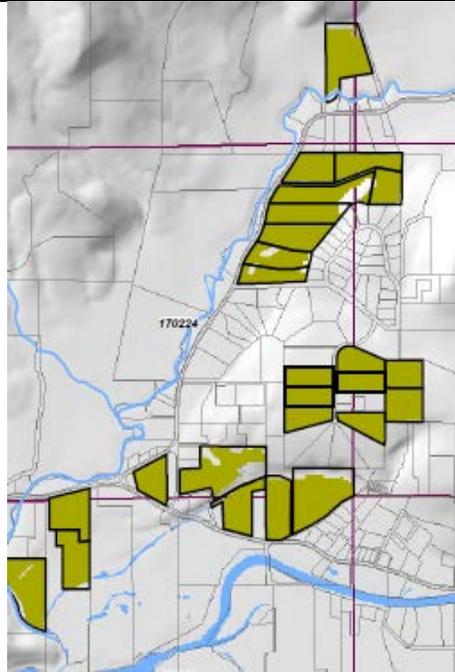
<sup>11</sup> See copy of A & T map 17-02-17-00 in the record with exceptions parcels highlighted.

<ul style="list-style-type: none"> <li>○ <u>17-02-08-00 0517 (6 ac.)</u></li> <li>○ <u>17-02-08-00 0600 (5.8 ac.)</u></li> <li>○ <u>17-02-08-00 0700 (5.7 ac.)</u></li> <li>○ <u>17-02-08-00 0701 (5.5 ac.)</u></li> </ul>	
<p><b>Oxbow/Camp Creek<sup>12</sup></b></p> <ul style="list-style-type: none"> <li>• Across the McKenzie River from Springfield</li> <li>• Majority of area is not adjacent to UGB</li> <li>• 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</li> <li>• Unconstrained parcels 5 acres or larger are distant from Springfield, 2-6 miles from UGB at Hayden Bridge</li> <li>• Slopes &gt; 25% constrain much of this area</li> <li>• DOGAMI SLIDO mapped landslide areas</li> <li>• Floodway and riparian resource constraints along river frontage.</li> <li>• Two BPA easements cross this area</li> <li>• Parcels containing 5 or more unconstrained acres (<u>underlined</u>) are zoned for and developed with rural residential uses except where noted: <ul style="list-style-type: none"> <li>○ <u>17-02-29-00 800 (5.6 ac.)</u></li> <li>○ <u>17-02-21-00 107, (6.1 ac.)</u></li> <li>○ <u>17-02-21-00 113, (6 ac.)</u></li> <li>○ <u>17-02-21-00 128, (5.5 ac.)</u></li> <li>○ <u>17-02-21-00 129, (6.6 ac.)</u></li> <li>○ <u>17-02-21-00 801, (5 ac.)</u></li> <li>○ <u>17-02-21-00 802, (5 ac.)</u></li> <li>○ <u>17-02-22-00 500, (5 ac.)</u></li> <li>○ <u>17-02-22-00 600, (5 ac.)</u></li> <li>○ <u>17-02-26-00 704, (5.1 ac.)</u></li> <li>○ <u>17-02-26-00 2100, (6.6 ac., vacant)</u></li> <li>○ <u>17-02-25-00 1101 (8.1 ac.)</u></li> <li>○ <u>17-02-25-00 1103, (7.7 ac.)</u></li> <li>○ <u>17-02-25-00 1205, (10.4 ac.)</u></li> <li>○ <u>17-02-25-00 2600, (6.9 ac.)</u></li> <li>○ <u>17-02-24-00- 100 (7.8 ac.)</u></li> <li>○ <u>17-02-24-00- 134 (5.6 ac.)</u></li> <li>○ <u>17-02-24-00- 136 (8 ac.) RR-10</u></li> <li>○ <u>17-02-24-00 138 (8.1 ac.)</u></li> <li>○ <u>17-02-24-00 141 (4.9 ac.)</u></li> <li>○ <u>17-02-24-00 143 (6.9 ac.)</u></li> <li>○ <u>17-02-24-00 144 (5.0 ac.)</u></li> </ul> </li> </ul>	 <p>McKenzie Ridge tract</p>

<sup>12</sup> 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.

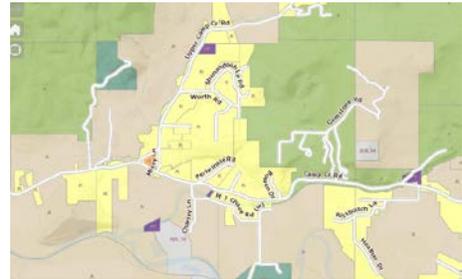
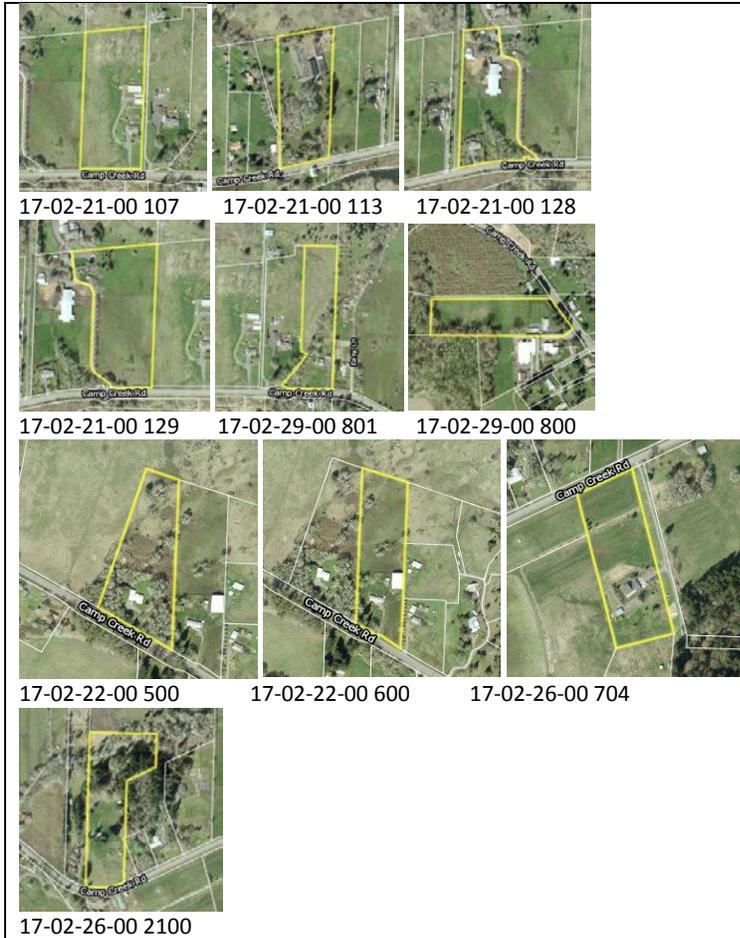
- 17-02-24-00 200 (6.8 ac.)
- 17-02-24-00 303 (5.0 ac.)
- 17-02-24-00 304 (5.0 ac.)
- 17-02-24-00 306 (5.0 ac.)
- 17-02-24-00 311 (5.0 ac.)
- 17-02-24-00312 (5.0 ac.)
- 17-02-24-00 313 (5.0 ac.)
- 17-02-24-00 1209 (11.6 ac.)
- 17-02-24-00 1400 (12.0 ac.)
- 17-02-24-00 1402 (7.7 ac.)
- 17-02-24-00 1501 (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.<sup>13</sup>



17-02-21-00 101 & 17-02-16-00 600  
(green indicates unconstrained portions of McKenzie Ridge tracts)

<sup>13</sup> See GIS screen shot map: “Camp Creek Exception-Non Resource 17-02-16-00 600” depicting location of RR-NRES portion of tract

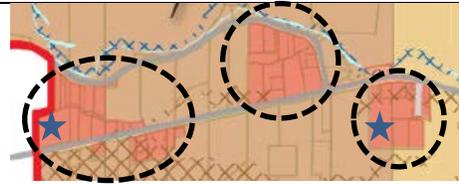


PF-designated land in **Oxbow/Camp Creek** area shown in purple

- Parcels designated and zoned Public Facility (PF) include three non-contiguous parcels scattered throughout the area, owned by City of Eugene (17-01-29-21 100), Eugene Water and Electric Board (17-02-25-00 200 and 17-02-25-00 2200). Parcels are publicly-owned, developed with and necessary for public facilities uses and are not available or suitable to meet Springfield’s employment land needs.
- Upper Camp Creek Rd. parcels are 6+ miles from UGB @ Hayden Bridge, or 5+ miles from UGB via Highway 126/Hendricks Bridge/Waltermville, remote, isolated, and abut resource land on three sides, north of Camp Creek.
- One parcel containing 5 or more unconstrained acres 17-02-24-00- 1501, (5.6 ac.) is zoned for and developed with Rural Commercial use, and is not available or suitable to meet Springfield’s employment land needs.

**Far East Springfield A**<sup>14</sup>

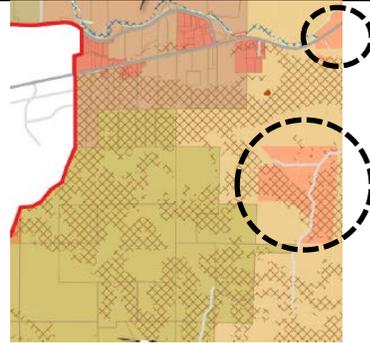
- Parcelized Rural Residential (RR-2 zoning)
- Some parcels abut eastern extent of UGB
- Parcels abut McKenzie Highway or Thurston Rd.
- Gay Creek bisects area
- Cedar Creek riparian resources
- Abuts large block of Class I and II prime farmland
- Slopes >25% south of McKenzie Highway
- DOGAMI SLIDO 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

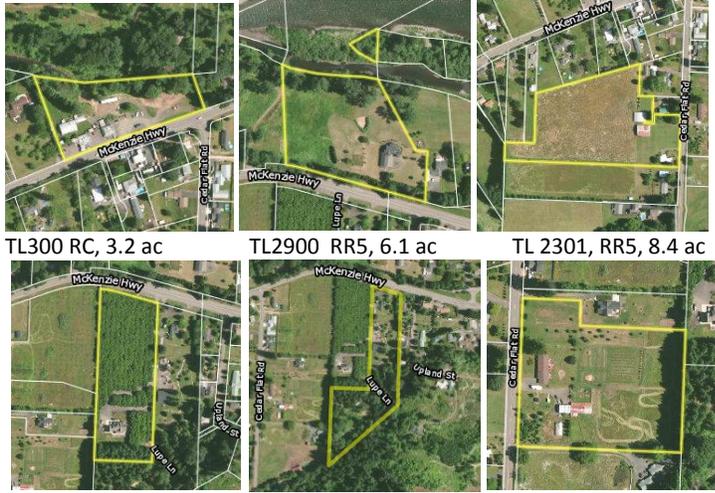
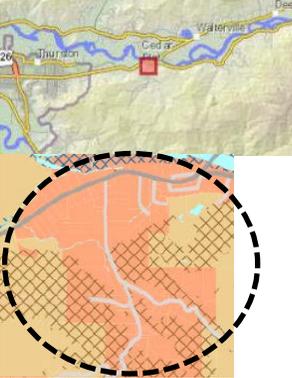
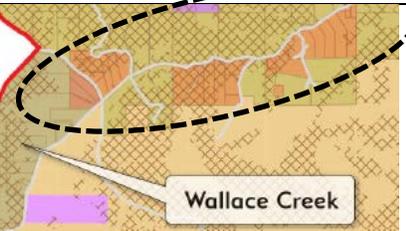
**Far East Springfield B**<sup>15</sup>

- 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%;



<sup>14</sup> 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.

<sup>15</sup> See maps in record "Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-01-30-00, 17-01-32-30, 17-01-31-10, and 17-01-32-20. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

<ul style="list-style-type: none"> <li>○ 1701322002803, RR5, constrained by slopes &gt;15%;</li> <li>○ 1701322002401 bisected by Cedar Creek;</li> <li>○ <u>1701322002601 (5 ac.)</u>, RR5, , flat topo, developed res use.</li> <li>● One parcel TL300 is zoned Rural Commercial, 3.7 ac</li> <li>● Upper Cedar Flats Rd. parcels constrained by slopes 15%-60%</li> </ul> 	 
<p><b>Wallace Creek<sup>16</sup></b></p> <ul style="list-style-type: none"> <li>● Within 1 mile of UGB ridgeline, 1-2 miles to UGB via roads, remote from Springfield, not adjacent to UGB</li> <li>● Parcelized</li> <li>● Rural Residential zoning RR-5, Panorama Rd. (8) upper Wallace Creek parcels contain 5.3 to 8.9 unconstrained acres, developed with dwellings             <ul style="list-style-type: none"> <li>○ 18-02-11-00 505 (5 ac.) slopes</li> <li>○ <u>18-02-11-00 1401 (5.8 ac.)</u>, slopes 12-45%</li> <li>○ 18-02-11-00 1100 (5.8 ac.), slopes 12-45%</li> <li>○ <u>18-02-11-00 1200 (6.2 ac.)</u>, slopes 12-45%</li> <li>○ 18-02-12-00 500 (13.8 ac.) slopes</li> <li>○ <u>18-02-12-00 603 (5.3 ac.)</u></li> <li>○ <u>18-02-12-00 604 (6.4 ac.)</u></li> <li>○ <u>18-02-12-00 605 (7.7 ac.)</u></li> <li>○ <u>18-02-12-00 606 (6.4 ac.)</u></li> <li>○ <u>18-02-12-00 615 (7.4 ac.)</u></li> <li>○ <u>18-02-12-00 619 (8.9 ac.)</u> 45% of lot is &gt;12% slope</li> </ul> </li> <li>● Forested</li> <li>● Steep slopes &gt; 25%, some small flatter areas near the</li> </ul>	

<sup>16</sup> 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<sup>17</sup> “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<sup>18</sup>**

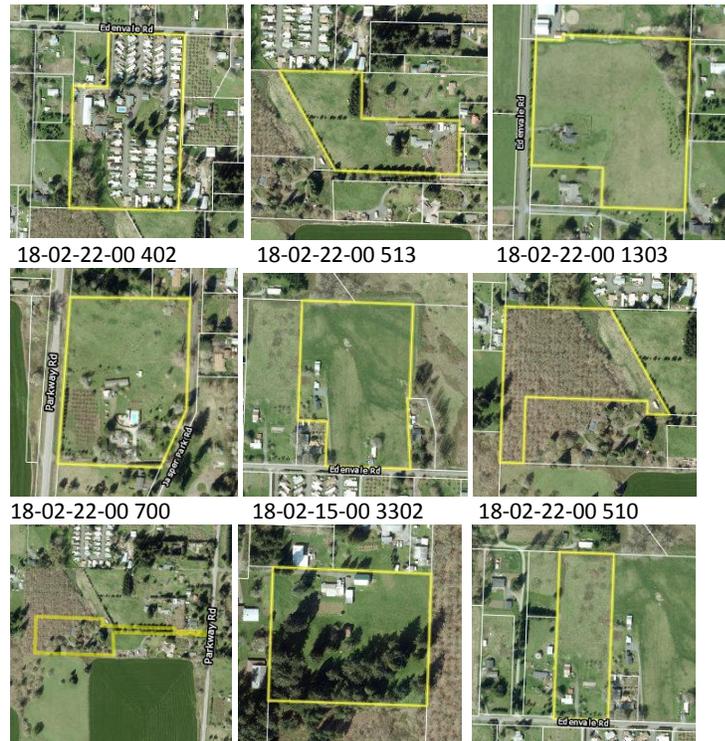
- Within 1-mile SW of UGB via Jasper Lowell Rd, west of Jasper-Lowell Road
- Separated from Springfield by Willamette River, resource land, and sloped land inside UGB
- Access via Jasper Lowell Road, and west across the Willamette River via Parkway Rd. and Edenvale Rd.
- Parcelized Rural Residential RR-5, mostly developed
- Parcels along river constrained by floodway, riparian resources



<sup>17</sup> <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

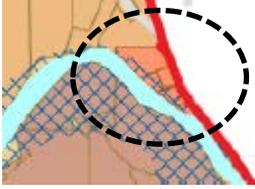
<sup>18</sup> See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-15-00, 18-02-22-00, 18-02-23-00

- Note: large block of Class I and II prime farmland is located immediately west of this area
- 71-acre Jasper State Park is zoned Park and Recreation
- Exception land along east side Jasper Lowell Road and Hills Creek Road is parcelized 1-2 acre Rural Residential
- 1-acre or smaller parcels along Parkway Rd. ~115 feet x 350 feet
- 30-acre RR site is Union Pacific Railroad
- 13-acre RR site on Edenvale Rd. is a mobile home park
- RR-zoned Parcels >5-acres are developed with rural residential uses:
  - 18-02-15-00 3302 (9.6 ac.)
  - 18-02-15-00 3303 (5 ac.)
  - 18-02-22-00 2100 (8.9 ac.)
  - 18-02-22-00 1303 (7.3 ac.)
  - 18-02-22-00 402 (13 ac.) developed mobile home park
  - 18-02-22-00 1000 (5 ac.)
  - 18-02-22-00 510 (8.8 ac.)
  - 18-02-22-00 511 (6.8 ac.)
  - 18-02-22-00 513 (7.6 ac.)
  - 18-02-22-00 700 (7.1 ac.)
  - 18-02-23-00 2500 (5 ac.)
  - 18-02-23-00 2503 (5 ac.)
  - 18-02-23-00 2401 (6.5 ac.)
  - 18-02-23-00 2402 (6.2 ac.)
- 18-02-15-00 3400 (9.6 ac.) ODOT
- Floodplain, Class II soil area



<p>18-02-22-00 511</p>  <p>18-02-23-00 2500</p>	<p>18-02-22-00 1000</p> <p>18-02-15-00 3303</p>	
<p><b>Jasper Bridge B<sup>19</sup></b></p> <ul style="list-style-type: none"> <li>• 1.25 miles SW of UGB via Jasper Lowell Rd., not adjacent to UGB, separated from Springfield by distance and slopes.</li> <li>• Located east of Jasper Lowell Road, south of Hills Creek Road</li> <li>• Parcelized small lot Rural Residential between river and Jasper Lowell Road, 0.5 to 1 acre</li> <li>• RR-5 parcels along south side of Hills Creek Road</li> <li>• 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:</li> <li>• <u>18-02-23-00 TL1800 17 unconstrained acres</u> is developed with industrial use (sawmills and planning mills), wetlands, irregular shape. Northern portion of site (n. of Keeney St.) has 6.4 unconstrained acres, developed with mill office.</li> <li>• <u>18-02-23-00 TL1801 33.3 unconstrained acres</u>, ponds, wetlands, slopes &gt; 15% in south half of site, irregular shape. Northern portion of site (n. of Keeney St.) has 10.3 unconstrained acres.</li> <li>• Floodway, riparian resources, wetlands and slope constraints</li> </ul>    		

<sup>19</sup> See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-23-00

<p><b>West Jasper/Mahogany</b><sup>20</sup></p> <ul style="list-style-type: none"> <li>• Adjacent to UGB</li> <li>• Rural Residential zoning RR-5, all smaller than 5 acres</li> <li>• All parcels have floodway along the Willamette River</li> <li>• Willamette Greenway</li> <li>• Located between Union Pacific railroad line, Bob Straub Parkway southern terminus and Willamette River</li> </ul>	
<p><b>Clearwater</b><sup>21</sup></p> <ul style="list-style-type: none"> <li>• Adjacent to UGB</li> <li>• Located south of Jasper Rd. along Clearwater Lane</li> <li>• Abuts UGB, near City limits, east of 42<sup>nd</sup> Street</li> <li>• 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.<sup>22</sup></li> <li>• Land abutting the exception area to the south is Clearwater Park, zoned Park and Recreation</li> </ul>	
<p><b>Seavey Loop</b><sup>23</sup> A</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Land between the Springfield UGB southern extent and the <b>Seavey Loop A</b> UGB Study Area Grouping (mapped on A &amp; T maps 18-03-11-00, located along the I-5 onramp, McVay/Franklin intersection and Central Oregon &amp; 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.</li> <li>• 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.</li> <li>• Willamette River Greenway and floodway east of Franklin</li> </ul>	 <p>Park (green) and Natural Resource-Mineral (gray) designated land south of Springfield UGB (UGB in red) in the vicinity of <b>Seavey Loop A</b> UGB Study Area Grouping;<sup>24</sup> showing</p>

<sup>20</sup> 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

<sup>21</sup> 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.

<sup>22</sup> Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-11.

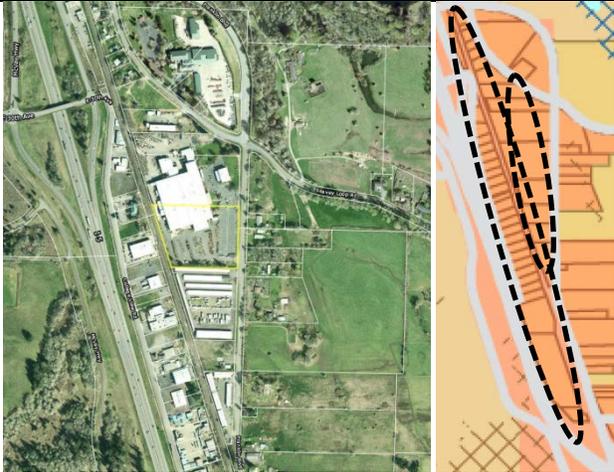
<sup>23</sup> See maps in record “Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

<sup>24</sup> 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.

 <p>RC (orange) and RR (yellow) zoning      floodway (cross-hatch)</p>	<p>OCPR rail line, I-5 corridor, McVay and Franklin Blvd. and Glass Bar Willamette River Greenway. Park and Natural Resource-Mineral lands are owned by public or non-profit conservation organizations</p>
<p><b>Seavey Loop B</b><sup>25</sup></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Northern portion of strip between railroad and Franklin is within 1 mile of UGB</li> <li>• Parcelized 0.2 to 0.7 acre lots, Freeway Park Plat</li> <li>• Lot depth ranging from 90-200', lot width predominantly 100'</li> <li>• Developed with commercial and industrial uses that are expected to continue in planning period</li> <li>• N/S railroad line separates College View parcels from Franklin parcels</li> <li>• slopes 2-12%, DOGAMI mapped landslide hazards</li> <li>• Rural Industrial parcels along South Franklin and College View, 0.1-5.6 acres, are developed with commercial and industrial uses, lot depth 200'- 644' (Johnson Crushers developed parcels)             <ul style="list-style-type: none"> <li>○ 18-03-11-30 3500 (5.6 ac.) developed industrial use</li> <li>○ 18-03-11-30 3600 (5.5 ac.) developed industrial use</li> <li>○ <u>18031400 400; (6 ac.), vacant RI &amp;</u></li> <li>○ <u>18031400 900; (0.8 ac.) same owner (split plan des.)</u></li> </ul> </li> </ul>	 <p>County RR (yellow), RI (red) and RC (orange) zoning</p>  <p>18-03-14-00 400</p>  <p>Southern portion of 18-03-14-00 900</p>

<sup>25</sup> See maps in record "Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

 <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>has a split plan designation. PF-designated land shown in purple</p>
<p><b>Seavey Loop C</b></p> <ul style="list-style-type: none"> <li>Exception parcels are 1.5-2 miles from UGB, not adjacent to UGB</li> <li>Rural Industrial and Rural Residential parcels, along Twin Buttes Road, developed with industrial and residential uses</li> <li>Slopes &gt; 25% and &gt; 15 % south of Twin Buttes Road, DOGAMI mapped landslide hazards</li> <li>Very restrictive Bonneville Power line easement along south side of Twin Buttes Road (mapped in yellow) - no structures permitted</li> <li>Middle Fork Willamette River floodway constraint</li> <li>Oxley Slough/Wild Hog Creek, floodway, hydric soils,</li> <li>Freeway access to south via Goshen and Highway 58</li> <li>Larger 2-6 acre RR parcels on north side of Twin Buttes road may have development potential.</li> <li>15-ac RR-5 parcel is developed with mobile home park</li> </ul>	

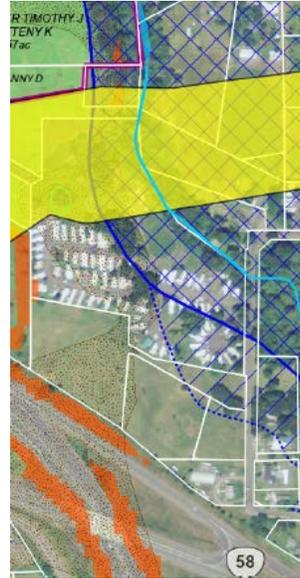


Access to I-5 from S. Franklin is via Hwy 99 and Hwy 58

- 18-03-14-40 502 (5.6 ac.), RR developed residential use
- 18-03-14-40 600 (2 ac.), RR and 700 (4 ac.), RI 701 (2.7 ac.), 800 (0.5 ac.), RI, 900 (0.5 ac.), RI developed industrial use: Walsh Trucking
- 18-03-14-40 300 (2.4 ac.), RR developed residential use, BPA and riparian constraint
- 18-03-14-40 508 5.2 constrained by BPA, slopes
- 18-03-14-40 200 (4.7) riparian constraint
- 18-03-13-30 1701 (15.2 ac.), RR, developed Dunker Mobile Home Park, BPA, floodway, wetland and riparian constraints
- 18-03-13-30 1702 (5 ac.), RR, Dunker, vacant
- 18-03-13-30 1600 (1.2 ac.), 1602 (1.1 ac.) and 1700 (2.8) Flynn = 5.1 ac.



18-03-13-30 1701



Floodway and BPA constraints



18-03-14-40 700



18-03-14-40 300



18-03-14-40 508



18-03-13-30 1702



18-03-13-30 1700



18-03-14-40 502

**Seavey Loop D**

- Designated and zoned Rural Public Facility and developed with the Emerald People’s Utility District (EPUD) Headquarters. This use will continue through the planning period and thus the site is not suitable to meet Springfield’s employment land needs.

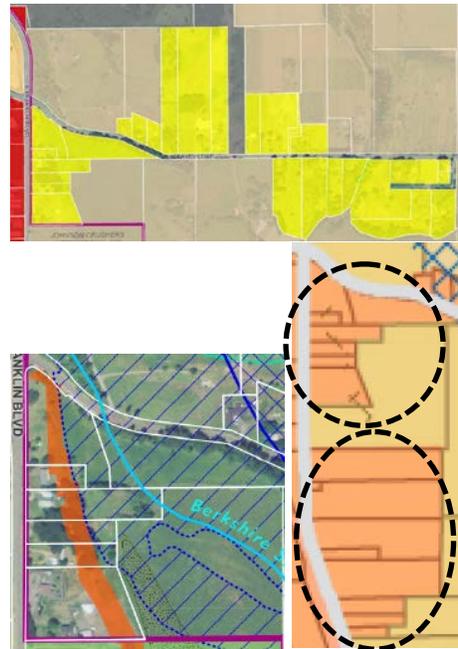


**Seavey Loop E**

- RR parcels north and south sides of Seavey Loop Rd., range in size from 0.65 to 9.75 acres, most are within the floodway and are developed with rural homes
- Adjacent to Willamette River Confluence Greenway area (Nature Conservancy and Friends of Buford Park lands)
- RI parcel Friends of Buford Park (TL 3802)
- RR-5 parcels south of Seavey Loop Rd, along Franklin range in size from 0.5 to 6.8 acres, mostly developed with rural homes and rural businesses:
  - 18-03-14-10 700 (6.5 ac.)
  - 18-03-14-10 900 (7.6 ac.)
  - 18-03-14-10 301 (6.9 ac.)
  - 18-03-14-10 1201 (6.8 ac.)
- Some slopes >15%
- Berkshire and Oxley Sloughs

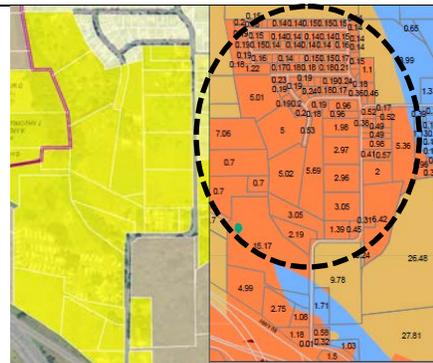


- 18-03-11-30 3900, (3.1 ac.) slopes and Berkshire Slough
- 18-03-10-10 1600, (3.8 ac.) same owner



**Seavey Loop F<sup>26</sup>**

- 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



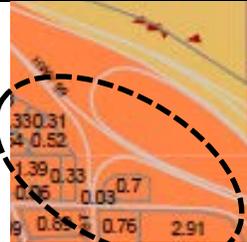
<sup>26</sup> See maps in record A & T map 18-03-13-30, 18-03-13-23



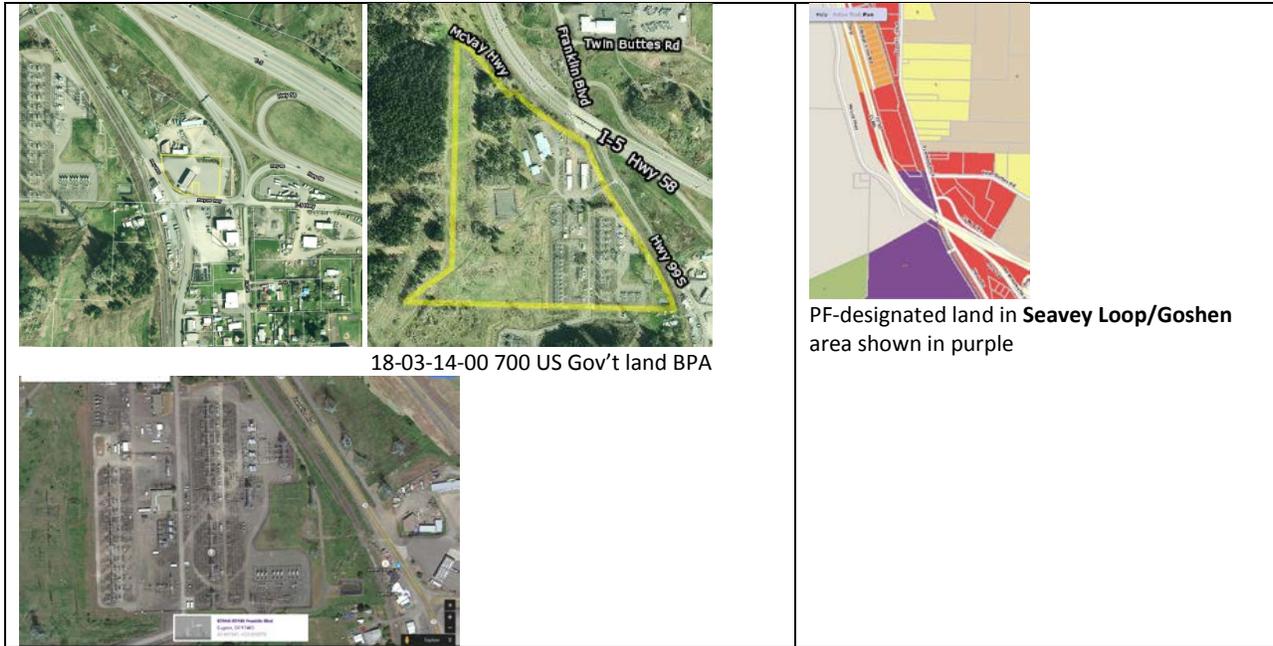
Floodway constraint (cross-hatch)

**Seavey Loop/Goshen<sup>27</sup>**

- 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



<sup>27</sup> See maps in record A & T map 18-03-14-44, 18-03-14-44



The following summary in Table 3 identifies the general geographic groupings containing *potentially* suitable second priority parcels after excluding constrained portions of parcels and parcels smaller than 5 acres.

<b>Table 3: Summary of Second Priority Exception Lands Parcels and Constraints Analysis - Unconstrained Parcels 5 Acres and Larger*</b>					
Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
<b>McKenzie View A</b>	0	0	0		
<b>McKenzie View B</b>	0	0	2	17-02-19-00 3000; (6.7 ac) 17-02-19-00 3100; (5 ac.)	RR RR
<b>Mohawk A</b>	1	0	1	17-02-20-00 202; (5.3 ac)	RR
<b>Mohawk B</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
<b>Mohawk C</b>	0	0	6	17-02-08-00 0515; (8.7 ac.) 17-02-08-00 0516; (6.7 ac.) 17-02-08-00 0517; (6 ac.) 17-02-08-00 0600; (5.8 ac.) 17-02-08-00 0700; (5.7 ac.) 17-02-08-00 0701; (5.5 ac.)	RR5 RR5 RR5 RR5 RR5 RR5



				18-02-12-00 605; (7.7 ac.) 18-02-12-00 606; (6.4 ac.) 18-02-12-00 615; (7.4 ac.) 18-02-12-00 619; (8.9 ac.)	
<b>Jasper Bridge A</b>	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.)	
<b>Jasper Bridge B</b>	0	1** PREDEV	1** PREDEV	18-02-23-00 TL1800; <u>17 acres</u> is developed with industrial use that likely will continue through planning period. Portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd. 18-02-23-00 1801; <u>33.3 acres</u> . 10 ac. portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd.	RI  RI
<b>West Jasper/ Mahogany</b>	0	0	0		
<b>Clearwater</b>	0	0	0		
<b>Seavey Loop A</b>	0	0	0		
<b>Seavey Loop B</b>	0	0	1	Developed industrial use (Johnson Crushers) will likely continue through planning period. <u>18031400 400; (6 ac.), vacant</u>	RI
<b>Seavey Loop C</b>	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
<b>Seavey Loop D</b>	0	0	0	Developed Rural Public Facility (EPUD)	RPF
<b>Seavey Loop E</b>	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

<b>Seavey Loop F</b>	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
<b>Seavey Loop/Goshen</b>	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 <sup>28</sup> 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<sup>29</sup> (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<sup>30</sup>
- 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

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<sup>28</sup> CIBL/EOA Table S-5, page ix-x.

<sup>30</sup> “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

planning period thus not suitable to meet the City's need for employment land sites larger than 5 acres and sites larger than 20 acres in the planning period.

For the purpose of evaluating second priority exception land, the City identified the following criteria to be applied equally to all parcels within the Preliminary Study Area — in order of their priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Parcel size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres. The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels less than 5 acres from further analysis. For the purpose of this step in the analysis, the City did not deduct for existing residential development on parcels 5 acres or larger.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial mixed use sites with relatively flat topography (less than 5% slope and less than 7% slope).

As explained in the City's findings under Goal 9 and in the CIBL/EOA, distance relative to the City and to existing urban infrastructure systems is a key factor in determining employment land suitability because Springfield's identified land need is for industrial and commercial mixed use sites that provide reasonable access and travel times to major transportation corridors and reasonable service connections to public water and wastewater conveyance systems, public transit service, and public stormwater and wastewater management systems, facilities and services. Employment sites must also have reasonable connection to electricity and telecommunications systems.

As previously explained, the City applied the following factors as absolute development constraints to providing urban services to employment land:

- Portions of tax lots with slopes > 15%
- Portions of tax lots comprising inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots comprising riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

For the initial screening of land, the City identified parcels or portions of parcels with slopes 15% or less as *potentially* suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes greater than 15% from further analysis.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same. As permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate those parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

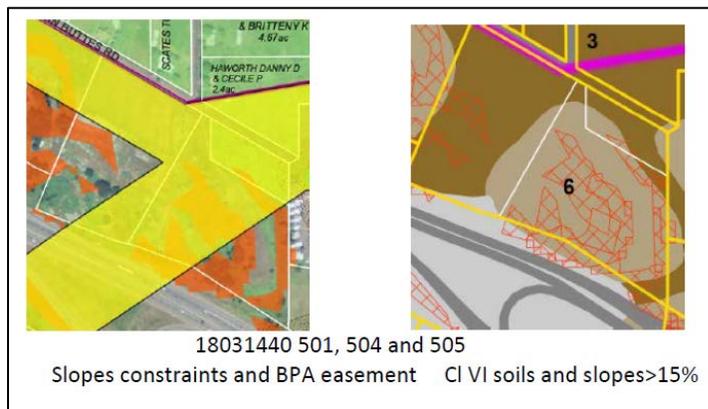
In addition to the summary data compiled in Map 1, Table 2 and Table 3, the record includes maps, acreage calculations and other evidence used as factual basis for the City's uniform and consistent evaluation of parcelization, slopes, floodway, inventoried wetlands and riparian resources on all exception parcels in the preliminary study area. This evidence is relevant to justify the City's identification of *potentially* suitable second priority exception land parcels and its exclusion of unsuitable second priority exception land parcels from further analysis.

### ORS 197.298 (1)(b):

*“Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\)](#).”*

To complete its evaluation of second priority land, the City examined the study area to identify resource land areas that are completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705). One area meeting this description exists within the UGB Study Area.

One tract of resource land (zoned EFU) in the Seavey Loop area meets the criteria for second priority: 18031440 tax lots 501, 504 and 506. As shown in the figure below, this tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.



## EXCLUDE LANDS THAT ARE NOT BUILDABLE (SUITABLE), BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As described in the preceding text and graphics, the City excluded exception land parcels less than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) when it analyzed the potentially suitable acreage of each exception land parcel or group of parcels, as permitted under OAR 660-024-0060(5).

### OAR 660-024-0060(1)(e)

*“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”*

### OAR 660-024-0060(5)

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”*

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all second priority exception land parcels in the UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

**These steps excluded the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.**

After excluding the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels, the City's analysis of parcel size and absolute development constraints identified the seven remaining exception area geographic groupings that contain *potentially* suitable land. These areas were identified for additional analysis study to determine serviceability and

suitability to determine whether exception lands in the vicinity fo the UGB can “reasonably accommodate” the identified employment land need.

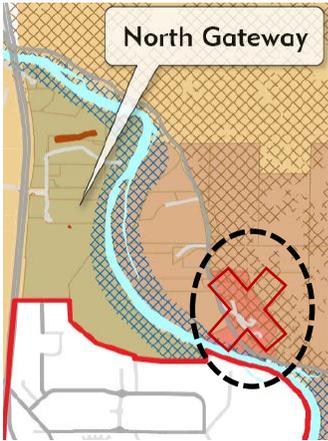
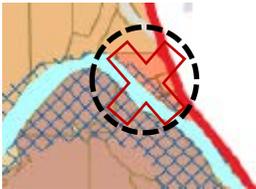
No exception area will provide a vacant candidate site with 20 or more unconstrained acres to meet Springfield’s industrial and commercial mixed-use employment land needs.

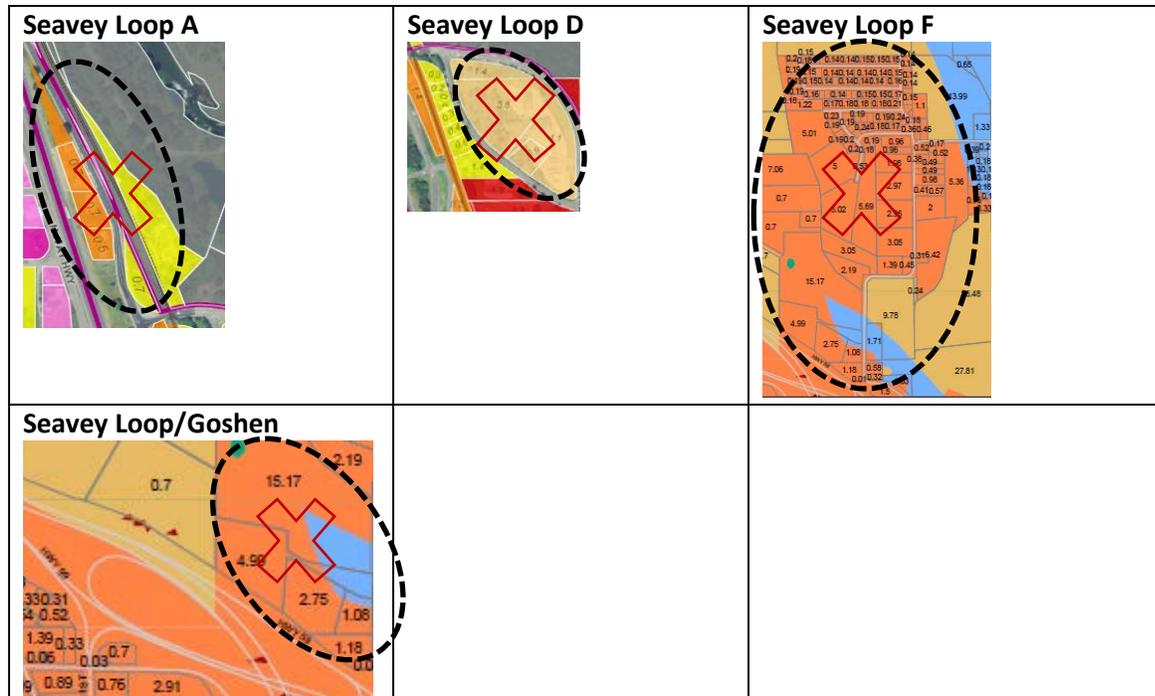
The City’s need for 186 acres to accommodate sites 20 acres and larger cannot be met by adding exception lands to the UGB.

