

VI. UGB Expansion Study

OAR 660-024-0060 Boundary Location Alternatives Analysis

OAR 660-024-0060(1)

“(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(3)

“The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.”

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

OAR 660-024-0060(5)

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."

OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group."

OAR 660-024-0060(7)

"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."

OAR 660-024-0060(8)

"The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:

(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements

on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

The following section of this report provides empirical evidence and findings to explain how the City’s Boundary Location Alternatives Analysis was conducted consistent with each of the requirements of ORS 197.298 and OAR 660-024-0060. Beginning with the highest priority of land available, the City’s Preliminary Study Area included all land adjacent to the UGB, including land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. The City evaluated the parcels within each priority to determine whether parcels are potentially suitable to satisfy the identified need deficiency determined under OAR 660-024-0050.

BOUNDARY ALTERNATIVES ANALYSIS STEP ONE: IDENTIFY SITE CHARACTERISTICS TO APPLY IN THE LOCATION ALTERNATIVES ANALYSIS PROCESS TO DETERMINE WHICH LANDS ARE SUITABLE TO ACCOMMODATE LAND NEED [OAR660-024-0060(1) and (4)]

As explained in the preceding section of this report (Goal 9), the CIBL/EOA ¹ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030.

OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.”

As explained in the City’s findings under Goal 9, the CIBL/EOA ² provides a determination that the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030 is 223 suitable acres, including 3 sites larger than 20 acres, possessing the suitability characteristics specified under OAR 660-009-0005(5). Site and land needs are summarized in CIBL/EOA Table S-5:

¹ CIBL/EOA Table S-5, page ix.

² Ibid.

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

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

Source: ECONorthwest

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

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

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

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

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

Springfield has the need for sites larger than five acres: two Industrial sites on a total of 126 acres and five Commercial and Mixed Use sites on a total of 97 acres. The total number of acres needed in the UGB expansion is based on the average size of needed sites, as explained in CIBL/EOA Table S-3³.

Springfield needs to expand the UGB to meet its need for sites 5 acres and larger. Springfield has a deficit of four sites between 5 and 20 acres in size and three sites larger than 20 acres. Meeting the need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, with access to I-5 or a State highway.

³ ECONorthwest, CIBL/EOA, p. vii.

Springfield has a deficit of two Industrial sites 20 acres and larger, four Commercial and Mixed Use sites 5 to 20 acres in size, and one Commercial and Mixed Use site 20 acres and larger.

The City's CIBL/EOA⁴ identifies the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses, as required under OAR 660-009-0015(2). The City's CIBL/EOA⁵ identifies site characteristics that make land suitable to accommodate the need deficiency determined under OAR 660-024-0050. The City identified the parcel size, topography, transportation access and access to city services site characteristics necessary for a site to be considered suitable for each type of target industry identified in the CIBL/EOA.

The tables in Chapter 5 and Appendix C provide data to document typical building and site needs of various industries.⁶ In addition to the evidence provided in the CIBL/EOA document, the record provides extensive supplemental evidence to explain the site needs of industries and the typical characteristics of sites that are necessary to support business operations and develop in accordance with applicable Federal, State and Local regulatory requirements.

Table C-5 "Characteristics of Sites Needed to Accommodate Employment Growth"⁷ presents and explains common site needs for expected industrial and other employment uses. Table C-5 summarizes 14 site attributes and explains how each attributes aligns with Springfield sites: flat site; parcel configuration and parking; soil type; road, rail, air, transit transportation; pedestrian and bicycle facilities; labor force; amenities; fiber optics and telephone; potable water; power requirements, and land use buffers.

The characteristics of sites needed to address the site needs of Springfield's target industries are explained in CIBL/EOA pp. 82-95 and are-summarized as follows:

⁴ ECONorthwest, CIBL/EOA, Chapter 4 and 5, Table 5-5, Appendix C

⁵ Ibid, pp. 82-95.

⁶ CIBL/EOA Chapter 5 and Appendix C.

⁷ CIBL/EOA. P. 167-169

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p>Target Industries: Medical Equipment High-tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing</p> <p>Building Type: General Industrial</p> <p>Site Needs for: Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 9-12 acre sites for 100,000 square foot buildings to 45-60 acre sites for 500,000 square foot buildings.</p> <p>The average size of existing sites with employment in Springfield is: 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p>Target Industries: High Tech Services Corporate Headquarters Biotech Professional and Technical Services Back office Medical Services</p> <p>Building Type: Commercial and Other</p> <p>Site Needs for: Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 4-6 acre sites for 50,000 square foot buildings to 16-24 acre sites for 200,000 square foot buildings.</p> <p>If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres.</p> <p>The average size of existing sites with employment in Springfield is:</p> <ul style="list-style-type: none"> • 5-20 acre site: 9.3 acres • 20+ acre site: 60 acres 	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p> <p>Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

The following section of this report provides evidence to demonstrate how the City conducted the Boundary Location Alternatives Analysis to include land adjacent to the UGB and land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

BOUNDARY ALTERNATIVES ANALYSIS STEP TWO: DETERMINE PRIORITY OF LAND AS SPECIFIED IN ORS 198.298 TO DETERMINE PRIORITY OF LAND TO BE INCLUDED IN UGB AMENDMENT

To determine which lands to add to the UGB to meet the specified land needs, the City evaluated alternative boundary locations in accordance with the priority of land specified in ORS 197.298 and the requirements of the urbanization rule.

ORS 197.298 Priority of land to be included within urban growth boundary

“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

(a) First priority is land that is designated urban reserve land under ORS [195.145](#) (Urban reserves), rule or metropolitan service district action plan. (emphasis added)

(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710](#) (High-value farmland description for ORS 215.705).

(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS [197.247](#) (1991 Edition).

(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to

accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands. [1995 c.547 §5; 1999 c.59 §56]"

OAR 660-024-0060(1)(a)

"Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050. "

OAR 660-024-0060(1)(e)

"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable." (emphasis added)

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

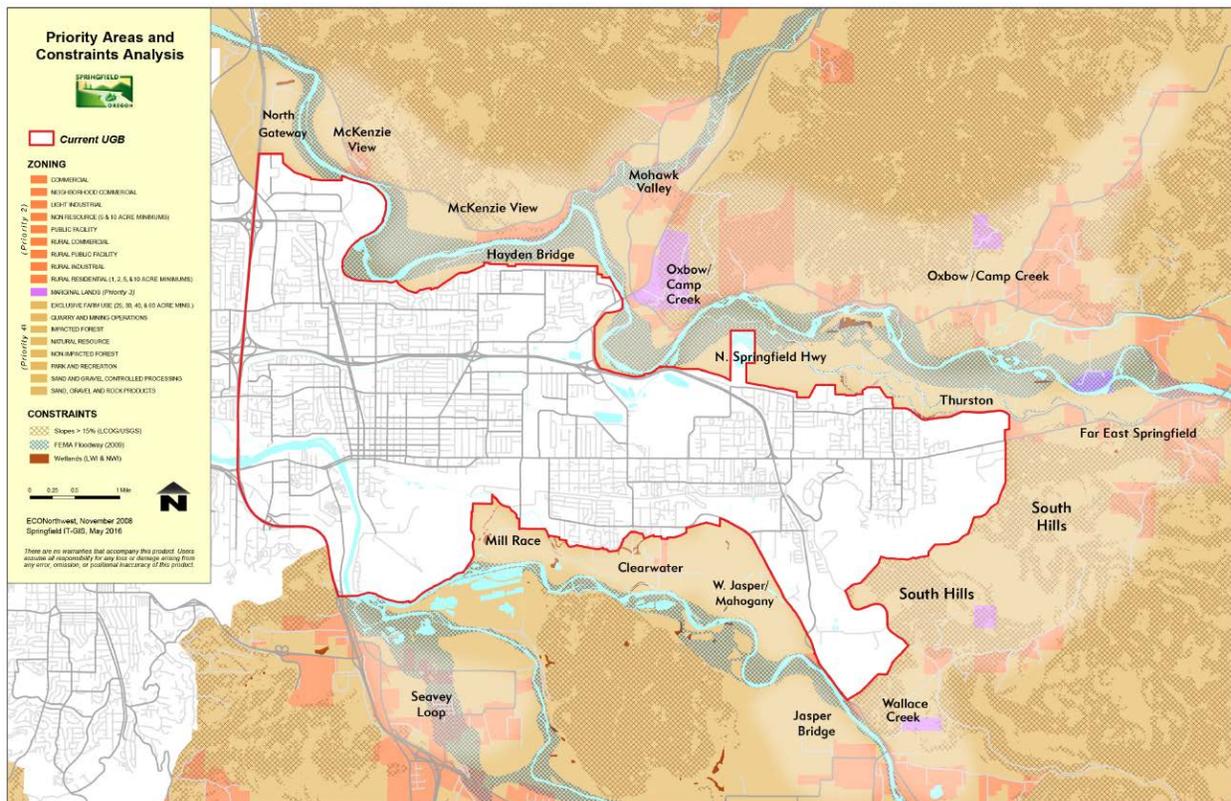
OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group." (emphasis added)

The following section of this report explains how the City’s UGB alternatives analysis addressed ORS 197.298 and OAR 660-024-0060(4) to identify the preliminary UGB study area and to determine which land in the vicinity of the UGB within each priority is/is not suitable and thus has a reasonable potential to satisfy the employment land need deficiency determined under OAR 660-024-0050.

Methodology Used to identify candidate lands: UGB Study Area. To determine the priority of land to be included in the UGB to meet Springfield’s 2010-2030 land needs, the City established a study area that identified potential candidate lands under the four priorities of ORS 197.298. The City and consultant ECONorthwest conducted initial GIS scans of all land adjacent to and in the vicinity of the existing Springfield portion of the Metropolitan UGB (east of Interstate 5). The Eugene-Springfield Metro Plan identifies Interstate Highway 5 as the boundary between Springfield’s and Eugene’s jurisdictional areas. The acknowledged Springfield UGB follows the centerline of Interstate Highway 5. The City of Eugene is presently conducting an UGB alternatives analysis for lands located east of Interstate Highway 5.

As shown in Map 1, Priority Areas and Constraints Analysis, the lands surrounding the UGB were divided into 15 general groupings and named for study and communication purposes. The study area included all lands surrounding the UGB east of Interstate Highway 5, lands located along the McKenzie River and its tributaries north of Springfield’s UGB, lands in the southeast hills, and lands along the Middle Fork and Coast Fork of the Willamette River. The North Gateway and Seavey Loop study areas are located along Interstate Highway 5 north and south of Springfield respectively.



Map 1: Priority Areas and Constraints Analysis

Priority Areas and Constraints Analysis



Current UGB

ZONING

- COMMERCIAL
- NEIGHBORHOOD COMMERCIAL
- LIGHT INDUSTRIAL
- NON RESOURCE (5 & 10 ACRE MINIMUMS)
- PUBLIC FACILITY
- RURAL COMMERCIAL
- RURAL PUBLIC FACILITY
- RURAL INDUSTRIAL
- RURAL RESIDENTIAL (1, 2, 5, & 10 ACRE MINIMUMS)
- MARGINAL LANDS (Priority 3)
- EXCLUSIVE FARM USE (25, 30, 40, & 60 ACRE MINS.)
- QUARRY AND MINING OPERATIONS
- IMPACTED FOREST
- NATURAL RESOURCE
- NON-IMPACTED FOREST
- PARK AND RECREATION
- SAND AND GRAVEL CONTROLLED PROCESSING
- SAND, GRAVEL AND ROCK PRODUCTS

CONSTRAINTS

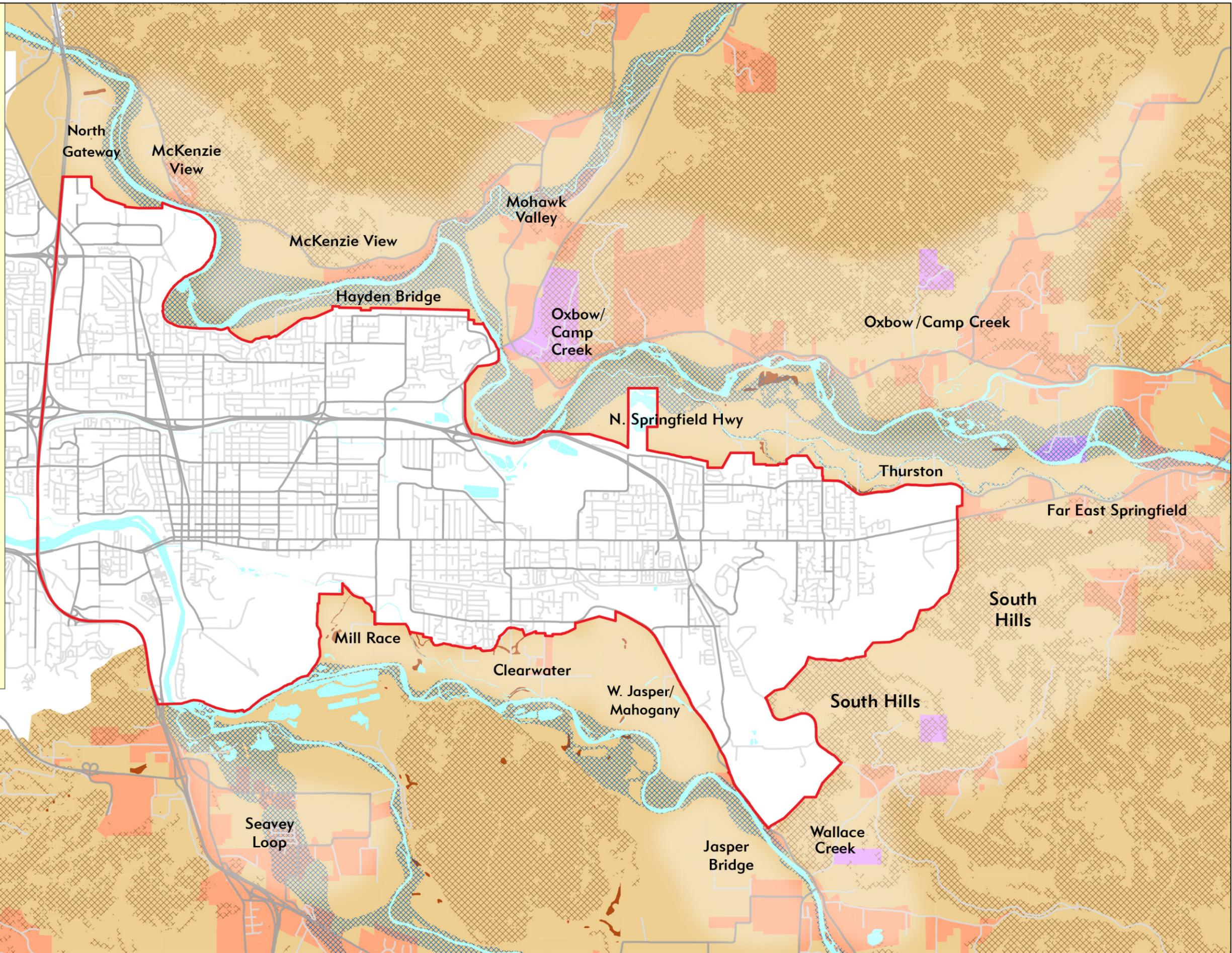
- Slopes > 15% (LCOG/USGS)
- FEMA Floodway (2009)
- Wetlands (LWI & NWI)

0 0.25 0.5 1 Mile



ECONorthwest, November 2008
Springfield IT-GIS, May 2016

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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.