The City identified the exception land parcels listed in Table 3, Summary of Second Priority Exception and Non-Resource Parcels and Constraints Analysis as candidate lands for additional analysis to determine serviceability and suitability to meet the need for 37 acres to accommodate smaller 5-20 acre sites.

**The McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels with less than 5 unconstrained acres were excluded from further analysis.**

**Table 4: Second priority exception parcels excluded based upon specific land needs [ORS 197.298(3)(a)]**

McKenzie View A	West Jasper/Mahogany	Clearwater
		



## IDENTIFY SECOND PRIORITY EXCEPTION LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable exception parcels identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

The following section of this report provides explanation of the City's rationale and evaluation criteria for comparing serviceability and suitability of candidate lands.

The following section of this report provides substantial evidence to support the City's findings under Goals 11 and 12.

**OAR 660-024-0010(8)** Definitions states:

*“Suitable vacant and developed land” describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for “developed land,” section (12) for “suitable,” and section (14) for “vacant land.”*

**OAR 660-024-0040(7)** states:

*“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.”*

For land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

**OAR 660-011-0005(5)** defines “Public Facility”:

*“A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.”*

As explained in greater depth in the City’s findings under Goal 11, OAR Division 11 requires public facilities planning:

*“to help assure that urban development in such urban growth boundaries is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.”*[OAR 660-011-0000]

Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.<sup>31</sup> 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

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<sup>31</sup> 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.<sup>32</sup>

### **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 12, 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

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<sup>32</sup> See TadZo report

employment land uses can reasonably be provided within the planning period: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

### **OAR 660-012-0005(41) Vehicle Miles of Travel (VMT)**

*“Vehicle Miles of Travel (VMT): means automobile vehicle miles of travel. Automobiles, for purposes of this definition, include automobiles, light trucks, and other similar vehicles used for movement of people. The definition does not include buses, heavy trucks and trips that involve commercial movement of goods. VMT includes trips with an origin and a destination within the MPO boundary and excludes pass through trips (i.e., trips with a beginning and end point outside of the MPO) and external trips (i.e., trips with a beginning or end point outside of the MPO boundary). VMT is estimated prospectively through the use of metropolitan area transportation models.”*

To address OAR 660-012-0005 (41) *“Vehicle Miles of Travel (VMT)*, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned transportation system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

To further evaluate potentially suitable exception and land sites to meet employment land needs, the City applied the following factors (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception in the next stage of the evaluation process:

- Exclude lands that are not buildable<sup>33</sup>

<sup>33</sup> “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

### **OAR 660-024-0060 (1)(e)**

*“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”*

### **OAR 660-024-0060(5)**

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”*

For the public facility suitability analysis, the City assumed that the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas are the type, size and service levels needed to serve the target industries identified in the CIBL/EOA, as identified as summarized in this report in the City’s findings under Goal 9; as supported by the evidence in the record; and as required under applicable federal, state, regional and local plan policies and environmental permits. Target industries require and rely upon specific types, sizes and service levels of public water, wastewater, stormwater facilities and transportation systems to conduct their operations — including but not limited to necessary and typical proximity to existing public facilities, transportation systems and services. Therefore the City analyzed proximity to existing facilities and systems when it conducted the public facilities analysis summarized in Table 4 Public Facilities Analysis, and excluded lands from further consideration based on necessary and typical proximity when it conducted the boundary location alternatives analysis.

The City properly considered the employment land suitability characteristics regarding the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas, based on the characteristics of needed sites determined in the Economic Opportunities Analysis and supporting evidence in the record.

For the next steps, in the analysis, the City analyzed general geographic groupings of parcels within each priority category as permitted under OAR 660-024-0060(6).

It should be noted that two geographic areas (Mohawk and Wallace Creek) contain second priority exception parcels and third priority marginal parcels. These are discussed separately in order of priority. General geographic groupings comprising disparately located parcels were grouped into subgroups based on their location, relative proximity to the UGB, and relative proximity to potential service connections. For example, Mohawk A, B and C parcels are located increasingly distant from the UGB, with A being the closest.

## EXCLUDE LANDS THAT CANNOT REASONABLY BE PROVIDED WITH URBAN INFRASTRUCTURE AND SERVICES DUE TO PHYSICAL CONSTRAINTS [ORS 197.298(3)(b)].

**This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).**

As previously explained in the City’s findings under Goal 9, the CIBL/EOA <sup>34</sup> provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.” [emphasis added]

**OAR 660-009-0005(12)** states that “‘[s]uitable’ means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.”<sup>35</sup> [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,*

<sup>34</sup> CIBL/EOA Table S-5, page ix.

<sup>35</sup> The Goal 14 rule at OAR 660-024-0010(8) states: “‘[s]uitable vacant and developed land’ describes land for employment opportunities and has the same meaning as provided in OAR 660-009-0005 section...(12) for ‘suitable.’”

*environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.* [emphasis added]

### **OAR 660-009-0005(4)**

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

### **OAR 660-009-0005(11)**

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

Availability of urban infrastructure and public facilities is identified as a necessary employment land site characteristic in the CIBL/EOA, thus serviceability is a critical site characteristic for determining whether a particular parcel of land is suitable to meet the City's specified employment needs. Specific infrastructure needs for Springfield's target industries are summarized on page 161 and further explained in CIBL/EOA Chapter on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

### **OAR 660-024-0060(8)**

OAR 660-024-0060(8) requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Part of the OAR 660-024-0060(8) analysis requires the City to determine which lands cannot reasonably be provided with urban services due to physical constraints [ORS 197.298(3)(b)]. To conduct the next step of the boundary alternatives analysis, the City excluded lands that cannot reasonably be provided with public infrastructure, facilities and services due to physical constraints [ORS 197.298(3)(b)]. The City identified the following factors as significant physical constraints to providing the public services necessary to develop employment land sites. As these factors preclude or place limitations on serviceability, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050:

- Physical separation from existing water and wastewater service mains by the McKenzie or Willamette River

- Physical separation by distance to existing or planned public facilities, service connections and service areas
- Slopes as identified in the CIBL/EOA: 5% or less for Manufacturing, 7% or less for High Tech and Campus Manufacturing
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible construction of functioning gravity flow systems.
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible connection of employment sites to Federal or State truck routes. As identified in the CIBL/EOA, “most businesses in Springfield typically locate within one mile of Interstate Highway 5 or ½ mile of a state highway.”
- Topographic, geographic or geological constraints that physically preclude or significantly impede construction of an interconnected transportation system, including the provision of transit service and accessible, multi-modal access to employment sites
- Stormwater basin capacity constraints, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.
- Wastewater system capacity constraint, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.

Others parts of the OAR 660-024-0060(8) analysis require the City to consider, evaluate and compare potential service and capacity impacts to existing or planned facilities and services that serve land already in the UGB. In this step the City determined whether potentially suitable lands can physically be served. This includes consideration of whether facilities and services are physically possible given how such facilities and services would impact capacities of existing and planned facilities and services. OAR 660-024-0060(8) provides a list of facilities and services that must be addressed in the public facilities and services comparative analysis:

### **OAR 660-024-0060(8)**

*“The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system. “Coordination” includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation must include:*

*(a) The impacts to existing water, sanitary sewer, stormwater and transportation facilities that serve nearby areas already inside the UGB;*

*(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*

*(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”*

As stated in OAR 660-024-0060(8)(a-c), impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Thus such impacts and needs are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050 and are identified in Table 4.

Extending public water and wastewater and would impact existing services primarily by adding flows to existing mains or via new mains. Volumes of flows to the MWMC sewage treatment facility would increase. Water quality regulations will require pretreatment of discharges. Additional water volume needs would increase SUB water treatment needs. As stated in Table 4, extension of mains is not physically possible in some areas.

Adding vehicular trips to serve industrial and commercial land uses would impact existing roads and bridges primarily by increasing traffic and by creating physical stress on roadways not designed and constructed to withstand heavy truck and public transit buses. Road maintenance needs would increase as facility size and length increases. Operational costs would increase as facility size, length and distance from operations centers increases. Adding additional stormwater flows to receiving streams and rivers would impact capacity of facilities that serve nearby areas already inside the UGB. For example, the Cedar Creek basin (Far East study area) is already nearing capacity while the easternmost portion of the UGB that drains into that basin is yet to be fully developed. Most areas in the UGB study are outside of existing City drainage basins. Water quality regulations will require pretreatment of all discharges.

Expansion of the water, wastewater and stormwater systems will create additional maintenance needs, increasing overall systems maintenance needs.

Industrial and commercial development would generate need for transit service. Increasing industrial and commercial development in an area is likely to result in an increase in transit service to an area that could benefit the overall system as well as end users in an area.

The City evaluated these impacts when it identified existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB in Table 5 (page 237-251). Table 5 identifies substantial infrastructure needs to serve exception land.

For the purpose of evaluating impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 2.

For the purpose of evaluating serviceability of parcels within the second priority [ORS 197.298(3)(a)] category, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 5.

For each Study Area general geographic grouping, the City engineers, service providers, and ODOT staff provided an assessment of facilities that would likely require upgrading or replacement in order to provide additional capacity to serve development beyond the existing UGB. Those assessments are listed in Table 5.

The City's evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations was conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable second priority exception land by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints, Table 3: Second Priority Land Public Services Analysis Summary, and Table 5 Second Priority Land Public Facilities and Services Analysis Summary. Based on this compilation of input and data, and the facilities plans described in pages 212-235, the City determined whether a parcel or group of exception parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 5: Second Priority Land: Public Services Analysis Summary. Based on this data, the City determined whether and how providing a parcel or group of second priority exception parcels with the water, sewer/wastewater,

stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 3: Second Priority Land: Public Services Analysis Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of second priority exception parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of second priority land under ORS 197.298.

## **OAR 660-024-0060 (7)**

*“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”*

Consistent with OAR 660-009-0005(9) : “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.” For land to be reasonably considered as serviceable within the planning period, “orderly and economic provision of public facilities and services” must be possible within the planning period.

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and

how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable second priority exception parcels within the seven geographic areas: McKenzie View, Mohawk, Oxbow/Camp Creek, Far East, Wallace Creek, Jasper Bridge, and Seavey Loop. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of second priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 5 and as further supported by evidence in the record.

The following section of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities to describe the physical location and proximity of existing facilities to potentially suitable parcels and to identify physical or regulatory barriers that would make service extensions difficult or infeasible to support development within the 2010-2030 planning period. As previously noted, this section provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

This section provides additional evidence to support the City's rationale for excluding from consideration the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels in the previous step.

**To avoid unnecessary redundancy within this report, the following information identifies information used by the City to identify and compare public infrastructure, facilities and services deficiencies through the remainder of this boundary location alternatives analysis. Thus, this section provides additional evidence to support the City's rationale for excluding lands from consideration in the previous steps and subsequent steps.**

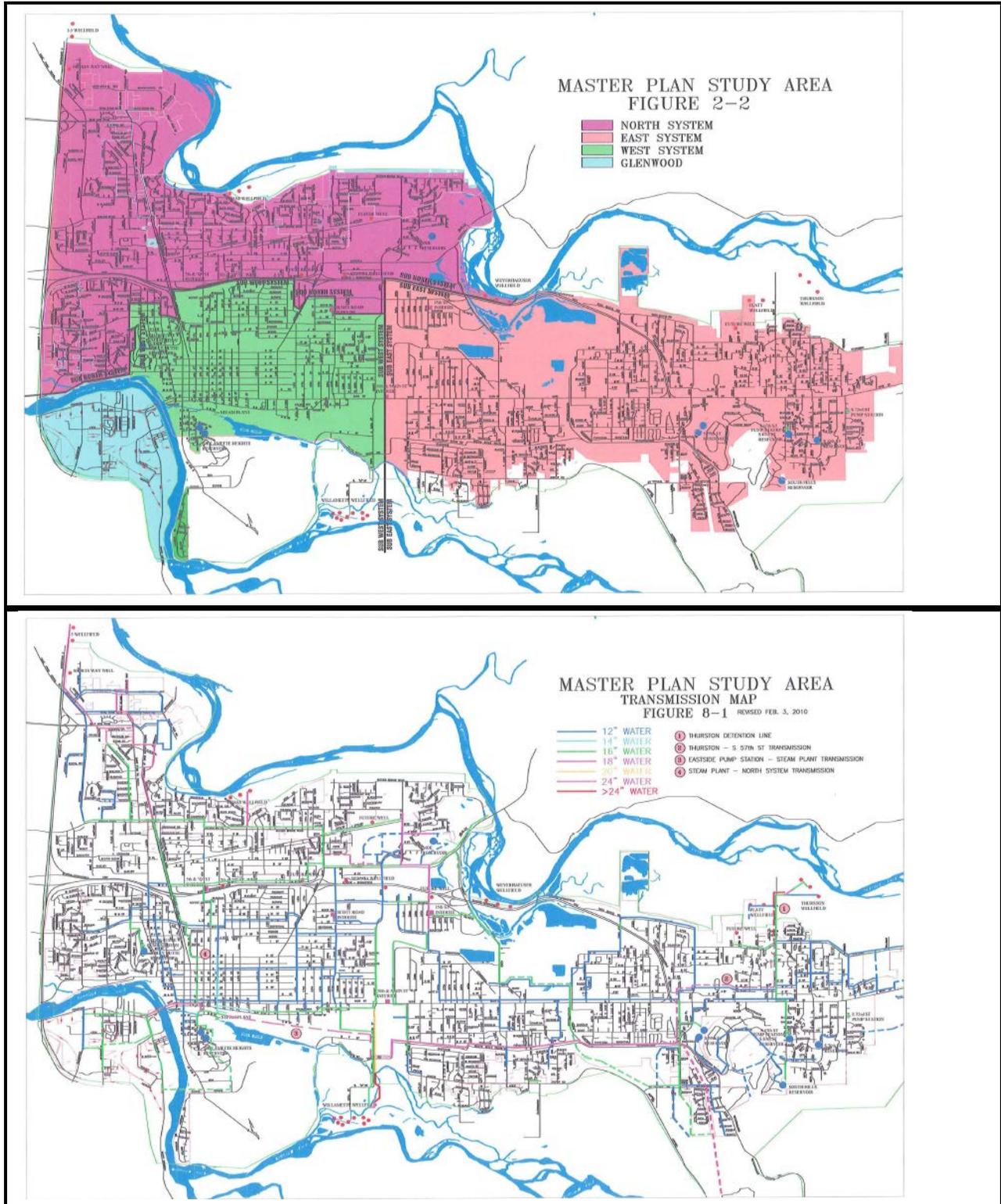
The City incorporated maps and data from City, Eugene-Springfield Metro area and Lane County facilities plans and service provider plans to complete the Public Services Analysis, including but not limited to:

#### Water

- *Water System Master Plan for Springfield Utility Board, April 2010*
- *Springfield Utility Board & Rainbow Water District Water Management and Conservation Plan, 2012*

The following map provides a general depiction of the existing water system in the area.

Existing Water System, Master Plan for Springfield Utility Board, Figures 2-2 and 8-1



The preceding maps depict the extent of SUB/Rainbow existing water system in 2010 and are included to explain how waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

In addition to the water system depicted above, the Willamette Water Company currently provides water service to the Seavey Loop/Goshen area by purchasing water from Eugene Water and Electric Board (EWEB), and transmitting water through its system from Bloomberg Reservoir, west of I-5, to homes and businesses. The company owner's representative submitted information into the record describing the existing system, and the owner confirmed the accuracy of information submitted.<sup>36</sup> A company representative also participated in the College View Study Area Stakeholder Working Group.<sup>37</sup>

Oregon Dept. of Water Resources staff Michael Mattick provided information about Willamette Water Company:<sup>38</sup>

- 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,"<sup>39</sup> "Short term, they may continue to be served by their incumbent water provider. As in the past, for efficiency SUB is open to providing a transition to SUB service sooner rather than later."

#### Sanitary Sewer

- *City of Springfield Wastewater Master Plan*, June 2008, prepared by CH2MHill

The following map provides a general depiction of the existing wastewater system in the area.

#### **Existing Wastewater Collection System, City of Springfield Wastewater Master Plan Figure 4-1**

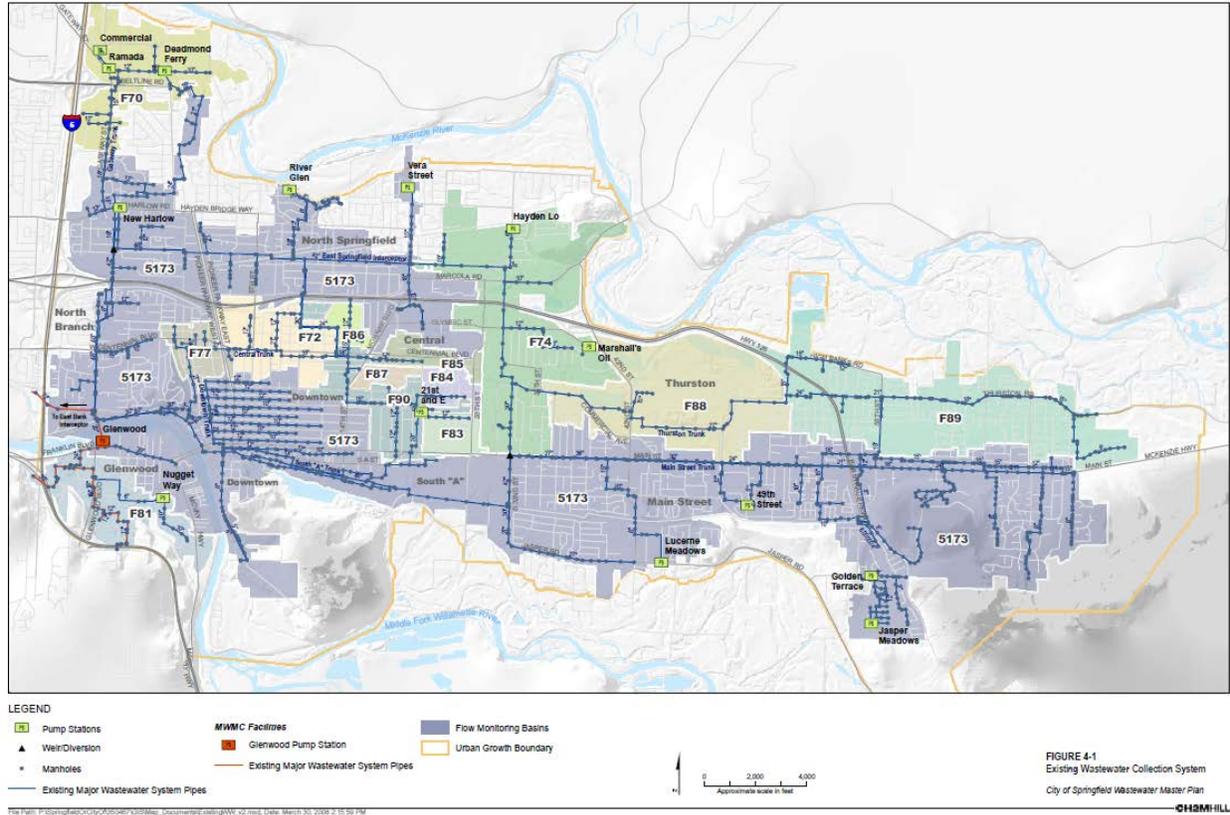
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<sup>36</sup> Letter from Bill Kloos to City of Springfield and Lane County Planning Commissions, Feb. 17, 2010; and email to staff Pauly from Greg Demers, June 21, 2013.

<sup>37</sup> Stakeholder Working Group meetings were held on Feb. 11, 2015, February 25, 2015, and March 4, 2015.

<sup>38</sup> Meeting with staff Pauly on May 20, 2014; email and attached copy of S-50877 permit to staff Pauly on May 21, 2014.

<sup>39</sup> Email from SUB General Manager Jeff Nelson to staff Pauly, May 23, 2014



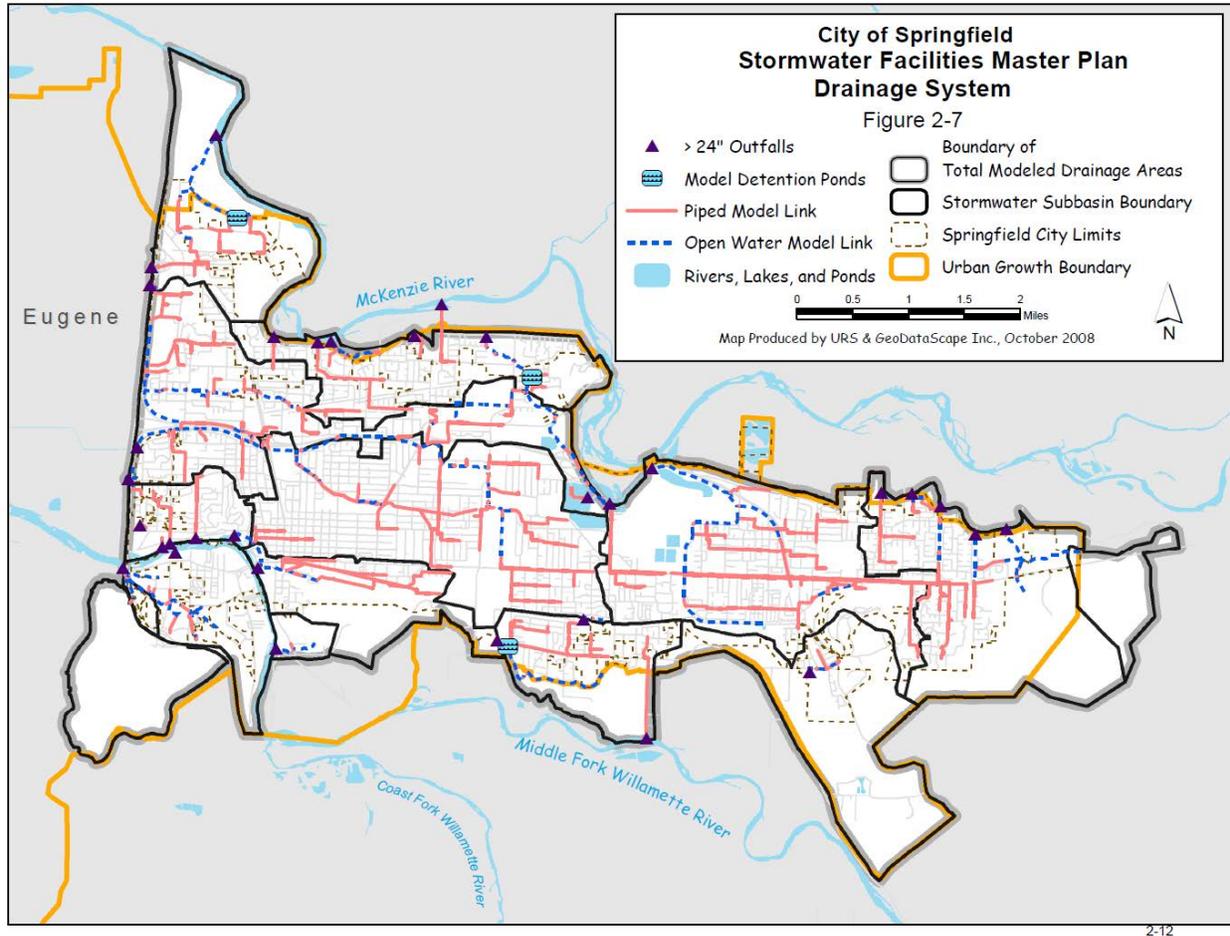
The preceding map depicts the extent of the existing wastewater service area and system in 2008 and explains how topography, waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

### Stormwater Management

- *City of Springfield Stormwater Facilities Master Plan, Oct. 2008, prepared by URS*

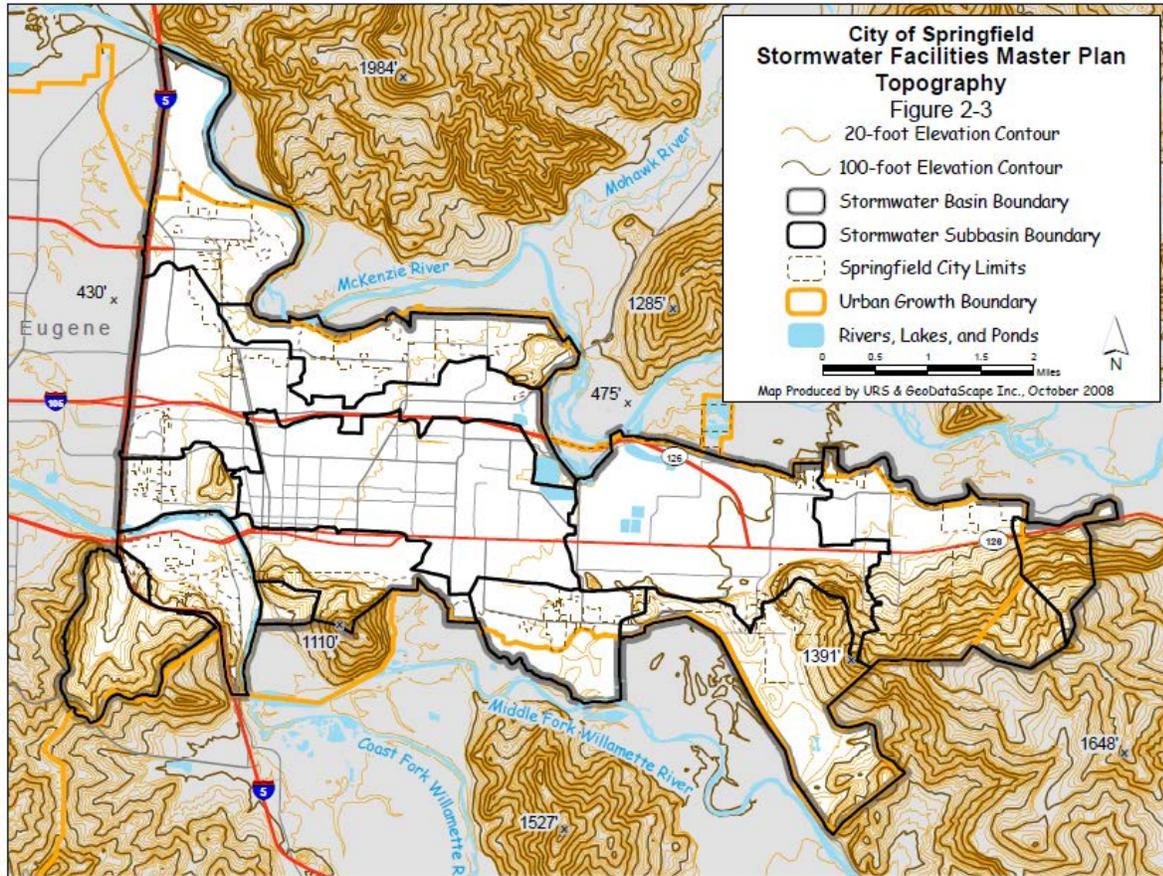
The following map depicts the extent of the existing stormwater drainage system, including outfalls, in 2008 and explains how topography, waterways, outfalls to waterways, and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB. The City's findings under Goal 11 provide more information about stormwater management facilities and applicable policies.

### **City of Springfield Stormwater Facilities Master Plan Figure 2-7 Drainage System**

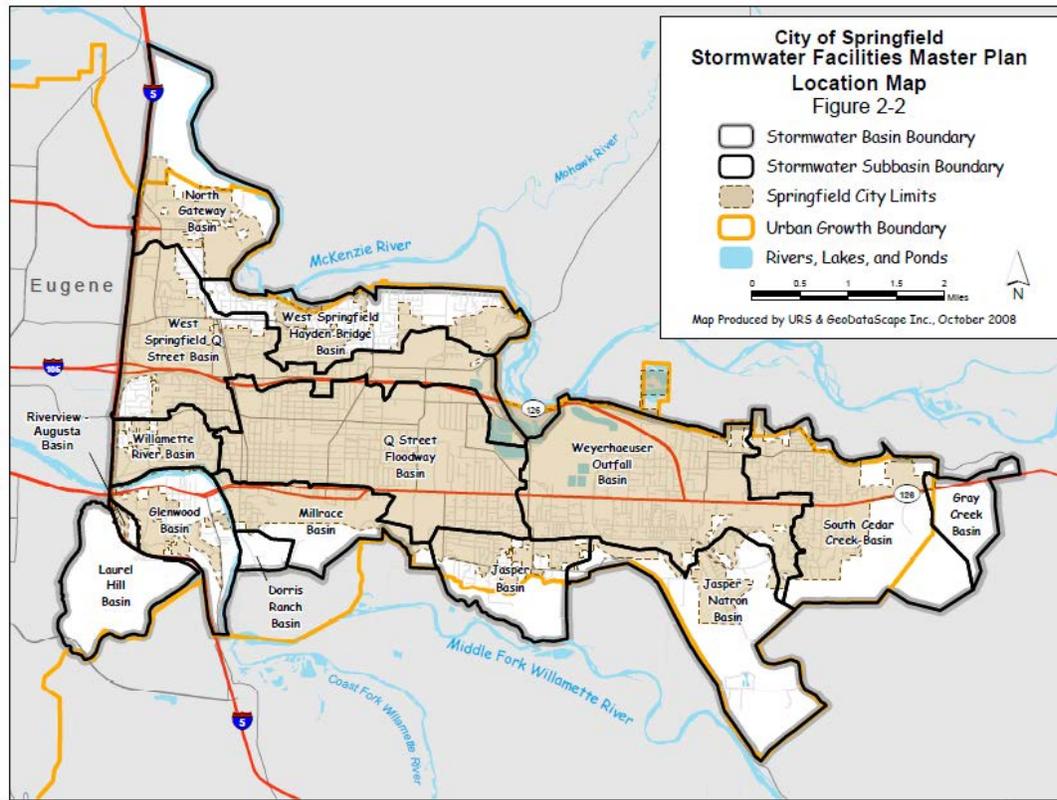


The following map depicts topography surrounding the UGB to demonstrate how topography presents constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

**Stormwater Facilities Master Plan Figure 2-3 Topography**



The following map depicts the extent of the existing stormwater service area and system in 2008 to explain how topography, waterways, gravity flow and distance influence and place limitations on potential service extensions to lands beyond the existing UGB.

**Stormwater Facilities Master Plan Figure 2-2 Basin Location**

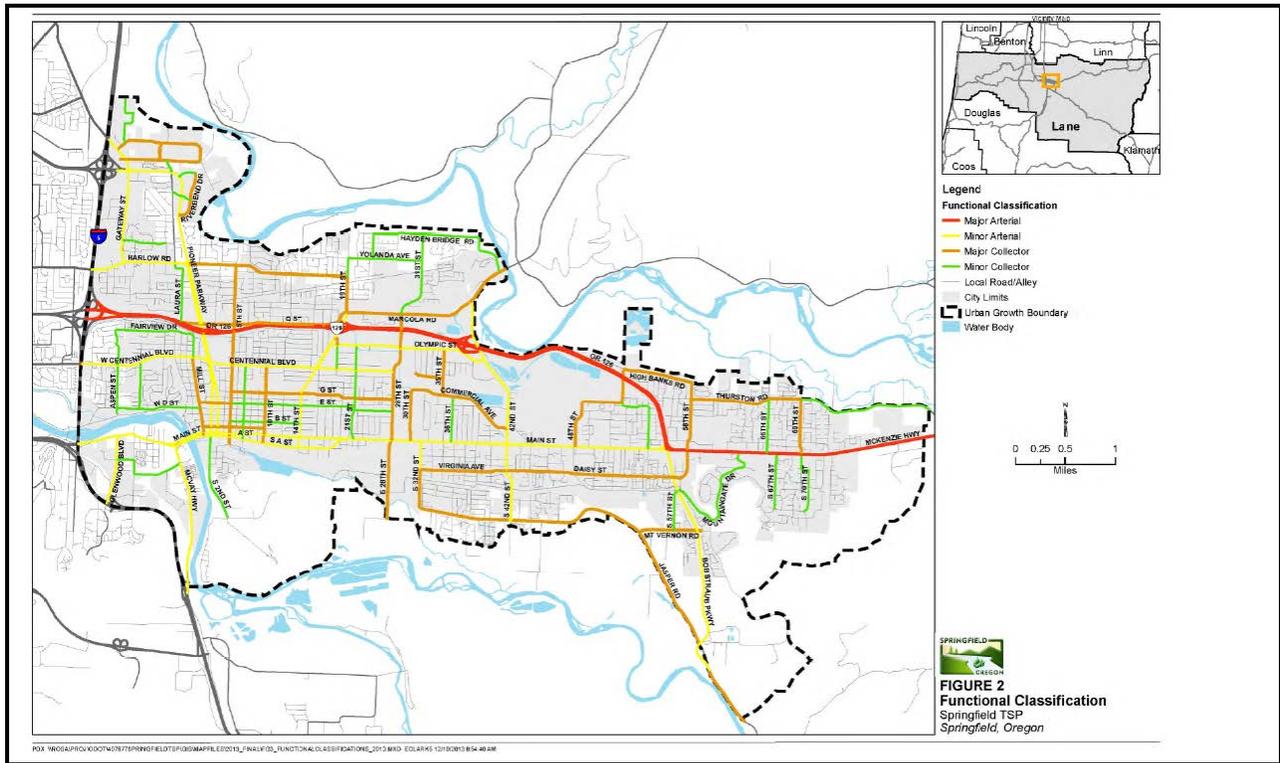
### Transportation

- 2004 Lane County Transportation System Plan
- Lane County Roads Inventory
- 2035 City of Springfield Transportation System Plan
- 2002 Eugene-Springfield Transportation System Plan (TransPlan)
- Central Lane MPO Regional Transportation Plan

The following maps provide general depictions of the existing transportation system in Springfield and in the areas outside the UGB. The City's findings under Goal 12 provide more information about transportation facilities and applicable policies.

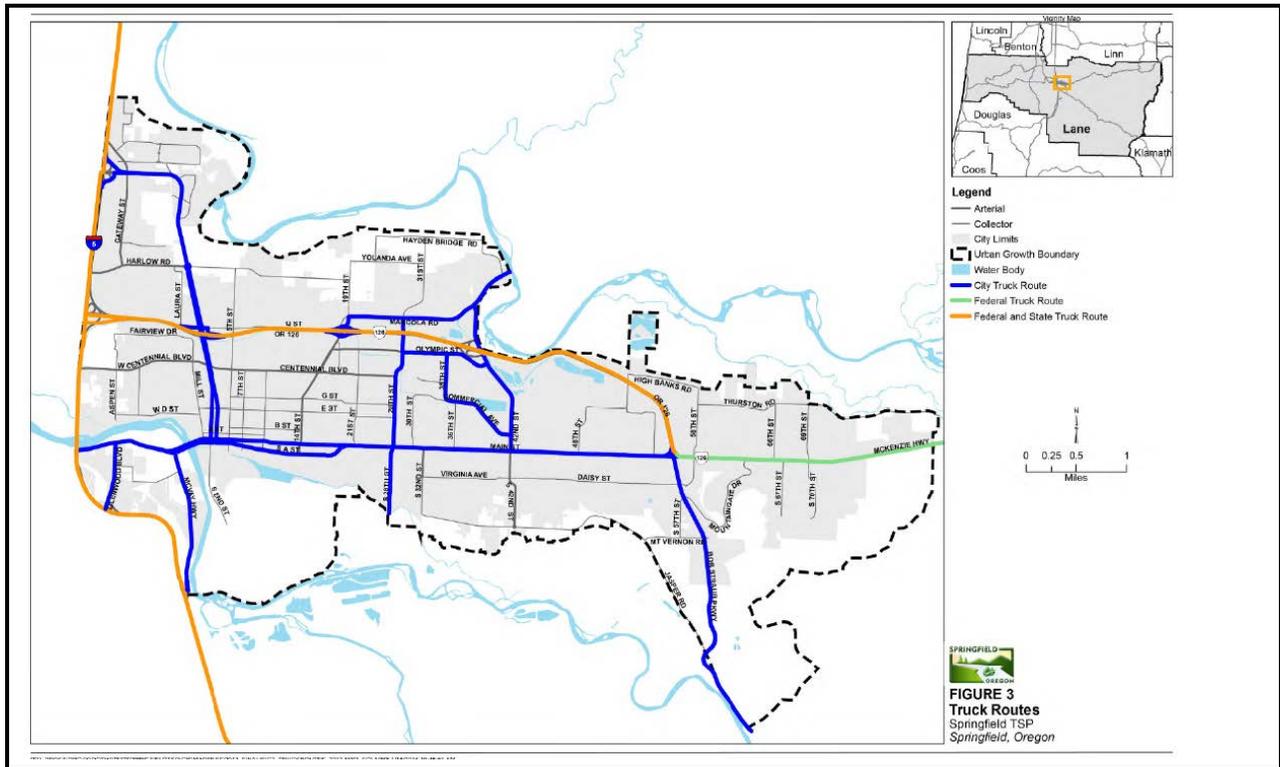
Springfield TSP Map Functional Classifications (2014) depicts the existing transportation system backbone to compare the location of existing facilities in relationship with lands outside the UGB. Lack of transportation facilities is a constraint that influences and place limitations on potential service extensions to lands beyond the existing UGB.

### Springfield TSP Functional Classifications (2014)



The following map depicts existing Federal, State, and Local truck routes to compare the location of existing facilities in relationship with lands outside the UGB. Location relative to transportation facilities that are designated, designed and built to support truck traffic is a consideration that influences and place limitations on potential service extensions to serve industrial and commercial lands within and beyond the existing UGB.

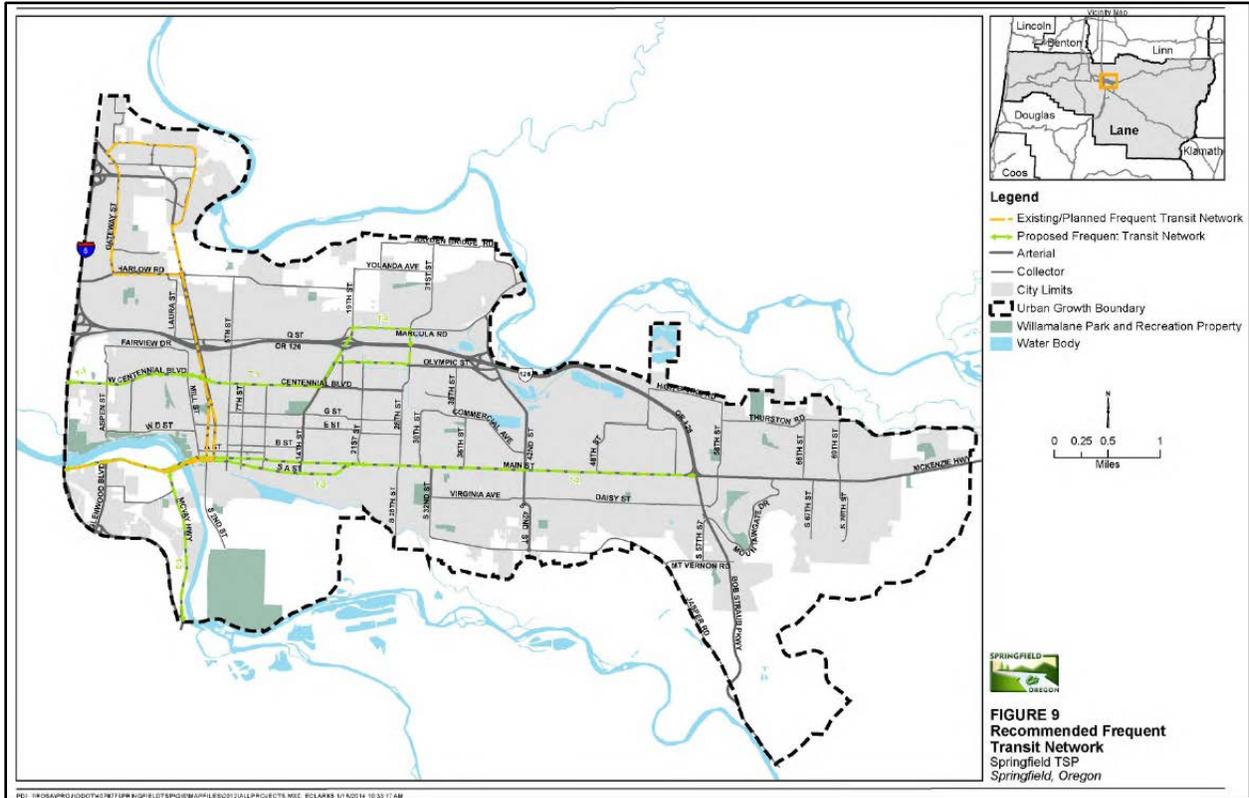
### Springfield TSP Truck Routes



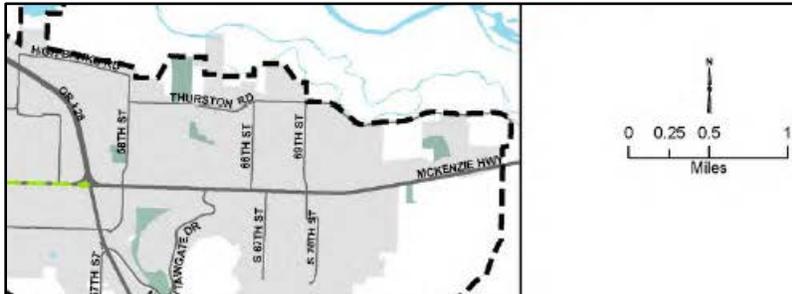
**Planned Frequent Transit Service Network.** The following map depicts the existing and planned frequent transit network to compare the location of existing and planned transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to

serve urban development is an important consideration to ensure that new employment areas are accessible to the population, including the transportation disadvantaged.

**Springfield TSP Figure 9 Recommended Frequent Transit Network**

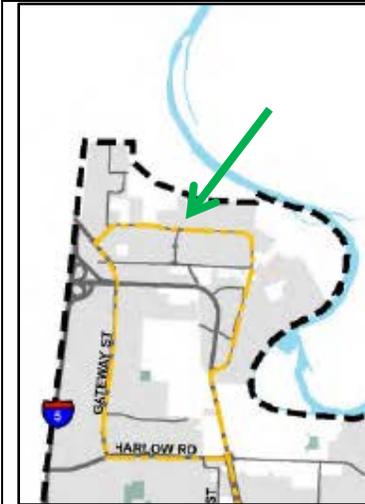


As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.3 miles west of the eastern UGB extent on Main Street/Highway 126.



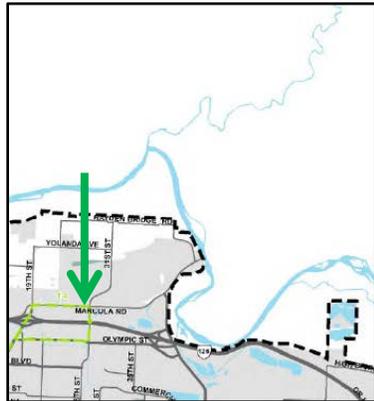
Detail of Springfield TSP Figure 9 Recommended Frequent Transit Network map

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is currently located approximately 0.25 miles from the northern extent UGB (International Way/Maple Island Rd.).



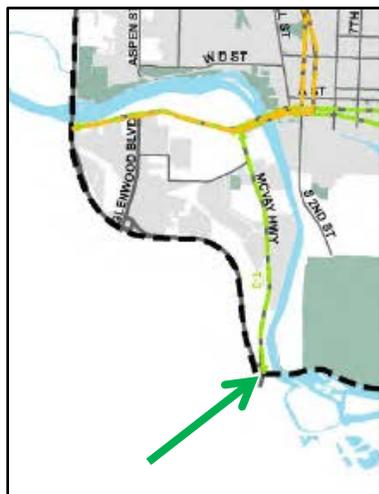
Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 1.25 miles to the northern extent of the UGB at Marcola Rd/Hayden Bridge.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to the southern extent of the UGB at McVay in Glenwood.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend on Main Street approximately 0.75 miles from the southern extent of the UGB at South 28<sup>th</sup> Street and

on South A approximately  $\frac{1}{2}$  mile from the UGB. Existing frequent transit service is on Main Street.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.75 miles to the southeastern extent of the UGB at Jasper Road.

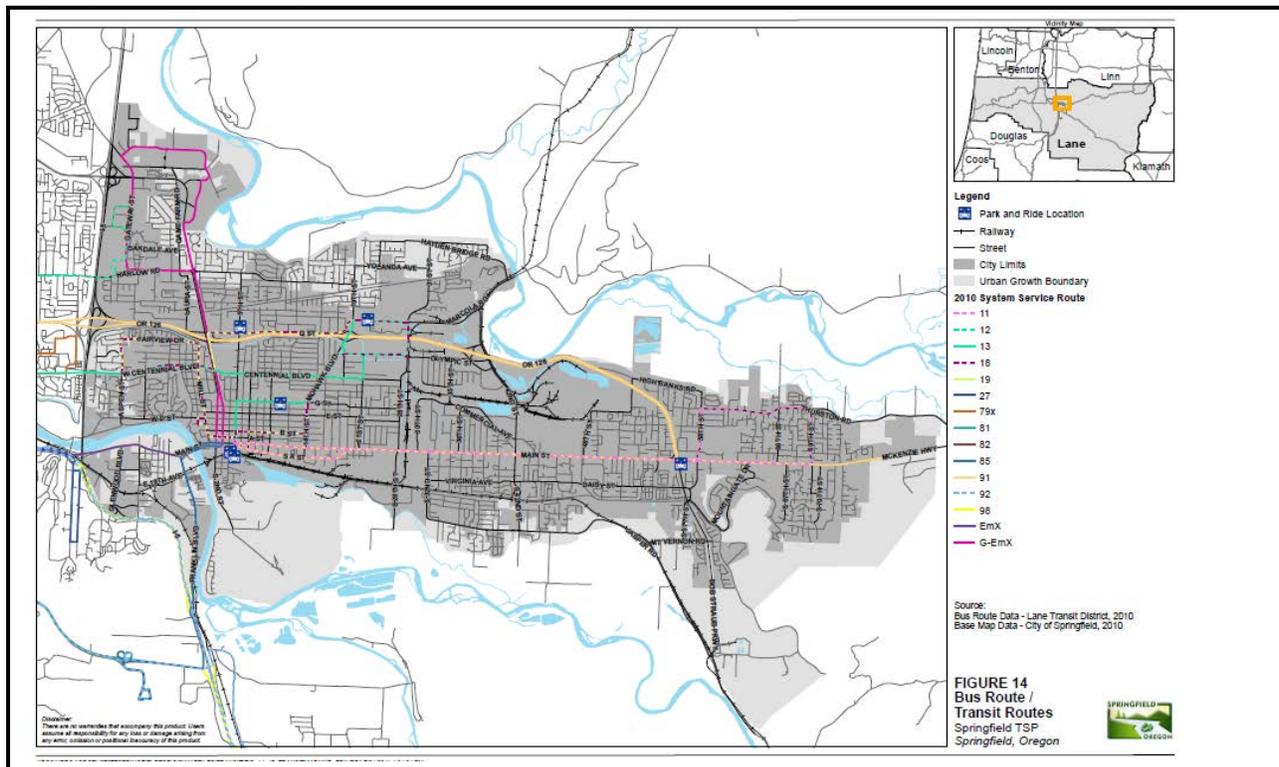


Detail of Springfield TSP Figure 9

### Existing Transit Service Routes

The following map depicts existing bus/transit routes operating in 2010 to demonstrate the location of existing transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to serve urban development is an important consideration to ensure that new employment areas are accessible to the population.

## Springfield TSP Existing Conditions Bus Routes/Transit Routes



As shown in the following details of the Lane Transit District System Map, three exception areas — the Far East, Seavey Loop/Goshen and Jasper Bridge B — are currently served by the public transit system or have existing routes in the vicinity of the exception area.

In 2010, Route 91 McKenzie Bridge provides service along East Main/Highway 126 via Route 91 with limited service and trips:

### 91 - McKenzie Br - Route Description

*The route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on 7th Avenue. The bus crosses the Ferry Street Bridge and travels on I-105/Highway 126 to arrive at Thurston Station (Bay B). It continues along Main Street/Highway 126 to serve Walterville, Leaburg, Vida, Nimrod, Finn Rock, Blue River, McKenzie Bridge and McKenzie River Ranger Station. To return the bus travels on the same route to Eugene Station.*

*During morning trips the bus serves McKenzie River Drive between Blue River and McKenzie Bridge before arriving at the Ranger Station. After noon, this area will be served after departing from the Ranger Station to head back to Eugene Station*

*Route Variation: The weekday 5:30 PM trip; the route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on Broadway which becomes Franklin Boulevard where it serves the Onyx Street. Franklin Boulevard becomes South*

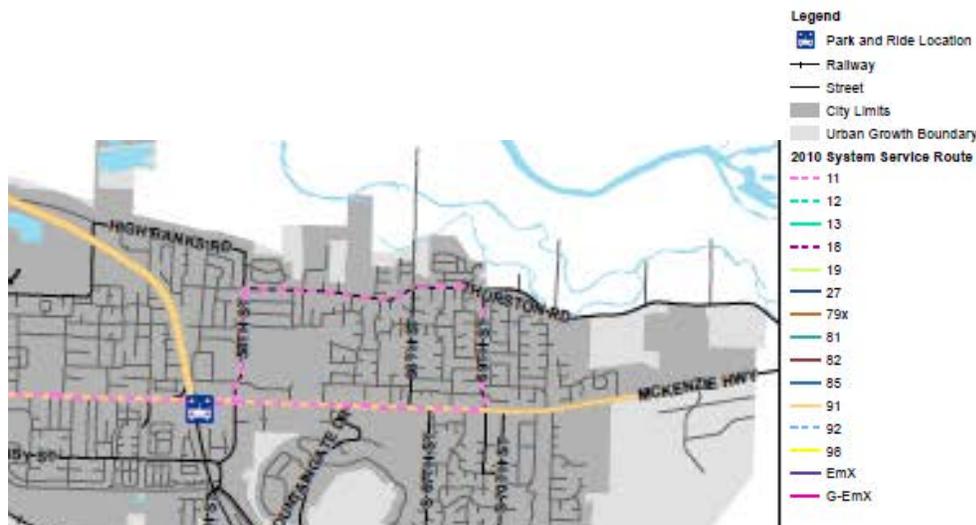
A Street where the bus serves Springfield Station (Bay H). The bus continues East down South A Street to Main Street until reaching Thurston Station (Bay B). The bus travels on regular routing after Thurston Station.

The weekday 6:14 AM trip which begins at the McKenzie River Ranger Station and follows the same limited routing in reverse upon reaching Springfield Station. However, the bus travels from Franklin Boulevard East on 11th to Eugene Station.

Route 91 Map



Routes 91 and 11 detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 91 transit service to eastern UGB extent. UGB is indicated by light gray.



As shown in the following description and route map detail of the Lane Transit District System Map, Route 92 Lowell/LCC provides limited service and trips connecting Eugene, Pleasant Hill and Lowell via Franklin Blvd. in the vicinity of the Seavey Loop/Goshen exception area, and following Highway 58 in the vicinity of exception area Jasper Bridge B:

92 - Lowell/LCC - Route Description<sup>40</sup>

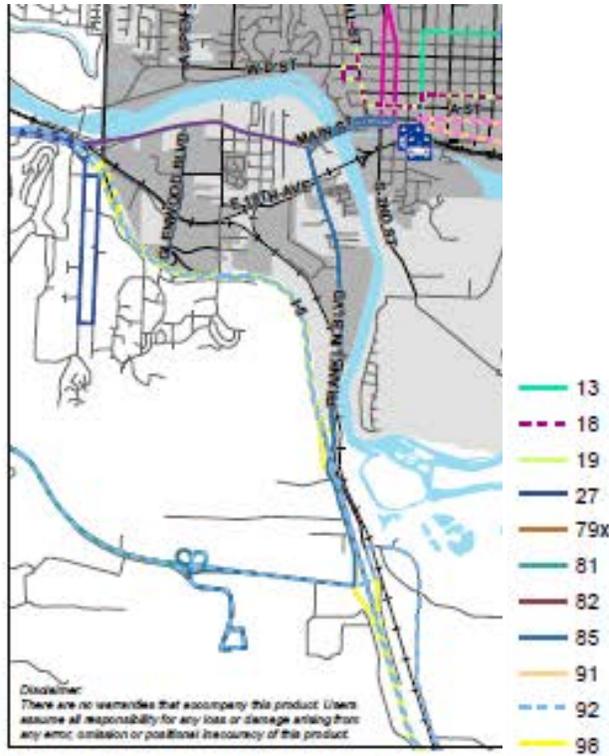
The route begins at Eugene Station (Bay I) and travels South on Willamette Street, East on 13th Avenue, and South on Pearl Street where it serves the West side of South Eugene High School before continuing South on Amazon Parkway. Upon reaching Amazon Station (Bay C), the bus turns East and travel on 30th Avenue to the Lane Community College exit, and South on Gonyea where it serves Lane Community College Station (Bay E), and Main Campus. The bus departs Lane Community College Station on Gonyea Road and travels East on 30th Avenue across I-5 onto Franklin Boulevard, and travels onto Seavey Loop Road. The bus continues towards Goshen and takes HWY 58 Eastbound where it serves Pleasant Hill. The bus travels North on Pioneer Street to Lowell, crossing Dexter Reservoir, West on East Main Street, North on Moss Street, and East on 2nd Street. The bus turns South on Pioneer Street and continues to Hwy 58 West to travel the regular routing to return to Eugene Station. Route Variation: The 6:32 PM trip leaving Lowell. The bus heads East on Jasper-Lowell Road and resumes on regular inbound routing until the bus reaches 20th Avenue. The 6:32 PM trip does not service LCC. The bus continues West on 30th Avenue and serves Amazon Station (Bay A). It continues North on Amazon Parkway, West on 19th Avenue, North on Oak Street, and West on 13th Avenue where it serves Sacred Heart Medical Center University District and UO Station (Bay B). The bus will head North on Kincaid Street and West on 11th Avenue to Eugene Station.

LTD Route 92 Map

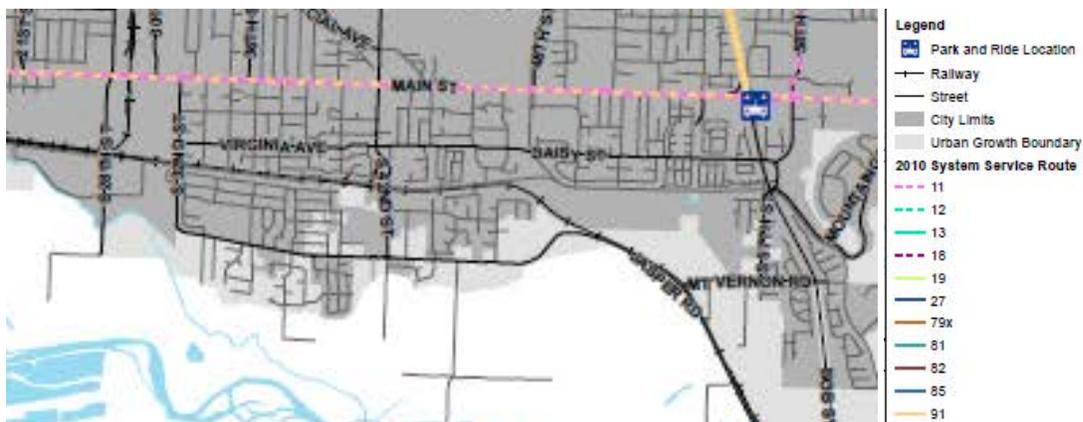


<sup>40</sup> LTD website <https://www.ltd.org/92-lowell-lcc-route-description/>

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.

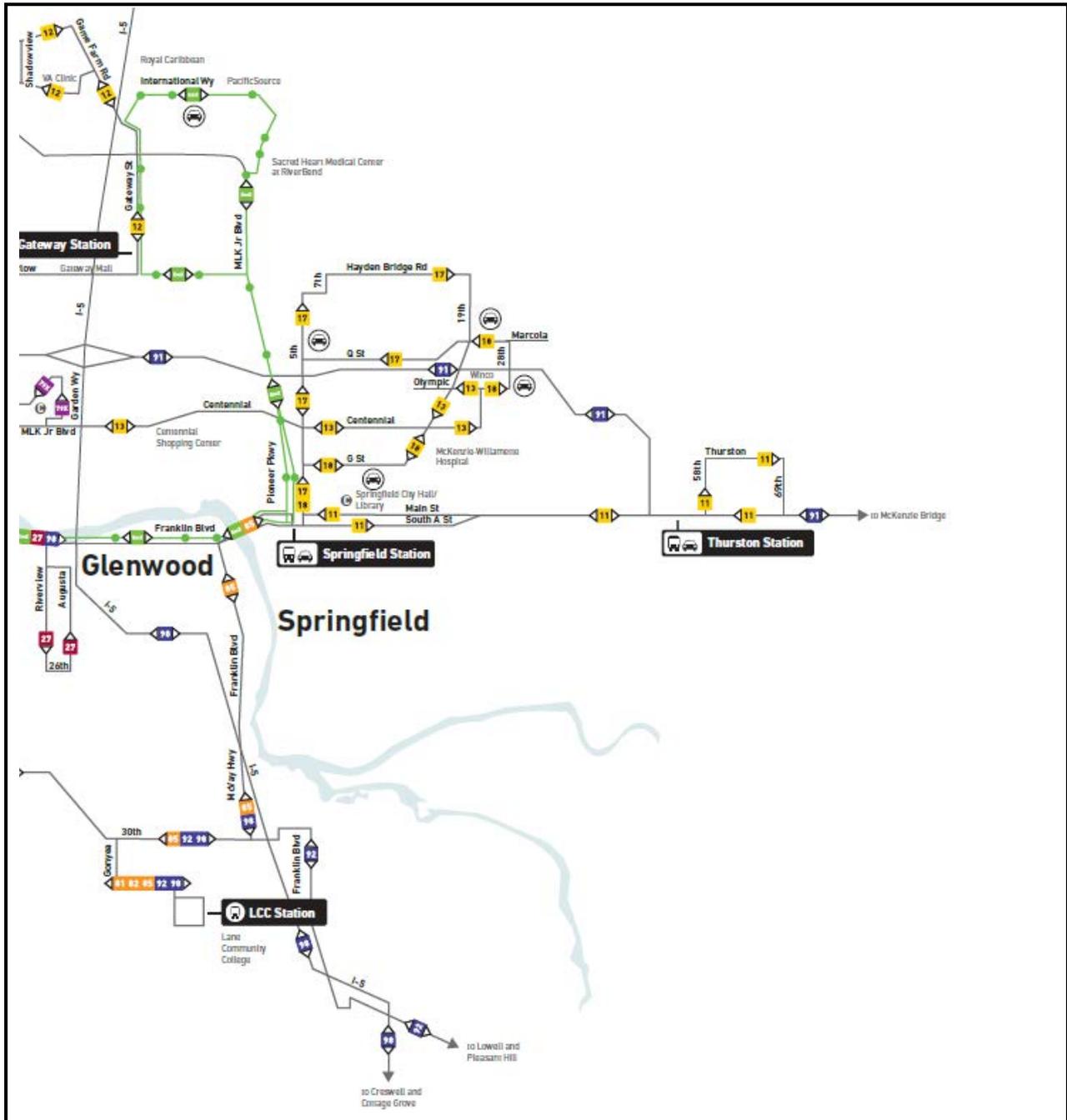


Except where noted above, second and third priority exception and non-resource lands and marginal land areas are located distant to the Lane Transit District System.



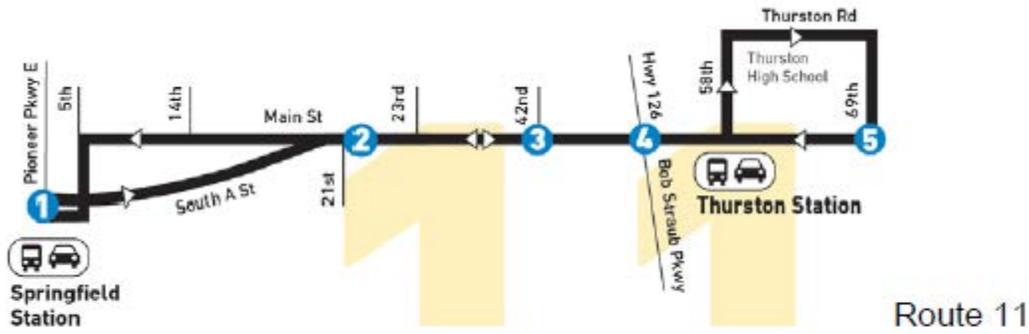
### Springfield Detail of Lane Transit District System Map 2015<sup>42</sup>

Green routes indicate existing EmX Bus Rapid Transit System frequent transit service.<sup>43</sup>

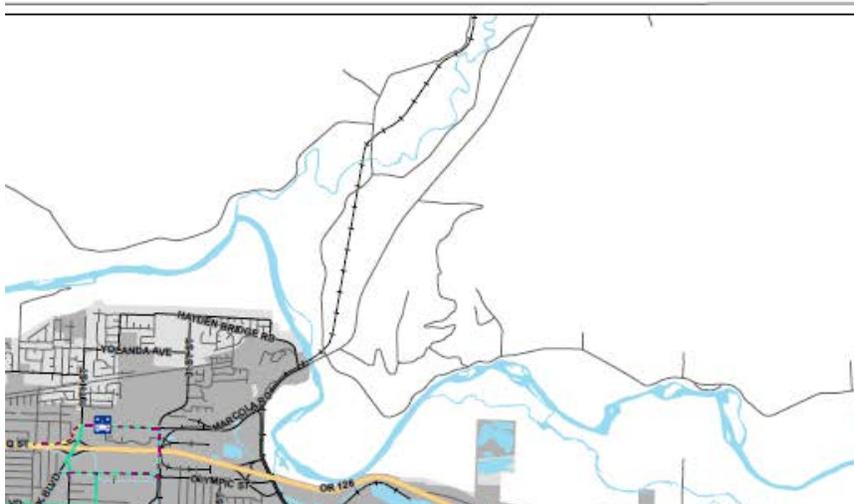


<sup>42</sup> Lane Transit District website, <https://www.ltd.org/maps-stations-routing/> accessed 2-1-15.

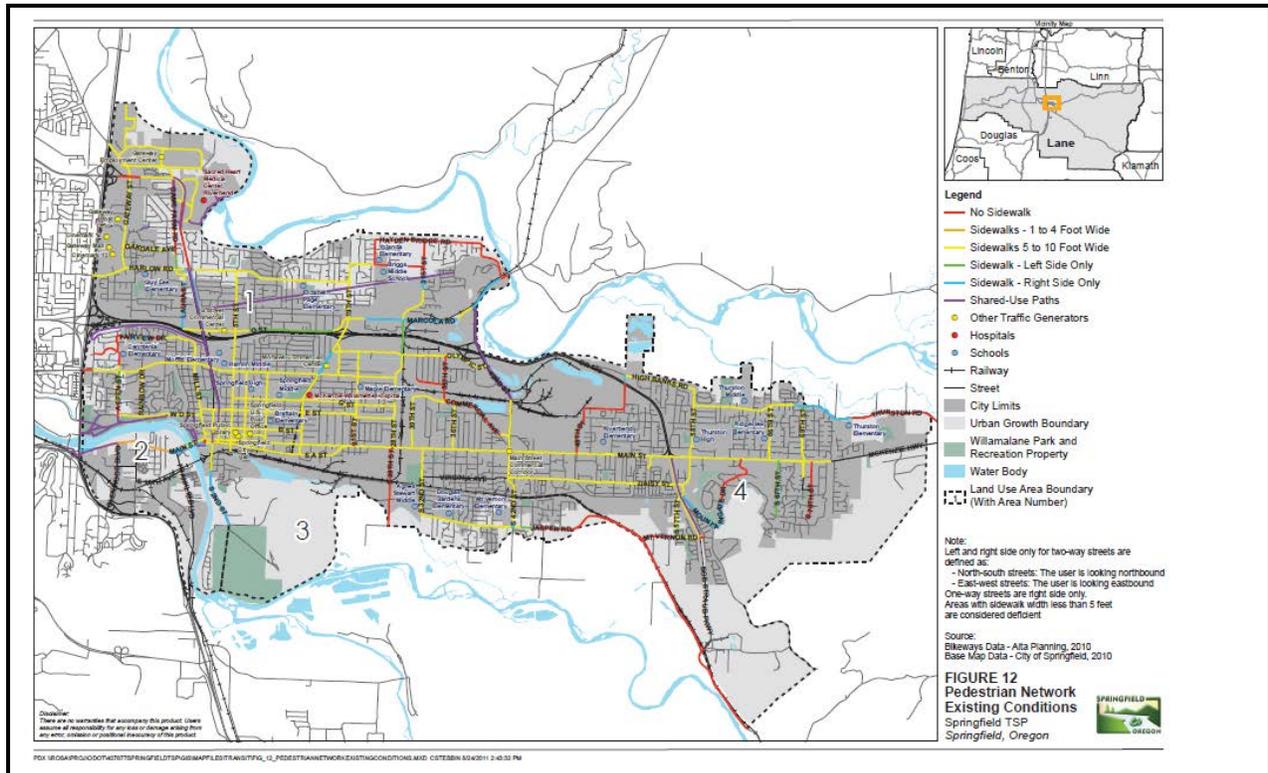
<sup>43</sup> The Main Street route study to select a Preferred Alternative for service improvements between Springfield Station and Thurston Station is underway in 2016.



Route 11 currently provides services in the Main Street corridor east to 58<sup>th</sup> Street (Thurston High School) continuing on Thurston Road east to 69<sup>th</sup> Street and back west to Thurston Station.



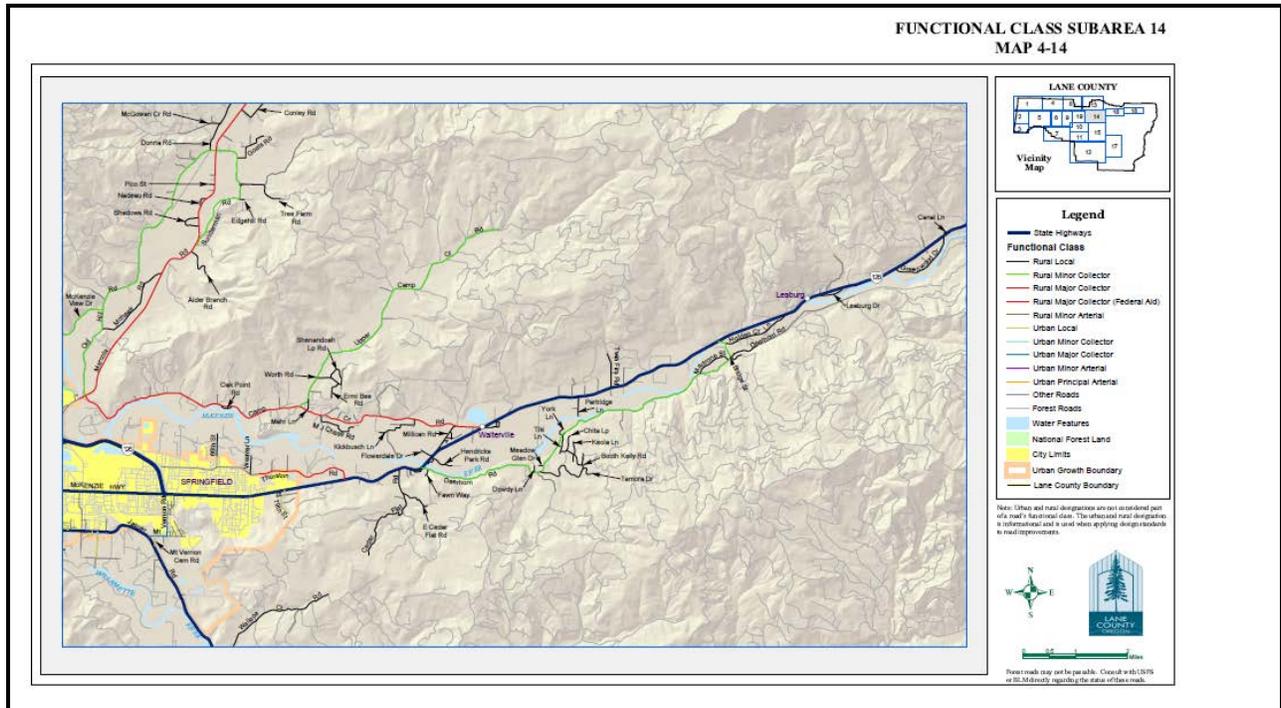
## Springfield TSP Existing Conditions Pedestrian Network



The preceding map depicts Springfield’s existing network of pedestrian facilities, as of 2010. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. The accessibility of transit services is dependent upon one’s ability walk safely to and from a transit stop. Proximity to existing and planned networked pedestrian facilities is an important consideration to ensure that new employment areas are accessible to the workforce population, including the transportation disadvantaged and employees who choose alternative modes of transportation.

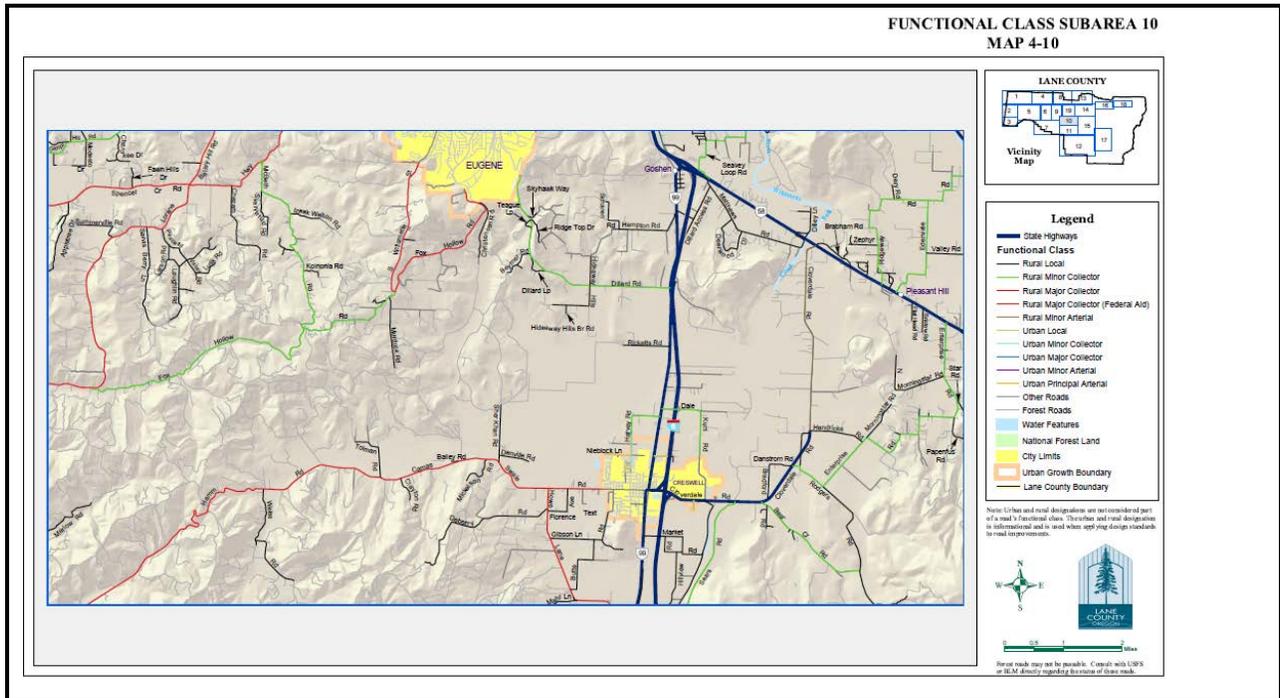
The following maps depict Lane County’s existing transportation system to explain the location of existing facilities in relationship with lands outside the UGB. The maps also depict topography as it relates to the location of the rural road network. Topography is a constraint that influences and places limitations on potential transportation extensions to lands beyond the existing UGB and to potential connectivity with lands inside the existing UGB.

Lane County TSP Functional Class Subarea 14



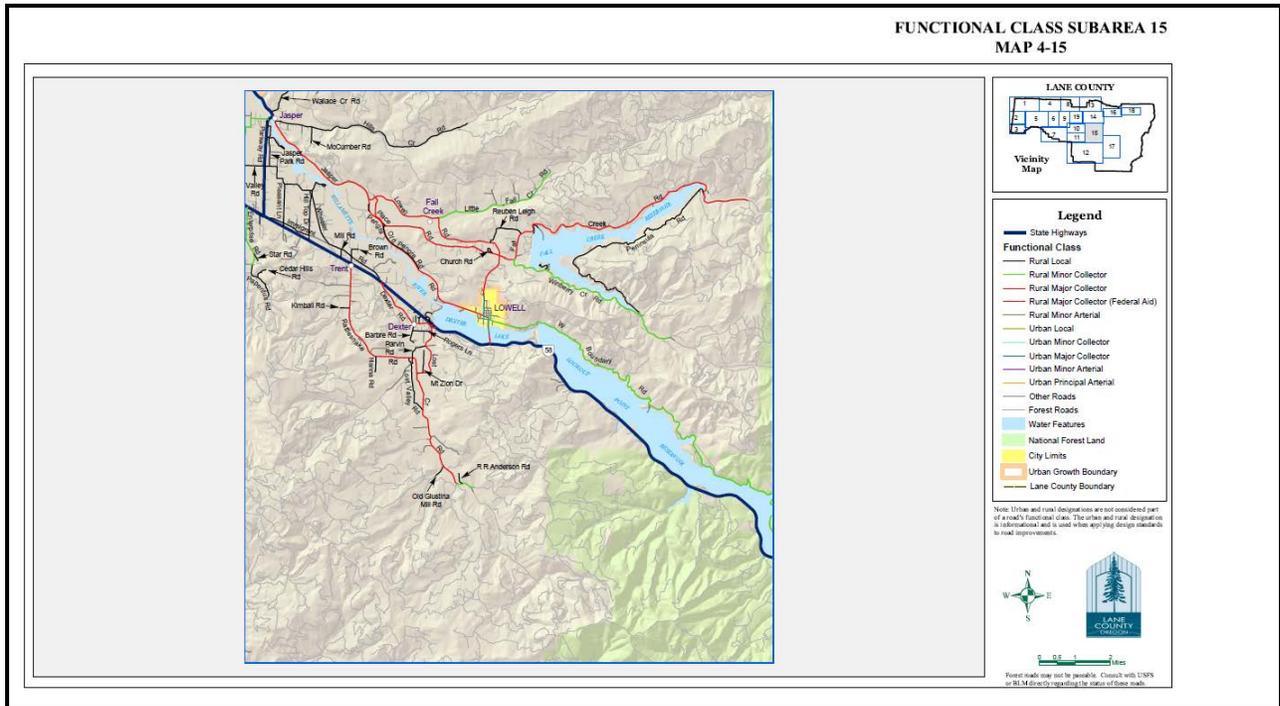
The preceding map depicts Lane County’s rural road network proximate to the **Far East, Thurston, Mohawk, Oxbow/Camp Creek, South Hills, Wallace Creek, and Clearwater** second priority exception areas. The preceding map depicts Lane County’s rural road network in the vicinity of the **Mohawk, Wallace Creek and Oxbow/Camp Creek** third priority marginal land areas.

Lane County TSP Functional Class Subarea 10



The preceding map depicts Lane County’s rural road network in the vicinity of the **Seavey Loop**, and **Seavey Loop/Goshen** second priority exception areas.

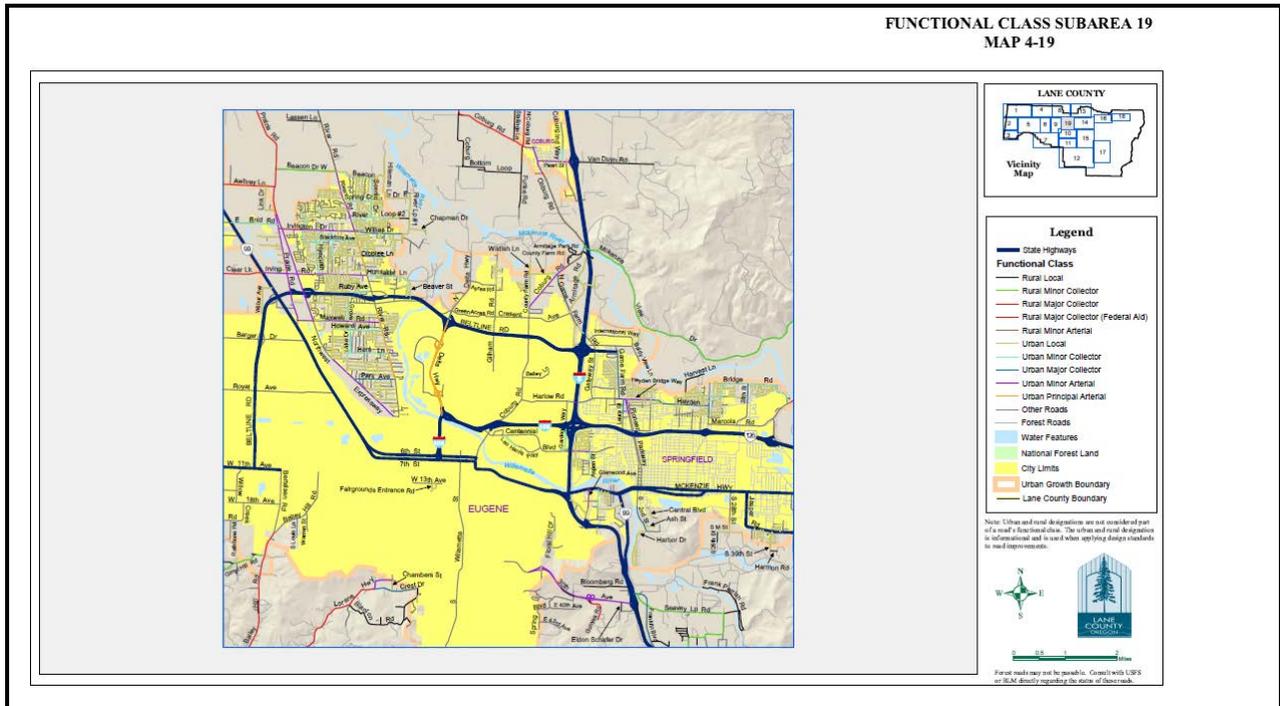
Lane County TSP Functional Class Subarea 15



The preceding map depicts Lane County’s rural road network in the vicinity of the **Wallace Creek** and **Jasper Bridge** second priority exception areas, and Wallace Creek third priority marginal areas.

Lane County TSP Functional Class Subarea 19

FUNCTIONAL CLASS SUBAREA 19  
MAP 4-19



The preceding map depicts Lane County’s rural road network in the vicinity of the **McKenzie View** and **Seavey Loop** second priority exception areas.

## Public Services Analysis of Potentially Suitable Second Priority Land

Table 5 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.<sup>44</sup> 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.

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<sup>44</sup> 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**

<b>McKenzie View B Exception Parcels:</b>	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Would need to bore under river (if permitted) to extend public water service main</li> <li>Nearest water transmission line is a 24" line in the vicinity of 28<sup>th</sup> Street/Yolanda, approximately 6,000-8000 feet from the parcels</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street.</li> <li>Would need to upgrade Vera pump station.</li> <li>Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>Separated from urban services by the McKenzie River</li> <li>No developed system or outfalls in vicinity</li> <li>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.</li> <li>The McKenzie River is federally classified as critical salmonid habitat.</li> </ul>
<b>Transportation (including transit service)</b>	<ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>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.</li> <li>All roads will need improvement to accommodate industrial or commercial development and multi-modal access</li> <li>Upgrade McKenzie View Drive to urban standards and provide capacity improvements</li> <li>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."<sup>45</sup></li> <li>No transit services, pedestrian facilities or ADA access in area.</li> <li>Same findings as Mohawk re upgrades to 42<sup>nd</sup> St., 42<sup>nd</sup>/Marcola intersection and 42<sup>nd</sup> and Hwy 126 interchange</li> </ul>
<b>Urban services conclusion/</b>	The City excluded the <b>McKenzie View Exception</b> parcels from consideration because this areas does not provide and cannot reasonably be expected to be provided with

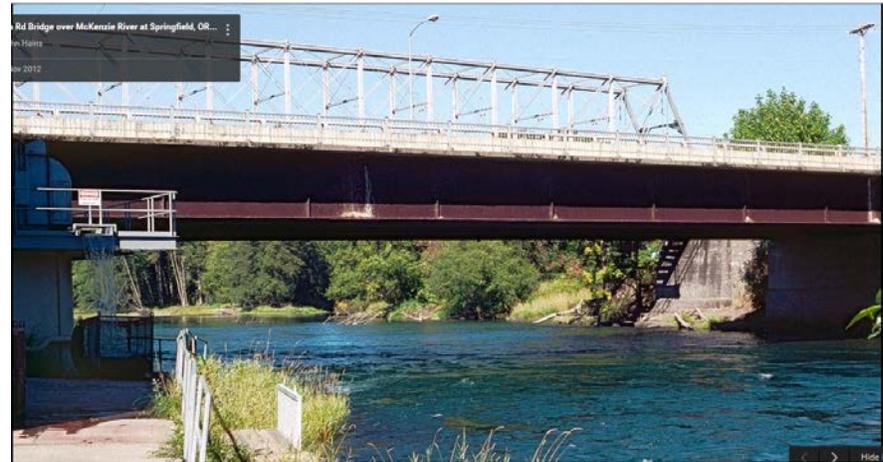
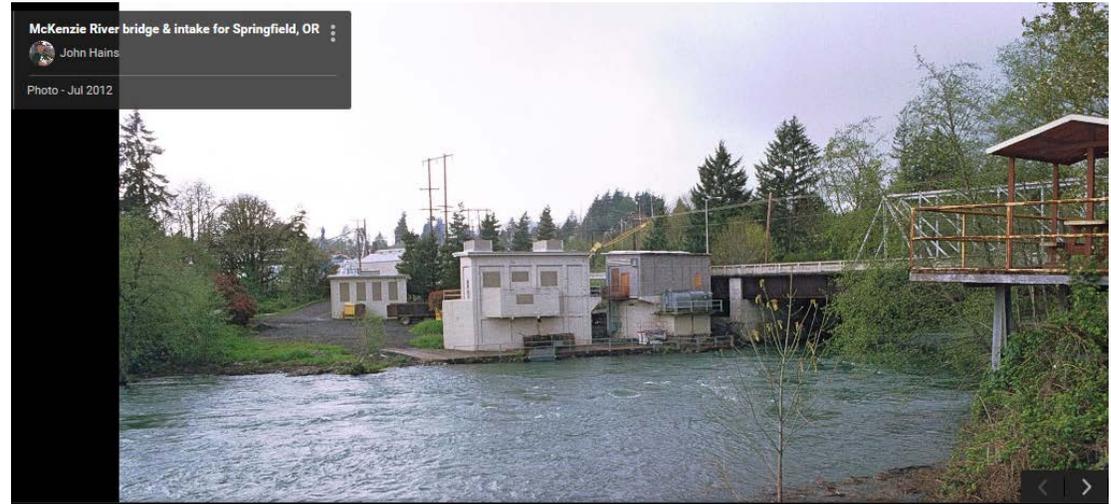
<sup>45</sup> Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

<p>physical constraints <b>McKenzie View Exception</b></p>	<p>the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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**Mohawk A, B, and C Exception Parcels:**

<p><b>Water</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• B and C are isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• River is a barrier to extension of water transmission that makes extension of public water system infeasible<sup>46</sup></li> <li>• Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge</li> </ul>
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**Photos: EWEB Intake at Hayden Bridge and existing Hayden Bridge (Marcola Road crossing McKenzie)**



<sup>46</sup> 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.