ORAR 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.

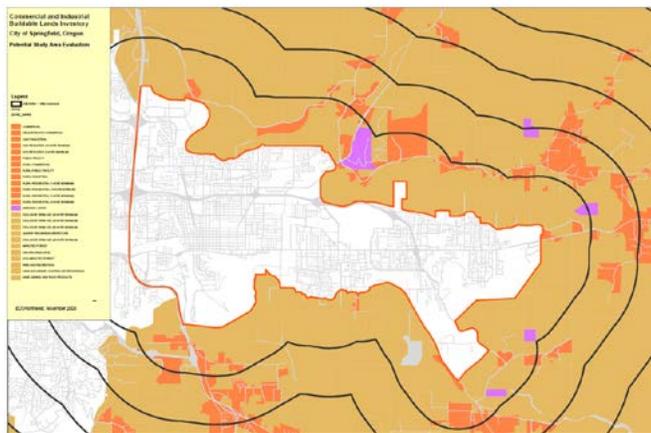
Conclusion ORS 197.298 (1)(a) First Priority Land: There are no Urban Reserves in the vicinity of Springfield or the Eugene-Springfield Metro area. No first priority land is available to accommodate the need deficiency determined under OAR 660-024-0050, thus the City looked to second priority land.

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%.

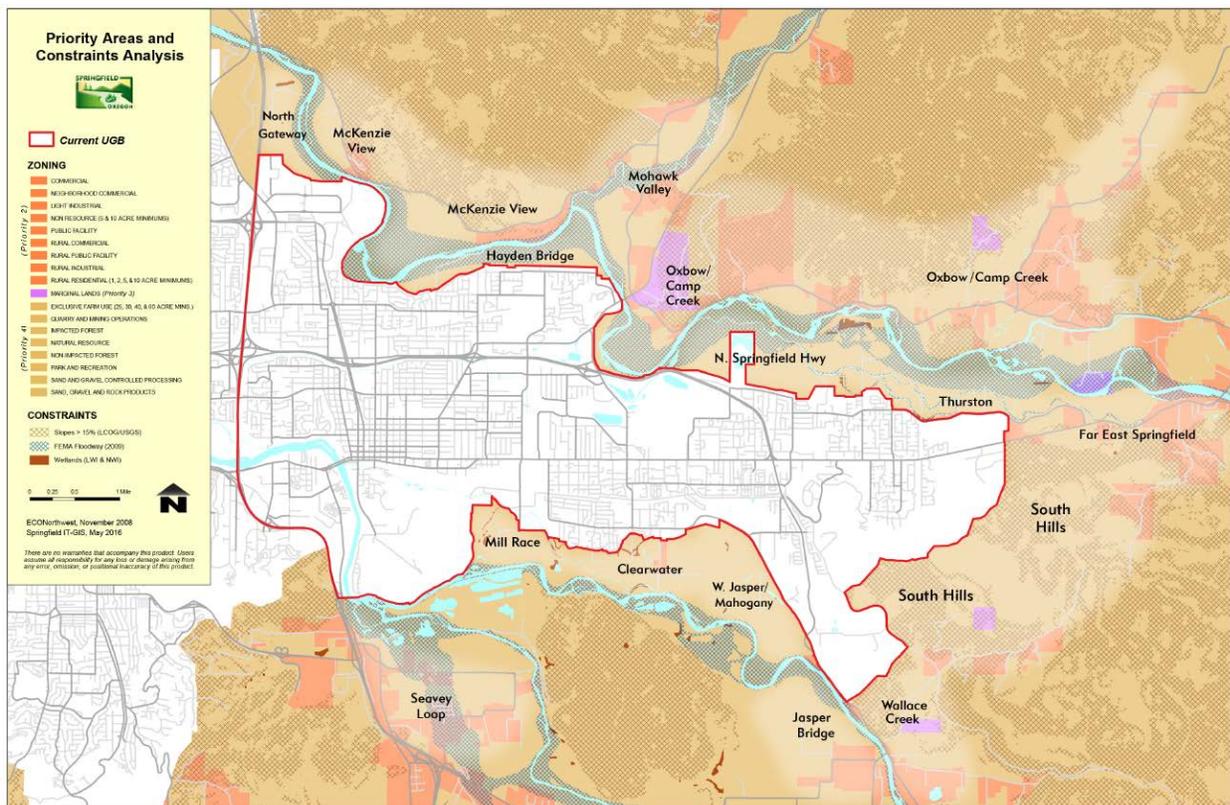


Table 1 Study Areas Containing Second Priority Exception Lands:

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),

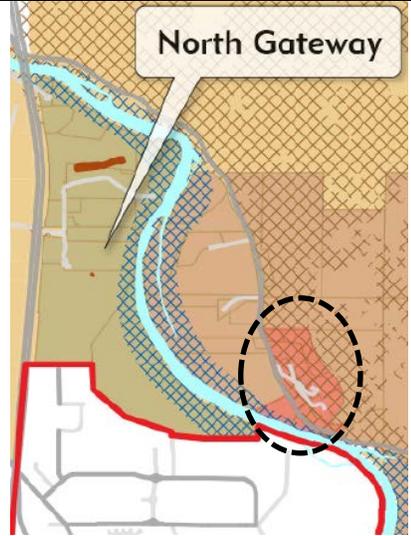
OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

General Description of Second Priority Exception and Non-Resource Lands

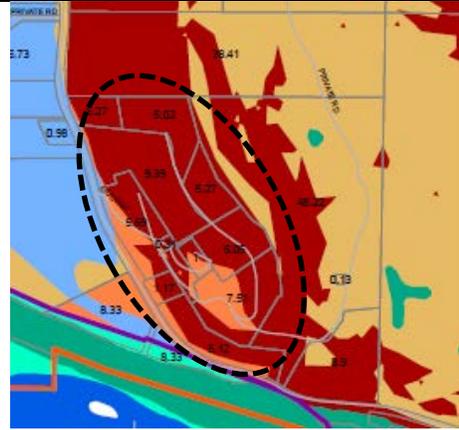
Table 2 provides the general descriptive summary of the second priority exception and non-resource lands in the vicinity of the UGB. Table 2 identifies parcels or portions of parcels containing 5 acres or more without slope, wetland, floodway, riparian resource or highly irregular parcel shape configuration 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.

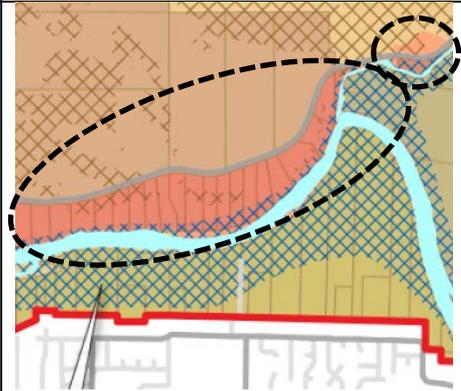
Table 2: Second Priority Exception and Non-Resource Parcels and Constraints	
McKenzie View A⁸ <ul style="list-style-type: none">• Located across the McKenzie River from Springfield's Gateway/International Way Campus Industrial employment area• Zoned RR-10• Parcelized Lane Cedar Plat• Slopes predominantly >25%, Witzel 116G rock outcrop• Bisected by BPA easement• Some floodway, wetlands, hydric soils and Goal 5 riparian resources along the McKenzie River• TL 800 RR-10 11.9 acre parcel flat topo, partially in floodway, developed with rural residential use, has only 4.6 unconstrained acres.• Separated from UGB by resource lands to west, east, and north• (0) parcels with 5 or more unconstrained acres:	

⁸ See maps in record "Employment Opportunity Area 1 North Gateway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-03-14-00 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database



McKenzie View B

- Across the McKenzie River from Springfield
- RR-5 zoning
- Parcelized McKenzie View Estates, developed rural residential uses, 5-acre parcels are constrained by floodway and riparian resources
- Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage
- DOGAMI SLIDO mapped landslide areas Coburg Hills
- Separated from UGB by the river, EFU farmland between the river and the UGB, and the floodway
- (2) parcels with 5 or more unconstrained acres:
17-02-19-00 3000 (6.7ac.)
17-02-19-00 3100 (5 ac.)

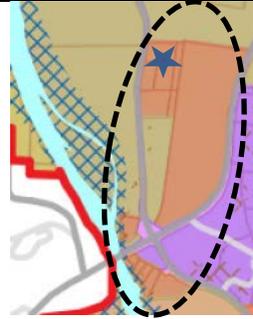


TL 3000, 6.7 ac

TL 3100 5 ac

Mohawk A⁹

- 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 B¹⁰

- 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.



⁹ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with exceptions parcels highlighted.

¹⁰ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-17-00 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

- Rural Residential zoning: (2) RR5 parcels contain 5 or more unconstrained acres in size and are developed with rural residential uses.¹¹
 - 17-02-17-00 1600 (5.4 ac.)
 - 17-02-17-00 1309 (7 ac.)
 - 17-02-17-00 1316 (5 ac.) – irregular shape
 - 17-02-17-00 1318 (5 ac.) – irregular shape
 - 17-02-17-00 0905 (5 ac. has floodway, and riparian resource constraints)
 - 17-02-17-00 0201 (9.2 ac. has floodway, and riparian resource constraints)
- Smaller parcels east of Marcola Road are constrained by slopes >15% and >25%, contain wetlands, hydric soils.
- Smaller parcels west of Jasper Mt. Center 2.5 to 5 acres contain slopes >15% and >25%
- DOGAMI SLIDO mapped landslide areas
- BPA easement crosses this area
- Separated from UGB by land zoned for Exclusive Farm Use (EFU) including Class I soils.
- Mohawk River flooding
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present.



17-02-17-00 1313
Jasper Mountain Safe Center



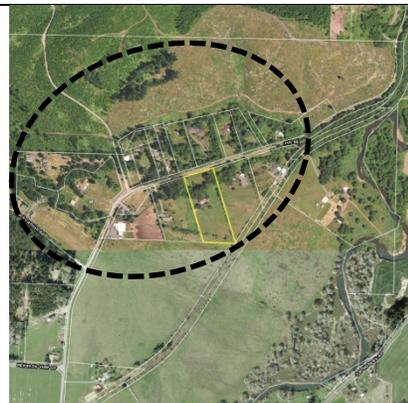
17-02-17-00 1502 1503 17-02-17-00 1501 17-02-01-00 1600



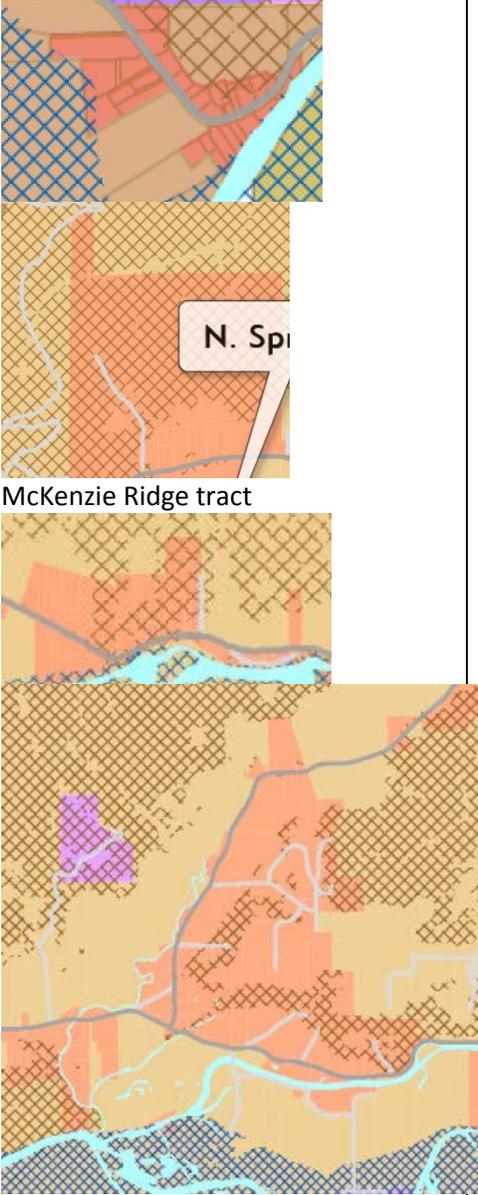
17-02-17-00 1309

Mohawk C.

- Across the McKenzie River from Springfield
- Remote and isolated, more than 2 miles from UGB, not adjacent to UGB
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present
- DOGAMI SLIDO mapped landslide areas
- RR5 zoning, parcels 1.1-8.7 ac
- (6) parcels are 5 acres in size, largest is 8.7 acres, all are developed with rural residential uses:
 - 17-02-08-00 0515 (8.7 ac.)
 - 17-02-08-00 0516 (6.7 ac.)