<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• B and C are isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• Mohawk C parcels are located more than 2 miles from UGB</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by the McKenzie River</li> <li>• No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule<sup>47</sup>)</li> <li>• Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake<sup>48</sup></li> <li>• No developed system in vicinity</li> <li>• Mohawk C parcels &gt;2 miles from UGB</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>4 Difficult</b></p> <ul style="list-style-type: none"> <li>• B and C are isolated by distance and topography from existing urban services</li> <li>• Access to exception parcels from Springfield is across the McKenzie River via 42<sup>nd</sup> 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).<sup>49 50</sup> Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> <li>• Upgrade 42<sup>nd</sup> St. to urban standards<sup>51</sup></li> <li>• Upgrade 42<sup>nd</sup>/Marcola intersection</li> <li>• May need to upgrade 42<sup>nd</sup> and OR 126 interchange<sup>52</sup></li> <li>• Upgrade Camp Creek to urban standards and provide capacity improvements</li> <li>• Would require internal collector street system.</li> <li>• Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access.</li> </ul> </li> <li>• Urban standards and capacity improvements needed on existing and future collector</li> </ul>

<sup>47</sup> 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).

<sup>48</sup> 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.

<sup>49</sup> Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

<sup>50</sup> Source of road widths: Lane County Roads Inventory,

[http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB\\_RoadsInventory.pdf](http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf)

Accessed January 26, 2016

<sup>51</sup> Project # R-41 42<sup>nd</sup> St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

<sup>52</sup> See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42<sup>nd</sup> St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system.” Project #R-35 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP, Appendix A, p. 14.

	<p>system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19<sup>th</sup> St, 23<sup>rd</sup> St, and 31<sup>st</sup> St</p> <ul style="list-style-type: none"> <li>• Previous ODOT study showed a need for upgrading at Hwy 126 and 42<sup>nd</sup> St. (without UGB expansion). Traffic backs up at the 42<sup>nd</sup> St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126.</li> <li>• 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 &gt;2 miles from UGB</li> <li>• Steep slopes east of Marcola Rd.</li> <li>• Access to Mohawk A, B and C would route traffic through farmland and rural residential areas</li> <li>• 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.”<sup>53</sup></li> <li>• No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19<sup>th</sup> 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.”<sup>54</sup></li> </ul>
<p>Urban services conclusion/ physical constraints <b>Mohawk Exception</b></p>	<p>The City excluded the <b>Mohawk Exception</b> parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in 660-009-0005(9).</p>
<b>Oxbow/Camp Creek Exception Parcels</b>	
<p><b>Water</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• Nearest water transmission line is a 16” line Marcola Rd. /Hayden Bridge</li> <li>• River is a barrier to extension of water transmission that makes extension of public water system infeasible<sup>55</sup></li> <li>• Same findings as Mohawk</li> </ul>

<sup>53</sup> 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.

<sup>54</sup> 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).

<sup>55</sup> 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.

<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• 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.</li> <li>• EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply.</li> <li>• 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.</li> <li>• 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.</li> <li>• Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street.</li> <li>• Same findings as Mohawk</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by the McKenzie River</li> <li>• No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)<sup>56</sup></li> <li>• EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply.</li> <li>• No developed system or existing discharge permits in vicinity</li> <li>• Same findings as Mohawk are applicable</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• 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:</li> <li>• Upgrade 42<sup>nd</sup> St. to urban standards</li> <li>• Upgrade 42<sup>nd</sup>/Marcola intersection</li> <li>• Upgrade 42<sup>nd</sup> and Hwy 126 interchange</li> <li>• Upgrade Camp Creek to urban standards and provide capacity improvements</li> <li>• Would require internal collector street system</li> <li>• 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.”<sup>57</sup></li> <li>• No transit services, pedestrian facilities or ADA access in area.</li> <li>• Same findings as Mohawk are applicable</li> </ul>
<b>Urban services conclusion: Oxbow/Camp</b>	<p>The City excluded the <b>Oxbow/Camp Creek Exception</b> parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation</p>

<sup>56</sup> 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).

<sup>57</sup> 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

<b>Creek Exception</b>	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).
<b>Jasper Bridge Exception Parcels</b>	
<b>Water</b>	<p><b>A: 5 Difficult</b>  <b>B: 4 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Must cross Willamette River with urban services to serve Jasper Bridge A (west side) parcels.</li> <li>• 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.</li> <li>• A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• The nearest sewer is 2-3 miles from these parcels. The Jasper Trunk terminus at S. 57<sup>th</sup> is a 12” main. Nearest 27” main is at 42<sup>nd</sup> St. Multiple pump stations would be needed, or a new treatment facility if permitting would allow.</li> <li>• Would require pump stations and trunk line extensions to cross Willamette River to serve west side parcels.</li> <li>• Jasper trunk sewer may not have adequate capacity to serve industrial uses, so a new parallel trunk may be necessary</li> <li>• May be more feasible to serve from Pleasant Hill if a public collection/treatment system is developed for that area in the future</li> <li>• Geology may allow boring under river in this location</li> </ul>
<b>Stormwater</b>	<p><b>2 Easier</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Development of the area may require land acquisition to safely convey stormwater runoff to the river.</li> <li>• Would require new outfall(s) to Willamette River.</li> <li>• 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.</li> <li>• The Middle Fork Willamette River is federally classified as critical salmonid habitat.</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Access from Jasper Road but urban standards and capacity improvements would be necessary.<sup>58</sup></li> <li>• Topography limits expansion of Jasper Rd.</li> </ul>

<sup>58</sup> Project #US-12 Jasper Road-South 42<sup>nd</sup> Street to northwest of Mt. Vernon Road, and Project # US-13 Bob Straub Parkway – Mt. Vernon Rd to UGB are identified as a “Beyond 20-year Projects,” TSP Projects Located on Lane CO Facilities list, in the 2035 Springfield TSP, Attachment A.

	<ul style="list-style-type: none"> <li>• West side parcels: The existing 1952 metal truss Jasper Bridge<sup>59</sup> 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.</li> <li>• Connection to Hwy 58 but limited connection to Hwy 126/I-5</li> <li>• Need to further study capacity at the I-5/Hwy 58<sup>th</sup> interchange. Improvements may be needed depending on size and location of expansion area.”<sup>60,61</sup></li> <li>• Access to west side parcels would route traffic through existing rural residential development on Edenvale Rd.</li> <li>• 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.”<sup>62</sup></li> <li>• Needs internal collector system</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031.<sup>63 64</sup></li> <li>• Bob Straub Parkway – Mt. Vernon to UGB needs to be improved to a three-lane cross section with sidewalks and bike facilities.<sup>65</sup></li> <li>• No pedestrian facilities or ADA access in area.</li> <li>• Nearest public transit service is at Thurston Station on Main Street, &gt;3 miles away.<sup>66</sup></li> </ul>
<p>Urban services conclusion: <b>Jasper Bridge Exception</b></p>	<p>The City excluded the <b>Jasper Bridge Exception</b> parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>

<sup>59</sup> 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.

<sup>60</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

<sup>61</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> are listed as financially constrained projects in the Regional Transportation Plan (RTP).

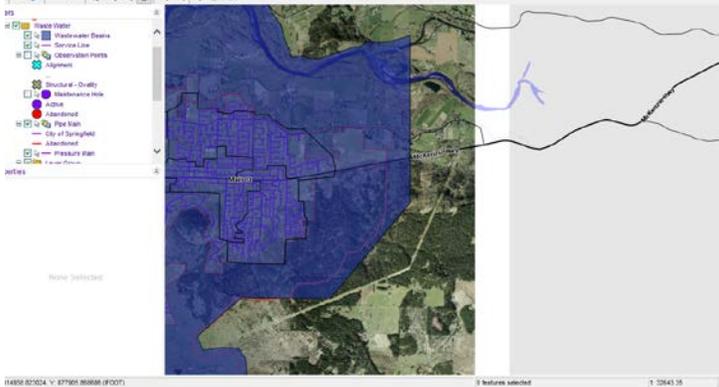
<sup>62</sup> *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

<sup>63</sup> Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>64</sup> Project #R-58 OR 126/52<sup>nd</sup> 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.

<sup>65</sup> 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.

<sup>66</sup> 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	
<b>Water</b>	<p><b>A: 1 Easier</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>B: 5 Difficult</b></p> <ul style="list-style-type: none"> <li>Separated from urban services by distance and topography.</li> <li>The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126.</li> <li>Distant from SUB service area.</li> <li>Higher elevation would require pumping and reservoir.</li> </ul>
<b>Wastewater</b>	<p><b>A: 1 Easier</b></p> <p><b>B: 5 Difficult</b> - Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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).</li> <li>Steep slopes south of McKenzie Hwy/Main St.</li> </ul>  <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with <b>Far East</b>, <b>Thurston</b> and <b>Oxbow/Camp Creek</b> areas</p>
<b>Stormwater</b>	<p><b>A: 3 Medium Difficult</b></p> <p><b>B: 5 Difficult</b></p> <ul style="list-style-type: none"> <li>No developed system in vicinity</li> <li>Cedar Creek drainage basin is nearing stormwater receiving capacity<sup>67, 68</sup> (unfunded upgrade project is identified in CIP).</li> <li>No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)<sup>69</sup></li> </ul>

<sup>67</sup> 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.

<sup>68</sup> 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.

<sup>69</sup> OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered "essential fish habitat" for threatened and endangered species (Table 11, p. 20).

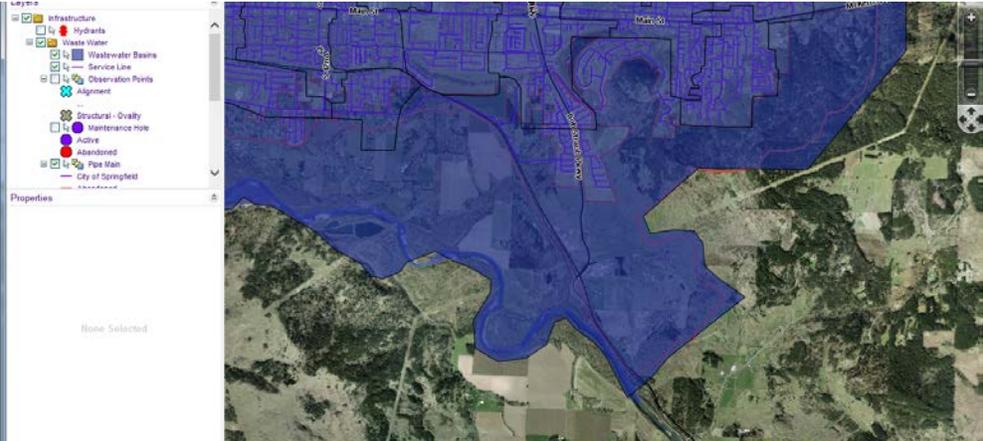
	<ul style="list-style-type: none"> <li>• Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls</li> <li>• Ability to manage stormwater on-site will be limited by high water table and typically<sup>70</sup> requires 8-10% of parcel area.</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>A: 1 Easier</b></p> <p><b>B: 5 Difficult.</b> Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> <li>• Access to A and B from E. Main Street/McKenzie Hwy (State Highway) and Thurston Road (Rural Major Collector).</li> <li>• Two new bridges would be needed over Cedar Creek on 66<sup>th</sup> and Weaver Lane.</li> <li>• 66<sup>th</sup> St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades.</li> <li>• Extend Billings Rd. to E. Main St.</li> <li>• Upgrade capacity on 66<sup>th</sup> St. from Main St. to Thurston Rd.</li> <li>• Upgrade capacity on Thurston Rd. and provide urban standards from 69<sup>th</sup> St. to E. Main Street</li> <li>• Improve Thurston Rd between Weaver Rd. and UGB<sup>71</sup></li> <li>• Intersection improvements at Thurston Rd. and E. Main St.</li> <li>• Would need internal collector street system</li> <li>• Access to Exception C from Cedar Flat Road, Rural Local Collector</li> <li>• slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031.<sup>72, 73</sup></li> </ul>
Urban services conclusion: <b>Far East Exception</b>	<p><b>Far East Exception A parcels</b> 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 <b>Far East Exception B</b> parcels from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as</p>

<sup>70</sup> Eugene Stormwater Management Manual “Simplified Method”, Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

<sup>71</sup> 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.

<sup>72</sup> Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>73</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> 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).
<b>Wallace Creek Exception Parcels</b>	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography.</li> <li>• Exception parcels are located more than 3 miles from the nearest water main.</li> <li>• 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.</li> <li>• A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.</li> <li>• Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative.</li> <li>• No developed system in vicinity</li> </ul>
<b>Wastewater</b>	<p><b>4 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• No developed system in vicinity.</li> <li>• 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.</li> <li>• The nearest sewer is 2-3 miles from the parcels. The Jasper Trunk terminus at S. 57<sup>th</sup> is a 12" main. Nearest 27" main is at 42<sup>nd</sup> St.</li> <li>• 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.</li> <li>• Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary.</li> </ul>  <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with <b>Wallace Creek, South Hills, West Jasper Mahogany, and Jasper Bridge</b> areas</p>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Upgrade existing Wallace Creek outfall to Middle Fork Willamette River</li> <li>• No developed system in vicinity</li> <li>• Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems.</li> <li>• Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek</li> <li>• New stormwater outfalls will involve several other regulatory agencies because the</li> </ul>

	<p>work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The Middle Fork Willamette River is federally classified as critical salmonid habitat.</li> </ul>
<p><b>Transportation (including transit service)</b></p>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Access limited to one way in/out</li> <li>• 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.</li> <li>• Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint.</li> <li>• DOGAMI SLIDO mapped landslide hazard area</li> <li>• Access via Jasper Rd., but urban standards and capacity improvements needed<sup>74</sup>: 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.</li> <li>• Topography limits expansion of Jasper Rd.</li> <li>• 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.</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.<sup>75</sup></li> <li>• Jasper Rd. &amp; 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.”</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>• 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.</li> <li>• Connection to Hwy 58 but limited connection to Hwy 126/I-5</li> <li>• Need to further study capacity at the I-5/Hwy 58<sup>th</sup> interchange. Improvements may be needed depending on size and location of expansion area.”<sup>76</sup></li> <li>• Nearest transit service is at Thurston Station on Main Street, &gt;3 miles away.<sup>77</sup> No transit services, pedestrian facilities or ADA access in area.</li> <li>• “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.</li> </ul>

<sup>74</sup> See Jasper Bridge exception area

<sup>75</sup> Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

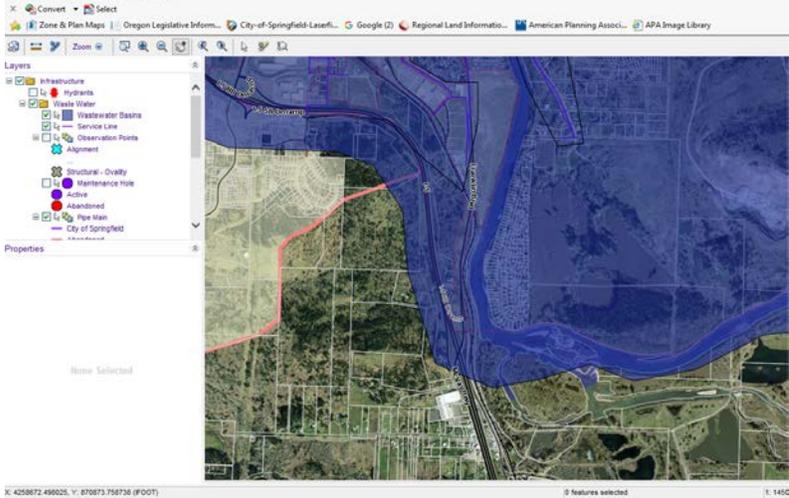
<sup>76</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

<sup>77</sup> 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/54 <sup>th</sup> St. and Main St/58 <sup>th</sup> St all exceed capacity by 2031. <sup>78, 79</sup>
Urban services conclusion: <b>Wallace Creek Exception</b>	The City excluded the <b>Wallace Creek</b> 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).
<b>Seavey Loop Exception B, C and E Parcels: Second Priority</b>	
<b>Water</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>Existing public rural water system and service provided by Willamette Water Company</li> <li>Exception B, C and E parcels are located more than 2 miles from the nearest SUB water main, a 16" line in McVay.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>No developed system in vicinity</li> <li>Isolated by distance and topography from existing urban services</li> <li>Would require sewer extension from the Franklin/McVay trunk 18" line in Glenwood</li> <li>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</li> <li>Would require upgrades to existing Glenwood MWMC pump station</li> <li>Would require a new small sized wastewater pump station located near the intersection of 30th Avenue and College View Road.</li> <li>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.</li> <li>Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road.</li> <li>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.</li> </ul>

<sup>78</sup> Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>79</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with <b>Seavey Loop</b> study area</p>
<p><b>Stormwater</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<p><b>Transportation (including transit service)</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Proximate to I-5, but access is indirect and limited by the awkward connection and limited capacity at Franklin and 30<sup>th</sup> Ave. interchange. Access to I-5 at south end is underneath the freeway, via Highway 58/Goshen interchange.</li> <li>• Limited capacity at I-5/30<sup>th</sup> Street interchange. “Need to further study capacity at the I-5/30<sup>th</sup> Street interchange and the I-5/Hwy 58<sup>th</sup> interchange. Improvements at one or both locations may be needed depending on size and location of expansion area.”<sup>80</sup></li> </ul>

<sup>80</sup> 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.<sup>81</sup>
- 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.”<sup>82</sup> No pedestrian facilities or ADA access in area.



I-5, Franklin, and rail overpass at northern entrance to Seavey Loop area

<sup>81</sup> At a meeting of the College View Stakeholder Working Group meeting, ODOT staff David Helton stated that the existing 30<sup>th</sup> Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept (as mapped on that date).

<sup>82</sup> Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.



I-5/30<sup>th</sup> ramp, Franklin Blvd., College View Rd. and railroad corridor

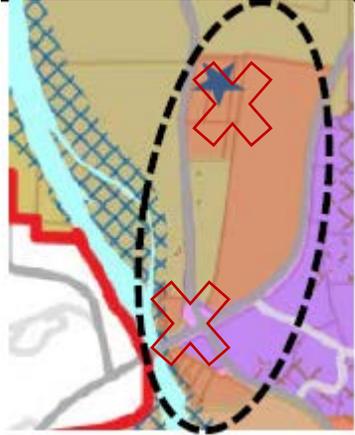
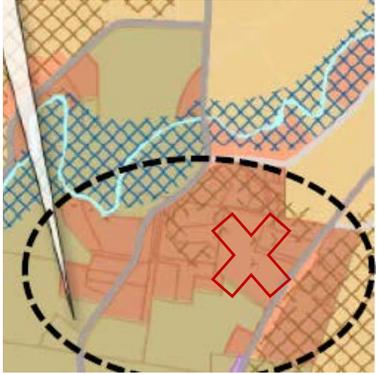
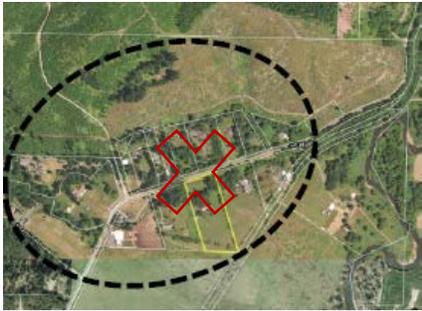
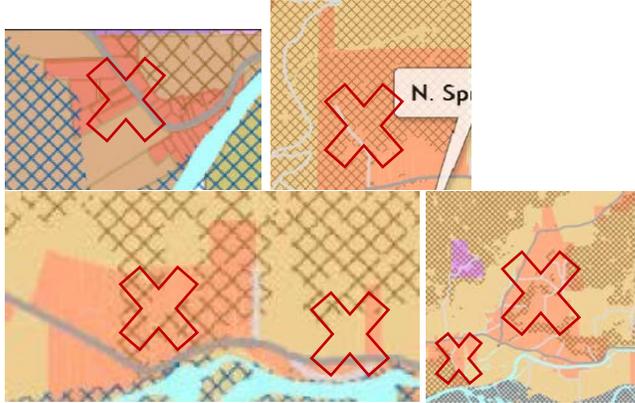
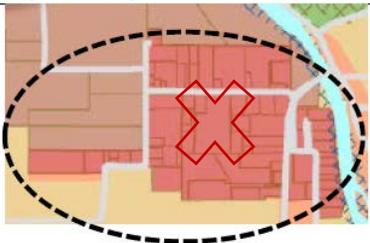


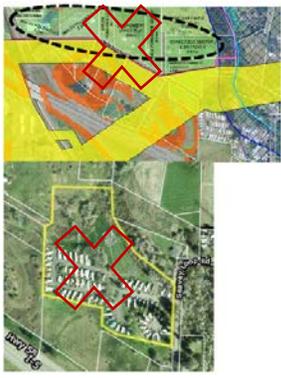
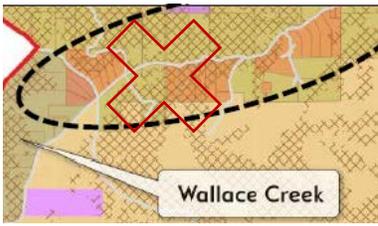
Access to I-5 is via South Franklin/Hwy 99, under I-5 overpass, and via Hwy 58 ramp

Urban services conclusion:  
**Seavey Loop Exception B, C and E**

The City excluded the **Seavey Loop B, C and E** exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

**Table 6: Second priority exception parcels excluded: public facilities constraints [ORS 197.298(3)(b)]**

<p><b>McKenzie View B</b></p> 	<p><b>Mohawk A</b></p> 	<p><b>Mohawk B</b></p> 
<p><b>Mohawk C</b></p> 	<p><b>Oxbow/Camp Creek</b></p> 	
<p><b>Far East Springfield B</b></p> 		<p><b>Jasper Bridge A</b></p> 

<p><b>Jasper Bridge B</b></p> 	<p><b>Seavey Loop B</b></p> 	<p><b>Seavey Loop C</b></p> 
<p><b>Seavey Loop E</b></p> 		<p><b>Wallace Creek</b></p> 

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels when it identified potentially suitable ORS 197.298 second priority exception land parcels; and that the City conducted the public services analysis in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system.

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels all exception parcels as the factual basis to justify excluding ORS 197.298 second priority exception land parcels from further analysis.

Although second priority areas McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels were excluded from further consideration under OAR 660-009-0005(12) above (in Table 4), because they lacked the appropriate site characteristics, areas McKenzie View A, West Jasper/Mahogany, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels could

also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

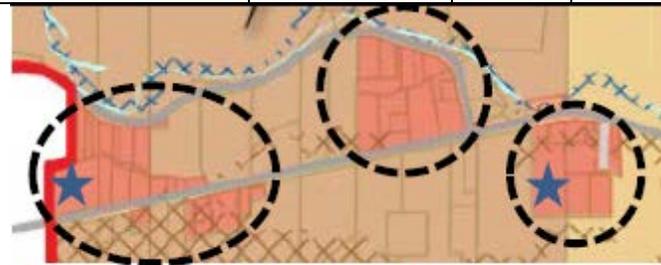
Exception areas excluded based upon specific land needs (197.298(3)(a)) in a previous step: **McKenzie View A\*, West Jasper/Mahogany\*, Clearwater\*, Seavey Loop A\*, Seavey Loop D\*, Seavey Loop F\*, Seavey Loop/Goshen\***

Exception areas excluded based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(b)): **Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E**

After excluding exception areas based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(a) and (b)), one *potentially* suitable and serviceable exception area remains a candidate for UGB expansion: **Far East A**. As shown in Table 7, this area has 2 parcels 5 acres or larger, a total of 13.3 acres. These parcels are not contiguous to one another.

**Table 7:  
Potentially Suitable & Serviceable Second Priority Exception Land Parcels**

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
<b>Far East A</b>	2	0	2	1702362401500; 6.4 acres 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12% <sup>83</sup>	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,

<sup>83</sup> 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<sup>84</sup>

<sup>84</sup> “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<sup>85</sup>, 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

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<sup>85</sup> 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”<sup>86</sup> to cost 13 million dollars based on a unit cost of \$428/liner foot to extend the pressure main and a unit cost of 3.5 million to upgrade an MWMC pump station. These costs are for the offsite portion of the infrastructure extension to reach the outside boundary of the area shown in the referenced map and do not include the cost to the development site from that boundary.

#### Goal 14 Location Factor 3 and 4 Evaluation of *Potentially Suitable* Exception Land

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — as the basis for comparing relative costs associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB, and thus to compare *economic* consequences (ESEE) of alternative expansion areas under Goal 14 Location Factor 3 in the next step in the UGB Alternatives Analysis. At this point in the analysis, the City excluded lands based on cost of needed infrastructure relative to the amount of suitable exception land to be served.

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis and associated text in this report — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — to compare the relative social, environmental and energy (ESEE) consequences associated with constructing public facilities, providing public services and urbanizing land to support industrial and commercial mixed-use development in alternative locations, and thus to compare the ESEE consequences of alternative expansion areas under Goal 14 Location Factor 3 in later steps in the UGB Alternatives Analysis.

Only one exception area was found to be *potentially* suitable and serviceable — **Far East A**, thus no further comparison with other second priority land under Goal 14 Location Factor 3 or Factor 4 was required.

### Goal 14 Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences

The City evaluated the **Far East A** exception land parcel(s) further under a Goal 14 Location Factor 3 analysis: the comparative environmental, social, energy, and economic (ESEE) consequences.

#### Economic Consequences

The City’s Economic Opportunities Analysis Final report explains the importance of and the City of Springfield’s need to maintaining an inventory of suitable sites for industrial and commercial development to support a strong diverse economy and to provide for the city’s employment needs as required under Goal 9. To provide an adequate amount and suitable type of land for target industrial

<sup>86</sup> 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.<sup>87</sup> 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<sup>88</sup>, 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. <sup>89</sup>	2.8 ac	Robinson parcel, recently removed from Metro Plan

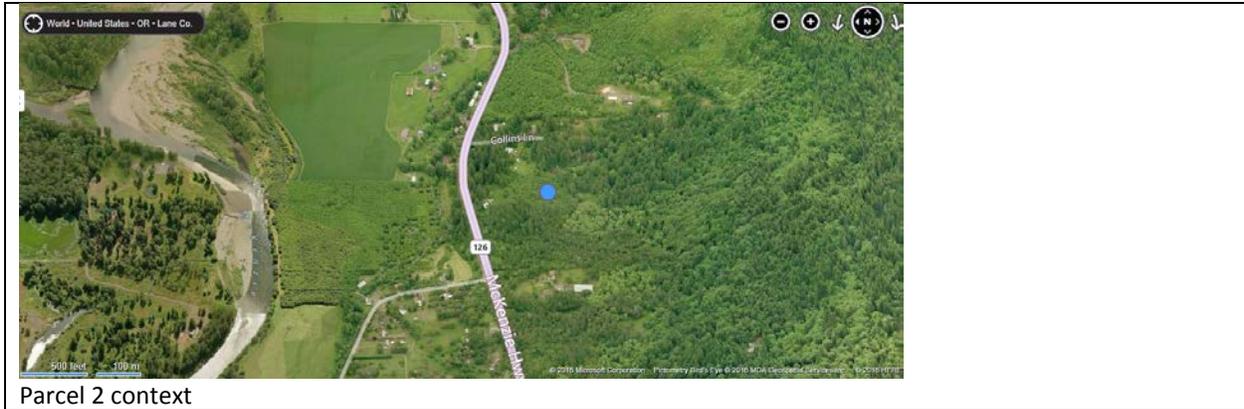


Parcel 2 context

<sup>87</sup> CIBL/EOA, p. 78.

<sup>88</sup> based on 2m resolution elevation data obtained from LCOG, email from staff Engelmann to staff Pauly, March 10,2016

<sup>89</sup> 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:

- As shown in TSP Figure 12, no existing or planned pedestrian facilities serve east Main Street/Highway 126 east of 70<sup>th</sup> Street. No existing or planned pedestrian facilities serve Thurston Road east of 69th Street.
- As shown in TSP Figure 10 Main Street/Highway 126 and Thurston Road to the UGB extent are within the Recommended Roadway Network.
- As shown in TSP Figure 3, Main Street/Highway 126 is a Federal Truck Route.

- As shown in TSP Figure 9, planned frequent transit service network routes, the nearest connect is at Main Street/Highway 126 and Straub Parkway.

### Geologic Hazards

The City referenced data in [Oregon HazVu](#), DOGAMI's online interactive geohazard map to identify hazard area areas. State of Oregon Department of Geology and Mineral Industries <http://oregongeology.org/pubs/>

Given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The DOGAMI website states that “the map offers a general look at regions that may be at risk for landslides, and will be used to help prioritize areas for future in-depth landslide mapping and study;” and “The Statewide Landslide Information Database of Oregon (SLIDO) project was created to improve our understanding of the landslide hazard in Oregon and to provide a statewide base level of landslide data. The original studies vary widely in scale, scope, and focus, which is reflected in a wide range in the accuracy, detail, and completeness with which landslides are mapped.” The map indicates areas of low, moderate, high and very high landslide susceptibility for counties, incorporated cities, and some watersheds. The DOGAMI website states: “Landslide susceptibility is the likelihood that a location will have landslides in the future.” DOGAMI maps are for informational purposes and are not regulatory.

The DOGAMI website states:

*“One of the most common and devastating geologic hazards in Oregon is landslides. Average annual repair costs for landslides in Oregon exceed \$10 million, and severe winter storm losses can exceed \$100 million (Wang, Y., Summers, R. D., and Hofmeister, R. J., 2002, Landslide loss estimation pilot project in Oregon: Oregon Department of Geology and Mineral Industries Open-File Report O-02-05, 23 p.). As population growth continues to expand and development into landslide susceptible terrain occurs, greater losses are likely to result. In order to begin reducing losses from landslides, widespread endeavors are necessary at all community levels from state government to individual family homes. One successful way to reduce losses from landslides is through pre-disaster mitigation, which can be performed at many scales from statewide to local. To begin pre-disaster mitigation, the landslide hazard must be located. Once the hazard is located, the population and infrastructure vulnerable to the hazard can be identified and the risk mitigated.” (emphasis added)*

The DOGAMI website states:

*“The primary purpose of SLIDO is to provide the best currently available mapping of landslide features throughout Oregon. The database should serve as useful tool for differentiating broad areas of higher and lower hazards and as a starting point for more*

*detailed study. This spatial information is basic to emergency management and land-use applications, including:*

- Identify vulnerable areas that may require planning considerations
- *Estimate potential losses from specific hazard events (before or after a disaster hits)*
- *Decide how to allocate resources for most effective and efficient response and recovery*
- *Prioritize mitigation measures that need to be implemented to reduce future losses”*  
(emphasis added)

The City considered the DOGAMI SLIDO data for the purposes of informing the next steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield’s employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the second priority category.

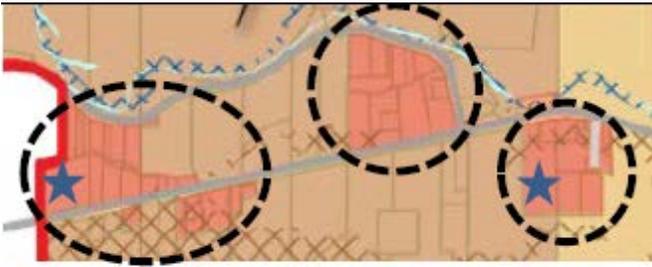
The City appropriately considered the general DOGAMI SLIDO data in relationship to the UGB Preliminary Study Area to discern and differentiate broad areas of higher and lower landslide hazards to identify potentially vulnerable areas within the Preliminary Study Area that may require land use planning considerations.

The City appropriately used the general DOGAMI SLIDO data when it identified the UGB Preliminary Study Area groupings in the vicinity of documented landslide hazards to determine where there exists an increased likelihood that a location will have landslides in the future and where relatively greater losses are likely to result. Comparatively, the City considered areas without known landslide hazards to be more suitable for urbanization than areas with documented landslide hazards.

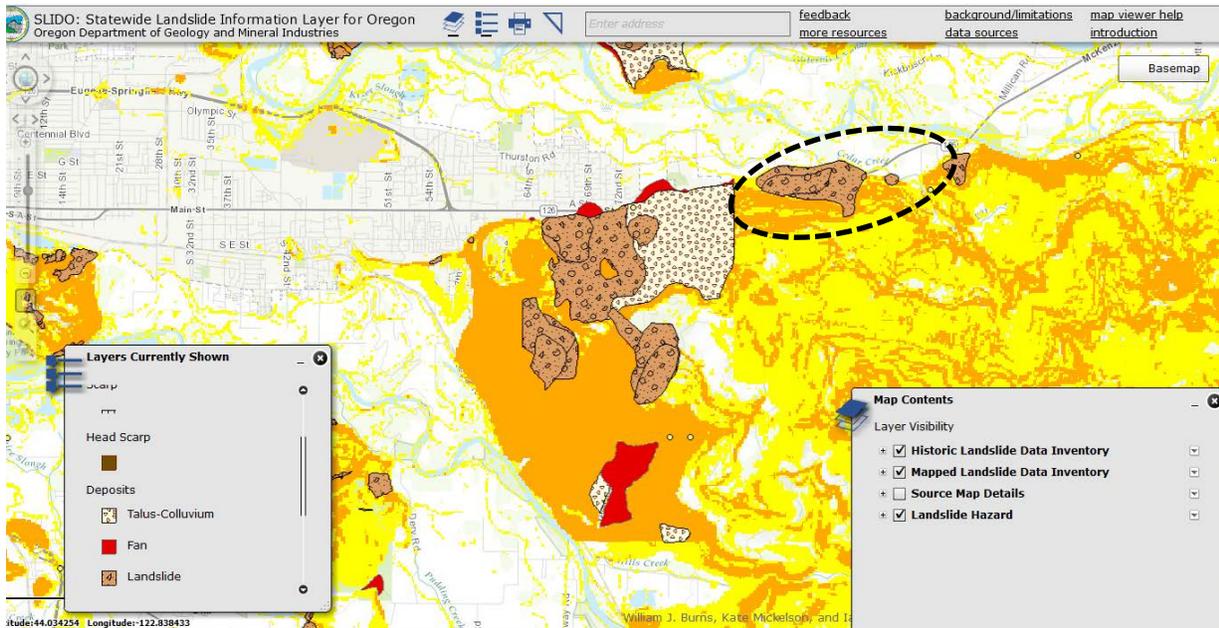
Oregon Statewide Planning Goal 7 directs local governments to “adopt comprehensive plans (inventories, policies and implementing measures) to reduce risk to people and property from natural hazards” including landslides. Springfield has acknowledged comprehensive plan policies and implementing measures to reduce risk to people and property from landslide hazards, including Springfield Development Code Section 3.3-500 Hillside Development Overlay District standards. These policies and standards were developed to address development of lands already inside the UGB that are planned to accommodate urban levels of development. New hazard information published by the State, such as the DOGAMI SLIDO data is useful to local governments as they plan expansions of their UGBs to accommodate forecast urban growth.

The City’s review of The DOGAMI SLIDO map data identified the presence of documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/Camp Creek, **Far East**, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

DOGAMI SLIDO maps<sup>90</sup> of the South Hills area indicate the presence of landslide hazards 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.

<sup>90</sup> 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.<sup>91</sup>

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<sup>92</sup> 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

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<sup>91</sup> 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.

<sup>92</sup> Radio interview with DOGAMI Chief Scientist Ian Madin, on Jefferson Exchange program, 1280AM, March 10, 2016 explaining the SLIDO map data project.

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **social** consequences of urbanization in this location:

**OAR 660-009-0005 (3)** states:

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

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial employment land uses because of the following **social** consequences:

- The Goal 9 rule’s definition of “industrial” clearly recognizes that “Industrial uses may have external impacts on surrounding uses;” and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.
- Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.[OAR 660-009-0005(3)]
- The **Far East A** exception area is already committed to rural residential uses on small parcels.
- Based on the UGB Alternatives Analysis, input from the CIBL Technical Advisory Committee and the public, the **Far East A** area is better suited to residential uses than industrial or office commercial employment uses.
- The cost of extending offsite infrastructure to serve industrial and commercial mixed use development sites will create a public cost, as the city has limited legal authority to exact off-site improvements. Exactions must be proportional to the impacts of the development.

#### ORS 197.298(1)(b) Goal 14 Location Factor 3 Conclusion – Second Priority Lands Analysis

**The City excluded Far East A** lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3). The City determined that the cost to serve 2 parcels 5 acres or larger — a total of 13.3 acres — is not economically feasible. These parcels are not contiguous to one another. McKenzie View A Preliminary Study Area grouping cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need. The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at the exception site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

## Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the consequences of urbanization in this location:

- Excellent Class I and II agricultural soils exist on and immediately abutting and between the potentially suitable exception parcels. The land along the McKenzie River is prime class I and II farm land.

ORS 197.298 (1)(b) Goal 14 Location Factor 4 Conclusion – Second Priority Lands Analysis: Goal 14 Location Factor 4 implicitly requires that the City’s determination to exclude the exception area sites it considered and rejected must also be justified based on consideration of Goal 14 Location Factor 4: Compatibility with nearby ag and forest land. The City’s findings provide evidence to explain why this is the case.

As previously stated, the lands adjacent to the UGB that are identified in the Lane Rural Comprehensive Plan as exception or nonresource land are identified by orange color in Map 1 Priority Areas and Constraints Analysis. As shown in that map, Springfield is unlike many Oregon cities in that there are few exceptions areas in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 and thus not suitable for meeting Springfield’s large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to natural barriers formed by the McKenzie and Middle Fork Willamette rivers, steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes >15%.

The City’s description of exception land Table 2 provides evidence to demonstrate that expanding the UGB onto exception lands in all instances would actually promote urban sprawl by “opening up” new corridors of urbanization into, through, and adjacent to extensive large blocks of resource land areas north of the McKenzie River, up the McKenzie River, and south of the Springfield UGB. In all but two instances (Far East Springfield which has one exception parcel 5 acres or larger abutting the UGB, and Clearwater, which has no parcel 5 acres or larger ), exception areas are located remote to the UGB and would require leapfrogging across land unsuitable for urbanization to extend infrastructure and services to remote parcels of land.

The analysis of efficient accommodation of identified land needs under Goal 14, factor 1, allows a local government to consider the ability of a site to accommodate a compact urban form. The term “maximum efficiency of land uses” invokes a concern for avoiding leapfrog or sprawling development inconsistent with the density and connectivity associated with urban development. In addition to being highly inefficient, impractical and financially infeasible, it would have consequences that could pose impacts to nearby ag and forest land and uses thereon, including but not limited to increased traffic conflicts with farm or forestry vehicles.

Also it should be noted that some exception parcels, while developed, committed and zoned for rural uses, comprise Class 1 and 2 agricultural soils that, if included in the UGB, would become urbanizable. Throughout the analysis, staff noted the presence of agricultural uses in many of these areas that currently provide opportunities for small “micro” farms close to the urban area that contribute to the local food system economy.<sup>93</sup>

#### **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*

<sup>93</sup> **Citation:** Local Food system report in the record

*Metropolitan Area Public Facilities and Services Plan*, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the exception and non-resource lands adjacent to the UGB because exception and non-resource lands cannot "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, second priority exception and non-resource lands are inadequate to accommodate the amount of land needed because specific types of identified land needs cannot be reasonably accommodated on exception and non-resource lands, and future urban services could not reasonably be provided to the exception and non-resource lands due to topographical or other physical constraints.

The City's conclusion that exception and non-resource lands adjacent to the UGB these lands could not reasonably be provided with urban services within the 2010-2030 planning period based on topographical or other physical constraints was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints (**Far East A**), the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to the Far East A area compare unfavorably to directing urbanization to other lands because land is not suitable to meet the site needs of target industries and the amount of unconstrained land is economically infeasible to serve with public water and wastewater facilities on a cost basis. The City concluded that urbanization of Far East A is not economically viable on a service cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **Far East A** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14 Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of Far East A and other exception land is not economically viable on a service cost basis and is more likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [Goal 14 Boundary Location Factor 4] conclusions here.

Thus, urbanization of exception land compares unfavorably with other lands the City considered for inclusion in the UGB.

The City's evaluation properly considered second priority exception and non-resource lands as alternative boundary locations consistent with ORS 197.298 and Goal 14 Boundary Location Factors 3 and 4.

The City's conclusion that directing urbanization to the Far East A exception area would not "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The City's conclusion that directing urbanization to the Far East A exception area to accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger compares unfavorably to directing urbanization to other lands was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Therefore, second priority exception and non-resource area lands are inadequate to accommodate the amount of land needed.

The City's conclusion that second priority exception and non-resource lands are inadequate to accommodate the amount of employment land needed because specific types of identified land needs was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The preceding analysis provide substantive evidence to explain why the city concluded that most of the 72 isolated, remote and scattered second priority exception land parcels 5 acres or larger are not serviceable and suitable to meet Springfield's employment land needs and why the few, scattered parcels that may be serviceable are of insufficient size, quantity and location to be provided with economically feasible and cost efficient infrastructure and services.

To accommodate the identified land need, the City identified and evaluated the next priority of land under ORS 197.298.

### **ORS 197.298 (1)(c):**

*"If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition)."*

### **OAR 660-024-0060(1)**

*"(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same*

*method specified in subsections (a) and (b) of this section until the land need is accommodated.”*

## IDENTIFY THIRD PRIORITY MARGINAL LAND

Next, the City’s analysis identified third priority marginal lands adjacent to the UGB. As shown in Table 7, marginal lands exist in three areas adjacent to Springfield’s UGB: Oxbow/Camp Creek, Mohawk and Wallace Creek.

**Table 7 Preliminary Study Areas Containing Third Priority Marginal Lands:**

North Gateway	McKenzie View	<b>Oxbow/Camp Creek</b>
Hayden Bridge	<b>Mohawk</b>	North Springfield Highway
East Springfield	South Hills	West Jasper/Mahogany
<b>Wallace Creek</b>	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

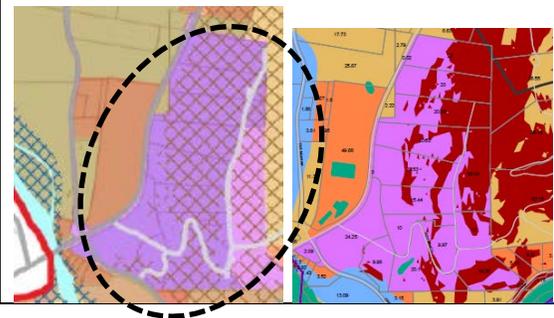
**This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).**

Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints provides a general descriptive summary of the Third Priority marginal lands in the vicinity of the UGB. Where shown, the red line in the small maps below is the UGB. Underlined parcel numbers indicate parcels with 5 or more unconstrained acres.

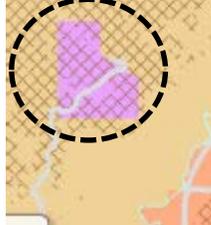
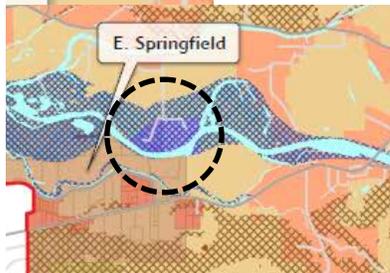
**Table 8: Third Priority Marginal Lands Parcels and Constraints**

**Mohawk Marginal<sup>94</sup>**

- 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

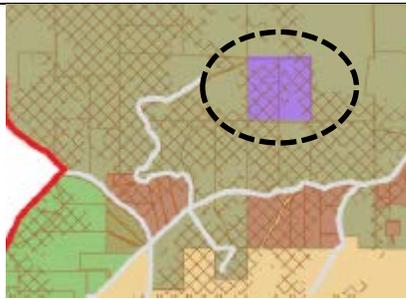


<sup>94</sup> See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing marginal land area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with marginal parcels highlighted and slope calculations for parcels.

  <ul style="list-style-type: none"> <li>○ <u>17-02-20-00 0431: 8 acres &lt;5% slope. 13.8 acres, 80 % of 13.8 ac. site is NRCS CI 8 (110—Pits)<sup>95</sup>, 12% of site has 3-12% slopes, 8% has slopes&lt;3%, vacant. Parcel 1 of Subdivision 2015-P2658.</u></li> <li>○ <u>17-02-20-00 0432: 9.3 acres slopes &lt; 15% (3 acres &lt;5%, 6.3 5-15%), hydric soils, vacant</u></li> <li>○ <u>17-02-20-00 0413: developed rural residential use on High Ranch Drive, small flatter topo area (&lt;5 acres) along Marcola road edge of parcel</u></li> <li>○ <u>17-02-20-00 0412: 20.6 acres developed rural residential use on High Ranch Drive, small flatter topo area (~2 acres) along Marcola road edge of parcel, 56% of parcel has slopes &gt; 12%, slopes up to 75%, hydric soils</u></li> </ul> <ul style="list-style-type: none"> <li>• Other parcels in this area have slopes &gt; 15% and are developed with rural residential uses.</li> <li>• (3) parcels 5.8-9.3 unconstrained acres in this area</li> </ul>	   
<p><b>Oxbow/Camp Creek Marginal<sup>96</sup></b></p> <ul style="list-style-type: none"> <li>• Three contiguous 15-acre parcels: 17022400 TL 406 (73% 12-45% slopes), TL 407 (94% 12-45% slopes), TL 408 (84% 12-45% slopes)</li> <li>• Slopes 12-45%</li> <li>• Remote from UGB</li> <li>• Developed with rural residential uses.</li> </ul>  <ul style="list-style-type: none"> <li>• Marginal parcels on the McKenzie River 17-01-30-00 2300, 2301, 2302, 2303 are entirely in the floodway</li> </ul>	 

<sup>95</sup> 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.”

<sup>96</sup> See maps in record A & T map 17-02-21-24 with marginal land parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

<p><b>Wallace Creek Marginal A</b></p> <ul style="list-style-type: none"> <li>○ Within 1 mile of UGB via Jasper Rd. and Wallace Creek Rd.</li> <li>○ (2)20-acre parcels (separate ownership) Some slopes 2-12%, some &gt;15%</li> <li>○ <u>18-02-14-00 1002 17.9 unconstrained acres</u></li> <li>○ <u>18-02-14-00 1003 17.7 unconstrained acres</u> (Wallace Creek<sup>97</sup> 50' setback assumed)</li> <li>○ Wetlands and hydric soils are present along Wallace Creek, both sides of Wallace Creek Rd.</li> </ul> 	
<p><b>Wallace Creek Marginal B</b></p> <ul style="list-style-type: none"> <li>● Predominantly slopes &gt;15%</li> <li>● 2 parcels, total of 40.3 acres, separate ownership, homes on each parcel</li> <li>● 18-02-12-00 TL 302 3.8 acres unconstrained</li> <li>● <u>18-02-12-00 TL 303 6.4 acres unconstrained</u> (unconstrained portion is developed with rural residence)</li> </ul> 	

**IDENTIFY THIRD PRIORITY MARGINAL LAND WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB**

<sup>97</sup> *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](http://www.longtom.org/wp-content/uploads/2012/05/Upper-Willamette-WQ-Monitoring-Final-Report_2010.pdf) report states: “Wallace Creek, a small tributary that enters the Middle Fork Willamette River downstream of Dexter Dam and which dries up in the summer, always met the State Standard for temperature but did not for dissolved oxygen and E. coli.”

### Suitability Findings: Marginal Land

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors<sup>98</sup> (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<sup>99</sup>
- 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

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<sup>99</sup> “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

The City identified parcels or portions of parcels with slopes <15% as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes >15% from further analysis.

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

None of the marginal land areas contains a potentially redevelopable parcel larger than 20 acres without absolute development constraints.

As shown in Table X, two marginal land groupings contain vacant or potentially redevelopable parcels 5-20 acres without absolute development constraints:

<b>Table 9: Potentially Suitable Third Priority Marginal Land</b>		
Area	Vacant or potentially redevelopable parcels larger than 20 acres without absolute development constraints?	Vacant or potentially redevelopable 5-20 acre parcels without absolute development constraints?
Mohawk	No	Yes
Oxbow/Camp Creek	No	No
Wallace Creek A	No	Yes
Wallace Creek B	No	Yes

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all third

priority marginal land parcels in the Preliminary UGB Study Area to identify potentially suitable third priority land to meet the employment land need. **These steps excluded the Oxbow/Camp Creek and Wallace Creek B marginal land parcels from further analysis.**

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors<sup>100</sup> (from an outline provided by DLCDC Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable<sup>101</sup>
- 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.

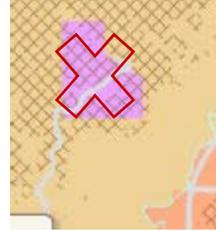
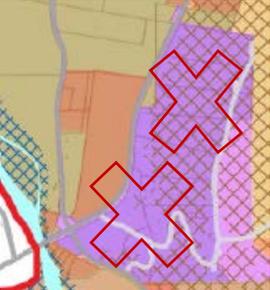
The City identified Mohawk and Wallace Creek A marginal land parcels as worthy of additional analysis to determine serviceability and suitability to meet the need for smaller 5-20 acre sites.

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

<sup>101</sup> “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

## Public Services Analysis of Potentially Suitable Third Priority Land

**OAR 660-024-0060(7)** states:

*“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”*

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable third priority marginal land parcels within the Mohawk, Oxbow/Camp Creek, and Wallace Creek areas. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.<sup>102</sup> 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,

<sup>102</sup> Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

Just as the TSP must “evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;”[OAR 660-012-0035] the City’s UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.”

The transportation system must “support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.” [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*”, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of third priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 11 and as further supported by evidence in the record.

The Public Services Analysis section, on pages 211-251 of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City referenced when it described the physical location and proximity of existing facilities to *potentially* suitable parcels, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding from consideration the **Oxbow/Camp Creek, Wallace Creek B and Mohawk** marginal land parcels in the City's previous step.

Table 11 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.<sup>103</sup> 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.

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<sup>103</sup> Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

The City's conclusions regarding which lands to exclude are reasonable and supported by ample evidence.

Although third priority areas **Mohawk Marginal, Oxbow/Camp Creek Marginal and Wallace Creek B Marginal** were excluded from further consideration under OAR 660-009-0005(12) in the city's previous step because these lands lacked the appropriate site characteristics, these areas could also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

<b>Table 11 - Public Services Analysis of Potentially Suitable Marginal Land</b>	
<b>Mohawk Marginal Parcels</b>	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>River is a barrier to extension of water transmission that makes extension of public water system infeasible<sup>104</sup></li> <li>Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>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.</li> <li>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.</li> </ul> <p>Nearest collection system is a 10" line in Marcola Rd., 4 miles to outer areas</p>

<sup>104</sup> 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.

<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by the McKenzie River</li> <li>• No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule<sup>105</sup>)</li> <li>• Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake<sup>106</sup></li> <li>• No developed system in vicinity</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Access to Springfield is across the McKenzie River via 42<sup>nd</sup> 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).<sup>107 108</sup> Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> <li>• Upgrade 42<sup>nd</sup> St. to urban standards<sup>109</sup></li> <li>• Upgrade 42<sup>nd</sup>/Marcola intersection</li> <li>• May need to upgrade 42<sup>nd</sup> and OR 126 interchange<sup>110</sup></li> <li>• Upgrade Camp Creek to urban standards and provide capacity improvements</li> <li>• Would require internal collector street system.</li> <li>• Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access.</li> <li>• Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19<sup>th</sup> St, 23<sup>rd</sup> St, and 31<sup>st</sup> St</li> <li>• Previous ODOT study showed a need for upgrading at Hwy 126 and 42<sup>nd</sup> St. (without UGB expansion). Traffic backs up at the 42<sup>nd</sup> St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126.</li> <li>• Located 1-5 miles mile from Highway 126/I-105, and I-5</li> <li>• Steep slopes east of Marcola Rd.</li> <li>• Access would route traffic through farmland and rural residential areas</li> <li>• 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.”<sup>111</sup></li> </ul> </li> <li>• No transit services, pedestrian facilities or ADA access in area. Nearest service is</li> </ul>

<sup>105</sup> 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).

<sup>106</sup> 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.

<sup>107</sup> Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

<sup>108</sup> Source of road widths: Lane County Roads Inventory,

[http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB\\_RoadsInventory.pdf](http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf)

Accessed January 26, 2016

<sup>109</sup> Project # R-41 42<sup>nd</sup> St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

<sup>110</sup> See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42<sup>nd</sup> 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.

<sup>111</sup> 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.

	Route 17 Hayden Bridge Rd. and 19 <sup>th</sup> 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.” <sup>112</sup>
Urban services conclusion: <b>Mohawk Marginal</b>	The City excluded the <b>Mohawk Third Priority lands</b> 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).
<b>Wallace Creek A Marginal Parcels</b>	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Parcels are separated from urban services by distance and topography</li> <li>• 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.</li> <li>• A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.</li> <li>• 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.</li> <li>• No developed system in vicinity</li> <li>• Marginal land parcels are located ~2.5 miles from the nearest water main.</li> <li>• Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography</li> <li>• Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk).</li> <li>• 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.</li> <li>• 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.</li> <li>• Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.</li> </ul>

<sup>112</sup> Email from LTD staff Will Mueller, dated June 28, 2013 provides LTD comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).”

	<ul style="list-style-type: none"> <li>• Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.</li> <li>• No developed system in vicinity.</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography</li> <li>• No developed system in vicinity</li> <li>• 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.</li> <li>• Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems.</li> <li>• Upgrade existing Wallace Creek stormwater outfall to Middle Fork Willamette River</li> <li>• 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.</li> <li>• The Middle Fork Willamette River is federally classified as critical salmonid habitat.</li> <li>• Stormwater management through the use of on-site retention and/or infiltration may be possible in flatter topo areas of parcels.</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Would require secondary access</li> <li>• 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.</li> <li>• Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint.</li> <li>• DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road</li> <li>• Access via Jasper Rd., but urban standards and capacity improvements needed<sup>113</sup>: 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.</li> <li>• Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River</li> <li>• 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.</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.<sup>114</sup></li> <li>• Jasper Rd. &amp; 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.”</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>• 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.</li> </ul>

<sup>113</sup> See Jasper Bridge exception area

<sup>114</sup> Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

	<ul style="list-style-type: none"> <li>• Connection to Hwy 58 but limited connection to Hwy 126/I-5</li> <li>• “Need to further study capacity at the I-5/Hwy 58<sup>th</sup> interchange. Improvements may be needed depending on size and location of expansion area.”<sup>115</sup></li> <li>• Nearest transit service is at Thurston Station on Main Street, &gt;3 miles away.<sup>116</sup> No transit services, pedestrian facilities or ADA access in area.</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031.”<sup>117, 118</sup></li> </ul>
Urban services conclusion: <b>Wallace Creek Marginal A</b>	The City excluded the <b>Wallace Creek Marginal A</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 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).
<b>Wallace Creek B Marginal Parcels</b>	
<b>Water</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>• Parcels are separated from urban services by distance and topography</li> <li>• 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.</li> <li>• A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.</li> <li>• Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be possible.</li> <li>• No developed system in vicinity</li> </ul>

<sup>115</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

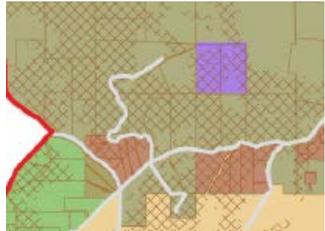
<sup>116</sup> Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that 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).

<sup>117</sup> Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>118</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	<ul style="list-style-type: none"> <li>• Marginal land parcels are located more than 3 miles from the nearest water main.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography</li> <li>• No developed system in vicinity.</li> <li>• Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk).</li> <li>• 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.</li> <li>• 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.</li> <li>• Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography</li> <li>• No developed system in vicinity</li> <li>• Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems.</li> <li>• Development of the area may require land acquisition to safely convey stormwater runoff to the River.</li> <li>• 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.</li> <li>• Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography.</li> </ul>
<b>Transportation (including transit service)</b>	<ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Would require secondary access</li> <li>• 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.</li> <li>• 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.</li> <li>• Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint.</li> <li>• DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road</li> <li>• Access via Jasper Rd., but urban standards and capacity improvements needed<sup>119</sup>: 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.</li> <li>• Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River</li> <li>• May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading</li> </ul>

<sup>119</sup> See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> <li>• Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.<sup>120</sup></li> <li>• Jasper Rd. &amp; 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.”</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>• 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.</li> <li>• Connection to Hwy 58 but limited connection to Hwy 126/I-5</li> <li>• “Need to further study capacity at the I-5/Hwy 58<sup>th</sup> interchange. Improvements may be needed depending on size and location of expansion area.”<sup>121</sup></li> <li>• Nearest transit service is at Thurston Station on Main Street, &gt;3 miles away.<sup>122</sup> No transit services, pedestrian facilities or ADA access in area.</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031.”<sup>123, 124</sup></li> </ul> 
<p>Urban services conclusion: <b>Wallace Creek Marginal B</b></p>	<p>The City excluded the <b>Wallace Creek Marginal B parcels</b> from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of</p>

<sup>120</sup> Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

<sup>121</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

<sup>122</sup> 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).

<sup>123</sup> Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>124</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
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The City relied on the findings in Table 11 — as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City’s evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable third priority marginal land by gathering and compiling data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. For the purpose of evaluating serviceability of parcels within the third priority [ORS 197.298(3)(b)], the City grouped the potentially suitable third priority parcels within general geographic areas. Based on this data, the City determined whether a parcel or group of marginal land parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City analyzed, evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB when it compiled data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. Based on this data, the City

determined whether and how providing a parcel or group of third priority marginal land parcels with the water, sewer/wastewater, stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of third priority marginal land parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of third priority land under ORS 197.298.

The City excluded the third priority lands based upon specific land needs (197.298(3)(a)):

- **This step excluded parcels with less than 5 unconstrained acres.**
- **The City excluded lands based on slopes exceeding 7%, distance to I-5**
- **This step excluded Oxbow/Camp Creek Marginal from further analysis.**
- **This step excluded Wallace Creek Marginal A from further analysis.**
- **This step confirmed exclusion of Wallace Creek Marginal B parcels.**
- **This step excluded Mohawk Marginal parcels.**

The City excluded the third priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))

- **This step confirmed exclusion of Mohawk Marginal parcels.**

- **This step confirmed exclusion of Wallace Creek Marginal A parcels.**
- **This step confirmed exclusion of Oxbow/Camp Creek Marginal parcels.**

### ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To confirm its evaluation of *potentially* suitable marginal land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable<sup>125</sup>
- 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 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

<sup>125</sup> “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<sup>126</sup>, 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

<sup>126</sup> 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, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

ORS 197.298 (1)(c) Conclusion – Third Priority Lands Analysis: After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the marginal lands adjacent to the UGB because marginal lands are not suitable and cannot reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, third priority marginal lands are inadequate to accommodate the amount of land because specific types of identified land needs cannot be reasonably accommodated on the marginal lands, and future urban services could not reasonably be provided to the marginal lands due to topographical or other physical constraints.

ORS 197.298 Conclusion: The City properly applied and followed the prioritization requirements in ORS 197.298 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment.

## CONSIDERATION OF LAND OF LOWER PRIORITY [ORS 197.298(1)(d)]

### ORS 197.298 (1)(d):

*“If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.”*

### ORS 197.298(2):

*“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”*

### OAR 660-024-0060(1)(d):

*“Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).”*

### ORS 197.298(3)

*“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:*

*(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;*

*(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or*

*(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”*

After the City examined and excluded all land of higher priority for expansion under ORS 197.298 (1)(b) and (1)(c), and found those lands unsuitable and thus inadequate to accommodate the land need, the City’s next two steps were to identify fourth priority land adjacent to and in the vicinity of the UGB that is potentially suitable to meet the need deficiency, [ORS 197.298 (1)(d)] and to evaluate potentially suitable land “by agriculture or forest land capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.” [ORS 197.298(2)] In this next step, the City identified candidate UGB study areas lands for further evaluation and comparison under ORS 197.298(3) by 1) identifying fourth priority lands; and 2) prioritizing those lands as required under ORS 197.298(2):

*“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”*

The statute directs the City to further prioritize lands land designated in an acknowledged comprehensive plan for agriculture or forestry for inclusion on the basis of the capability classification system or cubic foot class.

The statute directs the City to identify and evaluate both agriculture and forest lands in this step and without prioritize one over the other. Instead, the statute directs the analysis to consider “fourth priority land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.”

## IDENTIFY FOURTH PRIORITY LAND DESIGNATED IN AN ACKNOWLEDGED COMPREHENSIVE PLAN FOR AGRICULTURE OR FORESTRY OR BOTH

With the exception of its western boundary located along Interstate Highway 5, nearly all of Springfield’s UGB is surrounded by land designated in an acknowledged comprehensive plan for agriculture and forestry. As shown in Table 13, land designated in an acknowledged comprehensive plan for agriculture or forestry is present in every area adjacent to and in the vicinity of Springfield’s UGB.

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Table 13 indicates study area groupings that contain areas designated for agriculture in the Lane Rural Comprehensive Plan with beige color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for forestry in the Lane Rural Comprehensive Plan with olive green color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for agriculture and forestry in the Lane Rural Comprehensive Plan with both colors.

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060

(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c), Goal 14, Boundary Location Factor 3; and Goal 14, Boundary Location, Factor 4.

To perform analysis of the much larger set of fourth priority lands adjacent or in the vicinity of the UGB, the City conducted analysis by geographic area groupings in its next step. Table 14 provides a general descriptive summary of the Fourth Priority lands adjacent to and in the vicinity of the UGB. Lands in the Preliminary Study area are organized geographically and are named consistently with the names used in the second and third priority lands analyses.

This step identified candidate fourth priority land that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each grouping in Table 14 includes maps and information to identify agriculture or forest plan designations, dominant soil capability classifications and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) in each area to provide data to inform its determination of which fourth priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

For the purposes of the preliminary screening of fourth priority land in Table 14, the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable
- Wetlands – areas identified in the national wetlands inventory or Springfield's local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

## OAR 660-009-0005(2)

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

*infrastructure deficiencies, parcel fragmentation, or natural hazard areas.”* [emphasis added]

## OAR 660-009-0005(11)

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

The development constraints applied in the City’s analysis are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

For the purposes of increasingly detailed analysis to determine suitability of potentially suitable fourth priority land in Table X to meet the site needs of the City’s target employers and in addition to excluding lands with slopes 15% or greater, the City applied the following needed site characteristic parameters applicable to the City’s target employment industries<sup>1</sup>:

- 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<sup>2</sup> 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;<sup>3 4</sup> 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.

<sup>1</sup> CIBL/EOA pp. iii-iv, pages 82-95, Appendix C., pages 167-178.

<sup>2</sup> Context photos are screenshots from Bing maps accessed March 10-11 via links in RLID.

<sup>3</sup> <http://lcmmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

accessed March 10, 2016

<sup>4</sup> 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
<p>Rural Plan Designation</p> <p>RCP Plan Designation</p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #92d050; border: 1px solid black; margin-right: 5px;"></span> F - Forest</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #d9ead3; border: 1px solid black; margin-right: 5px;"></span> A - Agricultural</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #548235; border: 1px solid black; margin-right: 5px;"></span> ML - Marginal</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffcc00; border: 1px solid black; margin-right: 5px;"></span> C - Commercial</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff0000; border: 1px solid black; margin-right: 5px;"></span> I - Industrial</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffff00; border: 1px solid black; margin-right: 5px;"></span> R - Residential</li> <li><span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; margin-right: 5px;"></span> NRES - Non Resource</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #00ff00; border: 1px solid black; margin-right: 5px;"></span> P - Parks</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff9999; border: 1px solid black; margin-right: 5px;"></span> AIR - Airport</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #e0f7fa; border: 1px solid black; margin-right: 5px;"></span> NR:CA - Natural Resource Conservation Area</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #00ffff; border: 1px solid black; margin-right: 5px;"></span> E - Estuary</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #66c2a5; border: 1px solid black; margin-right: 5px;"></span> DR - Destination Resort</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #cccccc; border: 1px solid black; margin-right: 5px;"></span> NR:M - Natural Resource : Mineral</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #6a3d9a; border: 1px solid black; margin-right: 5px;"></span> PF - Public Facility</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffcc99; border: 1px solid black; margin-right: 5px;"></span> NR:W - Natural Resource : Wildlife</li> </ul>	<p>capability class</p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #333333; border: 1px solid black; margin-right: 5px;"></span> Class 1</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #663333; border: 1px solid black; margin-right: 5px;"></span> Class 2</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #993333; border: 1px solid black; margin-right: 5px;"></span> Class 3</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #cc3333; border: 1px solid black; margin-right: 5px;"></span> Class 4</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #ff9966; border: 1px solid black; margin-right: 5px;"></span> Class 5</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #996633; border: 1px solid black; margin-right: 5px;"></span> Class 6</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #666633; border: 1px solid black; margin-right: 5px;"></span> Class 7</li> <li><span style="display: inline-block; width: 30px; height: 20px; background-color: #339933; border: 1px solid black; margin-right: 5px;"></span> Class 8</li> </ul>

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):<sup>5</sup>
  - 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

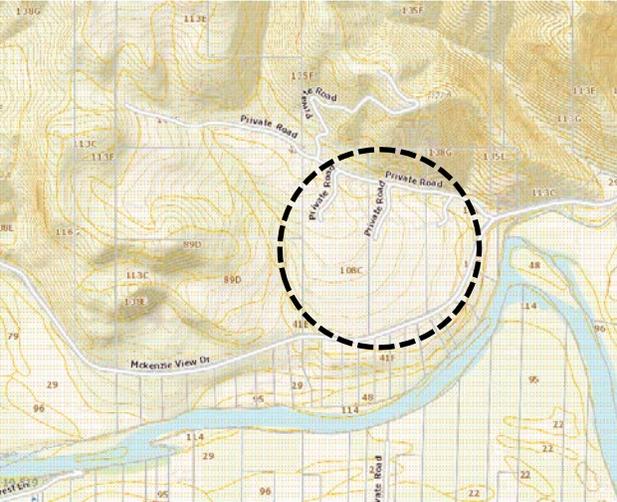
<sup>5</sup> The City used RLID data to calculate % of soil units in a tract.

## McKenzie View

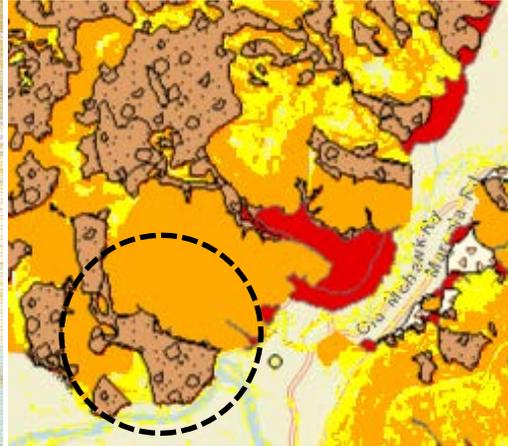


- The McKenzie View preliminary study area consists of the land north of the McKenzie River between Interstate Highway 5 and Marcola Road (Hayden Bridge).
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises Class I, II, III, IV, VI, VII, and VIII. Predominantly Class II soils along the river. Predominantly Class VI in the hills.
- Large parcels are across the river, none are adjacent to UGB.
- Slopes and soils:
  - Predominantly slopes >15% I-5 to Mohawk River on north side of McKenzie View Drive except one area of slopes <15% is shown on map, soil is Class VI (108C- Philomath 3-12% slopes)
  - 17021800 402
  - 17021800 403

- 17021800 404
- Slopes 15% or less I-5 to Mohawk River on south side of McKenzie View Drive Lands slopes are predominantly Class II
- DOGAMI mapped landslide hazards in Coburg Hills
- Floodway, riparian resources and wetlands along the river
- accessed via Coburg Rd - McKenzie View Drive; or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.

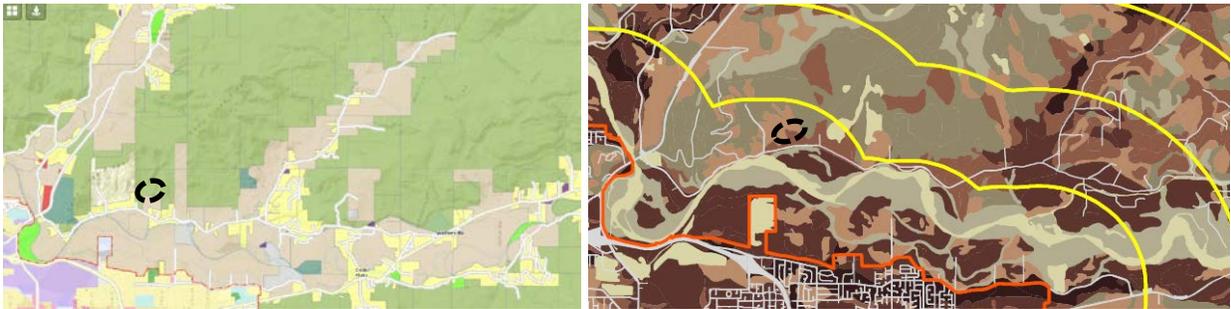


McKenzie View site topography and Cl. VI soil



McKenzie View site DOGAMI hazards

### Oxbow/Camp Creek



- The Oxbow/Camp Creek preliminary study area consists of the land north of the McKenzie River between Marcola Road (Hayden Bridge) and Hendricks Bridge, excluding the Mohawk Valley.
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises CI I, II, II, IV, VI, VII, VIII soils. Predominantly Class II soils along the river. Predominantly Class VI in the hills. Some Class I along Upper Camp Creek.
- Large, unconstrained parcels are located across the river, not adjacent to UGB.
- Large unconstrained parcels south of Camp Creek Road are predominantly Class II soils.
- Unconstrained portions of parcels north of Camp Creek Road are predominantly Class III soils (105A Pengra 1-4% slopes, and Class VI 108F Philomath 12-45% slope)
  - 17022200 200 approx. 31 acres Class III, slopes 15% or less (4% 105A), EFU
  - 17022200 103 approx. 11 acres Class III, slopes 15% or less (105A – Pengra 1-4% slopes, 113E, 102C), EFU
  - 17022300 300 approx. 6.8 acres Class III, slopes 15% or less (105A – Pengra 1-4% (105A – Pengra 1-4% slopes, 47% 108C Philomath, EFU, BPA easement
- Large unconstrained parcels west of Upper Camp Creek Road are Class I, II and III soils lower priority for expansion
- DOGAMI mapped landslide hazards in Coburg Hills
- riparian resources and wetlands along the McKenzie River

- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk Road – Mohawk Road
- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



17022200 200

17022200 103



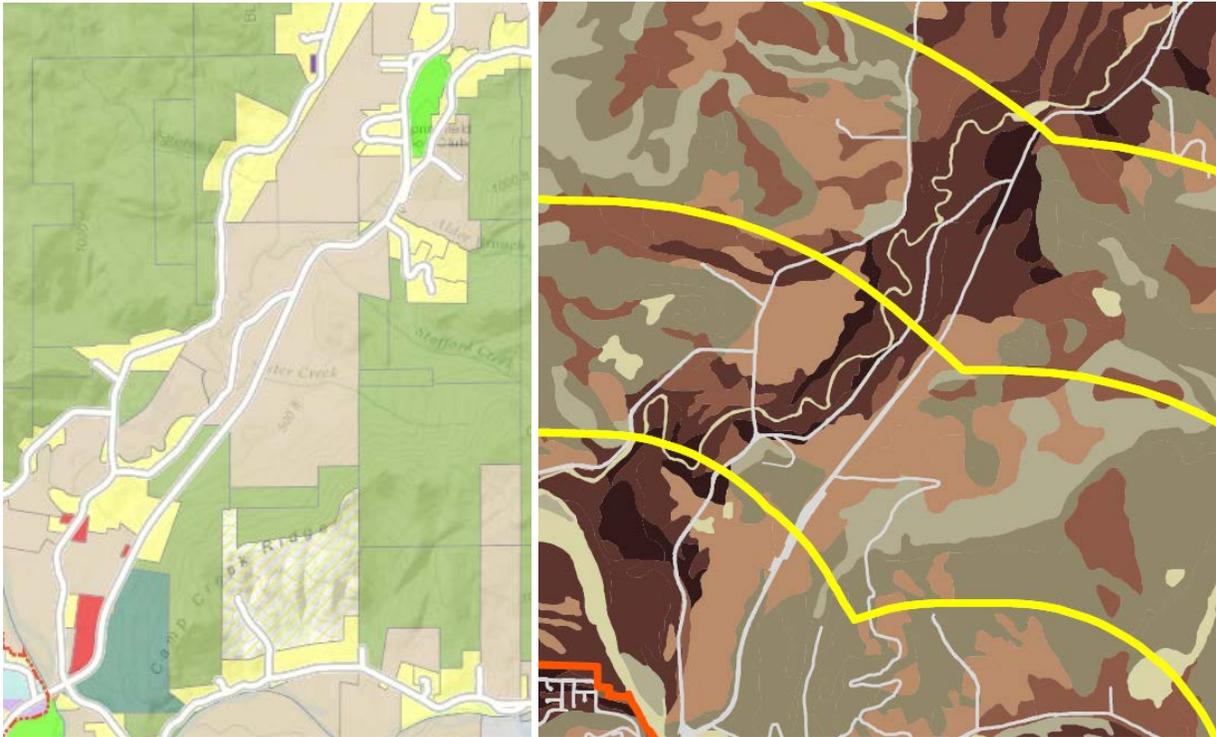
DOGAMI mapped landslide hazards north of Camp Creek Rd.

## Hayden Bridge



- The Hayden Bridge preliminary study area consists of the land between the UGB and the McKenzie River extending between the vicinity of Harvest Lane and Marcola Road and the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- Part of a larger block of agricultural land that extends north of the McKenzie River into the McKenzie View and Mohawk study areas
- Predominantly Class II soils. Area comprises Class II, III and IV.
- The area has large parcels that abut and are split by the Springfield UGB along Hayden Bridge Road, including several parcels larger than 20 acres.
- The area abuts urbanizable land designated for and developed with urban and urbanizable Low Density Residential uses.
- Topography is flat.
- Floodway, riparian resources and wetlands along the river
- Drinking Water Protection Overlay District: Pierce and Chase wells
- Accessed via Hayden Bridge Road and Harvest Lane
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.

## Mohawk



- The Mohawk preliminary study area consists of the land north of the McKenzie River along Marcola Road (Hayden Bridge)
- Land is across the McKenzie River from Springfield
- Fourth Priority lands are designated Agriculture and Forest.
- Large parcels are across the river, not adjacent to UGB
- DOGAMI mapped landslide hazards in Coburg Hills and Camp Creek Ridge
- Floodway, riparian resources and wetlands along the McKenzie and Mohawk Rivers
- Presence of hydric soils
- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk

**Road – Mohawk Road**

- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.
- Predominantly forestland
- Agricultural soil classification is mixed. Predominantly Class II with some Class I along the Mohawk and McKenzie Rivers. Area comprises Class I, II, III, IV, VI, and VII.
- Part of larger block of agricultural land that includes the Hayden Bridge and McKenzie View areas
- Large, unconstrained parcels west of Mohawk Road have Class I/II soils; and Class II/III (130 Waldo High Value), 1A Abiqua, 78 McAlpin High Value
- Large unconstrained parcels east of Mohawk Road are Class IV soils: predominantly 85 Natroy High Value/78 McAlpin High Value
- Lower priority for inclusion under ORS 197.298 because unconstrained large parcels consist of predominantly high value capability class soils.
- Presence of hydric soils may indicate wetlands.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

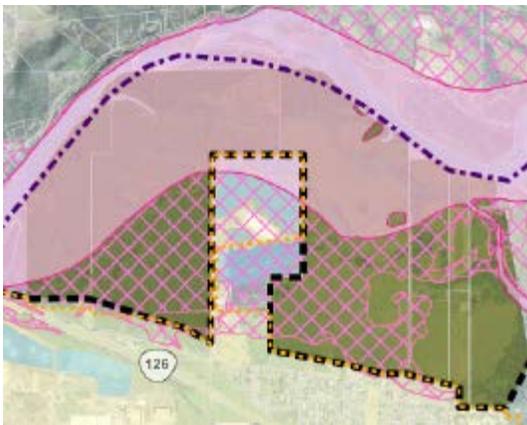
## North Springfield Highway



- The North Springfield Highway preliminary study area consists of the land between the UGB and the McKenzie River west to east between the Oxbow and Ruff Park, and extending north-south between the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- part of a larger block of agricultural land that extends on both sides of the McKenzie River west into the McKenzie View and Mohawk study areas an east to the Far East study area.
- Predominantly Class II soils. Area comprises Class I, II, III, IV, VII soils.
- The area has very large parcels (predominantly Class II, mixed with I, II and IV) that abut the Springfield UGB along High Banks Road at 52<sup>nd</sup> Street
- The parcels adjacent to and abutting UGB in the southern portion of the area have lower priority for inclusion under ORS 197.298 because they consist of predominantly high value soils.
- The area abuts land in the UGB designated for and developed with Heavy Industrial (Bluewater Boats),

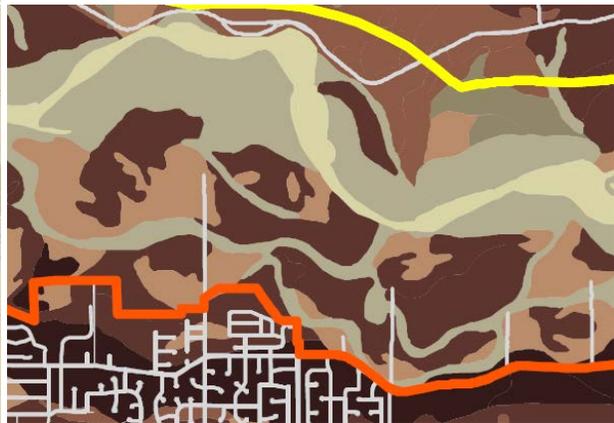
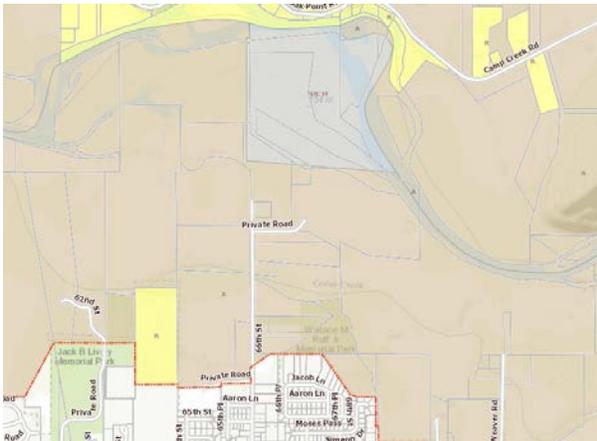
Low Density Residential and Park uses.