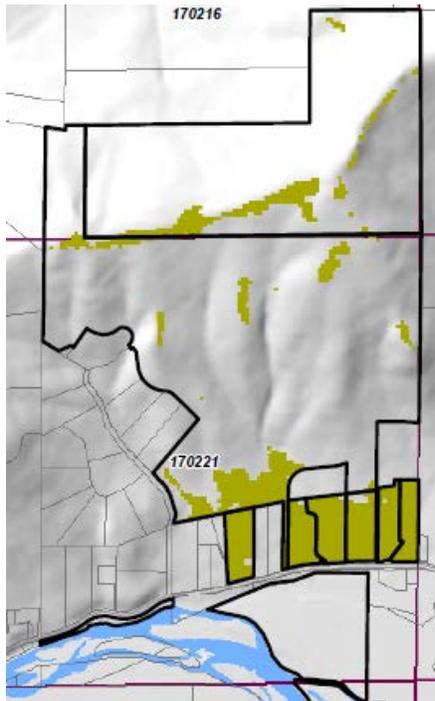
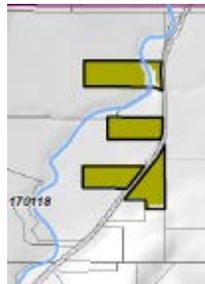
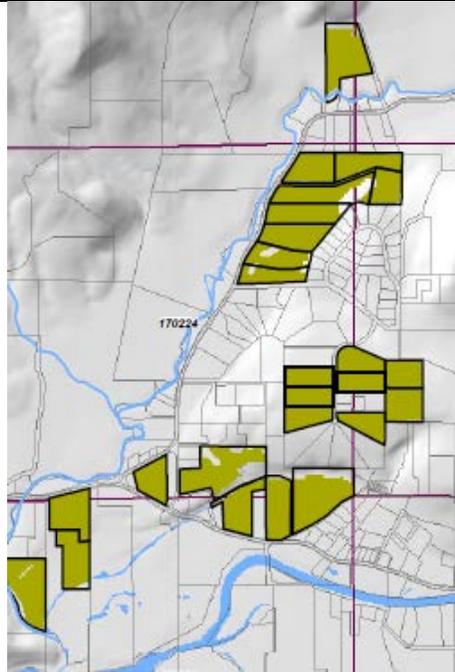
¹¹ See copy of A & T map 17-02-17-00 in the record with exceptions parcels highlighted.

<ul style="list-style-type: none"> ○ <u>17-02-08-00 0517 (6 ac.)</u> ○ <u>17-02-08-00 0600 (5.8 ac.)</u> ○ <u>17-02-08-00 0700 (5.7 ac.)</u> ○ <u>17-02-08-00 0701 (5.5 ac.)</u> 	
<p>Oxbow/Camp Creek¹²</p> <ul style="list-style-type: none"> ● Across the McKenzie River from Springfield ● Majority of area is not adjacent to UGB ● RR5 zoning, primarily 1 and 5 acre parcels along Camp Creek Rd. and RR-10 zoning Upper Camp Creek Rd., McKenzie Ridge Subdivision (RR5-NRES zoning), Shenandoah and Jo-Nette Subdivisions ● Unconstrained parcels 5 acres or larger are distant from Springfield, 2-6 miles from UGB at Hayden Bridge ● Slopes > 25% constrain much of this area ● DOGAMI SLIDO mapped landslide areas ● Floodway and riparian resource constraints along river frontage. ● Two BPA easements cross this area ● Parcels containing 5 or more unconstrained acres (<u>underlined</u>) are zoned for and developed with rural residential uses except where noted: <ul style="list-style-type: none"> ○ <u>17-02-29-00 800 (5.6 ac.)</u> ○ <u>17-02-21-00 107, (6.1 ac.)</u> ○ <u>17-02-21-00 113, (6 ac.)</u> ○ <u>17-02-21-00 128, (5.5 ac.)</u> ○ <u>17-02-21-00 129, (6.6 ac.)</u> ○ <u>17-02-21-00 801, (5 ac.)</u> ○ <u>17-02-21-00 802, (5 ac.)</u> ○ <u>17-02-22-00 500, (5 ac.)</u> ○ <u>17-02-22-00 600, (5 ac.)</u> ○ <u>17-02-26-00 704, (5.1 ac.)</u> ○ <u>17-02-26-00 2100, (6.6 ac., vacant)</u> ○ <u>17-02-25-00 1101 (8.1 ac.)</u> ○ <u>17-02-25-00 1103, (7.7 ac.)</u> ○ <u>17-02-25-00 1205, (10.4 ac.)</u> ○ <u>17-02-25-00 2600, (6.9 ac.)</u> ○ <u>17-02-24-00- 100 (7.8 ac.)</u> ○ <u>17-02-24-00- 134 (5.6 ac.)</u> ○ <u>17-02-24-00- 136 (8 ac.) RR-10</u> ○ <u>17-02-24-00 138 (8.1 ac.)</u> ○ <u>17-02-24-00 141 (4.9 ac.)</u> ○ <u>17-02-24-00 143 (6.9 ac.)</u> ○ <u>17-02-24-00 144 (5.0 ac.)</u> 	 <p>McKenzie Ridge tract</p>

¹² See maps in record “Employment Opportunity Area 3 North Springfield Highway Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copies of Lane County Assessor’s maps 17-02-21-00, 17-02-21-24, 17-02-21-31, 17-02-22-00, 17-02-24-00, 17-02-25-00, 17-02-29-00, 17-02-19-00, 17-01-30-00, 17-01-29-00, 17-01-29-20 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database.

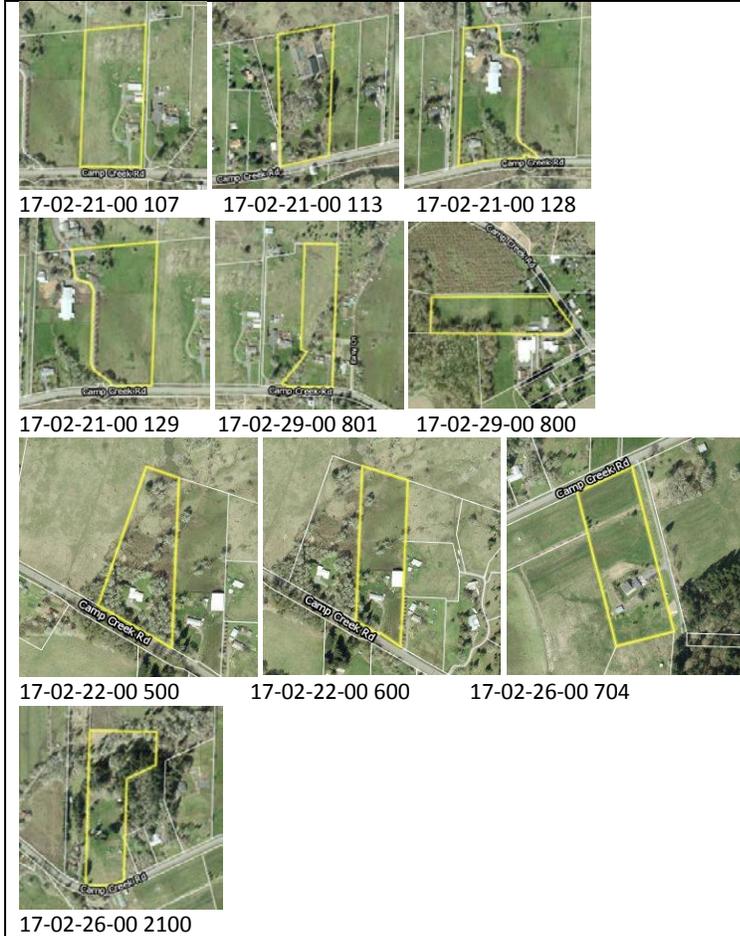
- 17-02-24-00 200 (6.8 ac.)
- 17-02-24-00 303 (5.0 ac.)
- 17-02-24-00 304 (5.0 ac.)
- 17-02-24-00 306 (5.0 ac.)
- 17-02-24-00 311 (5.0 ac.)
- 17-02-24-00312 (5.0 ac.)
- 17-02-24-00 313 (5.0 ac.)
- 17-02-24-00 1209 (11.6 ac.)
- 17-02-24-00 1400 (12.0 ac.)
- 17-02-24-00 1402 (7.7 ac.)
- 17-02-24-00 1501 (5.6 ac.)

- (1) large tract zoned RR5-NRES is vacant, but is constrained by slopes >15%:
 - 17-02-21-00 101 (19.7 ac.) unconstrained portions of McKenzie Ridge site are in SW corner of site (shown in green in map below). BPA easement crosses site.
 - 17-02-16-00 600 (11 ac.) unconstrained portions of McKenzie Ridge site are located along a ridgetop and in SW corner of site (shown in green in map below). BPA easement crosses site. Note this parcel has split zoning. The majority of this tract is F2 Impacted Forest resource land.¹³



17-02-21-00 101 & 17-02-16-00 600
(green indicates unconstrained portions of McKenzie Ridge tracts)

¹³ See GIS screen shot map: “Camp Creek Exception-Non Resource 17-02-16-00 600” depicting location of RR-NRES portion of tract

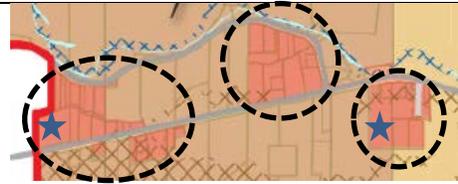


PF-designated land in **Oxbow/Camp Creek** area shown in purple

- Parcels designated and zoned Public Facility (PF) include three non-contiguous parcels scattered throughout the area, owned by City of Eugene (17-01-29-21 100), Eugene Water and Electric Board (17-02-25-00 200 and 17-02-25-00 2200). Parcels are publicly-owned, developed with and necessary for public facilities uses and are not available or suitable to meet Springfield’s employment land needs.
- Upper Camp Creek Rd. parcels are 6+ miles from UGB @ Hayden Bridge, or 5+ miles from UGB via Highway 126/Hendricks Bridge/Waltermville, remote, isolated, and abut resource land on three sides, north of Camp Creek.
- One parcel containing 5 or more unconstrained acres 17-02-24-00- 1501, (5.6 ac.) is zoned for and developed with Rural Commercial use, and is not available or suitable to meet Springfield’s employment land needs.

Far East Springfield A¹⁴

- 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 B¹⁵

- Parcelized Cedar Flats and Upper Cedar Flats Rd. community
- Located more than 1.5 miles east of UGB, remote from Springfield, not adjacent to UGB
- Separated from UGB by block of Class II prime farmland between McKenzie River and McKenzie Highway or by steep slopes
- Bisected by Gay and Cedar Creeks
- Predominantly RR-5 zoning, (4 parcels with 5 or more unconstrained acres (underlined))
 - 1701322002800 (5.4 ac.) developed with residential use and orchard & 1701322002801 (7.8 ac., same owner)
 - 1701322002301 (8.3 ac.) res/ag use;
 - 1701322002802, RR5, constrained by slopes >15%;
 - 1701322002802, RR5, constrained by slopes >15%;



¹⁴ See maps in record "Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-02-36-10, 17-02-36-24, 17-01-31-20, and 17-01-31-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database. See also Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-17-33.

¹⁵ See maps in record "Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-01-30-00, 17-01-32-30, 17-01-31-10, and 17-01-32-20. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

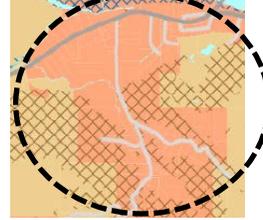
- 1701322002803, RR5, constrained by slopes >15%;
- 1701322002401 bisected by Cedar Creek;
- 1701322002601 (5 ac.), RR5, , flat topo, developed res use.
- One parcel TL300 is zoned Rural Commercial, 3.7 ac
- Upper Cedar Flats Rd. parcels constrained by slopes 15%-60%



TL300 RC, 3.2 ac TL2900 RR5, 6.1 ac TL 2301, RR5, 8.4 ac

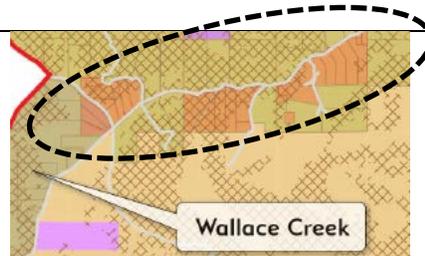


TL 2800 RR5, 5.1 ac TL 2801, RR5 7.8 ac TL2601, RR5, 5 ac



Wallace Creek¹⁶

- Within 1 mile of UGB ridgeline, 1-2 miles to UGB via roads, remote from Springfield, not adjacent to UGB
- Parcelized
- Rural Residential zoning RR-5, Panorama Rd. (8) upper Wallace Creek parcels contain 5.3 to 8.9 unconstrained acres, developed with dwellings
 - 18-02-11-00 505 (5 ac.) slopes
 - 18-02-11-00 1401 (5.8 ac.), slopes 12-45%
 - 18-02-11-00 1100 (5.8 ac.), slopes 12-45%
 - 18-02-11-00 1200 (6.2 ac.), slopes 12-45%
 - 18-02-12-00 500 (13.8 ac.) slopes
 - 18-02-12-00 603 (5.3 ac.)
 - 18-02-12-00 604 (6.4 ac.)
 - 18-02-12-00 605 (7.7 ac.)
 - 18-02-12-00 606 (6.4 ac.)
 - 18-02-12-00 615 (7.4 ac.)
 - 18-02-12-00 619 (8.9 ac.) 45% of lot is >12% slope
- Forested
- Steep slopes > 25%, some small flatter areas near the



¹⁶ See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-11-00, 18-02-12-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

junction of Wallace Creek Rd. and Weyerhaeuser Rd. and along upper Wallace Creek Rd.