- Slopes are flat.
- Floodway, riparian resources and wetlands along the river
- Floodplain
- Drinking Water Protection Overlay zone: Plat 1 and 2 wells
- Convenient access to Interstate Highway 5 via Interstate Highway 105/State Highway 126B at 52<sup>nd</sup> Street
- 52<sup>nd</sup> 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 52<sup>nd</sup> and 58<sup>th</sup> 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

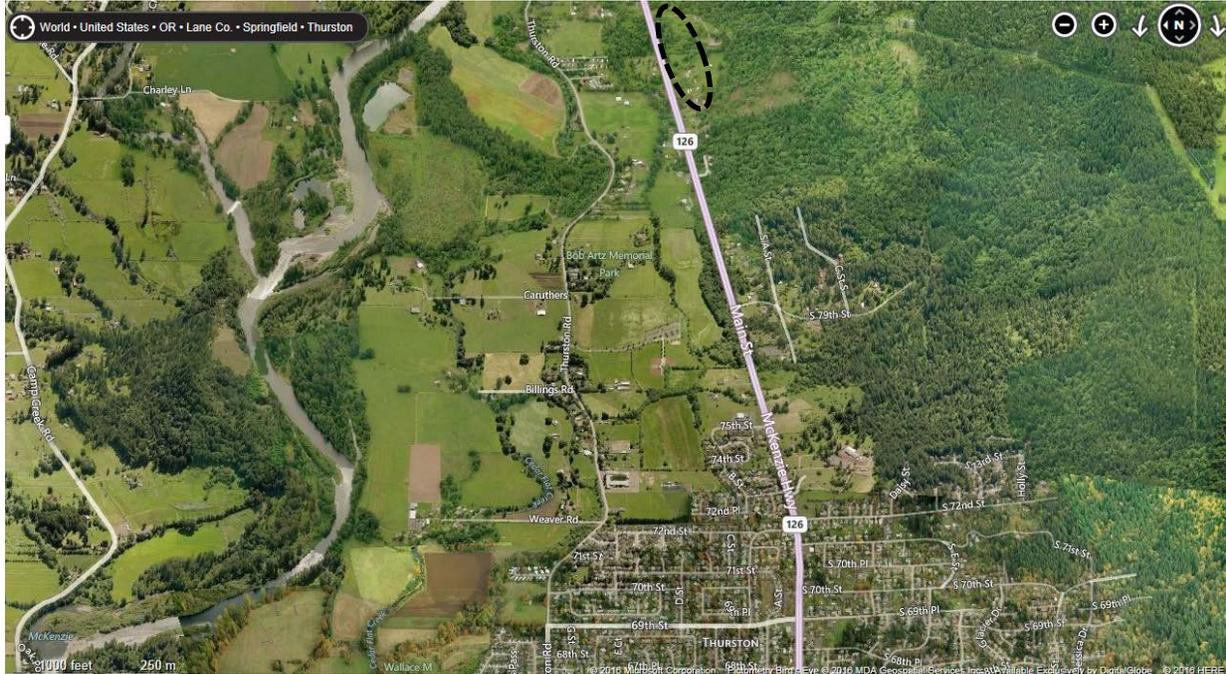


- Abuts UGB
- Part of a large block of agricultural land.
- Soils capability classification is mixed. Area comprises Class I, II, IV and VII, predominantly Class II.
- Constrained by floodway, riparian resources (McKenzie River, Cedar Creek), wetlands
- Drinking Water Protection Overlay District: Thurston, 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)

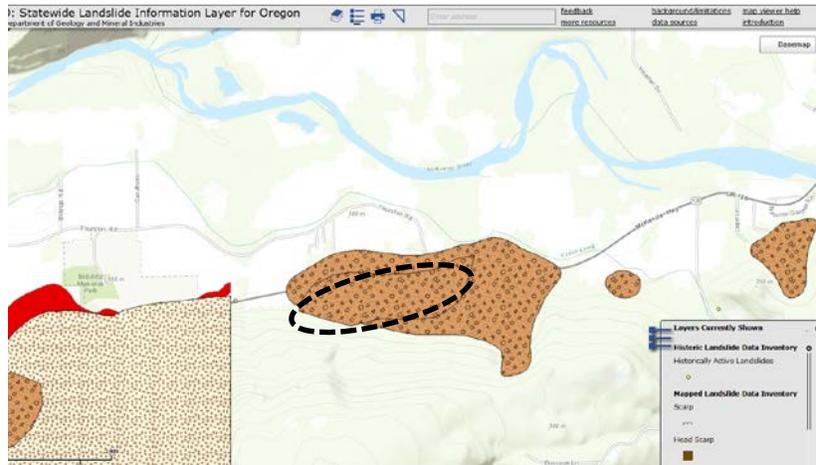
## Far East



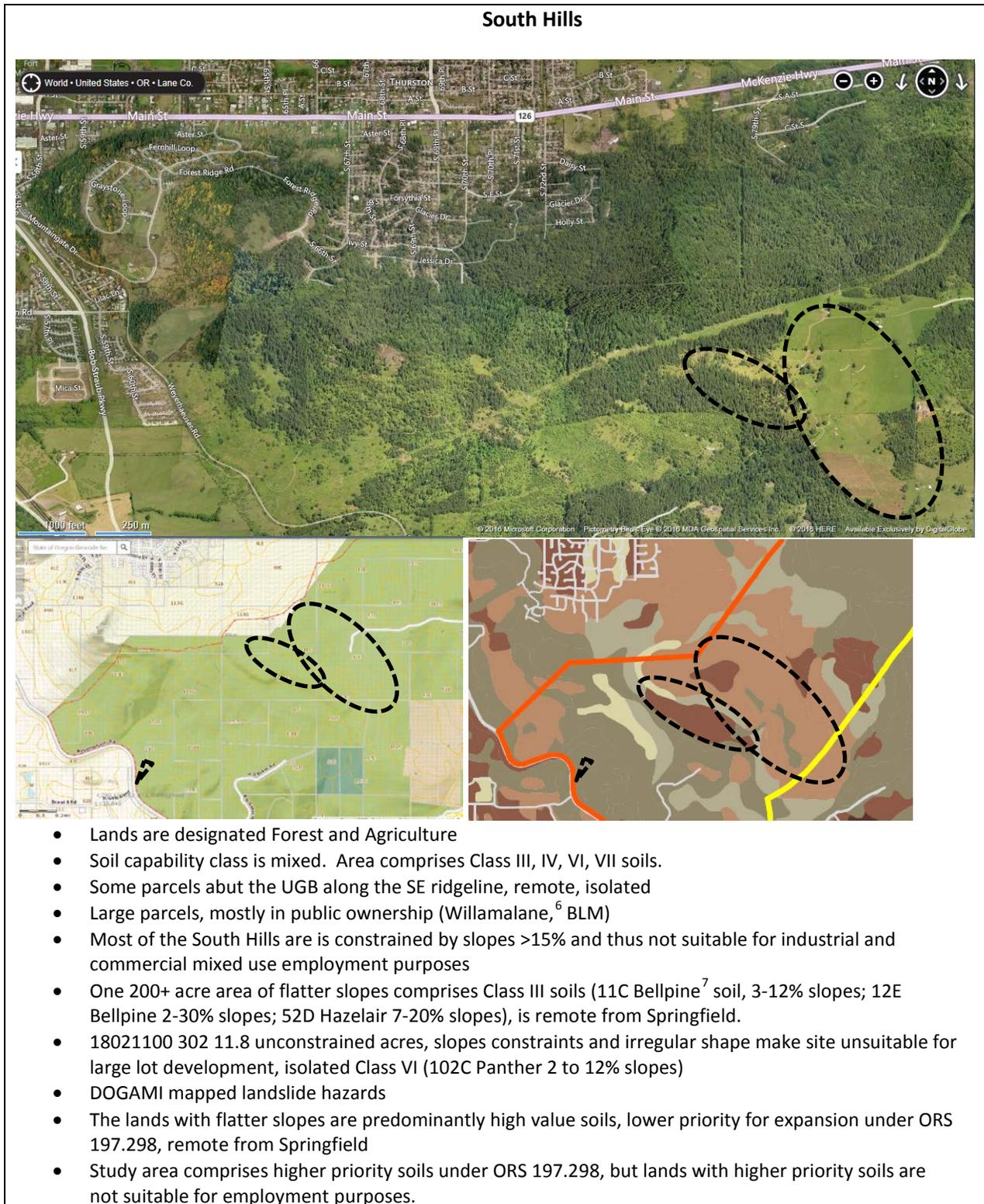
- Area comprises Class I, II, III, IV, VI, VI, VII, VIII soils; predominantly Class II and flat topography north of Highway 126; predominantly Class IV south of Highway 126 constrained by slopes 20-30%; (52D Hazelair 7-20 % slopes)
- Large Agriculture parcels 6-13 acres in size north of Highway 126 comprise 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.



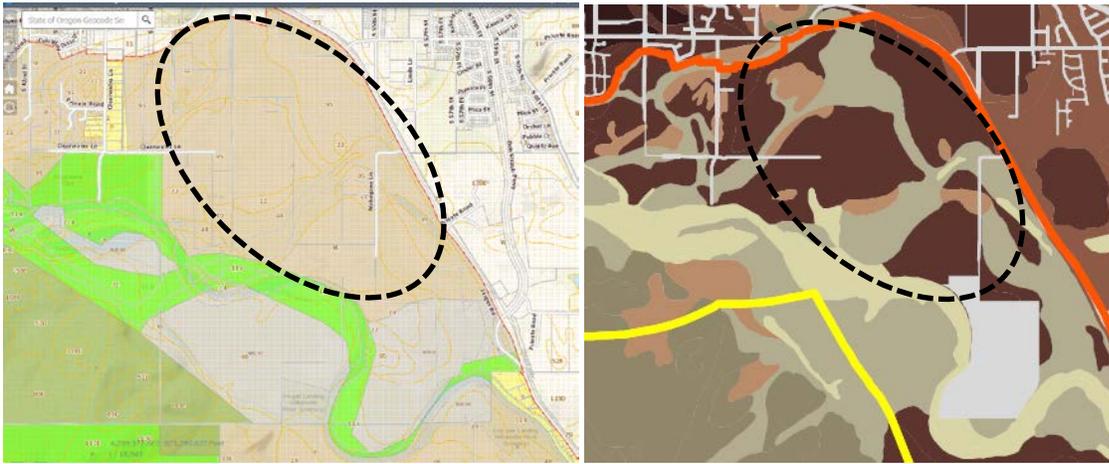
DOGAMI mapped landslides



<sup>6</sup> 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.”

<sup>7</sup> Class III Bellpine is identified in OAR 660-033-0030(8)(a) as meeting the definition of “High Value Farmland”

## West Jasper/Mahogany



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class II, IV, VII, and VIII.
- Predominantly flat topography
- Wetlands, hydric soils
- Study area includes productive farmland
- 2 BPA easements cross the study area
- Suitable large parcels abut UGB along Jasper Road, including parcels larger than 20 and 50 acres
- EFU tracts comprising predominantly CI II high value soils, lower priority for expansion<sup>8</sup>:

<sup>8</sup> See detailed maps in the record: West Jasper/Mahogany study area

- 18020400 1600
- 18020400 2701
- 18020900 2600
- 18020100 500
- 18020900 1402
- 18020900 1403
- 18020800 200
- (5) EFU tracts are not predominantly high value farmland, higher priority for expansion:
  - 18020900 200 (62.4 acres): 53% cl VII and VIII, 44% CI II
  - 18020900 301 (8.4 acres) 64% CI VII, 17% CI III, 10% CI VIII water, 9% CI II
  - 18020900 203 (22.7 acres): 78% CI VII, 8% CI VIII water, 12% CI III, 2% CI II
  - 18020400 2401 (6.1 acres): 28% CI VII, 26% CI III, 46% CI II
  - 18020400 3000 (54.5 acres):
- 18020900 1300 is public land: Oregon Dept. of State Lands
- Proximate (across Jasper Road) to un-annexed land designated for Industrial uses inside the UGB (Jasper-Natron) and land within the City Limits that is planned and partially developed with residential uses (Jasper Meadows), school and park uses.
- Area was identified by staff (2013) as a potential employment area worthy of further study in the UGB Study Area and was included in draft alternatives reviewed by the Springfield City Council in 2013-2014.



18020400 3000



18020400 2701



18020400 2401



18020900 203

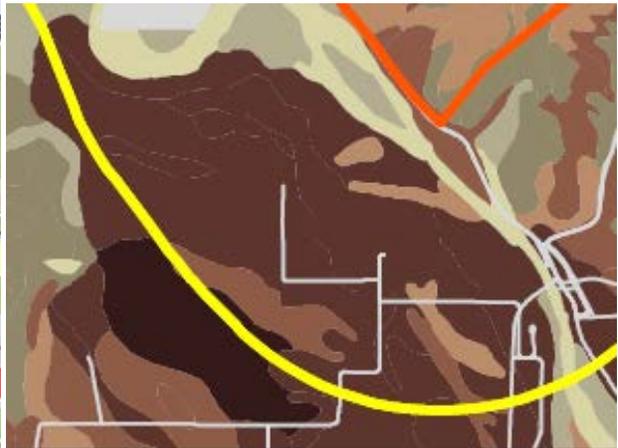
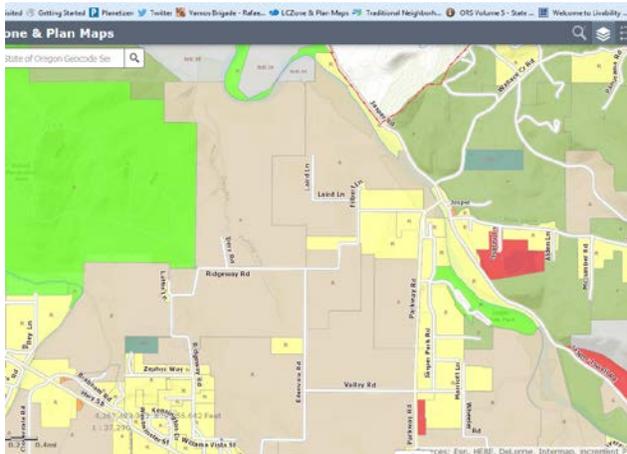
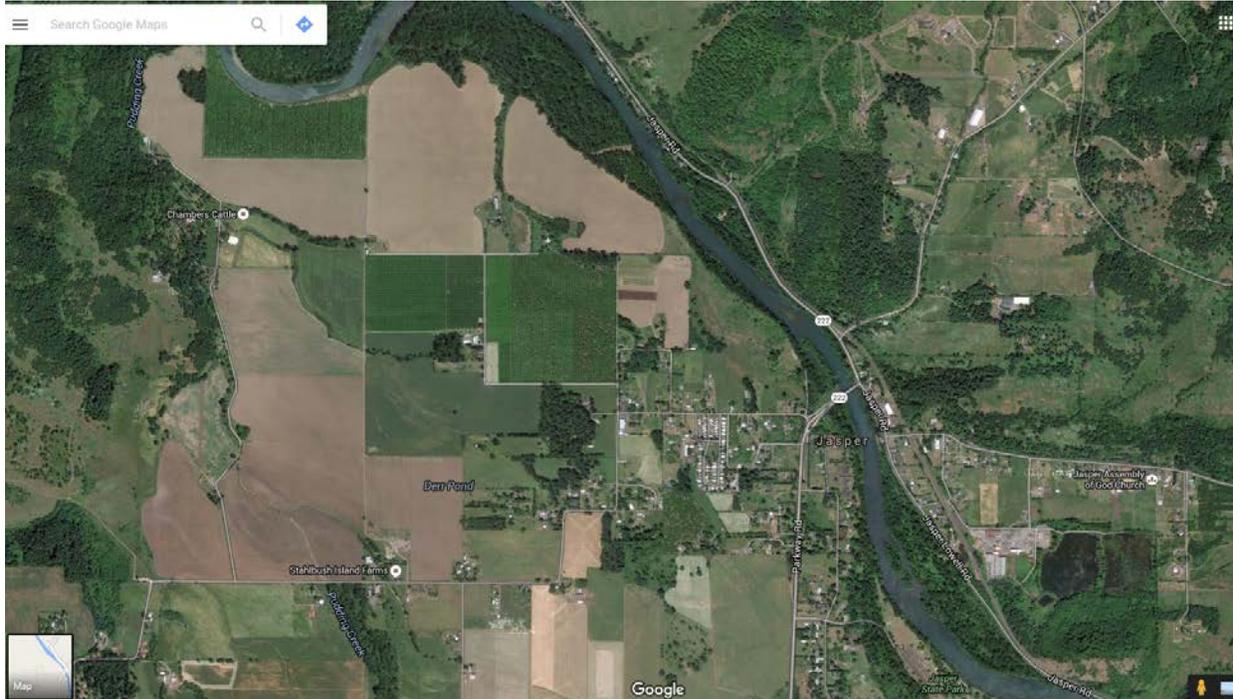


18020900 200



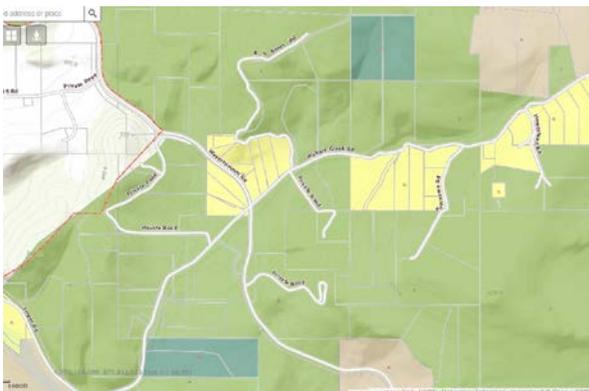
18020900 301

## Jasper Bridge



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class I, II, II, and IV. Predominantly Class II.
- Productive farmland
- Predominantly flat topography
- Wetlands
- Large block of Class I and II soils – lower priority for expansion under ORD 197.298

## Wallace Creek



- Designated Forest
- Abuts UGB along ridgeline
- Constrained by slopes >15%
- Soil capability class is mixed. Area comprises Class II, III, IV, VI, VII soils.
- Philomath 3-12% (olive green), McAlpin (intersection w/ Wey. Rd.) HazelAire 2-7%
- Flatter slope areas are Class II, III and IV soils.
  - 1802140000 801: 52% CI II and III (Bellpine HV), lower priority for expansion
  - 1802140000 501: 79% CI II, lower priority
  - 1802140000 905: 50% Class III (Bellpine HV), low priority, slopes 12-20%
  
  - 1802140000 900: 51% CI VI, 49% CI. II (inc. 41% Bellpine CI III HV)
  - 1802140000 800: 66% CI III, 28% CI VI, 6% CI II
  - 1802140000 500: 46% CI III, 28% CI VI, 14% CI IV, 11% CI II, 1% CI VI
  - 1802140000 903: 89% CI III, 7 ac. wetland

- 1802140000 902: 94% CI III
- 1802140000 1303: 19 ac. 77% CI VI



1802140000 900



1802140000 800



1802140000 500



1802140000 902 & 903



1802140000 1303

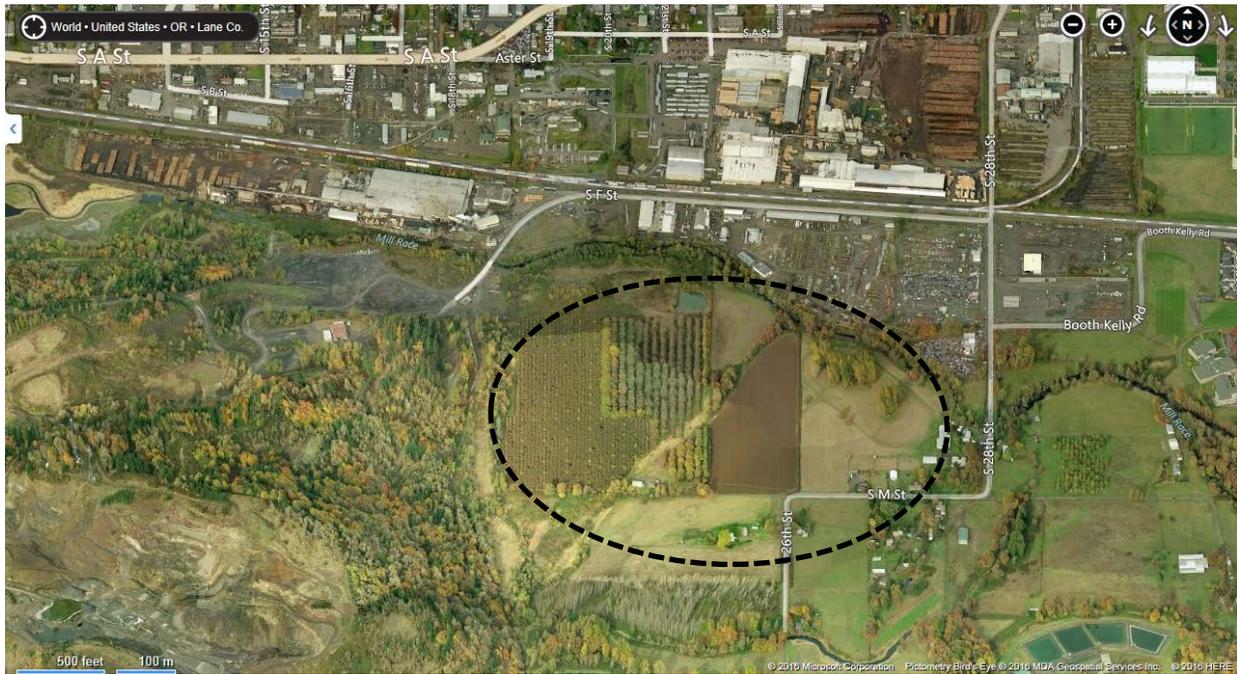


Slopes >15%



Hydric soils and NWI wetlands

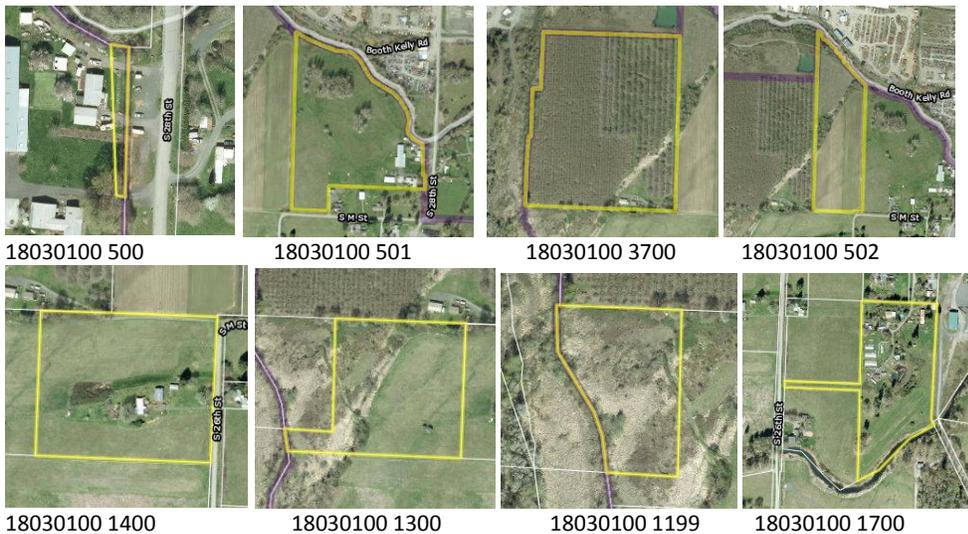
### Mill Race



- The Mill Race preliminary study area grouping consists of the land south of the UGB along South 28<sup>th</sup>, South M and South 26<sup>th</sup> 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 rebuilt and upgraded after the 2014 fire), and has access easements through to F Street.<sup>9</sup>
  - 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 28<sup>th</sup> Street, classified as a Major Collector in the TSP; and South M and South 26<sup>th</sup> (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.



<sup>9</sup> 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

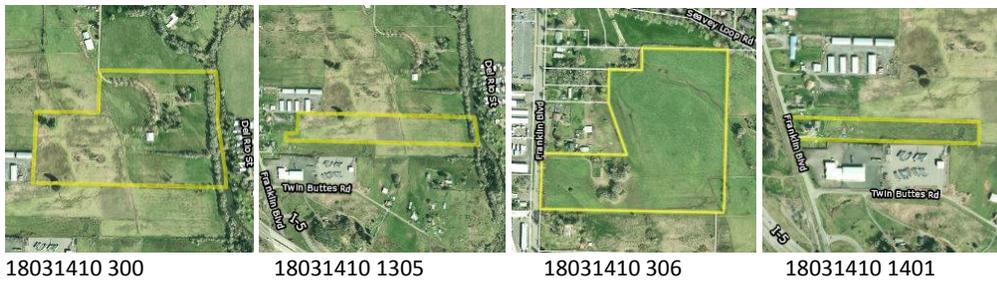
18030100 1702

### 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 CI 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.



<sup>10</sup> It should be noted that the Alvey Substation located south of this area “is a high voltage substation hub for BPA’s high voltage transmission network 115kV and above. It is not a distribution substation. Lines go out of BPA’s substation that feed to local distribution substations that transform the voltage from 115kV to a lower distribution voltage.” “If a large user were to locate in the College View area, they would not receive service directly from BPA’s substation, however a new High Voltage to Low Voltage distribution network substation could be built.” (email from Jeff Nelson to staff Pauly, SUB, 9-11-14)



Floodway extent

## Clearwater



- Designated agriculture
- Potentially suitable parcels including parcels 10 and 20 acres and larger parcels that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Low Density Residential
- Area is flat with some slopes along the banks of the Middle Fork Willamette river
- Riparian resources and wetlands along the river and Mill Race and Gorrie Creek
- Portions of study area are in the floodplain; floodway along the river
- Sensitive Drinking Water Protection Overlay zone and near SUB's Willamette Wellfield, Springfield's primary drinking water source.
- Soil classifications are mixed, predominantly Class II overall, with some Class IV and VII.
- Public parkland in the vicinity
- Hydric soils
- Parcels comprising <50% High Value Ag soils
  - 18020800 100 (16.2 acres) 54% non high value (Cl. VIII, II VII)
  - 18020500 2801 (29 ac.)\* 58% non high value (Cl VII, VI, II)

- 18020500 1928 (10 ac.)\* 33% CI VII, 34% CI IV, 33% CI II
- Parcels comprising more than 50% High Value Ag soils:
  - 18020500 2800 (39.5 ac.) 63% CI II, low priority for expansion
  - 18020500 2600 (22 ac.)\* 72% CI II, low priority for expansion
  - 18020500 2202 (21 ac.)\* 96% CI II, low priority for expansion
  - 18020500 1900 (10.3 ac.)\* 80% CI II, low priority for expansion
  - 18020500 1708 (5.8 ac.)\* 66% CI II, low priority for expansion
  - 18020500 1800 (36 ac.)\* 63% CI II, low priority for expansion
  - 18020600 4202 (21 ac.)\* 73% CI II, low priority for expansion
- 18020500 1909, 18020600 1001 are public land owned by Springfield School District
- Area was identified by the RLS and CIBL Technical and Stakeholder Advisory Committees as a potential future residential expansion area but not suitable for industrial and commercial development.



## PRIORITIZE FOURTH PRIORITY AGRICULTURAL AND FOREST LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

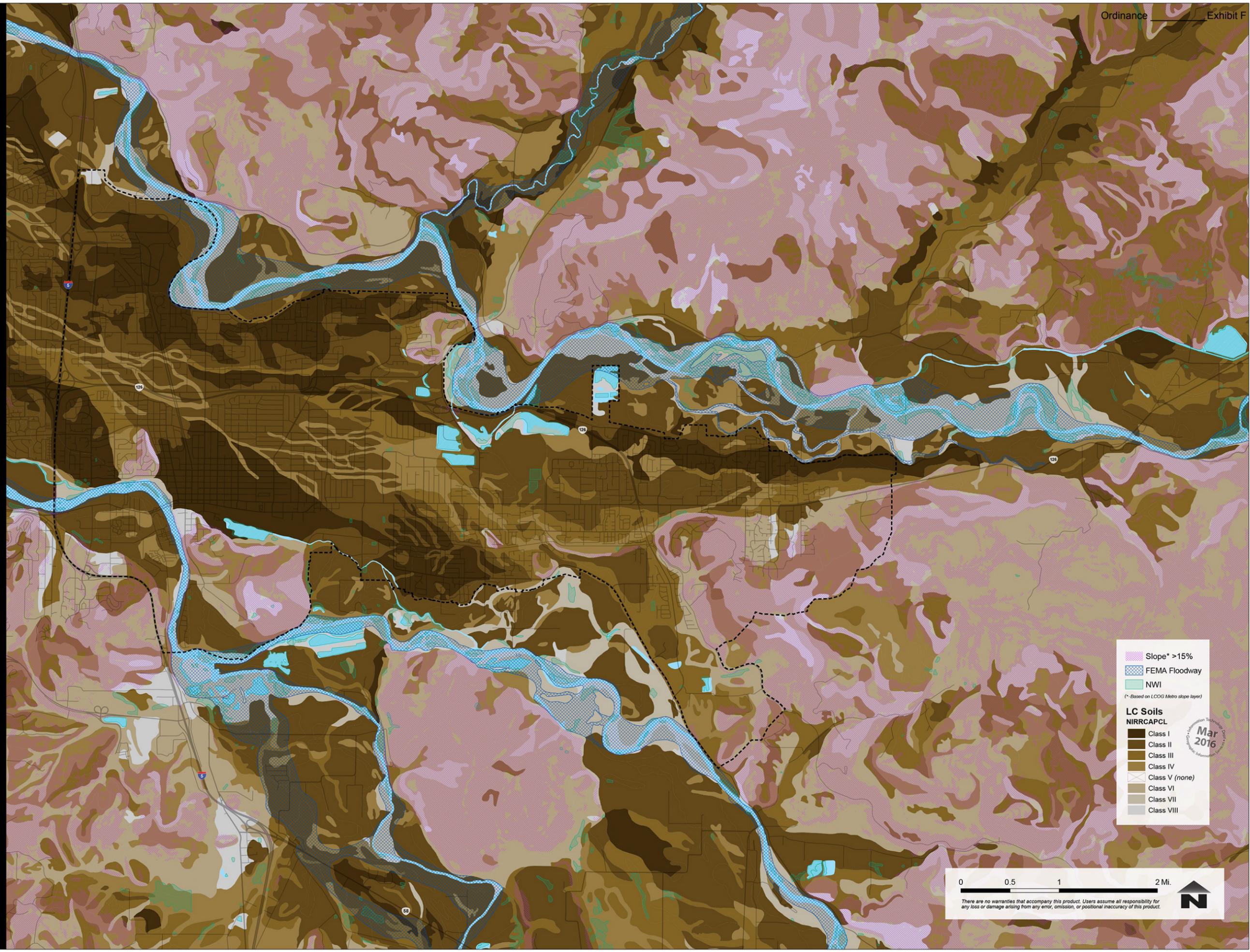
### ORS 197.298(2):

*“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”*

The City conducted an area-wide high level assessment of soil capability classification to determine and compare the capability classification system or by cubic foot site class of lands adjacent to the UGB that are designated for agriculture, forestry or both.

Table 14 above provides additional information to compare general soil classifications between the study area groupings and parcels within groupings.

SPRINGFIELD 2030 REFINEMENT PLAN: Soil Capability and Constraints



Slope\* >15%

FEMA Floodway

NWI

(\*Based on LCOG Metro slope layer)

**LC Soils**  
NIRRCAPCL

- Class I
- Class II
- Class III
- Class IV
- Class V (none)
- Class VI
- Class VII
- Class VIII

Mar 2016

0 0.5 1 2 Mi.

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

## 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.<sup>11</sup> 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.<sup>12</sup> 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.<sup>13</sup>

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.*

<sup>11</sup> 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.

<sup>12</sup> Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

<sup>13</sup> USDA NRCS website [http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/?cid=nrcs142p2\\_053375](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.”<sup>14</sup>*

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.”<sup>15</sup>*

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.”<sup>16</sup>*

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.”<sup>17</sup>*

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*

<sup>14</sup> National Soil Survey Handbook, Part 622, USDA, NRCS  
[http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/ref/?cid=nrcs142p2\\_054226#ex6](http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/ref/?cid=nrcs142p2_054226#ex6) accessed 12-16-15.

<sup>15</sup> 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.

<sup>16</sup> Agriculture Handbook No. 210, Land Capability Classification, USDA Soil Conservation Service,

<sup>17</sup> 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.”<sup>18</sup>*

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.”<sup>19</sup>*

The City used NRCS SSURGO data to map soils and their capability classifications.<sup>20</sup> Staff contacted Cory Owens, USDA NRCS State Soil Scientist<sup>21</sup> 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.<sup>22</sup> 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.

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<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> NRCS Lane County Soil Survey

<sup>21</sup> telephone communication between staff Pauly and NRCS staff Cory Owens, 12-17-15

<sup>22</sup> 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<sup>23</sup> 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.*

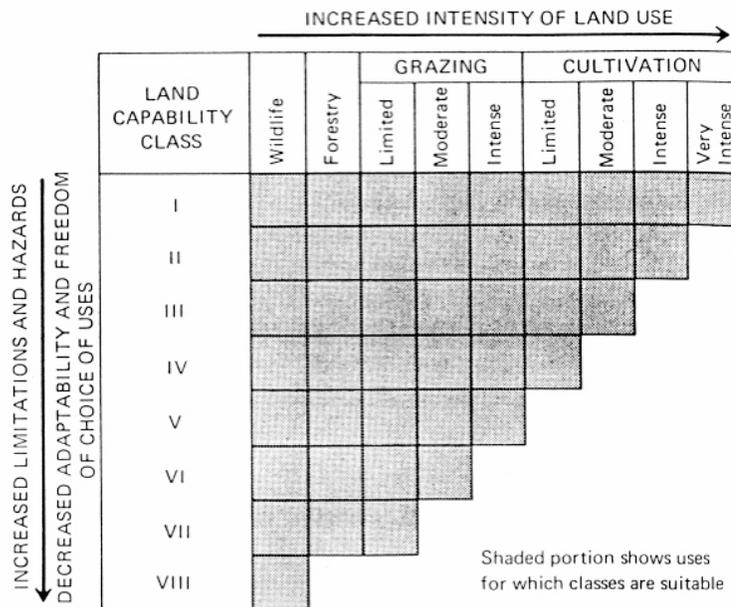
*Soils surveys are based on all the characteristics of soils, including climate, that influence their use and management. Interpretations are provided within soil surveys for various land uses, including agriculture. Among these interpretations is the grouping of soils into*

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<sup>23</sup> Pages 13-14

agricultural capability classes. This classification system places soils in eight capability classes. The better the agricultural capability (decreasing from I-VIII), the less management (input) is required by the operator to produce a crop. Soil quality is also a key to the production options available to a grower.

The soils in the first four classes (I-IV), under typical/good management practices, are considered arable and are capable of producing adapted plants and common cultivated field crops and pasture plants. Some soils in classes V-VII are capable of producing specialized crops and even field and vegetable crops under special management.”



“Soils can also be designated as prime, unique, or high-value farmland:

*Prime Farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber and oilseed crops. It must be available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not exclusively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.”*

*“Unique farmland is land other than prime farmland that is used for the production of specific high value food and fiber crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce economically sustained*

*high quality and/or high yields of a specific crop when treated and managed according to acceptable farming methods. Some examples of crops are tree nuts, cranberries, wine grapes, and tree fruits.”*

*“High Value Farmland is defined in ORS 215.710(1), (3) and (4) and OAR 660-033-0020(8)(a), (c), (d) and (e). “High Value Farmland” is land in a tract composed predominantly (50.1%) of certain specified soils commonly referred to as “High Value Farmland Soils.” These soils (alone or in combination) are the following:*

*1. Those soils classified by the Natural Resource Conservation Service (NRCS) as:*

- a. Prime, Unique, Capability Class 1 or Capability Class 2 not irrigated; or*
- b. Prime, Unique, Capability Class 1 or Capability Class 2 if irrigated; and*

*2. Certain specifically listed Capability Class 3 and 4 soils for the:*

- a. Willamette Valley; and*
- b. Oregon Coast west of the summit of the Coast Range if used in conjunction with a dairy operation on January 1, 1993; and*

*“High-value farmland also includes other lands planted in specified perennials based on the 1993 Farm Service Agency air photos.”*

*“Water: Availability of water for irrigation of agricultural crops and livestock watering. Water is key to the production of many high-value crops. However, many crops, including high-value crops, can be produced using dryland agricultural practices. Dryland production is most feasible where precipitation is adequate to allow economic return on a nonirrigated crop. New technologies in delivery and storage can compensate for limited availability.”*

*“Water availability is both an asset and a threat to regional agricultural. Current availability is overall good throughout the region. Expansion in some areas, especially where groundwater is the major source, is severely limited by ground water limitations. Such limitations do not impair the use of existing water rights. It is especially important to recognize existing agricultural irrigation in groundwater restricted areas because new irrigation rights currently are difficult to obtain.”*

*“Most of the suitability factors can be related to the position of farming operations as part of a large block of agricultural land or other resource lands. Protecting and maintaining large blocks of agricultural land is key to maintaining the integrity of working lands. Integrity involves many issues including the ability to operate with limited conflicts, curtail speculative land values and maintain a critical mass of land sufficient to leverage the infrastructure needs of the industry. (emphasis added)*

- *Land use pattern: Adjacent and area land use pattern (nonfarm uses, exception areas). Includes analysis of edges that provide workable buffers between agricultural lands and nonfarm uses.*
- *Agricultural land use pattern within the subject agricultural area: The types of crops grown and the ability of farming operations/practices associated with the producing these crops to co-exist with other land uses in the area can be an important factor.*
- *Parcelization (number and size), tenure and ownership pattern: In analyzing suitability, parcelization is important, but not always as a stand-alone factor. All other factors being equal, smaller parcels under multiple ownerships are less favorable for long-term commercial farm use. The practice of renting or leasing smaller (and larger) parcels is very common in the region and needs to be taken into account. Long term, if the smaller parcels are protected for farm use, they frequently become available for rent, lease or acquisition for farm use, especially if they do not contain dwellings.*
- *Agriculture infrastructure: Elements such as transportation, irrigation delivery, labor availability, processing and other service needs, agricultural special districts, drainage facilities, etc., can be important factors in the long-term viability of an area. It is important to note that, unlike the infrastructure needs for new urban development, the agricultural infrastructure is in most cases already in place and has been and is being maintained and updated on an ongoing basis.*
- *Zoning, within subject agricultural area: Many lands currently employed in farm use within the Metro region are not zoned for exclusive farm use. The long-term suitability of such areas is impacted by the nonfarm uses that may be permitted and by the ability to further partition or subdivide the area.*
- *Location in relationship to adjacent lands zoned for nonresource development:*
- *The number, size and length of edges with urban and other nonfarm development impact the efficiency and effectiveness of agricultural practices and can impact land values.*
- *The scale, shape and size of protrusions of nonresource lands into agricultural lands also impact efficient and effective agricultural operations.*
- *Certain nonfarm uses are more compatible with agricultural operations than others.*
- *The ability to further partition or subdivide.*
- *Location/availability of edges and buffers that help insulate and protect agricultural operations from nearby nonfarm use.*

*Other factors*

- *Concentration/clusters of farms:*
- *The dependence between farms: ability for sharing of labor, housing, equipment and other needed services can be critical to the bottom line.*
- *The ability to leverage agriculture’s infrastructure needs by maintaining economies of scale.*
- *A cluster of farms can also have marketing value. Customers like to make one trip to obtain berries, fruits, vegetables and other products in one area.*
- *Agri-tourism can also benefit from clusters. Examples include winery tours, marketing by the Tri County Farm Fresh Food Guide, and the Hood River Valley “Fruit Loop.”*

*“Trends in regional agriculture create different needs, opportunities and abilities for the industry. Consumer trends are increasingly dynamic and segmented, creating new markets; markets that are rapidly changing and demanding more specialty products. Specifically:*

- *Global trade opportunities and concerns.*
- *Demand for organic, sustainable, high quality foods both in the home and at restaurants.*
- *Farmers markets, direct marketing opportunities, development of specialty and niche crops.*
- *“Agri-tourism*
- *Increasing demand for biofuels/energy development. Agricultural practices associated with the production of commodities used in the production of biofuels tend to be more extensive in nature, usually do not require irrigation and tend to require the use of larger machinery.*
- *Growing recognition of food security issues and demand for products from the local food shed.*
- *Federal Farm Bill. New conservation incentives and other programs related to renewable energy and farmland protection could help region farms cope.*

*Location within and near a major metropolitan region can be a major asset in light of the trends outlined above. Many of the intensive, high-value, niche and specialty crops in increasing demand can be produced under circumstances not otherwise conducive to more recognized agricultural production in the region.”<sup>24</sup>*

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<sup>24</sup> *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.”<sup>25</sup>*

The City’s data base and methodology for identifying and evaluating soils for the purpose of ORS 197.298 and Goal 14 is reasonable and consistent with the law.