- DOGAMI SLIDO mapped landslide data¹⁷ “Very High” landslide susceptibility: Wallace Creek Rd. area



Jasper Bridge A¹⁸

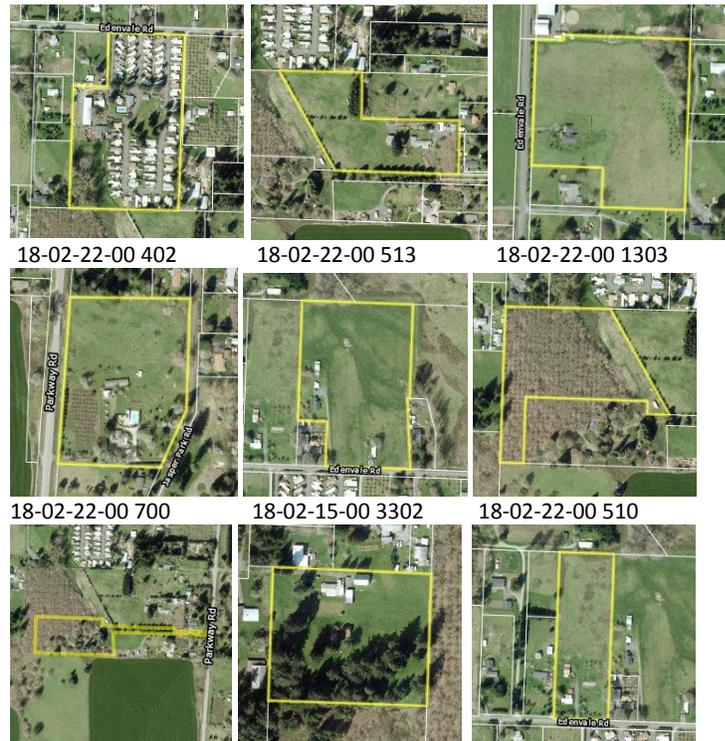
- Within 1-mile SW of UGB via Jasper Lowell Rd, west of Jasper-Lowell Road
- Separated from Springfield by Willamette River, resource land, and sloped land inside UGB
- Access via Jasper Lowell Road, and west across the Willamette River via Parkway Rd. and Edenvale Rd.
- Parcelized Rural Residential RR-5, mostly developed
- Parcels along river constrained by floodway, riparian resources



¹⁷ <http://www.oregongeology.org/slido/index.html> Statewide Landslide Information Layer for Oregon (SLIDO), Oregon Dept. of Geology and Mineral Industries, website accessed Feb. 29, 2016

¹⁸ See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-15-00, 18-02-22-00, 18-02-23-00

- Note: large block of Class I and II prime farmland is located immediately west of this area
- 71-acre Jasper State Park is zoned Park and Recreation
- Exception land along east side Jasper Lowell Road and Hills Creek Road is parcelized 1-2 acre Rural Residential
- 1-acre or smaller parcels along Parkway Rd. ~115 feet x 350 feet
- 30-acre RR site is Union Pacific Railroad
- 13-acre RR site on Edenvale Rd. is a mobile home park
- RR-zoned Parcels >5-acres are developed with rural residential uses:
 - 18-02-15-00 3302 (9.6 ac.)
 - 18-02-15-00 3303 (5 ac.)
 - 18-02-22-00 2100 (8.9 ac.)
 - 18-02-22-00 1303 (7.3 ac.)
 - 18-02-22-00 402 (13 ac.) developed mobile home park
 - 18-02-22-00 1000 (5 ac.)
 - 18-02-22-00 510 (8.8 ac.)
 - 18-02-22-00 511 (6.8 ac.)
 - 18-02-22-00 513 (7.6 ac.)
 - 18-02-22-00 700 (7.1 ac.)
 - 18-02-23-00 2500 (5 ac.)
 - 18-02-23-00 2503 (5 ac.)
 - 18-02-23-00 2401 (6.5 ac.)
 - 18-02-23-00 2402 (6.2 ac.)
- 18-02-15-00 3400 (9.6 ac.) ODOT
- Floodplain, Class II soil area



18-02-22-00 511

18-02-22-00 1000

18-02-15-00 3303



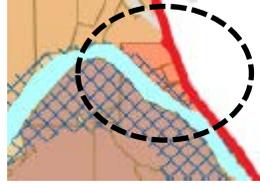
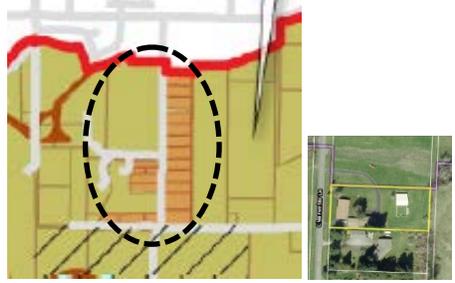
18-02-23-00 2500

Jasper Bridge B¹⁹

- 1.25 miles SW of UGB via Jasper Lowell Rd., not adjacent to UGB, separated from Springfield by distance and slopes.
- Located east of Jasper Lowell Road, south of Hills Creek Road
- Parcelized small lot Rural Residential between river and Jasper Lowell Road, 0.5 to 1 acre
- RR-5 parcels along south side of Hills Creek Road
- Two Rural Industrial-zoned parcels 18-02-23-00-01800 (20-acre) and 1801 (95 acres) located south of Hills Creek Road via Keeney Street/Osprey Lane are within 1.5 miles of UGB, developed with industrial uses, large ponds occupy 26% of the 95-acre Zola site, large wetland, slopes 10-70% 8% of at south end of site. These parcels are awkwardly shaped but may have additional development capacity if infrastructure and services could be provided:
- 18-02-23-00 TL1800 17 unconstrained acres is developed with industrial use (sawmills and planning mills), wetlands, irregular shape. Northern portion of site (n. of Keeney St.) has 6.4 unconstrained acres, developed with mill office.
- 18-02-23-00 TL1801 33.3 unconstrained acres, ponds, wetlands, slopes > 15% in south half of site, irregular shape. Northern portion of site (n. of Keeney St.) has 10.3 unconstrained acres.
- Floodway, riparian resources, wetlands and slope constraints



¹⁹ See maps in record "Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-23-00

<p>West Jasper/Mahogany²⁰</p> <ul style="list-style-type: none"> • Adjacent to UGB • Rural Residential zoning RR-5, all smaller than 5 acres • All parcels have floodway along the Willamette River • Willamette Greenway • Located between Union Pacific railroad line, Bob Straub Parkway southern terminus and Willamette River 	
<p>Clearwater²¹</p> <ul style="list-style-type: none"> • Adjacent to UGB • Located south of Jasper Rd. along Clearwater Lane • Abuts UGB, near City limits, east of 42nd Street • 1-acre rural residential lots are zoned RR, all smaller than 5 acres, and developed with homes; Hedlee Subdivision platted in 1972 with parcel sizes from 0.3 to 1.7 acres.²² • Land abutting the exception area to the south is Clearwater Park, zoned Park and Recreation 	
<p>Seavey Loop²³ A</p> <ul style="list-style-type: none"> • The lands abutting the UGB south of Springfield/Glenwood along Franklin Blvd. are primarily public lands comprising Interstate Highway 5 right of way, and Oregon Dept. of Parks and Recreation public park land. • Land between the Springfield UGB southern extent and the Seavey Loop A UGB Study Area Grouping (mapped on A & T maps 18-03-11-00, located along the I-5 onramp, McVay/Franklin intersection and Central Oregon & Pacific rail line (TL700) and 18-03-1010 designated Parks in the LRCP is primarily railroad right of way and thus is not suitable to meet Springfield’s employment land needs. • 0.5-0.7 acre exception parcels between UGB and the Franklin/Seavey Loop junction are zoned Rural Commercial and Rural Residential, developed commercial and residential uses, all smaller than 5 acres. • Willamette River Greenway and floodway east of Franklin 	  <p>Park (green) and Natural Resource-Mineral (gray) designated land south of Springfield UGB (UGB in red) in the vicinity of Seavey Loop A UGB Study Area Grouping;²⁴ showing</p>

²⁰ See maps in record “Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-10-00

²¹ See maps in record “Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-015-00.

²² Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-11.

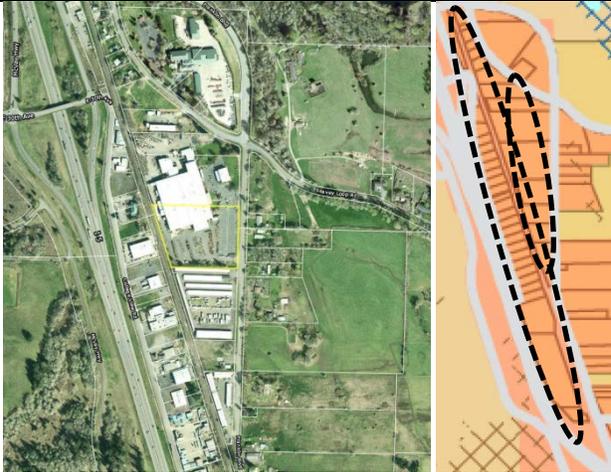
²³ See maps in record “Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

²⁴ Details from Lane County Plan Map Viewer website accessed Feb. 24, 2016:

<http://lcmmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>. and as shown in the Official Lane County Plan Maps for Township 17 South, Range 1 West; Township 17 South, Range 2 West; Township 17 South, Range 3 West; Township 18 South, Range 2 West; Township 18 South, Range 3 West; see also maps and other documentation in the record describing the Willamette Confluence Area submitted by Chris Orsinger, President, Friends of Buford Park.

 <p>RC (orange) and RR (yellow) zoning</p>  <p>floodway (cross-hatch)</p>	<p>OCPR rail line, I-5 corridor, McVay and Franklin Blvd. and Glass Bar Willamette River Greenway. Park and Natural Resource-Mineral lands are owned by public or non-profit conservation organizations</p>
<p>Seavey Loop B²⁵</p> <ul style="list-style-type: none"> • Strip of Rural Residential, Rural Commercial and Rural Industrial parcels south of Franklin/Seavey Loop junction along College View Road and west of Franklin/Seavey • Northern portion of strip between railroad and Franklin is within 1 mile of UGB • Parcelized 0.2 to 0.7 acre lots, Freeway Park Plat • Lot depth ranging from 90-200', lot width predominantly 100' • Developed with commercial and industrial uses that are expected to continue in planning period • N/S railroad line separates College View parcels from Franklin parcels • slopes 2-12%, DOGAMI mapped landslide hazards • Rural Industrial parcels along South Franklin and College View, 0.1-5.6 acres, are developed with commercial and industrial uses, lot depth 200'- 644' (Johnson Crushers developed parcels) <ul style="list-style-type: none"> ○ 18-03-11-30 3500 (5.6 ac.) developed industrial use ○ 18-03-11-30 3600 (5.5 ac.) developed industrial use ○ <u>18031400 400; (6 ac.), vacant RI &</u> ○ <u>18031400 900; (0.8 ac.) same owner (split plan des.)</u> 	 <p>County RR (yellow), RI (red) and RC (orange) zoning</p>  <p>18-03-14-00 400</p>  <p>Southern portion of 18-03-14-00 900</p>

²⁵ See maps in record "Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00



has a split plan designation. PF-designated land shown in purple

- 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.

Seavey Loop C

- Exception parcels are 1.5-2 miles from UGB, not adjacent to UGB
- Rural Industrial and Rural Residential parcels, along Twin Buttes Road, developed with industrial and residential uses
- Slopes > 25% and > 15 % south of Twin Buttes Road, DOGAMI mapped landslide hazards
- Very restrictive Bonneville Power line easement along south side of Twin Buttes Road (mapped in yellow) - no structures permitted
- Middle Fork Willamette River floodway constraint
- Oxley Slough/Wild Hog Creek, floodway, hydric soils,
- Freeway access to south via Goshen and Highway 58
- Larger 2-6 acre RR parcels on north side of Twin Buttes road may have development potential.
- 15-ac RR-5 parcel is developed with mobile home park



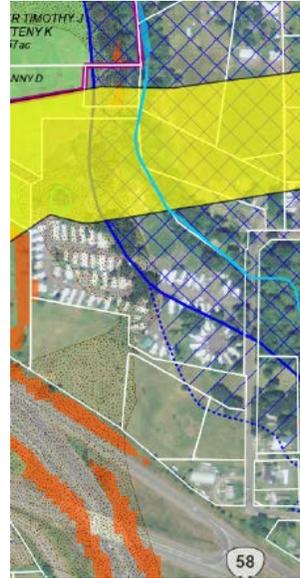


Access to I-5 from S. Franklin is via Hwy 99 and Hwy 58

- 18-03-14-40 502 (5.6 ac.), RR developed residential use
- 18-03-14-40 600 (2 ac.), RR and 700 (4 ac.), RI 701 (2.7 ac.), 800 (0.5 ac.), RI, 900 (0.5 ac.), RI developed industrial use: Walsh Trucking
- 18-03-14-40 300 (2.4 ac.), RR developed residential use, BPA and riparian constraint
- 18-03-14-40 508 5.2 constrained by BPA, slopes
- 18-03-14-40 200 (4.7) riparian constraint
- 18-03-13-30 1701 (15.2 ac.), RR, developed Dunker Mobile Home Park, BPA, floodway, wetland and riparian constraints
- 18-03-13-30 1702 (5 ac.), RR, Dunker, vacant
- 18-03-13-30 1600 (1.2 ac.), 1602 (1.1 ac.) and 1700 (2.8) Flynn = 5.1 ac.



18-03-13-30 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



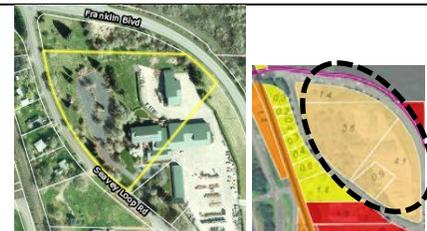
18-03-13-30 1700

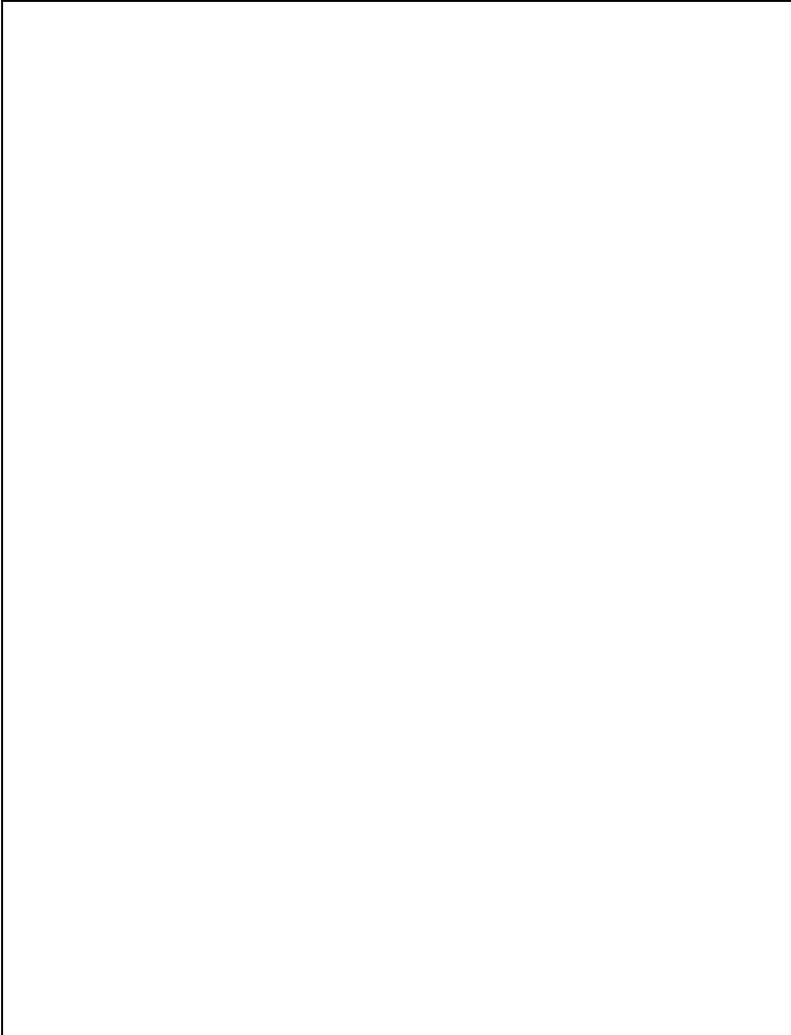


18-03-14-40 502

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.

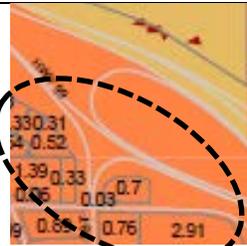




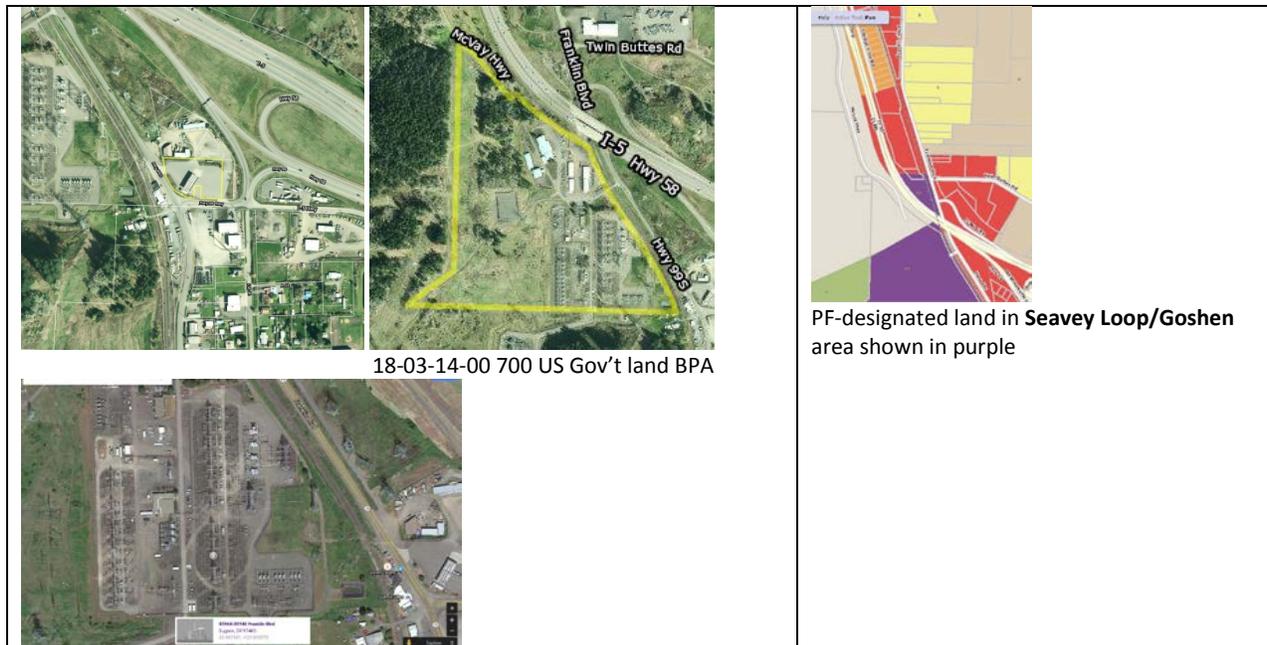
Floodway constraint (cross-hatch)

Seavey Loop/Goshen²⁷

- Lands located south of I-5 are included in Lane County’s GREAT Plan Goal Exception: Glendora Tracts Rural Commercial developed interchange area
- US Gov’t Bonneville Power (BPA) Alvey Substation, development and restrictive easement –lands are designated and zoned Public Facility in LRCP.
- Lands located south of I-5 and Highway 99 are included in Lane County’s GREAT Plan Goal Exception. Community of Goshen exception land is located more than 1.75 miles south of UGB.
- No parcels 5-acres or larger



²⁷ See maps in record A & T map 18-03-14-44, 18-03-14-44



The following summary in Table 3 identifies the general geographic groupings containing *potentially* suitable second priority parcels after excluding constrained portions of parcels and parcels smaller than 5 acres.

Table 3: Summary of Second Priority Exception Lands Parcels and Constraints Analysis - Unconstrained Parcels 5 Acres and Larger*

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
McKenzie View A	0	0	0		
McKenzie View B	0	0	2	17-02-19-00 3000; (6.7 ac) 17-02-19-00 3100; (5 ac.)	RR RR
Mohawk A	1	0	1	17-02-20-00 202; (5.3 ac)	RR
Mohawk B	0	0	4	17-02-17-00 1500; (5.7 ac., vacant) 17-02-17-00 1600; (5.4 ac.) 17-02-17-00 1309; (7 ac.) 17-02-17-00 1313; (18.3 Jasper Mt. Safe Center)	RI RR5 RR5 RR5
Mohawk C	0	0	6	17-02-08-00 0515; (8.7 ac.) 17-02-08-00 0516; (6.7 ac.) 17-02-08-00 0517; (6 ac.) 17-02-08-00 0600; (5.8 ac.) 17-02-08-00 0700; (5.7 ac.) 17-02-08-00 0701; (5.5 ac.)	RR5 RR5 RR5 RR5 RR5 RR5

				18-02-12-00 605; (7.7 ac.) 18-02-12-00 606; (6.4 ac.) 18-02-12-00 615; (7.4 ac.) 18-02-12-00 619; (8.9 ac.)	
Jasper Bridge A	0	0	14	all have homes and are surrounded by smaller residential parcels 18-02-15-00 3302; (9.6 ac.) 18-02-15-00 3303; (5 ac.) 18-02-22-00 2100; (8.9 ac.) 18-02-22-00 1303; (7.3 ac.) 18-02-22-00 402; (13 ac.) developed mobile home park 18-02-22-00 1000; (5 ac.) 18-02-22-00 510; (8.8 ac.) 18-02-22-00 511; (6.8 ac.) 18-02-22-00 513; (7.6 ac.) 18-02-22-00 700; (7.1 ac.) 18-02-23-00 2500; (5 ac.) 18-02-23-00 2503; (5 ac.) 18-02-23-00 2401; (6.5 ac.) 18-02-23-00 2402; (6.2 ac.)	
Jasper Bridge B	0	1** PREDEV	1** PREDEV	18-02-23-00 TL1800; <u>17 acres</u> is developed with industrial use that likely will continue through planning period. Portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd. 18-02-23-00 1801; <u>33.3 acres</u> . 10 ac. portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd.	RI RI
West Jasper/ Mahogany	0	0	0		
Clearwater	0	0	0		
Seavey Loop A	0	0	0		
Seavey Loop B	0	0	1	Developed industrial use (Johnson Crushers) will likely continue through planning period. <u>18031400 400; (6 ac.), vacant</u>	RI
Seavey Loop C	0	0	3	18-03-14-40 502; (5.6 ac.) 18-03-13-30 1702; (5 ac.) vacant 18-03-13-30 1600, 1602, 1700; (5.1 ac. combined)	RR
Seavey Loop D	0	0	0	Developed Rural Public Facility (EPUD)	RPF
Seavey Loop E	0	0	4	18-03-14-10 700; (6.5 ac.) 18-03-14-10 900; (7.6 ac.) 18-03-14-10 301; (6.9 ac.) 18-03-14-10 1201; (6.8 ac.)	RI RR

Seavey Loop F	0	0	0	RR-1 parcels south Seavey Loop Rd., east of Oxley Slough, are developed with residential use at urban densities RR-5 parcels Starlite Plat All in floodway	RR
Seavey Loop/Goshen	0	0	0		

* No deduction for existing residential development on parcels was made by City

** PREDEV= Potentially redevelopable rural industrial parcel considered by City. Land in the UGB Study Area with redevelopment potential is land that is classified as “developed” that may redevelop during the planning period to increase employment capacity in Springfield, consistent with the Goal 9 definition of redevelopment. As described in the preceding text and graphics, the City identified and evaluated several developed exception land sites larger than 5 acres on a site-by-site basis and determined that except where identified in Table 3, these sites are unlikely to redevelop over the 20-year planning period to meet Springfield’s specific employment land needs for sites larger than 5 acres. The City’s reasoning for this evaluation of alternatives was based on the presence of existing businesses or residential development on the site that are expected to continue to use the site for the planning period; physical absolute constraints that diminish the amount and site configuration of potentially redevelopable areas; and parcel sizes and configurations that result in potentially redevelopable areas smaller than five acres.

As shown in Table 3, the City’s initial screening identified a total of (72) second priority exception land parcels* 5 acres or larger in the vicinity of the UGB that *may* have potential to satisfy the identified need deficiency based solely on their parcel acreage and lack of absolute development constraints. These parcels are located within 13 study area groupings and within 8 different geographic areas.

As shown in Table 3, the City’s initial screening identified (3) parcels 5 acres or larger, a total of 18.6 acres of second priority exception land are located adjacent to the UGB. These parcels are located within 2 study area groupings and within 2 different geographic areas. The adjacent parcels are not contiguous to one another, and one of the parcels is sloped 12-15%, too steep for industrial uses and commercial mixed-use development.

EXCLUDE SECOND PRIORITY EXCEPTION LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

The next step in the process excluded the second priority lands that are *not* potentially suitable to provide unconstrained parcels larger than 5 acres to satisfy the identified employment land need deficiency. The City’s reasoning at this stage in the analysis was based on parcel size, ownership and presence of absolute development constraints on a parcel or grouping of adjacent parcels under single ownership.

OAR 660-024-0060 (1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”[emphasis added]

OAR660-024-0060(5)

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”
[emphasis added]*

Identification of Potentially Suitable Exception and Non-resource Land. As previously explained in the City’s findings under Goal 9, the CIBL/EOA ²⁸ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable.”

To identify *potentially* suitable exception land sites to meet employment land needs, the City applied the following factors²⁹ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception lands in the next stage of the evaluation process:

- Exclude lands that are not buildable³⁰
- Exclude lands based upon specific land needs (197.298(3)(a))

In the previous step in the alternatives analysis, the City identified exception land parcels that could *potentially* be suitable to meet the City’s need for employment land sites larger than 5 acres and sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints, and excluded exception land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites. For example, the City considered that 5.5 and 5.6 acre parcels in Preliminary Study Area grouping Seavey Loop B that are developed with the Johnson Crushers International plant to be developed with an industrial use expected to continue in the

²⁸ CIBL/EOA Table S-5, page ix-x.

³⁰ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

planning period thus not suitable to meet the City's need for employment land sites larger than 5 acres and sites larger than 20 acres in the planning period.

For the purpose of evaluating second priority exception land, the City identified the following criteria to be applied equally to all parcels within the Preliminary Study Area — in order of their priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Parcel size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres. The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels less than 5 acres from further analysis. For the purpose of this step in the analysis, the City did not deduct for existing residential development on parcels 5 acres or larger.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial mixed use sites with relatively flat topography (less than 5% slope and less than 7% slope).

As explained in the City's findings under Goal 9 and in the CIBL/EOA, distance relative to the City and to existing urban infrastructure systems is a key factor in determining employment land suitability because Springfield's identified land need is for industrial and commercial mixed use sites that provide reasonable access and travel times to major transportation corridors and reasonable service connections to public water and wastewater conveyance systems, public transit service, and public stormwater and wastewater management systems, facilities and services. Employment sites must also have reasonable connection to electricity and telecommunications systems.

As previously explained, the City applied the following factors as absolute development constraints to providing urban services to employment land:

- Portions of tax lots with slopes > 15%
- Portions of tax lots comprising inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots comprising riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

For the initial screening of land, the City identified parcels or portions of parcels with slopes 15% or less as *potentially* suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes greater than 15% from further analysis.

The City’s findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City’s analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same. As permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate those parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

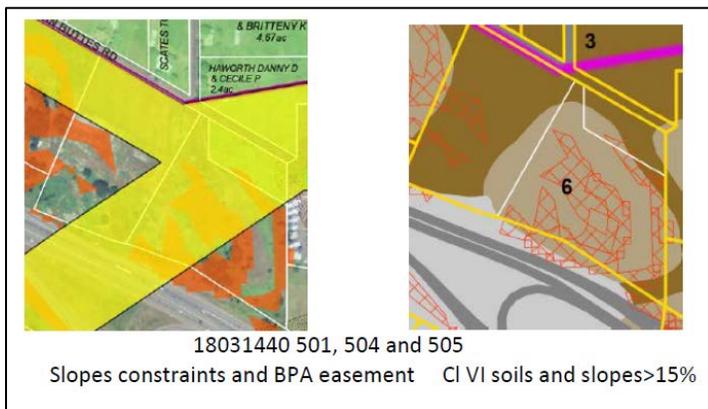
In addition to the summary data compiled in Map 1, Table 2 and Table 3, the record includes maps, acreage calculations and other evidence used as factual basis for the City’s uniform and consistent evaluation of parcelization, slopes, floodway, inventoried wetlands and riparian resources on all exception parcels in the preliminary study area. This evidence is relevant to justify the City’s identification of *potentially* suitable second priority exception land parcels and its exclusion of unsuitable second priority exception land parcels from further analysis.

ORS 197.298 (1)(b):

“Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\)](#).”

To complete its evaluation of second priority land, the City examined the study area to identify resource land areas that are completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705). One area meeting this description exists within the UGB Study Area.

One tract of resource land (zoned EFU) in the Seavey Loop area meets the criteria for second priority: 18031440 tax lots 501, 504 and 506. As shown in the figure below, this tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.



EXCLUDE LANDS THAT ARE NOT BUILDABLE (SUITABLE), BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As described in the preceding text and graphics, the City excluded exception land parcels less than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) when it analyzed the potentially suitable acreage of each exception land parcel or group of parcels, as permitted under OAR 660-024-0060(5).

OAR 660-024-0060(1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(5)

“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all second priority exception land parcels in the UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

These steps excluded the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.

After excluding the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels, the City's analysis of parcel size and absolute development constraints identified the seven remaining exception area geographic groupings that contain *potentially* suitable land. These areas were identified for additional analysis study to determine serviceability and

suitability to determine whether exception lands in the vicinity fo the UGB can “reasonably accommodate” the identified employment land need.

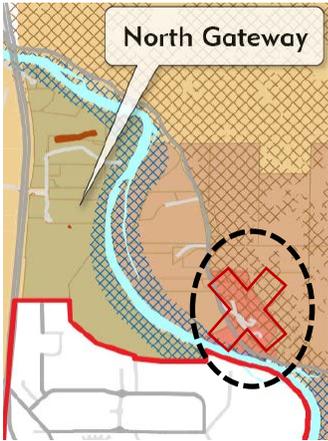
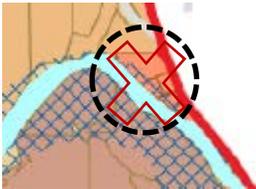
No exception area will provide a vacant candidate site with 20 or more unconstrained acres to meet Springfield’s industrial and commercial mixed-use employment land needs.