Evaluation results. The City’s initial wide-ranging look at soil classifications in 2008 provided a “big picture” of where prime agricultural soils and important agricultural lands are located in relationship with Springfield’s UGB and future growth needs. This assessment was confirmed through the City’s multi-year Citizen Involvement process and input from local agricultural experts and practitioners. This is important and germane to the City’s UGB study because Oregon law and the Oregon Department of Agriculture identify the importance of large blocks of agricultural land as an important factor in maintaining the states’s agricultural land base:

## ORS 215.243 (2)

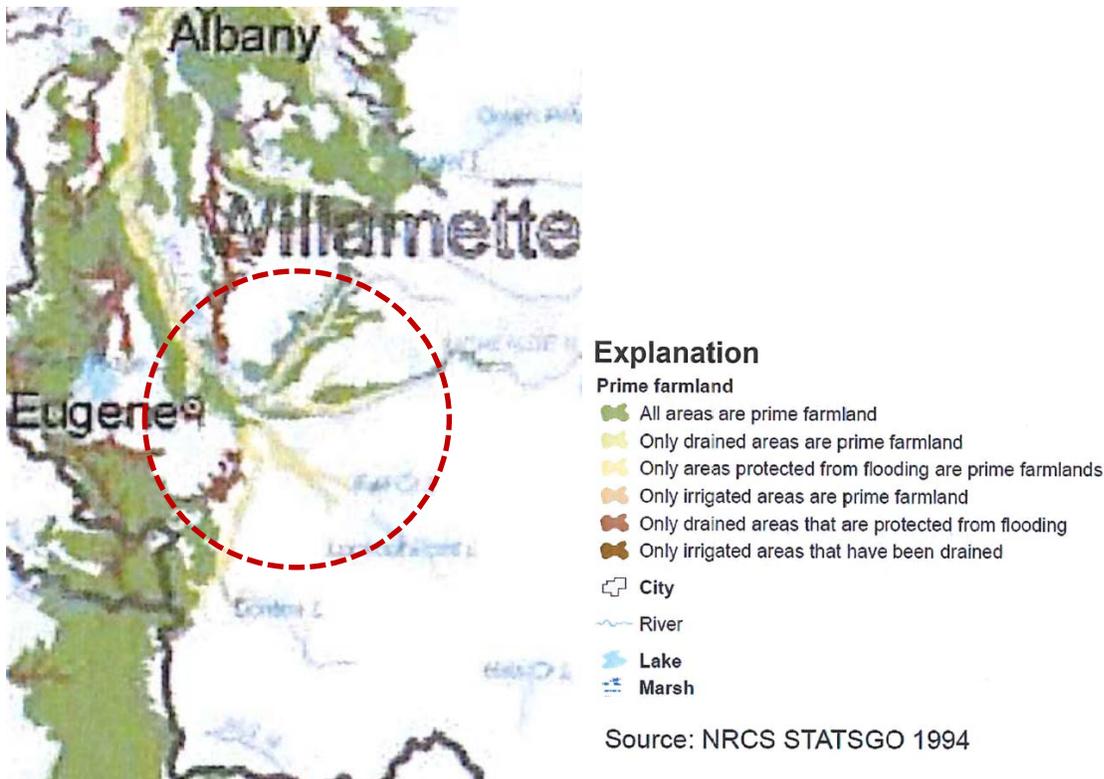
*“The preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state’s economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation. (emphasis added)*

<sup>25</sup> 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.<sup>26</sup>

An enlargement of the map “Prime Farmlands in Oregon” of the vicinity of the Springfield UGB Vicinity<sup>27</sup> illustrates the general location of large blocks of prime farmland in relationship to the Springfield/Eugene metro area:



<sup>26</sup> USDA Census of Agriculture 2012, County Profile, Lane County, Oregon, [http://www.agcensus.usda.gov/Publications/2012/Online\\_Resources/County\\_Profiles/Oregon/cp41039.pdf](http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Oregon/cp41039.pdf) accessed 12-16-15.

<sup>27</sup> *Integrated Water Resources Strategy, Map Gallery*, Oregon Water Resources Dept., 2010, p. 6.

Insert 11 x 17 page: Map 4: Study Area Soil Class, ECONorthwest, December 2008

As clearly shown in Map 2: Alternatives Analysis Soils and Constraints (derived from NRCS SSURGO data)—in which the darkest brown colors on the map indicate locations of Class I (soils with few limitations that restrict their use) and Class II (soils with moderate limitations that reduce the choice of plants or that require moderate conservation practices)— the largest blocks of predominantly Class I and II soils outside of the Springfield UGB are located:

- south of the Willamette River, south of the Springfield UGB and east of Interstate Highway 5 (Seavey Loop area);
- southeast of the UGB, between the Willamette River and Pudding Creek, north of Highway 58 (Jasper Bridge area), and extending farther south to the Pleasant Hill area.

The City identified two prime farmland areas consisting of the largest blocks of predominantly Class I and II soils outside of the Springfield UGB when it prioritized and evaluated lands based on capability classification, and when it considered and compared potential UGB expansion areas that would avoid or reduce impacts to those two prime farmland areas.

It should be noted here that both of these prime farm soil areas are located in the immediate vicinity of second priority exception areas, thus the City was required under ORS 197.298 to consider second priority Seavey Loop and Jasper Bridge areas as candidate lands for urbanization regardless of this fact. The City’s analysis provided explanation of why the Seavey Loop/College View study area and Jasper Bridge exception parcels were eliminated from consideration for employment land due to lack of suitable parcel sizes and physical constraints that preclude the ability to provide public facilities and services within the planning period. It should also be noted that the City received large volumes of comments from the public expressing concerns about and preferences for the importance of maintaining the Seavey Loop agricultural area for agriculture.

Other Class I and II soil areas, both in the vicinity of the UGB, and several miles out from the UGB are in smaller blocks or are more mixed.

- Generally, the northern edge of the existing Springfield UGB follows the McKenzie River and its flood plain. Lands outside of and adjacent to the UGB and on the Springfield side of the McKenzie River are predominantly Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southern portion of the existing Springfield UGB between the UGB and the Willamette River comprises lands consisting primarily of Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southeast portion of the existing Springfield UGB follows the ridgeline of the Thurston South Hills (“South Hills” Study Area grouping). The Thurston South Hills lands outside of and adjacent to the UGB are predominantly a mix of Class VI, IV, and VII soils.
- Generally, lands located farther south of the UGB, south of the Willamette River and its side channels comprise the largest blocks of Class I and II soils.

To conduct the soils analysis, the City identified general geographic groupings of all land areas in the vicinity of the UGB and named the areas for ease of reference, mapping and communication purposes. The City did not arbitrarily delineate UGB study areas for the purpose of conducting a quantitative analysis. Instead, the City reviewed NRCS Lane County Soil Survey soils series maps, sorted soil series into Classes I through VIII and conducted a visual qualitative assessment to determine the presence and general location of high value agricultural soils in the vicinity of the Springfield UGB.

For the purpose of prioritizing agriculture or forest land by capability classification, the City conducted a general visual assessment of mapped capability class to begin to sort lands in the order of highest capability classification as shown in Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008. This assessment includes all land, including the second and third priority lands previously discussed. It addresses mapped capability classification only and does not apply or address interplay of constraints such as slopes, rivers, floodway, existing development, etc.<sup>28</sup>

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<sup>29</sup>

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:

<sup>28</sup> The City prepared a map Soil Capability and Constraints, depicting soil capability classes and absolute development constraints, March 2016.

<sup>29</sup> In a meeting with staff Pauly, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.e

- North Gateway
- McKenzie View
- Hayden Bridge
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop
- Far East Springfield
- Jasper Bridge
- Mahogany
- Clearwater
- Oxbow/Camp Creek

Each Preliminary study area grouping comprises at least some Class II soils. The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek. The study area with the smallest size mapped Class II areas are South Hills and Wallace Creek.

The City's UGB employment land expansion includes Class II soils in the North Gateway and Mill Race areas.

### **Class III Soils**

Within the preliminary Springfield UGB Study area, Class III soils are found in the following areas:

- McKenzie View
- Mohawk
- Hayden Bridge
- Oxbow/Camp Creek
- North Springfield Highway
- Far East Springfield
- South Hills
- Wallace Creek

- Jasper Bridge
- Mill Race
- Seavey Loop

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprise at least some Class III soils. The largest contiguous areas of Class III soils are in Oxbow/Camp Creek.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

*(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.*

Underlined soils are present in UGB Preliminary Study Area.

The City’s UGB employment land expansion includes Class III soils in the Mill Race area.

## Class IV Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class IV soils are found in the following areas:

- North Gateway
- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

Each Preliminary study area grouping comprises at least some Class IV soils. The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are South Hills (Forest land) and Mohawk (agricultural land). Class IV soil are also located between the McKenzie Highway and South Hills in the Far East Springfield area.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising "High Value Farmland," including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

*(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.*

The City's UGB employment land expansion includes Class IV soils in the North Gateway and Mill Race areas.

## Class V Soils

No Class V soils are found within the Springfield UGB study area adjacent to the UGB.

## Class VI Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VI soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Far East
- South Hills
- Wallace Creek
- Seavey Loop

The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are McKenzie View, Mohawk, Camp Creek and South Hills

Class VI soils in the McKenzie View/Coburg Hills area are steep slopes with numerous landslide areas mapped in DOGAMI SLIDO.

Class VI soils in the Mohawk Valley area (east side of valley) include numerous areas are mapped in DOGAMI SLIDO as landslide talus/colluvium, and fans.

The City's UGB employment land expansion does not include Class VI soils.

## Class VII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East
- South Hills
- Wallace Creek
- West Jasper/Mahogany
- Clearwater
- Seavey Loop

The City's UGB expansion includes Class VII soils.

## Class VIII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VIII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Far East
- South Hills
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

This classification includes W Water, 114 Riverwash, 110 Pits, 127C Urban land-Hazelair-Dixonville

The City's UGB expansion includes Class VIII soils in the North Gateway (Natural Resource designation) and Mill Race (Public/Semi-Public designation) areas.

UGB Study Area Soils Summary:

In the vicinity of the Springfield UGB, the City concluded that largest contiguous areas of Class I and II high value farmland soils are located:<sup>30</sup>

- 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).<sup>31</sup>

**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?
<b>North Gateway Site (Note Class II land north of Sprague was excluded)</b>			
1703154000 400 (102 ac.)* High value farmland comprises 45% of tract	45% CI II 35% CI VII 15% CI IV 6% CI VIII Hydric soils	95 Newberg 48 Fluvents 22 Camas 114 Riverwash Flat topo	<b>YES</b> Proximity Topo Public Facilities ESEE
170310000 2500 (68.3 ac.)* High value farmland comprises 44% of tract	46% CI II 34% CI IV 16% CI VII 4% CI VIII Hydric soils	96 Newberg 22 Camas 48 Fluvents 114 Riverwash Flat topo	<b>YES</b> Proximity Topo Public Facilities ESEE
170310000 2400 (22.8 ac.)* High value farmland comprises 89% of portion of tract east of I-5 (area west of I-5 is excluded from this study)	89% CI II 4% CI VII 7% CI VIII Hydric soils	Flat site 96 Newberg 22 Camas, 114 Riverwash	<b>YES</b> Proximity Topo Public Facilities ESEE
<b>McKenzie View Site (Note Class I and II land was excluded)</b>			
17021800 402 17021800 403 17021800 404	VI	108C- Philomath 3-12% slopes	<b>NO</b> Public Facilities Slopes Proximity Landslide hazard ESEE

<sup>30</sup> Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

<sup>31</sup> The City's record includes descriptions of the applicable soil series from the NRCS Soil Survey of Lane County.

<b>Oxbow/Camp Creek (Note Class I and II land was excluded)</b>			
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	<b>NO</b> Public Facilities Proximity Landslide hazard BPA easement ESEE
17022300 700, 703, 704	III (high value farmland)	11C Bellpine 3-12% (high value farmland)	<b>NO</b> Soil Capability Slopes Proximity Public Facilities ESEE
<b>Far East (South) (Note Class I and II lands and lands north of Hwy 126 were excluded)</b>			
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	<b>NO</b> Slopes Landslide hazard ESEE
<b>West Jasper/Mahogany (Note Class II land was excluded)</b>			
18020900 301 (8.4 acres)*  18020900 200 (62.4 acres)*	64% CI VII, 17% CI III, 10% CI VIII water, 9% CI II  53% CI VII and VIII, 44% CI II	95 Newberg 48 Fluvents 52B Hazelaire 2-7 % slopes hydric soils	<b>NO</b> Proximity Public Facilities ESEE
18020400 3000 (54.5 acres)*	75% CI VII, 25% CI II	48 Fluvents 95 Newberg 73 Linslaw 121B Salkum, 2-8% slopes hydric soils	<b>NO</b> Proximity Public Facilities ESEE
1802090000 203 (22.7 acres)*	86% water and fluvents CI VIII, VII, 2% CI II	48 Fluvents 52B Hazelaire 2-7 % slopes 73 Linslaw 95 Newberg hydric soils	<b>NO</b> Proximity Public Facilities ESEE
18020400 2401 (6.1 acres)*	54% non farm, 46% CI VII, II, IV	95 Newberg 48 Fluvent 52B Hazelaire 2-7 % hydric soils	<b>NO</b> Proximity Public Facilities ESEE
<b>Clearwater</b>			
18020500 2800 (39.5 ac.)*	63% CI II 23% CI VII 14% CI IV	95 & 96 Newberg 48 Fluvents 22 Camas	<b>NO</b> Capability Classification Proximity Public Facilities

			ESEE
18020500 2600 (22 ac.)*	72% CI II 14% CI IV 14% CI VII	95 & 96 Newberg 22 Camas 48 Fluvents	<b>NO</b> Capability Classification Proximity Public Facilities ESEE
18020800 100 (16.2 ac.)*	46% CI II 40% CI VIII 14% CI VII	95 Newberg 110 Pits 48 Fluvents	<b>NO</b> Proximity Public Facilities ESEE
18020500 1928 (10 ac.)*	34% CI IV 33% CI VII 33% CI II	22 Camas 48 Fluvents 95 Newberg	<b>NO</b> Proximity Public Facilities ESEE
18020500 2801 (29 ac.)*	56% CI VII 3% CI VI 36% CI II	48 Fluvents 113E Rittner 12-30% slopes 96 Newberg, Salkum 2-8% slopes	<b>NO</b> Proximity Public Facilities ESEE
<b>Wallace Creek</b>			
1802140000 900 (17 ac.)*	51% CI VI	102C Panther 2-12% slopes 11D Bellpine 12-20% slopes 52B Hazelair 2-7% slopes hydric soils	<b>NO</b> Slopes Proximity Public Facilities ESEE
18021400 800 (8.3 ac.)*	66% CI III 28% CI VI 6% CI II	52B Hazelair 2-7 % slopes 102C Panther 2-12% slopes 78 McAlpin hydric soils	<b>NO</b> Slopes Proximity Public Facilities ESEE
1802140000 903 (7 ac.)* 1802140000 902 (4.8 ac.)*	89% CI III 11% 94% CI III	130 Waldo 102C Panther 2-12% slopes hydric soils	<b>NO</b> Slopes Proximity Public Facilities ESEE
1802140000 500 (20.8 ac.)*	46% CI III 28% CI VI 14% CI IV 11% CI II 1% CI VI	130 Waldo 108C Philomath, 3-12% 52D Hazelair, 14% 78 McAlpin 102C Panther 2-12% slopes hydric soils	<b>NO</b> Slopes Proximity Public Facilities ESEE
1802140000 1303 (19 ac.)*	77% CI VI 22% CI III	108C Philomath, 3-12% 130 Waldo/Hazelair/Dupee hydric soils	<b>NO</b> Proximity Public Facilities ESEE
<b>Mill Race</b>			
SUB Tract 18030100 3700 (SUB)(36.7 ac.)*	95% CI II 3 % CI III HV	26 Chehalis, 29 Cloquato, 95& 96 Newberg, 79 McBee (Prime)	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 502 (SUB) (20.5 ac.)*	85% CI II 13% CI III	96 Newberg, 79 McBee (Prime), 29 Cloquato, 26	<b>YES</b> Proximity Topo Public Facilities ESEE

	1% CI VIII water	Chehalis, W water	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 501 (22.1 ac.)*	99% CI II 1% Water	96 Newberg	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 1400 (9.9 ac.)*	100% High value ag: 63% CI II, 36% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 1300 (8.32 ac.)*	100% High value ag: 44% CI II, 56% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg 26 Chehalis	
18030100 1199 (3.4 ac.)*	100% High value ag: 82% CI II, 17% CI III McBee (HV)	26 Chehalis 95 Newberg 79 McBee	
18030100 1700 (10 ac.)*	56% CI II 44% CI III	95 & 96 Newberg, 29 Cloquato, 22 Camas	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 1701(5 ac.)*	100% CI II	96 Newberg, 29 Cloquato	<b>YES</b> Proximity Topo Public Facilities ESEE
18030100 1702(5.3 ac.)*	77% CI II 34% CI IV	95 & 96 Newberg, 29 Cloquato 22 Camas	
<b>Seavey Loop</b>			
18031410 300 (36 ac.)*	62% High Value Ag: 42% CI II 9% CI III Prime 28% CI III 11% CI IV High Value 11% CI VI	78 McAlpin, 26 Chehalis 79 McBee <sup>32</sup> 130 Waldo 85 Natroy <sup>33</sup> 43C Dixonville-Philomath- Hazelair complex	<b>NO</b> Soil Capability Public Facilities Proximity ESEE
18031410 1305 (15.6 ac.)*	74% High Value Ag: 72% CI IV High Value 1% CI III 1% CI II 24% CI VI	85 Natroy 79 McBee 78 McAlpin 43C Dixonville-Philomath- Hazelair complex	
18021410 1400 (5 ac.)*	100% High Value Ag:	85 Natroy	

<sup>32</sup> McBee is listed in the NRCS Soil Survey of Lane County as prime farmland soil.

<sup>33</sup> Natroy in the Willamette Valley is identified as high value farmland in ORS 215.710

18031100 1600 (3.8 ac.)*	100% CI IV High Value  100% High Value Ag: 71% CI II 30% CI II High Value	26 Chehalis 79 McBee	
18031130 3900 (3.1 ac.)*	61% High Value Ag: 61% CI III Prime 38% CI IV	79 McBee 43C Dixonville-Philomath-Hazelair complex  Hydric soils	
18031410 306 (20 ac.)*	77% High Value Ag: 40% CI II 14% CI III Prime 23% CI IV High Value 15% CI IV  9% CI 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	<b>NO</b> 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.

### Class I capability lands excluded.

The City excluded all the lands within the preliminary Springfield UGB Study area with Class I capability from further consideration:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Thurston
- Far East Springfield
- North Springfield Highway
- Jasper Bridge

- Seavey Loop<sup>34</sup>

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.<sup>35</sup> 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.

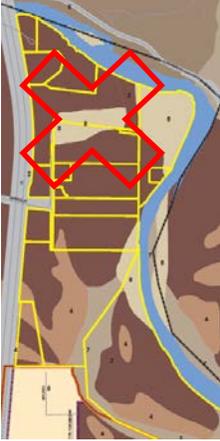
The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek areas. The City determined that those study areas have lower priority for inclusion if found to be suitable to meet the identified land need.

The North Gateway site north of Sprague Road comprises predominantly Class II soils. The City excluded that area from consideration:

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<sup>34</sup> 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.

<sup>35</sup> For example, *Agronomic Suitability Analysis of Wicklund Trust Property*, Northwest Consulting, Jan. 27, 2009, pp. 2-4 describes the perceived effect of adjacent urbanization on the economic viability of farm operations and the unknown effect on adjacent farmland if subject property were to be removed from production. See also attached corroborating letter from Chad Egge, farmer of subject property 2005-2009.



**Class II area excluded**

The City excluded all Class II areas in McKenzie View. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Oxbow/Camp Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Far East and all adjacent agricultural lands north of Highway 126. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in West Jasper/Mahogany. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Clearwater. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Wallace Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Seavey Loop. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes lands predominantly Class II in Mill Race. The City identified suitable parcels comprising Class II soils in Table 15.

The City's UGB expansion includes Class II soils within mixed soil areas in North Gateway. The City identified suitable parcels comprising Class II soils in Table 15.

#### Class III capability lands excluded.

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprises at least some Class III soils. Some Class III soils are considered High Value and Prime Farmland within the Willamette Valley.

The largest contiguous areas of Class III soils are in Oxbow/Camp Creek. The City excluded Class III (Bellpine) High Value Farmland areas in Oxbow/Camp Creek. Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded Class III (McBee) Prime Farmland areas in Seavey Loop that are mixed with Class II High Value and Class IV Prime Farmland soils. These Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes Class III soils in Mill Race that are mixed with Class II and Class IV.

Class IV capability lands excluded.

The City excluded Class IV (Natroy) High Value Farmland areas in Seavey Loop that are mixed with Class II and Class III High Value Farmland soils. These Class IV sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VI soils excluded.

The City's UGB expansion does not include Class VI soils. The City evaluated the potentially suitable lands comprising Class VI soils and ultimately rejected those sites from consideration. These Class VI sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VII soils are higher priority for expansion.

The City's UGB expansion includes Class VII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VII soils and ultimately rejected those sites from consideration. These Class VII sites were also excluded on the basis of physical public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VIII soils are higher priority for expansion.

The City's UGB expansion includes Class VIII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VIII soils and ultimately rejected those sites from consideration. It should be noted that the Class VIII capability classification in Lane County includes Water. These Class VIII sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

**Table 16: Fourth Priority Agriculture and Forest Land Excluded on the Basis of Predominant Capability Classification**

North Gateway (North of Sprague) Class II	McKenzie Class I and II	View	Oxbow/Camp Class I, II and III High Value	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East (North of Hwy 126)	South Hills Class III High Value		West Jasper/Mahogany Class II	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

Areas designated Agriculture are shown in beige color. Areas designated Forest are shown in green color. Areas with both designations are shown with both colors.

## EXCLUDE FOURTH PRIORITY LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

### OAR 660-024-0060(1)(d):

*“Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).”*

### ORS 197.298(3)

*“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:*

*(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands; (emphasis added)*

*(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; (emphasis added)*

*or*

*(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”*

As explained above, the City excluded fourth priority lands on the basis of 1) soil capability classification; and 2) specific types of land needs. As previously explained above and in the CIBL/EOA, the City screened each study area grouping to identify lands with slopes 15% or less and comprising at least 5

acres without absolute development constraints that make lands unbuildable for industrial or commercial employment uses. In this step, the City’s methodology excluded lands of higher priority capability classification because those lands are encumbered by absolute development constraints to the extent that the City’s specific types of identified cannot be reasonably accommodated [ORS 197.298 (3)(a)]. This report and the local record provide adequate evidence of the thorough and painstaking process conducted by City staff to screen candidate lands adjacent to the UGB to evaluate alternative locations. The City’s methodology and reasoning for excluding lands of lower priority capability classification is appropriate and consistent with the law.

Exclude higher priority lands where specific types of identified land needs cannot be reasonably accommodated [ORS 197.298(3)(a)] and/or where future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints [ORS 197.298(3)(b)]

In the next step, the City excluded the fourth priority lands that are *not* potentially suitable to provide sites with the needed site characteristics to satisfy the identified employment land need deficiency.

**OAR 660-024-0060 (1)(e)** states:

*“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”*[emphasis added]

**OAR660-024-0060(5)**

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”* [emphasis added]

## Identification of Potentially Suitable and Serviceable Land

At this stage in the analysis, the city had identified lands of suitable parcel sizes (at least 5 acres of unconstrained land - free of absolute development constraints. These candidate sites were then evaluated to determine whether topographic or other physical constraints preclude reasonable service provision and consideration of site location and other physical characteristics of needed sites to accommodate target industry employment types identified in the CIBL/EOA. The City’s Public Services Analysis compared relative physical distance to the public facilities and services needed to serve

industrial and office commercial employment land uses, including the target industries identified in the CIBL/EOA.

As previously explained in the City’s findings under Goal 9, the CIBL/EOA <sup>36</sup> provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.”

To identify *potentially* suitable land to meet employment land needs, the City applied the following factors<sup>37</sup> (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<sup>38</sup>
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the process screened candidate lands to identify and compare lands having the site characteristics necessary for the operation of the target industrial and other employment industries identified in the CIBL/EOA. Springfield’s EOA identifies a need for sites larger than 20 acres. As previously explained in this report, higher priority exception areas and marginal lands sites in the vicinity of the UGB will not provide suitable employment sites for the 2010-2030 planning period. Exception areas and marginal lands are inadequate to accommodate the type of employment land needed, thus the City’s analysis considered land designated in the acknowledged Lane Rural Comprehensive Plan for agriculture or forestry or both.

Background regarding City’s process to identify candidate lands based upon specific land needs. The following information is provided to explain how the City’s alternatives analysis integrated public input received through a multi-year iterative planning process, and to explain maps and other materials dated 2008-2010 that are in the City’s local record and/or have been integrated into this report.

Early in the City’s land assessment process (2008-2009), the CIBL Technical and Stakeholder committees identified an initial set of lands they deemed worthy of further analysis to determine their suitability for urbanization. This input was based on early GIS screening of land surrounding the UGB by consultant ECONorthwest to locate priority lands under ORS 197.298, large parcel sizes, and land free of absolute development constraints. At that time and based on Springfield’s preliminary draft analysis of residential and employment land needs, it was anticipated that UGB expansion would be required to meet both

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<sup>36</sup> CIBL/EOA Table S-5, page x.

<sup>38</sup> “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.<sup>39 40</sup> 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)]

<sup>39</sup> 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.

<sup>40</sup> The Metro Plan boundary was amended subsequent to the creation of the 2008-2009 maps.

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

### OAR 660-024-0060(1)(e)

*“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”*

### OAR 660-024-0060 (5)

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”*

The Goal 9 rule clearly allows and requires the City to identify the typical attributes of employment land sites necessary to accommodate the industries and employers that will support the City’s economic development objectives, based on the Economic Opportunities Analysis. The Goal 9 rule clearly allows and requires the City to designate suitable, serviceable sites, types and locations for employment uses — through its comprehensive plan and through appropriate implementing measures including amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. [OAR 660-009-0005(11)]

"Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. [OAR 660-009-0005(12)]

As described in the preceding text and graphics, the City excluded parcels smaller than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) from consideration when it analyzed the potentially suitable acreage within a grouping of parcels of a particular soil capability classification, as permitted under OAR 660-024-0060(5).

As described and shown in the preceding text and graphics, and as verified by supporting evidence (GIS and Lane County Assessor parcel maps and RLID parcel data) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to fourth priority land areas in the Preliminary UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

After excluding lands based on soil capability classification, the City’s analysis identified parcel groupings in Table 15 that contain *potentially* suitable fourth priority land. These areas were identified for additional analysis study to determine serviceability and suitability to determine which candidate lands lands in the vicinity of the UGB can “reasonably accommodate” the identified employment land need.

## Public Services Analysis of Potentially Suitable Fourth Priority Land

### OAR 660-024-0060(7)

*“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”*

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable fourth priority areas. The result of this step is a determination of whether parcels within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of fourth priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of “public facilities and services”, as demonstrated in the summary of data in Table 17 and as further supported by evidence in the record.

Table 17 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table 17 is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report pages 212-235. The Public Facilities and Services Analysis identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The Public Services Analysis section of this report on pages 211-235 provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City

referenced when it described the physical location and proximity of existing facilities to *potentially* suitable areas, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.2989(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding areas from consideration in the previous step.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1=EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.<sup>41</sup> The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. The cost of providing infrastructure and services was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 17 — as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate fourth priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude on the basis of public facilities constraints are reasonable and supported by evidence.

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<sup>41</sup> 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**

<b>North Gateway</b>	
The City excluded <b>North Gateway — North of Sprague Road</b> lands on the basis of agricultural capability classification.	
<b>North Gateway – UGB to Sprague Road:</b>	
<b>Water</b>	<p><b>1 Easier</b></p> <ul style="list-style-type: none"> <li>• Abuts City limits</li> <li>• An existing 12” line in Maple Island Road is 200 feet from the area.</li> <li>• An existing 24” line in Corporate Way is approximately 450 feet from the area.</li> <li>• An existing 12” line in Sportsway (Royal Caribbean) is approximately 310 feet from the area or 1000 feet from the area via Sportsway.</li> </ul>
<b>Wastewater</b>	<p><b>1 Easier</b></p> <ul style="list-style-type: none"> <li>• Abuts City limits</li> <li>• Existing sewer connections are located approximately 500 feet (at Corporate Way) and 1,700 feet (at Royal Caribbean) to the area.</li> <li>• 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.</li> <li>• A pressure main will need to be extended from the existing 8-inch main in Corporate Way north to the area.</li> <li>• Pump station upgrades will be required for the existing pump station at International Way and International Court.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>• Abuts City limits</li> <li>• 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.</li> <li>• 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.</li> <li>• The McKenzie River is federally classified as critical salmonid habitat.</li> <li>• 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.</li> <li>• New stormwater outfalls to the McKenzie River will also involve several other regulatory agencies for the same reasons as outfalls to Maple Island Slough.</li> <li>• 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.</li> </ul>
<b>Transportation including Transit</b>	<b>5 Difficult (Trip capacity)</b>

	<p><b>1 Easier (Transit service)</b></p> <ul style="list-style-type: none"> <li>• Abuts City limits</li> <li>• Nine offsite road extensions/improvements may be needed to provide service to the area:             <ul style="list-style-type: none"> <li>○ Extension of Maple Island Slough Road northerly towards the Maple Island Slough then extending westerly to the connection with Sports Way.<sup>42</sup></li> <li>○ Extension of Sports Way northerly to the existing UGB line.</li> <li>○ 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.</li> <li>○ Armitage Road will likely need to be widened from Sprague Road to North Game Farm Road.</li> <li>○ 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.</li> <li>○ 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.</li> <li>○ 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.<sup>43</sup></li> <li>○ Extension of Maple Island Slough Road Southerly from Game Farm Road to a connection point with Beltline Road.<sup>44</sup></li> <li>○ The addition of capacity improvements will likely be needed for the interchange operations at Beltline Road and Interstate 5.<sup>45</sup></li> </ul> </li> <li>• 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.</li> <li>• Capacity constraints at Gateway/Beltline and Beltline/I-5 will pose significant challenges for development within the planning horizon.</li> <li>• The need to construct bridges to provide services and internal circulation will pose significant challenges for development within the planning horizon.</li> <li>• 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.</li> </ul>
<p>Urban services conclusion/ physical constraints <b>North Gateway</b></p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the <b>North Gateway Fourth Priority</b> lands south of Sprague Road in the UGB.</p> <ul style="list-style-type: none"> <li>• 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).</li> </ul>

<sup>42</sup> Roadway project is shown in Springfield TSP Figure 10 Recommended Roadway Network.

<sup>43</sup> “Gateway-Beltline intersection capacity improvements” is a project identified in the Springfield TSP.

<sup>44</sup> Project is identified in the Springfield TSP.

<sup>45</sup> Project is identified in the Springfield TSP.

<b>Fourth Priority lands</b>	<ul style="list-style-type: none"> <li>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.</li> <li>Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.</li> <li>Transportation constraints may present significant challenges for development within the planning horizon and may require atypical restrictions, limits or solutions.</li> </ul>
<b>McKenzie View</b>	
The City excluded unconstrained <b>McKenzie View</b> lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Would need to bore under river (if permitted) to extend public water service main</li> <li>Nearest water transmission line is a 24" line in the vicinity of 28<sup>th</sup> Street/Yolanda, approximately 6,000-8000 feet from potentially suitable parcels</li> <li>Services would need to be extended through un-annexed land.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street.</li> <li>Would need to upgrade Vera pump station.</li> <li>Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor.</li> <li>Services would need to be extended through un-annexed land.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>Separated from urban services by the McKenzie River</li> <li>Isolated by distance and topography from existing urban services.</li> <li>No developed system or outfalls in vicinity</li> <li>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.</li> <li>The McKenzie River is federally classified as critical salmonid habitat.</li> <li>Services would need to be extended through un-annexed land.</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>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</li> </ul>

	<p>Hayden Bridge.</p> <ul style="list-style-type: none"> <li>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.</li> <li>All roads will need improvement to accommodate industrial or commercial development and multi-modal access</li> <li>Services would need to be extended through un-annexed land.</li> <li>Intersection improvements needed at Coburg Rd &amp; McKenzie View Drive</li> <li>Upgrade McKenzie View Drive to urban standards and provide capacity improvements</li> <li>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."<sup>46</sup></li> <li>No transit services, pedestrian facilities or ADA access in area.</li> <li>Same findings as Mohawk area regarding a need for upgrades to 42<sup>nd</sup> St., 42<sup>nd</sup>/Marcola intersection and 42<sup>nd</sup> and Hwy 126 interchange</li> </ul>
Urban services conclusion/ physical constraints <b>McKenzie View Fourth Priority lands</b>	The City excluded the <b>McKenzie View Fourth Priority</b> 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).
<b>Oxbow/Camp Creek</b>	
The City excluded lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>Nearest water transmission line is a 16" line Marcola Rd. /Hayden Bridge</li> <li>River is a barrier to extension of water transmission that makes extension of public water system infeasible<sup>47</sup></li> <li>Same findings as Mohawk are applicable.</li> <li>Services would need to be extended through un-annexed land.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>Isolated by distance and topography from existing urban services</li> <li>Separated from urban services by the McKenzie River, must cross river with urban services</li> </ul>

<sup>46</sup> 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

<sup>47</sup> See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply.</li> <li>• 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.</li> <li>• Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Hayden Bridge.</li> <li>• Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street.</li> <li>• Same findings as Mohawk are applicable.</li> <li>• Services would need to be extended through un-annexed land.</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by the McKenzie River</li> <li>• No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)<sup>48</sup></li> <li>• EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply.</li> <li>• No developed system or existing discharge permits in vicinity</li> <li>• Same findings as Mohawk are applicable</li> <li>• Services would need to be extended through un-annexed land.</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• 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: <ul style="list-style-type: none"> <li>• Upgrade 42<sup>nd</sup> St. to urban standards</li> <li>• Upgrade 42<sup>nd</sup>/Marcola intersection</li> <li>• Upgrade 42<sup>nd</sup> and Hwy 126 interchange</li> <li>• Upgrade Camp Creek to urban standards and provide capacity improvements</li> </ul> </li> <li>• Would require internal collector street system</li> <li>• 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.”<sup>49</sup></li> <li>• No transit services, pedestrian facilities or ADA access in area.</li> <li>• Same findings as Mohawk are applicable.</li> <li>• Services would need to be extended through un-annexed land.</li> </ul>
Urban services conclusion: <b>Oxbow/Camp Creek Fourth</b>	The City excluded the <b>Oxbow/Camp Creek</b> 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

<sup>48</sup> 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).

<sup>49</sup> 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

<b>Priority lands</b>	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).
<b>Hayden Bridge</b>	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
<b>Mohawk</b>	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
<b>Water</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• River is a barrier to extension of water transmission that makes extension of public water system infeasible<sup>50</sup></li> <li>• Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Separated from urban services by the McKenzie River, must cross river with urban services</li> <li>• 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.</li> <li>• 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.</li> <li>• Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from UGB, and 4 miles to outer areas</li> </ul>
<b>Stormwater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by the McKenzie River</li> <li>• No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule<sup>51</sup>)</li> <li>• Eugene Water and Electric Board's water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake<sup>52</sup></li> <li>• No developed system in vicinity</li> </ul>
<b>Transportation (including transit service)</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Access to Springfield is across the McKenzie River via 42<sup>nd</sup> Street and Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural</li> </ul>

<sup>50</sup> 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.

<sup>51</sup> 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).

<sup>52</sup> See email from City Civil Engineer Clayton McEachern P.E., to staff Pauly, dated 2/8/16 describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB's Hayden Bridge McKenzie River water intake facility.

	<p>Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide).<sup>53 54</sup> Roads may need improvement to accommodate additional development and provide multi-modal access:</p> <ul style="list-style-type: none"> <li>• Upgrade 42<sup>nd</sup> St. to urban standards<sup>55</sup></li> <li>• Upgrade 42<sup>nd</sup>/Marcola intersection</li> <li>• May need to upgrade 42<sup>nd</sup> and OR 126 interchange<sup>56</sup></li> <li>• Upgrade Camp Creek to urban standards and provide capacity improvements</li> <li>• Would require internal collector street system.</li> <li>• Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access.</li> <li>• Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19<sup>th</sup> St, 23<sup>rd</sup> St, and 31<sup>st</sup> St</li> <li>• Previous ODOT study showed a need for upgrading at Hwy 126 and 42<sup>nd</sup> St. (without UGB expansion). Traffic backs up at the 42<sup>nd</sup> St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126.</li> <li>• Located 1-5 miles mile from Highway 126/I-105, and I-5</li> <li>• Steep slopes east of Marcola Rd.</li> <li>• Access would route traffic through farmland and rural residential areas</li> <li>• 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."<sup>57</sup></li> <li>• No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19<sup>th</sup> 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."<sup>58</sup></li> </ul>
<p>Urban services conclusion/ physical constraints <b>Mohawk</b></p>	<p>The City excluded the <b>Mohawk Fourth Priority lands</b> from consideration on the basis of agricultural capability classification. These lands do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to</p>

<sup>53</sup> Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

<sup>54</sup> Source of road widths: Lane County Roads Inventory, [http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB\\_RoadsInventory.pdf](http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf)

Accessed January 26, 2016

<sup>55</sup> Project # R-41 42<sup>nd</sup> St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.

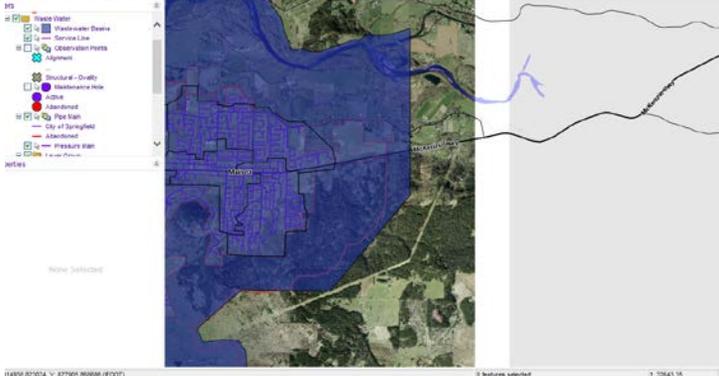
<sup>56</sup> See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42<sup>nd</sup> St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.

<sup>57</sup> 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.

<sup>58</sup> 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).

<b>Fourth Priority lands</b>	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).
<b>North Springfield Highway</b>	
The City excluded unconstrained parcels on the basis of agricultural capability classification.	
<b>Water</b>	<b>1 Easier</b> <ul style="list-style-type: none"> <li>• Abuts City Limits</li> <li>• An older 12" line in High Banks road is approximately 270 feet from the area.</li> <li>• A newer 24" line is in 52<sup>nd</sup> Street to serve Hyland Business Park, approximately 1300 feet from the area via High Banks Road.</li> </ul>
<b>Wastewater</b>	<b>1 Easier</b> <ul style="list-style-type: none"> <li>• Abuts City Limits</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Stormwater</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>• Abuts City Limits</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Transportation (including transit service)</b>	<b>2 Easier</b> <ul style="list-style-type: none"> <li>• Abuts City Limits</li> <li>• Four offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> <li>○ A new at grade intersection or interchange will be needed at the intersection of OR Highway 126 and 52<sup>nd</sup> Street.</li> <li>○ Intersection improvements for increased capacity will be needed at the intersection of Main Street and OR Highway 126.</li> <li>○ A new at grade intersection improvement will be needed for the intersection of 52<sup>nd</sup> Street and High Banks Road.</li> <li>○ A new at grade intersection improvement will be needed for the intersection of 58<sup>th</sup> Street and High Banks Road.</li> </ul> </li> <li>• Internal improvements needed within the area: bridge connections over existing ditches</li> </ul>

	and creeks to access the northern portion of the area.
Urban services conclusion/ physical constraints <b>North Springfield Highway Fourth Priority lands</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Thurston</b>	
The City excluded unconstrained land comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
<b>Far East</b>	
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)).	
<b>Water</b>	<p><b>Within one mile of UGB 2: Medium</b></p> <p><b>More than one mile from UGB: 5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography.</li> <li>• The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126.</li> <li>• Services would need to be extended through un-annexed land.</li> <li>• Distant from SUB service area.</li> <li>• Higher elevations would require pumping and reservoir.</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography.</li> <li>• The nearest service connection of sufficient size for industrial and commercial uses is the 15" line at Main Street/S. 72<sup>nd</sup>, approximately 1.5 miles to the western boundary of the area</li> <li>• Services would need to be extended through un-annexed land.</li> <li>• 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.</li> <li>• 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).</li> <li>• Services would need to be extended through un-annexed land.</li> <li>• Steep slopes south of McKenzie Hwy/Main St.</li> </ul>

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Far East, Thurston and Oxbow/Camp Creek areas</p>
<b>Stormwater</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>No developed system in vicinity</li> <li>Cedar Creek drainage basin is nearing stormwater receiving capacity<sup>59, 60</sup> (unfunded upgrade project is identified in CIP).</li> <li>No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)<sup>61</sup></li> <li>Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls</li> <li>Ability to manage stormwater on-site will be limited by high water table and typically<sup>62</sup> requires 8-10% of parcel area.</li> <li>Services would need to be extended through un-annexed land.</li> </ul>
<b>Transportation (including transit service)</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>Separated from urban services by distance and topography.</li> <li>Access is from E. Main Street/McKenzie Hwy (State Highway), with secondary access from Thurston Road (Rural Major Collector).</li> <li>Two new bridges would be needed over Cedar Creek on 66<sup>th</sup> and Weaver Lane.</li> <li>66<sup>th</sup> St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades.</li> <li>Extend Billings Rd. to E. Main St.</li> <li>Upgrade capacity on 66<sup>th</sup> St. from Main St. to Thurston Rd.</li> <li>Upgrade capacity on Thurston Rd. and provide urban standards from 69<sup>th</sup> St. to E. Main Street</li> <li>Improve Thurston Rd between Weaver Rd. and UGB<sup>63</sup></li> <li>Intersection improvements at Thurston Rd. and E. Main St.</li> </ul>

<sup>59</sup> 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.