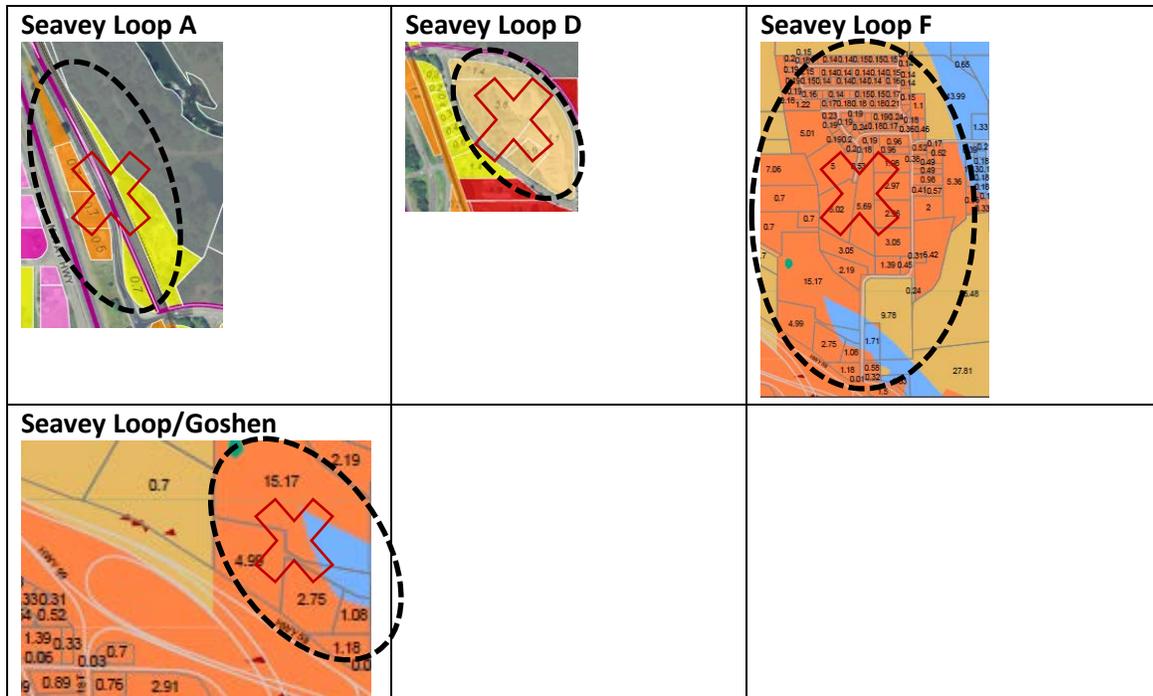
The City’s need for 186 acres to accommodate sites 20 acres and larger cannot be met by adding exception lands to the UGB.

The City identified the exception land parcels listed in Table 3, Summary of Second Priority Exception and Non-Resource Parcels and Constraints Analysis as candidate lands for additional analysis to determine serviceability and suitability to meet the need for 37 acres to accommodate smaller 5-20 acre sites.

The McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels with less than 5 unconstrained acres were excluded from further analysis.

Table 4: Second priority exception parcels excluded based upon specific land needs [ORS 197.298(3)(a)]

McKenzie View A	West Jasper/Mahogany	Clearwater
		



IDENTIFY SECOND PRIORITY EXCEPTION LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable exception parcels identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

The following section of this report provides explanation of the City’s rationale and evaluation criteria for comparing serviceability and suitability of candidate lands.

The following section of this report provides substantial evidence to support the City’s findings under Goals 11 and 12.

OAR 660-024-0010(8) Definitions states:

“Suitable vacant and developed land” describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for “developed land,” section (12) for “suitable,” and section (14) for “vacant land.”

OAR 660-024-0040(7) states:

“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.”

For land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

OAR 660-011-0005(5) defines “Public Facility”:

“A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.”

As explained in greater depth in the City’s findings under Goal 11, OAR Division 11 requires public facilities planning:

“to help assure that urban development in such urban growth boundaries is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.”[OAR 660-011-0000]

Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.³¹ Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

As explained in greater detail in the City’s findings under Goal 11, the City relied primarily on the 2035 TSP, the policies and findings of the acknowledged Metro Plan Public Facilities and Services Element, the *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, the Springfield Wastewater and Stormwater facilities master plans, and Springfield Utility Board facilities plans as the primary data sources to assess and compare the public facilities needs to serve candidate expansion lands in a timely, orderly, and efficient arrangement. The City relied primarily on those same data sources and interviews with County and City planning staff when it determined that public facilities and transportation facilities

³¹ Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

— as defined by OAR chapter 660, division 11 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period to serve candidate expansion lands in a timely, orderly and efficient arrangement consistent with OAR chapter 660, divisions 11. The City did this by conducting an iterative series of meetings with City and service provider agency engineering and transportation planning staff over a multi-year period to examine the nearest location and capacity of existing and planned public facilities in the vicinity of a candidate parcel or grouping of parcels and by considering possible ways and means of connecting candidate lands to facilities and services in accord with applicable provisions of the law.

OAR 660-012-0005(30) defines “Transportation Facilities”:

“Transportation Facilities means any physical facility that moves or assists in the movement of people or goods including facilities identified in OAR 660-012-0020 but excluding electricity, sewage and water systems.”

OAR 660-012-0020 states “TSPs shall establish a coordinated network of transportation facilities adequate to serve state, regional and local transportation needs;” and lists the elements that must be included in the required Transportation Systems Plans (TSPs). TSPs must establish “a system of planned transportation facilities, services and major improvements. The system shall include a description of the type or functional classification of planned facilities and services and their planned capacities and performance standards;” [OAR 660-012-0020 (3)(b)]. The TSP must describe the “location of planned facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. This shall include a map showing the general location of proposed transportation improvements, a description of facility parameters such as minimum and maximum road right of way width and the number and size of lanes, and any other additional description that is appropriate;” [OAR 660-012-0020 (3)(c)].

OAR 660-012-0025(1)

“Except as provided in section (3) of this rule, adoption of a TSP shall constitute the land use decision regarding the need for transportation facilities, services and major improvements and their function, mode, and general location.”

OAR 660-012-0030 Determination of Transportation Needs

(1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation network being planned including:

- (a) State, regional, and local transportation needs;*
- (b) Needs of the transportation disadvantaged;*
- (c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development).*

The City properly relied on the acknowledged 2035 Springfield TSP, the Lane County TSP and the Central Lane MPO RTP (as described in the City’s findings under Goal 12) as the primary data sources to assess and compare the need for transportation facilities, services and major improvements that would be associated with the urbanization of candidate expansion lands when it conducted the UGB Alternatives Analysis. The TSPs describe the location of existing and planned transportation facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. The City relied primarily on those same data sources and interviews with ODOT, County, City and Lane Transit District transportation planning staff when it determined that public facilities and transportation facilities — as defined by OAR chapter 660, division 12 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period consistent with OAR chapter 660, division 12.

Requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. The City seeks to add employment sites that are reasonably accessible to Interstate Highway 5 via designated freight routes to meet site needs of target industries. The City also seeks to add employment sites in locations that are accessible or can reasonably be made accessible via transit.

OAR 660-012-0005(22)

“Planning Period” means the twenty-year period beginning with the date of adoption of a TSP to meet the requirements of this rule.”

It should be noted that the 2030 Plan planning period is 2010-2030. The Springfield TSP planning period extends to the year 2035.

OAR 660-012-0005(24)

“Reasonably direct” means either a route that does not deviate unnecessarily from a straight line or a route that does not involve a significant amount of out-of-direction travel for likely users.”

The definition of "reasonably direct" is relevant and appropriate to the UGB Alternatives Analysis because "reasonably direct" travel routes are important location factors for Springfield's target manufacturing uses.³²

OAR 660-012-0005(32)

"Transportation Needs" means estimates of the movement of people and goods consistent with acknowledged comprehensive plan and the requirements of this rule. Needs are typically based on projections of future travel demand resulting from a continuation of current trends as modified by policy objectives, including those expressed in Goal 12 and this rule, especially those for avoiding principal reliance on any one mode of transportation."

To assess the types and levels of transportation needs associated with the industrial and commercial employment land UGB expansion, and to compare the relative advantages and disadvantages of candidate sites, the City assumed that those needs would be a continuation of current trends for similar industrial and commercial office employment uses as modified by policy objectives in the TSP, and applicable 2030 Comprehensive Plan Economic and Urbanization Element policies.

The transportation system must "minimize adverse economic, social, environmental and energy consequences; [OAR 660-012-0035(3)(c)], "minimize conflicts and facilitate connections between modes of transportation;" and "avoid principal reliance on any one mode of transportation by increasing transportation choices to reduce principal reliance on the automobile."

OAR 660-012-0035 Evaluation and Selection of Transportation System Alternatives

Requirements under OAR chapter 660, division 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

³² See TadZo report

employment land uses can reasonably be provided within the planning period: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

OAR 660-012-0005(41) Vehicle Miles of Travel (VMT)

“Vehicle Miles of Travel (VMT): means automobile vehicle miles of travel. Automobiles, for purposes of this definition, include automobiles, light trucks, and other similar vehicles used for movement of people. The definition does not include buses, heavy trucks and trips that involve commercial movement of goods. VMT includes trips with an origin and a destination within the MPO boundary and excludes pass through trips (i.e., trips with a beginning and end point outside of the MPO) and external trips (i.e., trips with a beginning or end point outside of the MPO boundary). VMT is estimated prospectively through the use of metropolitan area transportation models.”

To address OAR 660-012-0005 (41) *“Vehicle Miles of Travel (VMT)*, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned transportation system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

To further evaluate potentially suitable exception and land sites to meet employment land needs, the City applied the following factors (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception in the next stage of the evaluation process:

- Exclude lands that are not buildable³³

³³ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

OAR 660-024-0060 (1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(5)

“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”

For the public facility suitability analysis, the City assumed that the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas are the type, size and service levels needed to serve the target industries identified in the CIBL/EOA, as identified as summarized in this report in the City’s findings under Goal 9; as supported by the evidence in the record; and as required under applicable federal, state, regional and local plan policies and environmental permits. Target industries require and rely upon specific types, sizes and service levels of public water, wastewater, stormwater facilities and transportation systems to conduct their operations — including but not limited to necessary and typical proximity to existing public facilities, transportation systems and services. Therefore the City analyzed proximity to existing facilities and systems when it conducted the public facilities analysis summarized in Table 4 Public Facilities Analysis, and excluded lands from further consideration based on necessary and typical proximity when it conducted the boundary location alternatives analysis.

The City properly considered the employment land suitability characteristics regarding the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas, based on the characteristics of needed sites determined in the Economic Opportunities Analysis and supporting evidence in the record.

For the next steps, in the analysis, the City analyzed general geographic groupings of parcels within each priority category as permitted under OAR 660-024-0060(6).

It should be noted that two geographic areas (Mohawk and Wallace Creek) contain second priority exception parcels and third priority marginal parcels. These are discussed separately in order of priority. General geographic groupings comprising disparately located parcels were grouped into subgroups based on their location, relative proximity to the UGB, and relative proximity to potential service connections. For example, Mohawk A, B and C parcels are located increasingly distant from the UGB, with A being the closest.

EXCLUDE LANDS THAT CANNOT REASONABLY BE PROVIDED WITH URBAN INFRASTRUCTURE AND SERVICES DUE TO PHYSICAL CONSTRAINTS [ORS 197.298(3)(b)].

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As previously explained in the City’s findings under Goal 9, the CIBL/EOA³⁴ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.” [emphasis added]

OAR 660-009-0005(12) states that “‘[s]uitable’ means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.”³⁵ [emphasis added]

OAR 660-009-0005(2)

“Development Constraints” means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat,

³⁴ CIBL/EOA Table S-5, page ix.

³⁵ The Goal 14 rule at OAR 660-024-0010(8) states: “‘[s]uitable vacant and developed land’ describes land for employment opportunities and has the same meaning as provided in OAR 660-009-0005 section...(12) for ‘suitable.’”

environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. [emphasis added]

OAR 660-009-0005(4)

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

OAR 660-009-0005(11)

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

Availability of urban infrastructure and public facilities is identified as a necessary employment land site characteristic in the CIBL/EOA, thus serviceability is a critical site characteristic for determining whether a particular parcel of land is suitable to meet the City's specified employment needs. Specific infrastructure needs for Springfield's target industries are summarized on page 161 and further explained in CIBL/EOA Chapter on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

OAR 660-024-0060(8)

OAR 660-024-0060(8) requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Part of the OAR 660-024-0060(8) analysis requires the City to determine which lands cannot reasonably be provided with urban services due to physical constraints [ORS 197.298(3)(b)]. To conduct the next step of the boundary alternatives analysis, the City excluded lands that cannot reasonably be provided with public infrastructure, facilities and services due to physical constraints [ORS 197.298(3)(b)]. The City identified the following factors as significant physical constraints to providing the public services necessary to develop employment land sites. As these factors preclude or place limitations on serviceability, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050:

- Physical separation from existing water and wastewater service mains by the McKenzie or Willamette River

- Physical separation by distance to existing or planned public facilities, service connections and service areas
- Slopes as identified in the CIBL/EOA: 5% or less for Manufacturing, 7% or less for High Tech and Campus Manufacturing
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible construction of functioning gravity flow systems.
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible connection of employment sites to Federal or State truck routes. As identified in the CIBL/EOA, “most businesses in Springfield typically locate within one mile of Interstate Highway 5 or ½ mile of a state highway.”
- Topographic, geographic or geological constraints that physically preclude or significantly impede construction of an interconnected transportation system, including the provision of transit service and accessible, multi-modal access to employment sites
- Stormwater basin capacity constraints, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.
- Wastewater system capacity constraint, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.

Others parts of the OAR 660-024-0060(8) analysis require the City to consider, evaluate and compare potential service and capacity impacts to existing or planned facilities and services that serve land already in the UGB. In this step the City determined whether potentially suitable lands can physically be served. This includes consideration of whether facilities and services are physically possible given how such facilities and services would impact capacities of existing and planned facilities and services. OAR 660-024-0060(8) provides a list of facilities and services that must be addressed in the public facilities and services comparative analysis:

OAR 660-024-0060(8)

“The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system. “Coordination” includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation must include:

(a) The impacts to existing water, sanitary sewer, stormwater and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

As stated in OAR 660-024-0060(8)(a-c), impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Thus such impacts and needs are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050 and are identified in Table 4.

Extending public water and wastewater and would impact existing services primarily by adding flows to existing mains or via new mains. Volumes of flows to the MWMC sewage treatment facility would increase. Water quality regulations will require pretreatment of discharges. Additional water volume needs would increase SUB water treatment needs. As stated in Table 4, extension of mains is not physically possible in some areas.

Adding vehicular trips to serve industrial and commercial land uses would impact existing roads and bridges primarily by increasing traffic and by creating physical stress on roadways not designed and constructed to withstand heavy truck and public transit buses. Road maintenance needs would increase as facility size and length increases. Operational costs would increase as facility size, length and distance from operations centers increases. Adding additional stormwater flows to receiving streams and rivers would impact capacity of facilities that serve nearby areas already inside the UGB. For example, the Cedar Creek basin (Far East study area) is already nearing capacity while the easternmost portion of the UGB that drains into that basin is yet to be fully developed. Most areas in the UGB study are outside of existing City drainage basins. Water quality regulations will require pretreatment of all discharges.

Expansion of the water, wastewater and stormwater systems will create additional maintenance needs, increasing overall systems maintenance needs.

Industrial and commercial development would generate need for transit service. Increasing industrial and commercial development in an area is likely to result in an increase in transit service to an area that could benefit the overall system as well as end users in an area.

The City evaluated these impacts when it identified existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB in Table 5 (page 237-251). Table 5 identifies substantial infrastructure needs to serve exception land.

For the purpose of evaluating impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 2.

For the purpose of evaluating serviceability of parcels within the second priority [ORS 197.298(3)(a)] category, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 5.

For each Study Area general geographic grouping, the City engineers, service providers, and ODOT staff provided an assessment of facilities that would likely require upgrading or replacement in order to provide additional capacity to serve development beyond the existing UGB. Those assessments are listed in Table 5.

The City's evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations was conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable second priority exception land by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints, Table 3: Second Priority Land Public Services Analysis Summary, and Table 5 Second Priority Land Public Facilities and Services Analysis Summary. Based on this compilation of input and data, and the facilities plans described in pages 212-235, the City determined whether a parcel or group of exception parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 5: Second Priority Land: Public Services Analysis Summary. Based on this data, the City determined whether and how providing a parcel or group of second priority exception parcels with the water, sewer/wastewater,

stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 3: Second Priority Land: Public Services Analysis Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of second priority exception parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of second priority land under ORS 197.298.

OAR 660-024-0060 (7)

“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”

Consistent with OAR 660-009-0005(9) : “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.” For land to be reasonably considered as serviceable within the planning period, “orderly and economic provision of public facilities and services” must be possible within the planning period.

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and

how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable second priority exception parcels within the seven geographic areas: McKenzie View, Mohawk, Oxbow/Camp Creek, Far East, Wallace Creek, Jasper Bridge, and Seavey Loop. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of second priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 5 and as further supported by evidence in the record.

The following section of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities to describe the physical location and proximity of existing facilities to potentially suitable parcels and to identify physical or regulatory barriers that would make service extensions difficult or infeasible to support development within the 2010-2030 planning period. As previously noted, this section provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

This section provides additional evidence to support the City's rationale for excluding from consideration the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels in the previous step.

To avoid unnecessary redundancy within this report, the following information identifies information used by the City to identify and compare public infrastructure, facilities and services deficiencies through the remainder of this boundary location alternatives analysis. Thus, this section provides additional evidence to support the City's rationale for excluding lands from consideration in the previous steps and subsequent steps.

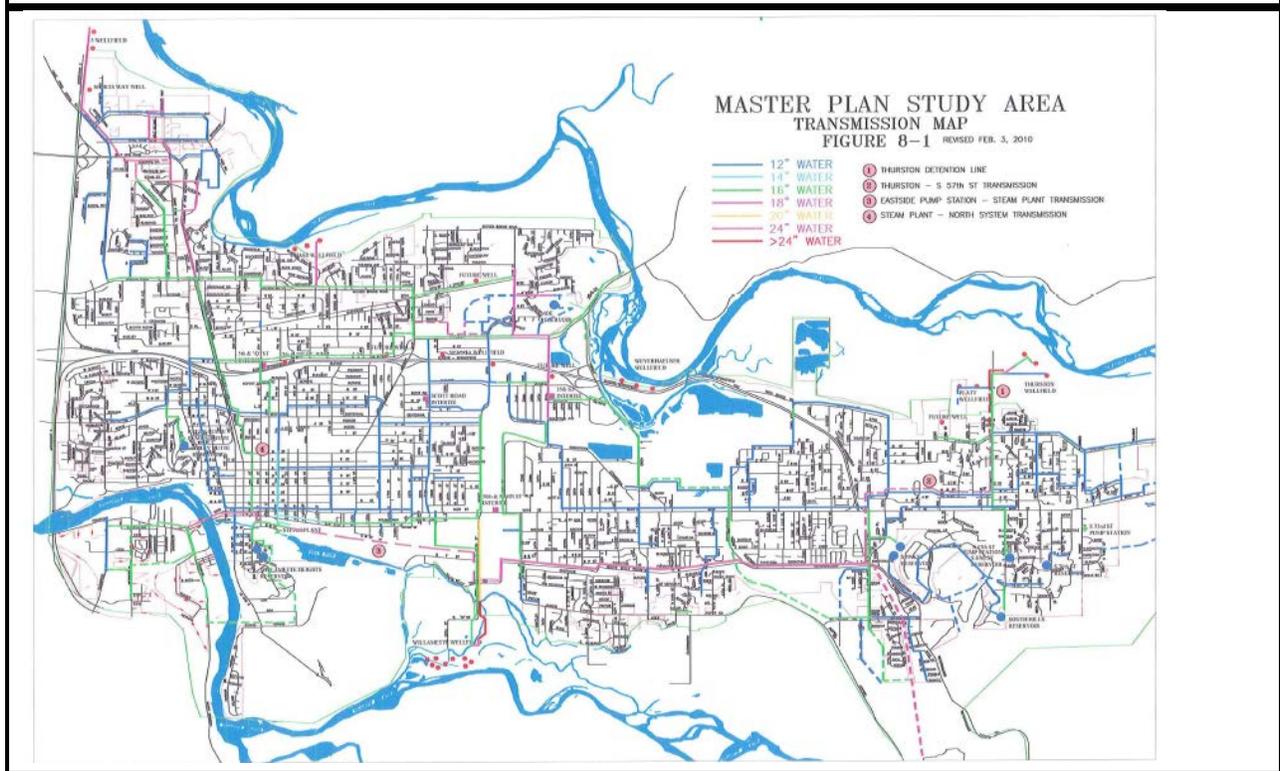
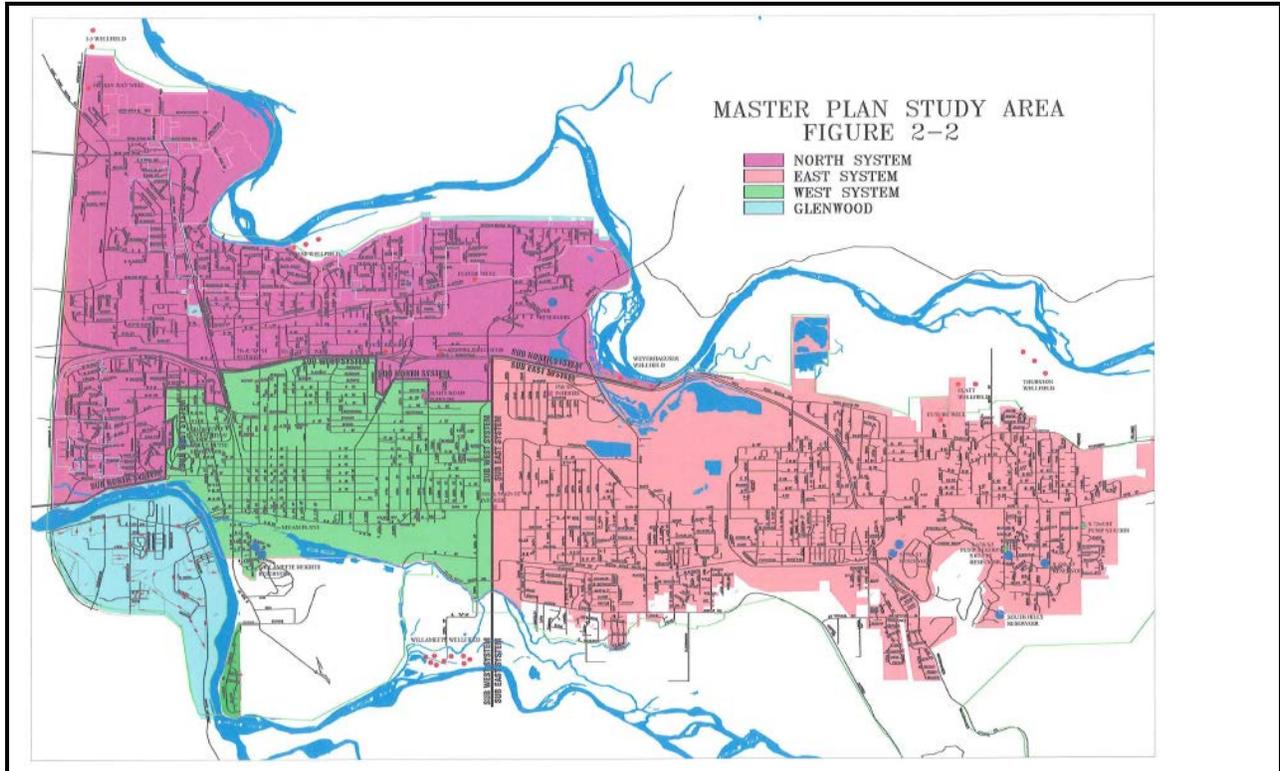
The City incorporated maps and data from City, Eugene-Springfield Metro area and Lane County facilities plans and service provider plans to complete the Public Services Analysis, including but not limited to:

Water

- *Water System Master Plan for Springfield Utility Board, April 2010*
- *Springfield Utility Board & Rainbow Water District Water Management and Conservation Plan, 2012*

The following map provides a general depiction of the existing water system in the area.

Existing Water System, Master Plan for Springfield Utility Board, Figures 2-2 and 8-1



The preceding maps depict the extent of SUB/Rainbow existing water system in 2010 and are included to explain how waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

In addition to the water system depicted above, the Willamette Water Company currently provides water service to the Seavey Loop/Goshen area by purchasing water from Eugene Water and Electric Board (EWEB), and transmitting water through its system from Bloomberg Reservoir, west of I-5, to homes and businesses. The company owner's representative submitted information into the record describing the existing system, and the owner confirmed the accuracy of information submitted.³⁶ A company representative also participated in the College View Study Area Stakeholder Working Group.³⁷

Oregon Dept. of Water Resources staff Michael Mattick provided information about Willamette Water Company:³⁸

- Has water right for 4 cfs, and is currently using 0.43 cfs. as of May 21, 2014.
- Has a permit valid through October 1, 2040 (Permit S-50877)
- Buys treated water from EWEB and runs it through their piped system
- Serves 148 connections, and estimated 444 users; expects 541 connections serving 1,620 in 2040.

Consistent with Metro Plan policy, it is SUB's position that if lands in Seavey Loop/College View area were added to the UGB, "they would be served by SUB, as municipal water providers take over service once an end user is annexed,"³⁹ "Short term, they may continue to be served by their incumbent water provider. As in the past, for efficiency SUB is open to providing a transition to SUB service sooner rather than later."

Sanitary Sewer

- *City of Springfield Wastewater Master Plan*, June 2008, prepared by CH2MHill

The following map provides a general depiction of the existing wastewater system in the area.

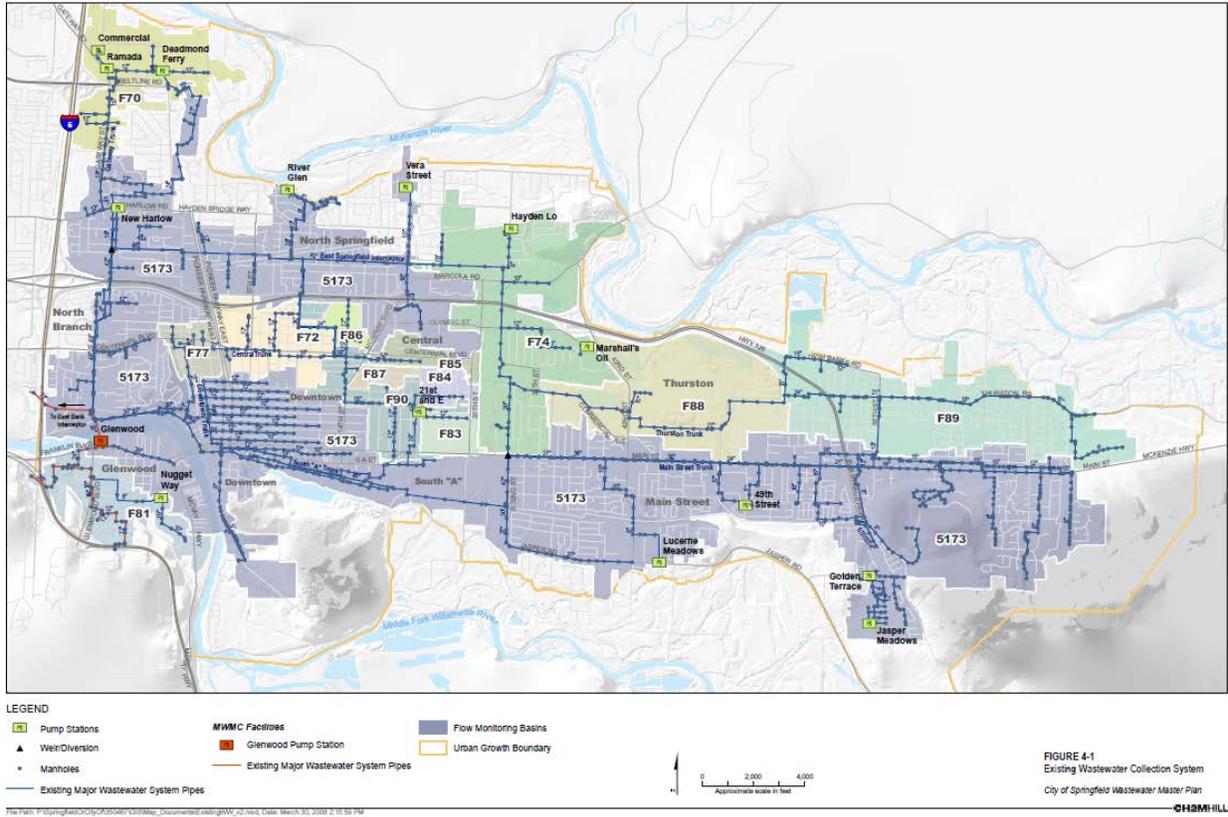
Existing Wastewater Collection System, City of Springfield Wastewater Master Plan Figure 4-1

³⁶ Letter from Bill Kloos to City of Springfield and Lane County Planning Commissions, Feb. 17, 2010; and email to staff Pauly from Greg Demers, June 21, 2013.