<sup>60</sup> 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.

<sup>61</sup> 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).

<sup>62</sup> Eugene Stormwater Management Manual "Simplified Method", Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

<sup>63</sup> Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of \$4,800,000.

	<ul style="list-style-type: none"> <li>• Would need internal collector street system</li> <li>• Access to Exception C from Cedar Flat Road, Rural Local Collector</li> <li>• slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031. <sup>64</sup>, <sup>65</sup></li> <li>• Services would need to be extended through un-annexed land.</li> <li>• Frequent transit service is not planned beyond Thurston Station.</li> </ul>
<p>Urban services conclusion: <b>Far East Fourth Priority lands</b></p>	<p><b>Far East Fourth Priority lands within 1 mile of the UGB</b> were considered physically serviceable for water and transportation during the 20-year planning period ending 2030 as described in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Area is physically constrained for wastewater service. Distance would likely preclude feasible extension of wastewater service within the 20-year planning period.</li> </ul> <p>The City excluded the <b>Far East Fourth Priority lands</b> farther than 1 mile from the UGB from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<b>South Hills</b>	
<p>The City excluded unconstrained lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained lands on the basis of specific land needs (197.298(3)(a)).</p>	
<b>West Jasper/Mahogany</b>	
<p>The City excluded unconstrained lands comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	

<sup>64</sup> Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>65</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> 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 .

<b>Water</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>• The nearest lines of sufficient size to serve industrial or commercial employment uses are the 16" line in South 57<sup>th</sup> /Mount Vernon Rd. and 16" line at Linda Lane, located approximately ½ mile from the eastern boundary of the area at Mahogany Lane.</li> <li>• Services would need to be extended under the Union Pacific railroad line and across Jasper Road.<sup>66</sup></li> </ul>
<b>Wastewater</b>	<p><b>1 Easier</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Services would need to be extended through un-annexed land and would require easements to facilitate feasible service connections</li> <li>• 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.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Transportation including Transit</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Eight offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>○ 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.</li> <li>○ Improvement of the entire length of Jasper Road to urban standards and upgrade to</li> </ul> </li> </ul>

<sup>66</sup> Bart McKee, SUB stated that it would be physically possible to bore under the railroad in the vicinity to extend water service to the area.

	<p>4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor.</p> <ul style="list-style-type: none"> <li>○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.</li> </ul> <ul style="list-style-type: none"> <li>● Internal improvements needed within the area: <ul style="list-style-type: none"> <li>○ A new small sized wastewater pump station will likely be needed located in the vicinity of the southerly end of Tax Lot 1802090000600.</li> <li>○ A new small sized wastewater pump station will likely be needed located in the vicinity of the easterly side of Tax Lot 1802090000200.</li> <li>○ 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.</li> <li>○ Improvements to the existing Mahogany Lane will be needed for additional capacity.</li> <li>○ The potential for two bridge connections over flood plain designated sloughs to facilitate internal circulation.</li> </ul> </li> </ul>
<p>Urban services conclusion: <b>West Jasper/ Mahogany Fourth Priority lands</b></p>	<p>Area was considered physically serviceable during the 20-year planning period ending 2030 as defined in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> <li>● 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).</li> <li>● 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.</li> <li>● Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.</li> <li>● The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.</li> </ul>
<b>Jasper Bridge</b>	
<p>The City excluded area comprising predominantly Class I and II soils on the basis of agricultural capability classification.</p>	
<p>Urban services conclusion: <b>Jasper Bridge Fourth Priority lands</b></p>	<p>The City excluded the <b>Jasper Bridge</b> Fourth priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<b>Clearwater</b>	
<p>The City excluded unconstrained parcels comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	
<b>Water</b>	<b>3 Medium Difficult</b>

	<ul style="list-style-type: none"> <li>• 16" line in the vicinity of Daisy and 48<sup>th</sup> Street (Westwind) is approximately ½ mile north of the UGB</li> <li>• Nearest 12" line is in South 42<sup>nd</sup> approximately ¼ mile to the UGB via 42nd Street</li> </ul>
<b>Wastewater</b>	<p><b>2 Easier</b></p> <ul style="list-style-type: none"> <li>• The Jasper Trunk sewer 27" line is located along Jasper Road.</li> <li>• Distance to potentially suitable land varies from approximately 330 feet at 42<sup>nd</sup> Street to 200 feet (across Jasper Slough) at 41<sup>st</sup>/Filbert Meadows to 1364 feet at South 39<sup>th</sup></li> <li>• Services would need to be extended through un-annexed developed residential land to reach some portions of this area.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Transportation</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Clearwater Lane would need to be upgraded to urban standards and may be of to serve industrial and commercial employment uses.<sup>67</sup></li> <li>• Secondary access would be required.</li> <li>• Offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>○ 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.</li> <li>○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes.</li> <li>○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.</li> </ul> </li> </ul>

<sup>67</sup> Urban Standards Project US-14: Clearwater Lane – south of Jasper Road to UGB is identified in TSP Projects located on Lane County facilities in the TSP Table 1 as a Priority Project in the 20-year project list.

	<ul style="list-style-type: none"> <li>Internal improvements be needed within the area: small-medium sized wastewater pump station to get flow to Jasper Trunk</li> <li>Nearest transit service is along Main Street, approximately ¾ mile to UGB/northern boundary of area</li> <li>A planned bike boulevard along Virginia-Daisy is approximately ½ mile to UGB/northern boundary of area.</li> </ul>
Urban services conclusion: <b>Clearwater Fourth Priority lands</b>	<p>Area is physically serviceable as defined in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.</li> <li>The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.</li> </ul>
<b>Mill Race</b>	
<b>Water</b>	<p><b>1 Easier</b></p> <ul style="list-style-type: none"> <li>There is ample existing water distribution infrastructure already located within this area to serve industrial and commercial employment uses.</li> <li>SUB's existing 60" line in South 28<sup>th</sup> Street extends south of the Mill Race along the eastern boundary of this area.<sup>68</sup></li> <li>Existing 20" and 16" lines cross the Mill Race.</li> <li>A 16" line extends south to wellfield site via easements on private lands.</li> <li>A new 24" line was recently installed along the north side of the Mill Race.</li> <li>A T was installed in F Street to extend a 12" line to serve properties adjacent to the Swanson Mill site.</li> <li>There are no major improvements anticipated to meet the internal water service needs within this area.</li> </ul>
<b>Wastewater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>The nearest wastewater line is the 48" trunk line in F Street at 28<sup>th</sup> Street, located approximately 1400-1700 feet from the area.</li> <li>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.</li> <li>A main line extension in south 28th Street from the South F Street interceptor to the new pump station will be needed.</li> <li>Abuts City limits</li> <li>There are no major improvements anticipated to meet the internal wastewater needs to serve this area.</li> </ul>
<b>Stormwater</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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</li> </ul>

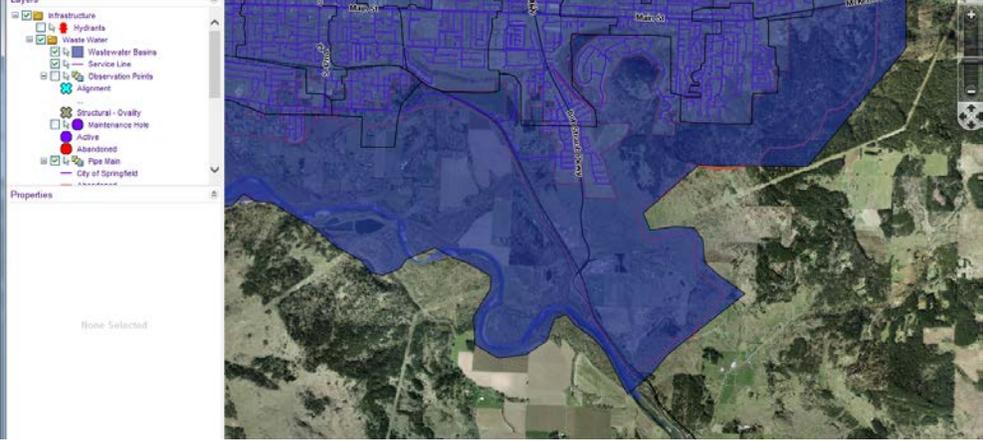
<sup>68</sup> Updated water line information provided by Bart McKee, SUB (telephone call with staff Pauly, April 5, 2016).

	<p>waters of the United States, and potential wetlands. New stormwater outfalls to the Springfield Mill Race are also regulated by an intergovernmental agreement with the US Army Corps of Engineers as part of the Mill Race enhancement project.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Abuts City limits</li> <li>• 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.</li> <li>• 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.</li> <li>• There are no major improvements anticipated to meet the internal stormwater needs to serve this area.</li> </ul>
<p><b>Transportation</b></p>	<p><b>4 Difficult</b>  Abuts City limits  Five offsite road extensions/improvements are needed to provide service to the area:</p> <ul style="list-style-type: none"> <li>• South 28<sup>th</sup> Street will need to be improved from Main Street southerly to the existing UGB near the Mill Race.<sup>69</sup></li> <li>• Crossing improvements for the intersection of South 28<sup>th</sup> Street and the Union Pacific Railroad will be needed.</li> <li>• Upgrades to the existing South 28<sup>th</sup> Street bridge at the Mill Race may be required due to weight limit restrictions.</li> <li>• Intersection improvements will be needed at the intersection of Main Street and South 28<sup>th</sup> Street.</li> <li>• 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 32<sup>nd</sup> Street.</li> <li>• 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 32<sup>nd</sup> Street.</li> <li>• Existing frequent transit service is available on Main Street, approximately .75 miles from the UGB at 28<sup>th</sup> 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).</li> <li>• 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.</li> <li>• There are no major improvements anticipated to meet the internal transportation needs to serve this area.</li> </ul>
<p>Urban services conclusion:</p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the <b>Mill Race Fourth Priority</b> lands in the UGB.<sup>70</sup></p>

<sup>69</sup> Urban Standards Project US-7: South 28<sup>th</sup> Street – F Street to UGB is identified in TSP Projects located on Lane County facilities, Table 4 as a Beyond 20-year project.

<b>Mill Race Fourth Priority lands</b>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• 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.</li> <li>• Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.</li> </ul>
<b>Wallace Creek</b>	
The City excluded unconstrained lands comprising predominantly Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.	
<b>Water</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>• Separated from urban services by distance and topography.</li> <li>• Located more than 3 miles from the nearest water main.</li> <li>• 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.</li> <li>• A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.</li> <li>• Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative.</li> <li>• Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.</li> <li>• No developed system in vicinity</li> </ul>
<b>Wastewater</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• No developed system in vicinity.</li> <li>• 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.</li> <li>• The Jasper Trunk sewer is 2-3 miles away.</li> <li>• 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.</li> <li>• Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary.</li> <li>• Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.</li> </ul>

<sup>70</sup> See proposed Metro Plan Amendment for parcel numbers designated Urban Holding Area – Employment. Note other publicly owned lands in this area designated Public/Semi Public that the City added to the UGB to accommodate existing and planned SUB water treatment facilities and Willamalane parks.

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with <b>Wallace Creek, South Hills, West Jasper Mahogany, and Jasper Bridge</b> areas</p>
<p><b>Stormwater</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Upgrade existing Wallace Creek outfall to Middle Fork Willamette River</li> <li>• No developed system in vicinity</li> <li>• Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems.</li> <li>• Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek</li> <li>• 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.</li> <li>• 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.</li> <li>• The Middle Fork Willamette River is federally classified as critical salmonid habitat.</li> </ul>
<p><b>Transportation (including transit service)</b></p>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• Would require secondary access</li> <li>• 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.</li> <li>• Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint.</li> <li>• DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road</li> <li>• Access via Jasper Rd., but urban standards and capacity improvements needed<sup>71</sup>: 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.</li> <li>• Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River</li> <li>• May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading</li> </ul>

<sup>71</sup> See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> <li>• Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.<sup>72</sup></li> <li>• Jasper Rd. &amp; 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.”</li> <li>• Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.</li> <li>• 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.</li> <li>• Connection to Hwy 58 but limited connection to Hwy 126/I-5</li> <li>• “Need to further study capacity at the I-5/Hwy 58<sup>th</sup> interchange. Improvements may be needed depending on size and location of expansion area.”<sup>73</sup></li> <li>• Nearest transit service is at Thurston Station on Main Street, &gt;3 miles away.<sup>74</sup> No transit services, pedestrian facilities or ADA access in area.</li> <li>• “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/54<sup>th</sup> St. and Main St/58<sup>th</sup> St all exceed capacity by 2031.”<sup>75, 76</sup></li> </ul>
<p>Urban services conclusion: <b>Wallace Creek Fourth Priority lands</b></p>	<p>The City excluded the <b>Wallace Creek</b> area from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p><b>Seavey Loop</b></p>	
<p>The City excluded unconstrained lands comprising predominantly Class II, Class III High Value Farmland and Class</p>	

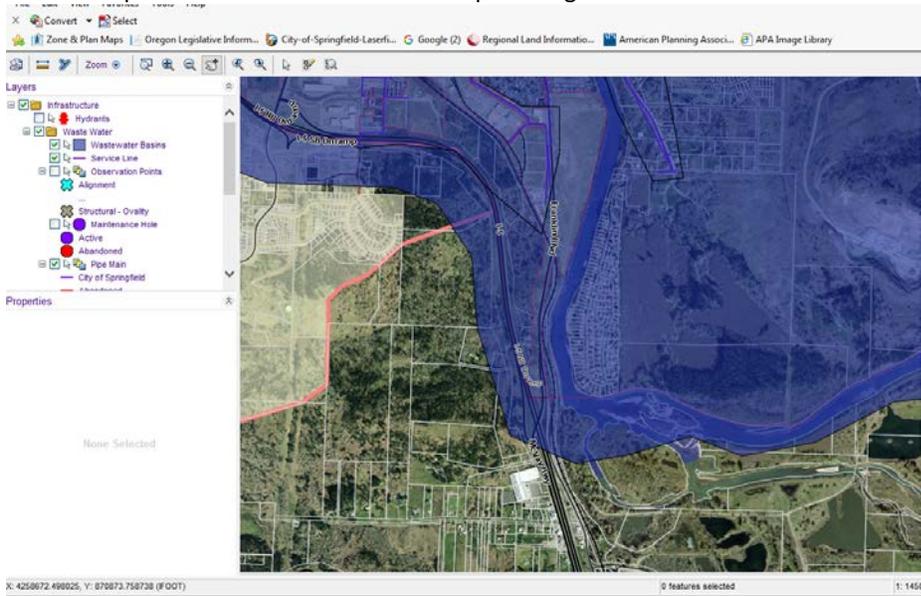
<sup>72</sup> Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

<sup>73</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

<sup>74</sup> 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).

<sup>75</sup> Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

<sup>76</sup> Interchange improvements at Main St/Hwy 126 and Highway 126 at 52<sup>nd</sup> are listed as financially constrained projects in the Regional Transportation Plan (RTP).

IV Prime soils on the basis of agricultural capability classification.	
<b>Water</b>	<p><b>3 Medium Difficult</b></p> <ul style="list-style-type: none"> <li>Existing rural water system and service provided by Willamette Water Company</li> <li>Potentially suitable lands are located more than 2 miles from the nearest SUB water main, a 16" line in McVay</li> </ul>
<b>Wastewater</b>	<p><b>5 Difficult</b></p> <ul style="list-style-type: none"> <li>No developed system in vicinity</li> <li>Isolated by distance and topography from existing urban services</li> <li>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.</li> <li>Would require upgrades to existing Glenwood MWMC pump station.</li> <li>A new large sized wastewater pump station located near the intersection of Seavey Loop and Franklin Boulevard will be needed.</li> <li>Would require a new small sized wastewater pump station located in the vicinity of the intersection of 30th Avenue and College View Road.</li> <li>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.</li> <li>Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road.</li> <li>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.</li> <li>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.</li> </ul>  <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with <b>Seavey Loop</b> study area</p>
<b>Stormwater</b>	<p><b>5 Difficult</b></p>

	<ul style="list-style-type: none"> <li>• Isolated by distance and topography from existing urban services</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Transportation (including transit service)</b>	<b>5 Difficult</b> <ul style="list-style-type: none"> <li>• Proximate to I-5, but freeway access is indirect and limited by the awkward connection and limited capacity at Franklin and 30<sup>th</sup> Ave. interchange. Access to I-5 at south end of area is from beneath the freeway, via Highway 58/Goshen interchange.</li> <li>• Limited capacity at I-5/30<sup>th</sup> Street interchange. “Need to further study capacity at the I-5/30<sup>th</sup> Street interchange and the I-5/Hwy 58<sup>th</sup> interchange. Improvements at one or both locations may be needed depending on size and location of expansion area.”<sup>77</sup></li> <li>• 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.<sup>78</sup></li> <li>• 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).</li> <li>• Existing rail underpass at Franklin is very narrow and restricts truck passage.</li> <li>• Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels</li> <li>• Isolated from urban transportation system</li> <li>• May trigger capacity improvements for McVay Highway in Glenwood</li> <li>• 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.</li> <li>• “Difficult to serve with transit except via one-directional route variation form current #92 Lowell/LCC route which only runs 3 trips per weekday.”<sup>79</sup> No pedestrian facilities or ADA access in area.</li> </ul>
<b>Urban services</b>	The City excluded the <b>Seavey Loop Fourth Priority lands</b> from consideration because

<sup>77</sup> Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

<sup>78</sup> At the College View Stakeholder Working Group meeting on March 4, 2015, ODOT staff David Helton stated that the existing 30<sup>th</sup> Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept as mapped on that date.

<sup>79</sup> Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.

<p>conclusion: <b>Seavey Loop Fourth Priority lands</b></p>	<p>these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services extensions and upgrades necessary to serve urban employment uses within the planning period. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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## IDENTIFY FOURTH PRIORITY LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

The City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.<sup>80</sup> 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

<sup>80</sup> Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

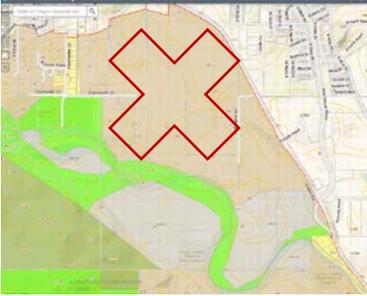
Just as the TSP must “evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;”[OAR 660-012-0035] the City’s UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.”

The transportation system must “support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.” [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

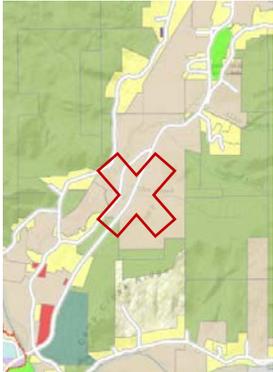
The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

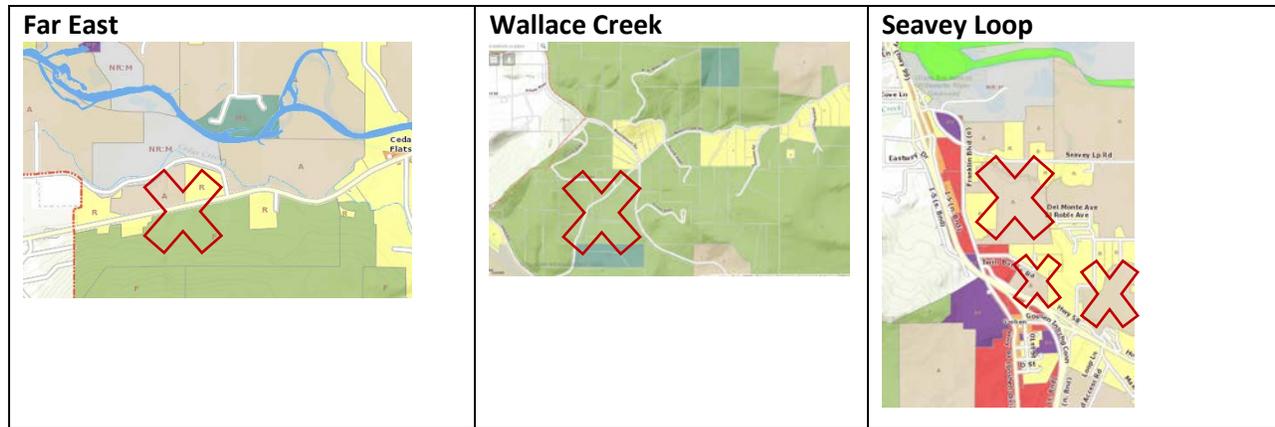
To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

**Table 18: Fourth priority land excluded based upon specific land needs [ORS 197.298(3)(a)]**

<p><b>Far East</b></p> 	<p><b>West Jasper/Mahogany</b></p> 	<p><b>Clearwater</b></p> 
<p><b>South Hills</b></p> 	<p><b>Wallace Creek</b></p> 	

**Table 19: Fourth priority land excluded: public facilities constraints [ORS 197.298(3)(b)]**

<p><b>McKenzie View</b></p> 	<p><b>Mohawk</b></p> 	<p><b>Oxbow/Camp Creek</b></p> 
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## ORS 197.298 (1)(b) Goal 14 Location Factor 3 and Factor 4 – Fourth Priority Lands Analysis

To continue its evaluation of *potentially* suitable land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the **North Gateway, McKenzie View, Mohawk, Oxbow/Camp Creek, North Springfield Highway, Far East, West Jasper/Mahogany, Clearwater, Wallace Creek, Mill Race and Seavey Loop** areas based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable<sup>81</sup>
- 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

<sup>81</sup> “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.<sup>82</sup>

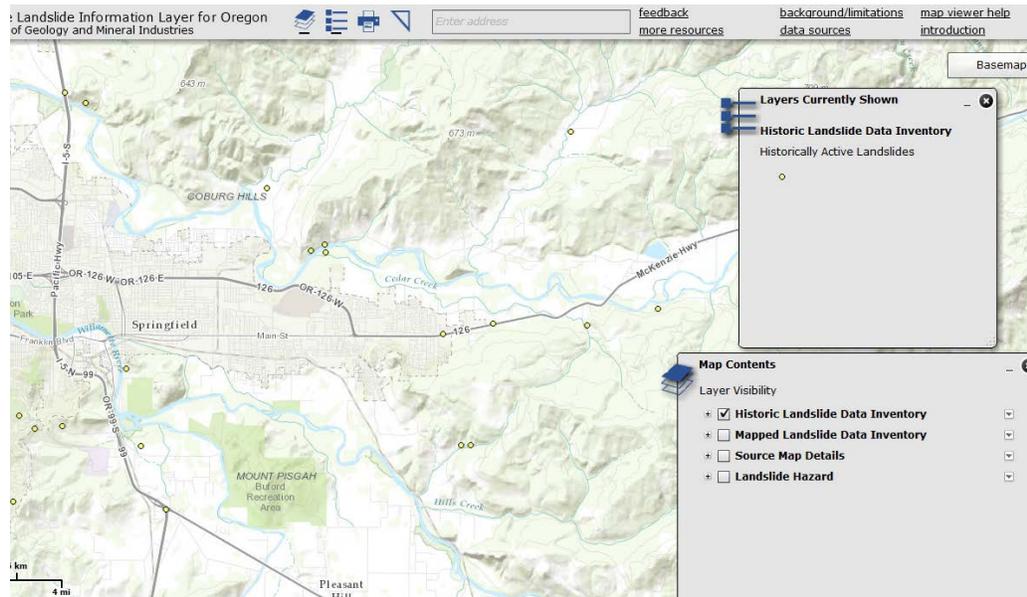
For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to 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

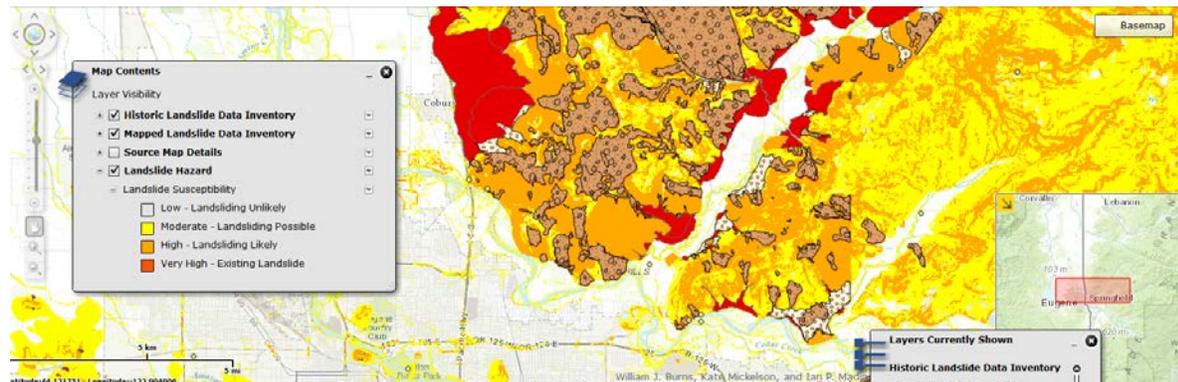
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<sup>82</sup> Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development 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<sup>83</sup> 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.”

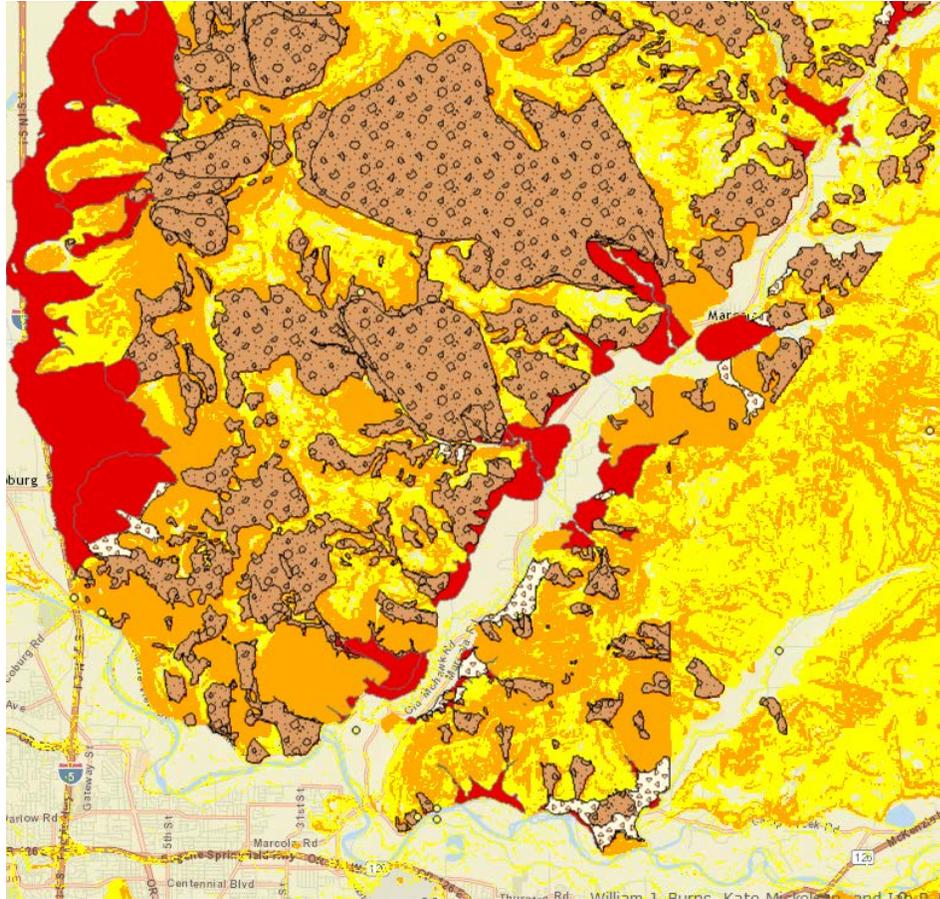


DOGAMI SLIDO Coburg Hills landslide hazard area: **McKenzie View B, Mohawk A, B and C and Oxbow/ Camp Creek Preliminary Study Area groupings**

<sup>83</sup> 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<sup>84</sup> 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.

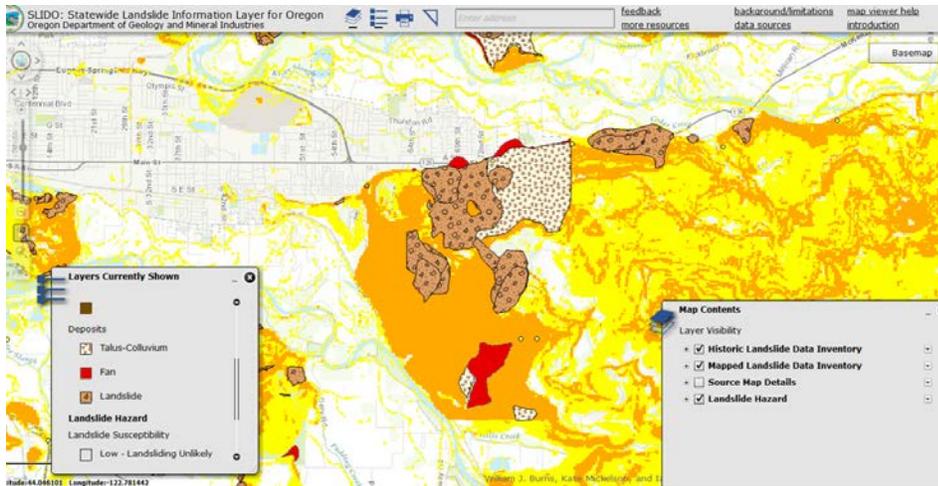


Detail: DOGAMI SLIDO McKenzie View A, B; Mohawk A, B and C; and Oxbow/Camp Creek areas

DOGAMI SLIDO maps<sup>85</sup> 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.

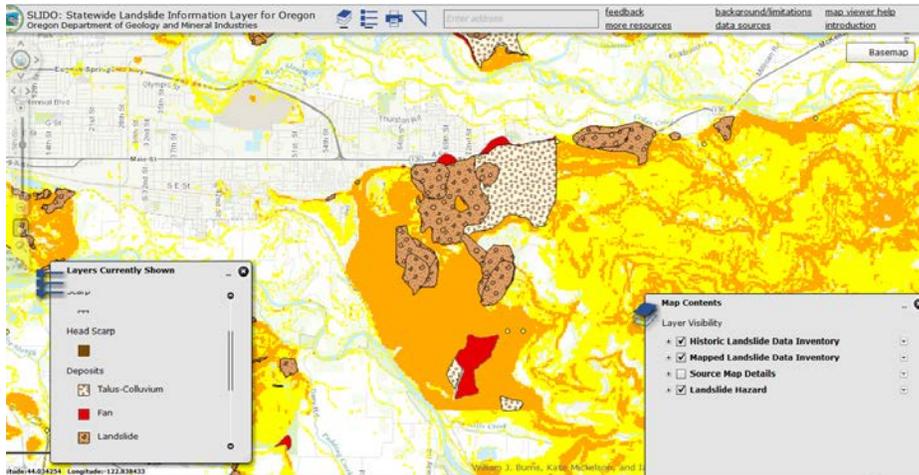
<sup>84</sup> Ibid.

<sup>85</sup> Ibid.

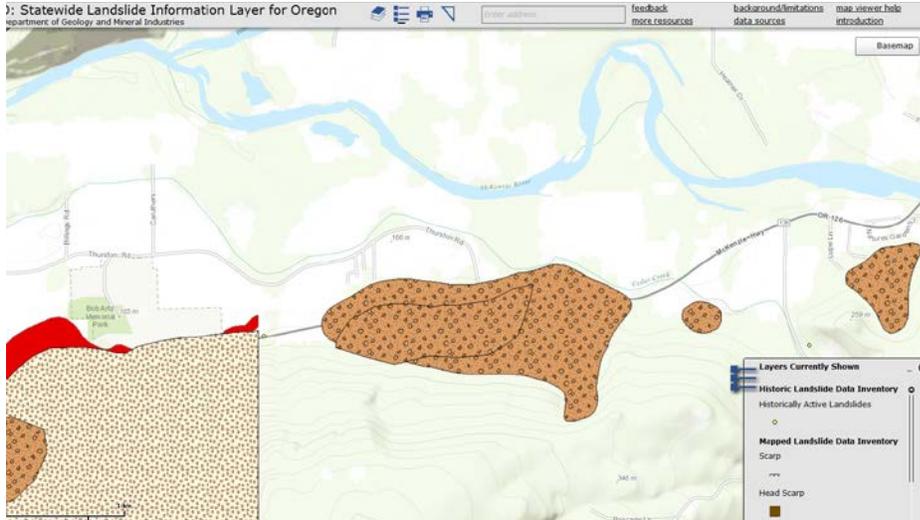


Detail DOGAMI SLIDO Wallace Creek landslide hazard area

DOGAMI SLIDO maps<sup>86</sup> 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



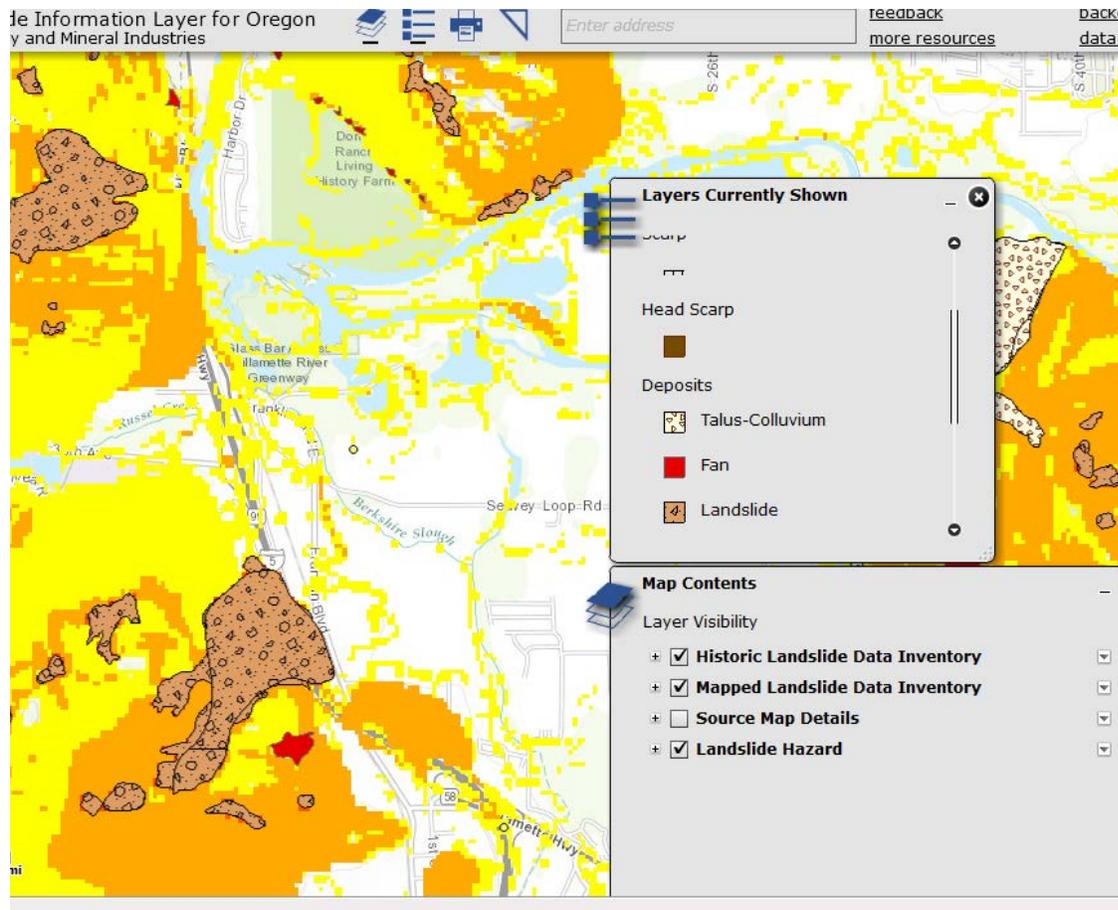
<sup>86</sup> Ibid.



Detail: DOGAMI SLIDO **Far East** landslide hazard area

DOGAMI SLIDO maps<sup>87</sup> 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.

<sup>87</sup> 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: <sup>88</sup>

*“**Trip-based assessment** of a project’s effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally most common, method of counting VMT. A **tour-based assessment** counts the entire home-back-to-home tour that includes the project.*

*Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip. ...a tour-based assessment of VMT is a more complete characterization of a project’s effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.*

*Characteristics of an office project can also affect an employee’s VMT even beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can cause an employee to need to own a car, which in turn affects the entirety of an employee’s travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT.”(emphasis added)*

Based on this reasoning and for the purposes of this ESEE analysis, the City assumed that the more distant the exception area is located from the City, the greater the distance the potential urban employment site/workplace will located from the City and from transit. This greater distance is more likely to cause an employee to need to own a car, which in turn affects the entirety of an employee’s travel behavior and VMT.

Urbanizing areas more distant from the City, will result in relative increases in VMT and transportation impacts within the existing UGB as more employees need to own a car to reach their more distant workplaces.

Designating land for employment centers within or proximate to multimodal transportation networks will have the consequence of adding new users to systems. This can cause mixed cumulative impacts:

*“When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new users as an adverse impact. Any travel-*

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<sup>88</sup> “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.”<sup>89</sup>*

*“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.”<sup>90</sup>*

*“Projects that would likely lead to an increase in VMT, (including for purposes of accurately estimating GHG and other impacts that are affected by VMT), generally include:*

- *Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.”*

*Projects that would not likely lead to a substantial or measureable increase in VMT, generally include:*

- *Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle lanes.*
- *Roadway shoulder enhancements to provide “breakdown space,” otherwise improve safety or provide bicycle access.*
- *Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety.*
- *Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes.*
- *Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit*
- *Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially decrease impedance to use*
- *Reduction in number of through lanes, e.g. a “road diet”*
- *Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g. HOV, HOT, or trucks) from general vehicles*

<sup>89</sup> Ibid. p. 26.

<sup>90</sup> “Technical Advisory of Evaluating Transportation Impacts in CEQA,” California Governor’s Office of Planning and Research, Jan. 20, 2016

- *Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features*
- *Traffic metering systems*
- *Timing of signals to optimize vehicle, bicycle or pedestrian flow*
- *Installation of roundabouts*
- *Installation or reconfiguration of traffic calming devices*
- *Adoption of or increase in tolls*
- *Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase (e.g., encourage carpooling, fund transit enhancements like bus rapid transit or passenger rail in the tolled corridor)*
- *Initiation of new transit service*
- *Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes*
- *Removal of off-street parking spaces*
- *Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).*
- *Addition of traffic wayfinding signage*
- *Rehabilitation and maintenance projects that do not add motor vehicle capacity*
- *Any lane addition under 0.3 miles in length, including addition of any auxiliary lane less than 0.3 miles in length”<sup>91</sup>*

*Causes of Induced VMT. Induced VMT occurs where roadway capacity is expanded in a congested area, leading to an initial appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:*

- *Longer trips. The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are further away, increasing trip length and VMT.*
- *Changes in mode choice. When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases VMT.*
- *Route changes. Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease VMT depending on whether it shortens or lengthens trips.*
- *Newly generated trips. Increasing travel speeds can induce additional trips, which increases VMT. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those ends via automobile trips as a result of increased speeds.*
- *Land Use Changes. Faster travel times along a corridor lead to land development further along that corridor; that development generates and attracts longer trips, which increases VMT. Over several years, this component of induced VMT can be substantial, e.g. approximately half of the total effect on VMT.*

*These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer.”<sup>92</sup>*

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<sup>91</sup> Ibid.

<sup>92</sup> Ibid

### ESEE Energy Consequences

*“Targets to reduce existing VMT to curb greenhouse gases, and other pollutants do not translate directly into VMT thresholds for individual projects for numerous reasons, however, including the following:*

*Some, though not all, of the emissions reductions needed to achieve those targets will be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content.*

*New projects alone will not sufficiently reduce VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.*

*Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.”<sup>93</sup>*

Because regional location is the most important determinant of VMT, locating vehicular trip-inducing urban land uses in travel efficient locations is widely recognized as one effective means of reducing VMT, and thus reducing energy consumption associated with transportation. Based on this accepted fact, it is reasonable for the City to assume that the more remote the location from Springfield, the higher the VMT associated with development would result. For the purposes of the UGB Alternatives Analysis, the City assumed locations farther from Springfield — as identified by relative trip length in the City’s Public Facilities Analysis — would result in increased VMT and increase in impacts associated with VMT compared to areas closer to Springfield.

The relative proximity of the North Gateway and Mill Race sites to the region’s existing and planned public frequent transit network system is the basis for the City’s assumption that those two locations provide travel-efficient locations relative to the other alternatives studied and thus would result in comparatively higher percentage of commute trips by transit and fewer vehicular commute trips to employment centers.

### ESEE Economic Consequences

OAR 660-009-0005 (3) states:

*“‘Industrial Use’ means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.” (emphasis added)*

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<sup>93</sup> Ibid.