³⁷ Stakeholder Working Group meetings were held on Feb. 11, 2015, February 25, 2015, and March 4, 2015.

³⁸ Meeting with staff Pauly on May 20, 2014; email and attached copy of S-50877 permit to staff Pauly on May 21, 2014.

³⁹ Email from SUB General Manager Jeff Nelson to staff Pauly, May 23, 2014



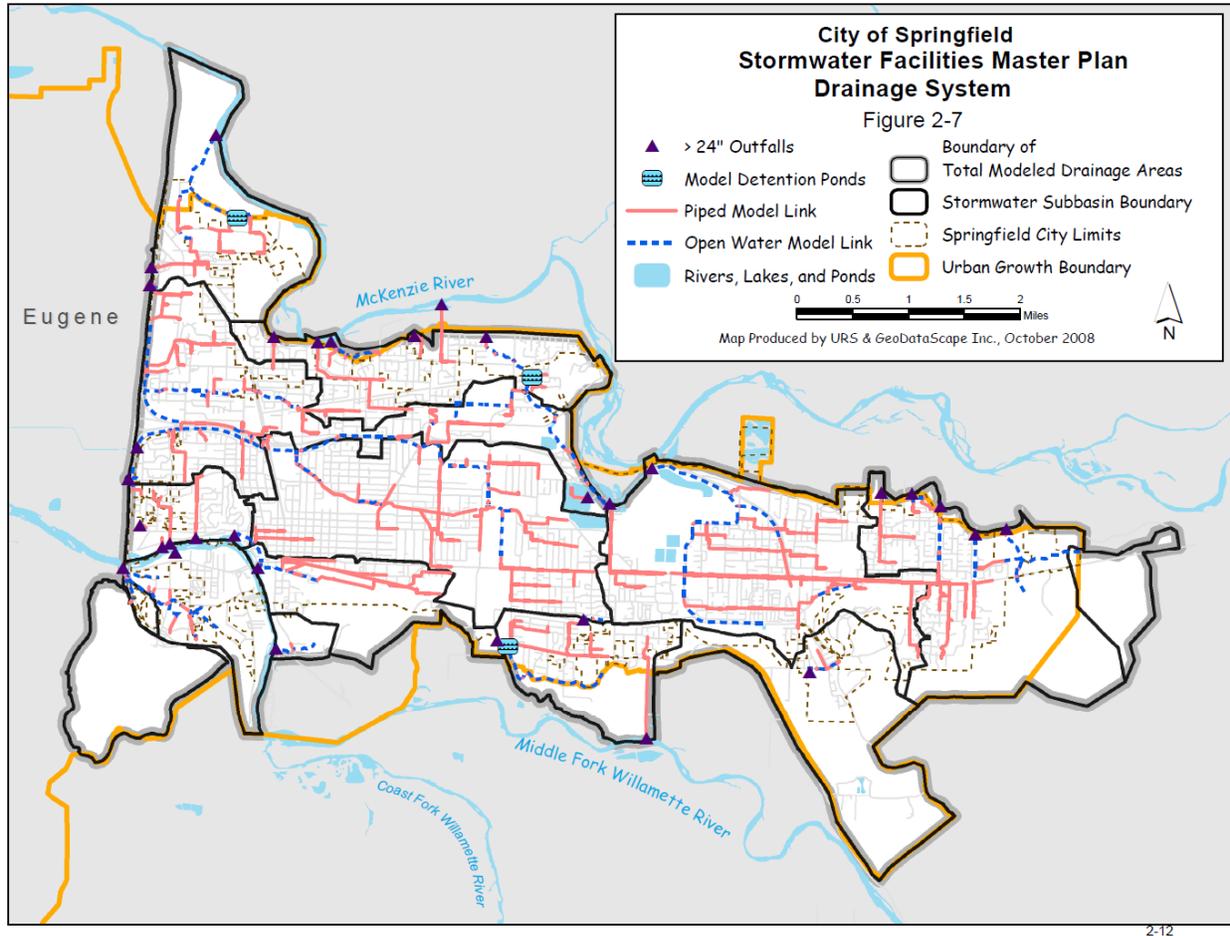
The preceding map depicts the extent of the existing wastewater service area and system in 2008 and explains how topography, waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Management

- *City of Springfield Stormwater Facilities Master Plan, Oct. 2008, prepared by URS*

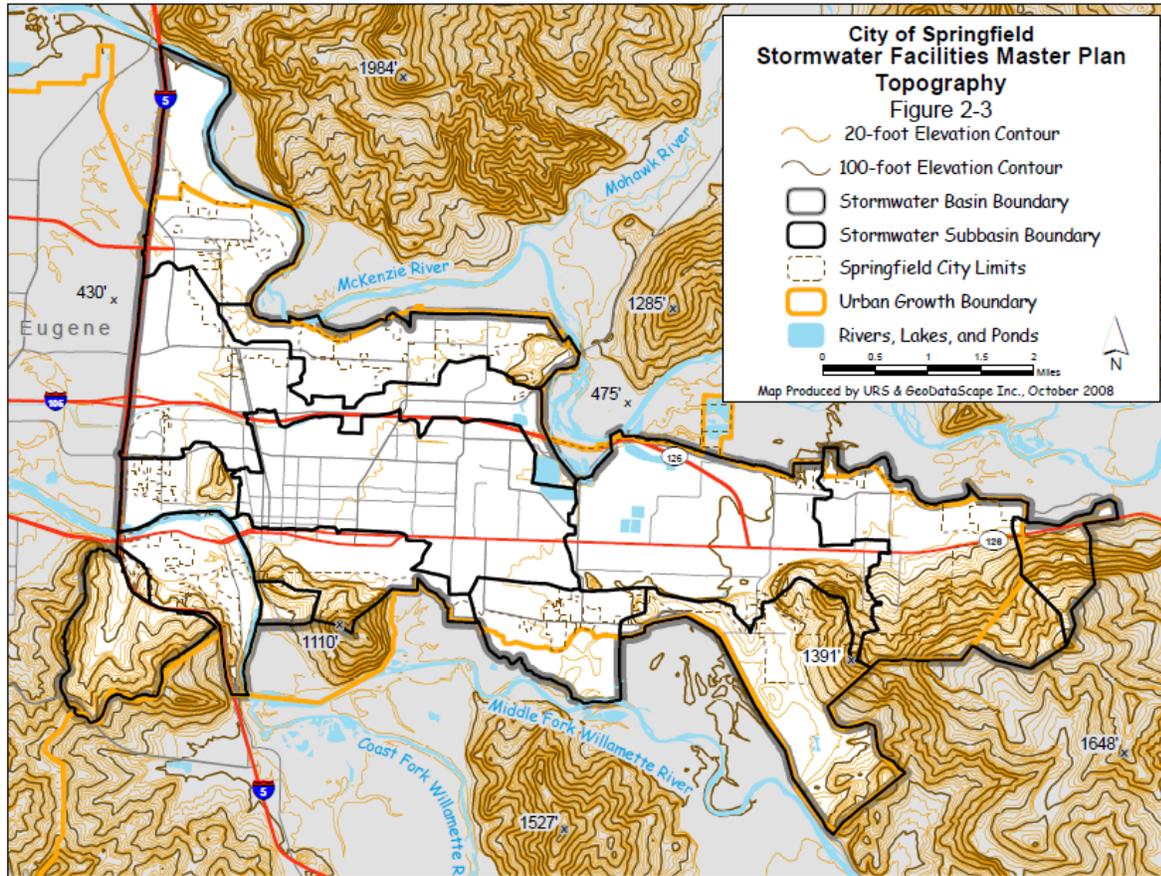
The following map depicts the extent of the existing stormwater drainage system, including outfalls, in 2008 and explains how topography, waterways, outfalls to waterways, and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB. The City’s findings under Goal 11 provide more information about stormwater management facilities and applicable policies.

City of Springfield Stormwater Facilities Master Plan Figure 2-7 Drainage System



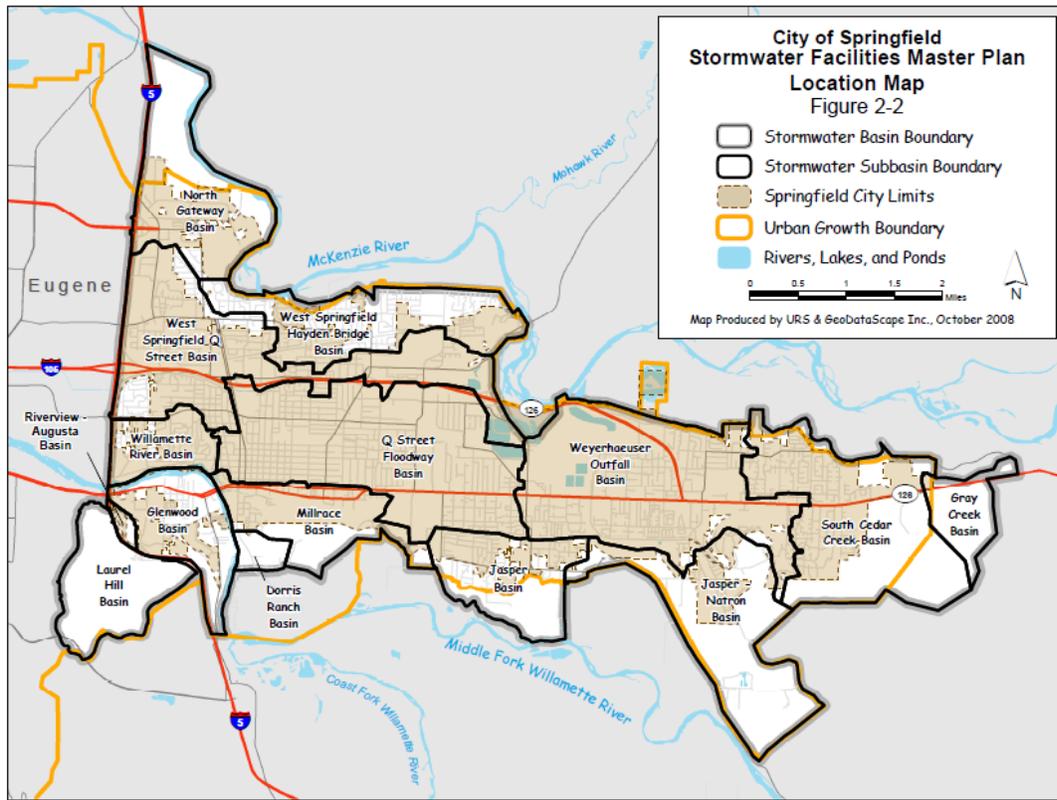
The following map depicts topography surrounding the UGB to demonstrate how topography presents constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-3 Topography



The following map depicts the extent of the existing stormwater service area and system in 2008 to explain how topography, waterways, gravity flow and distance influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-2 Basin Location



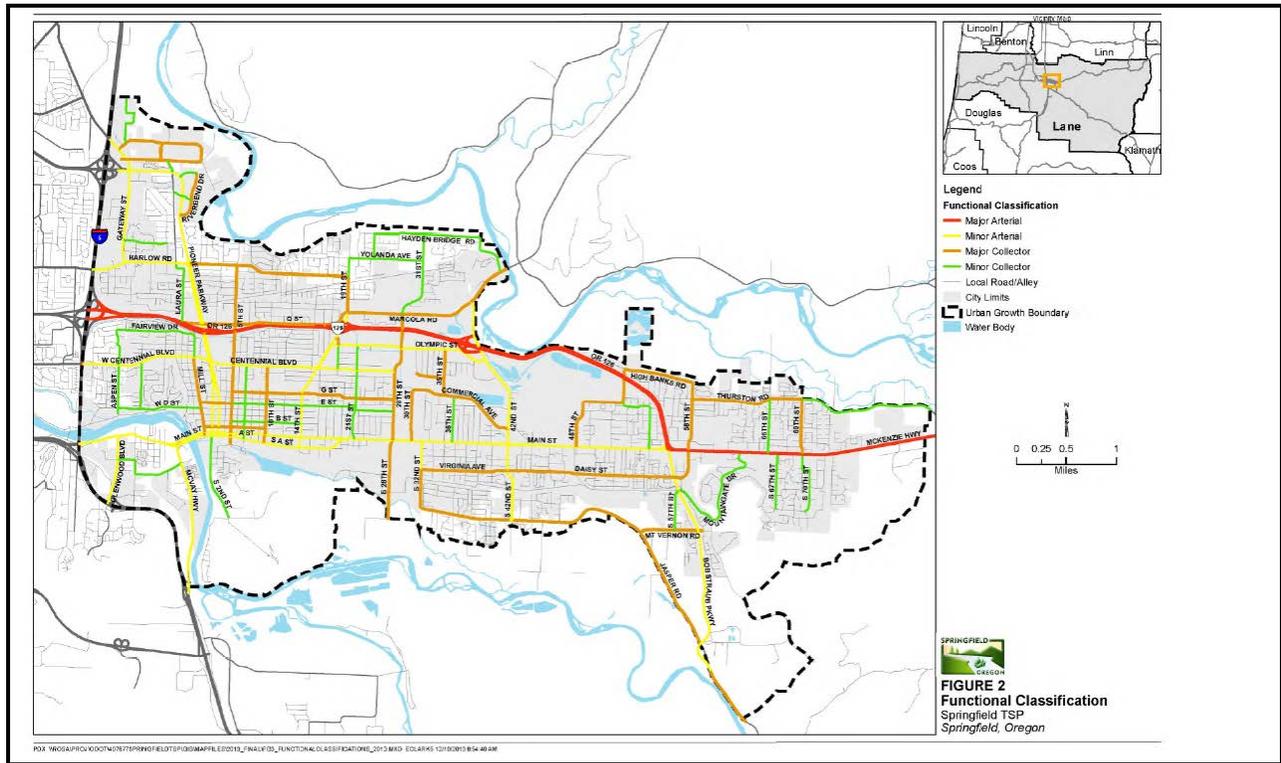
Transportation

- 2004 Lane County Transportation System Plan
- Lane County Roads Inventory
- 2035 City of Springfield Transportation System Plan
- 2002 Eugene-Springfield Transportation System Plan (TransPlan)
- Central Lane MPO Regional Transportation Plan

The following maps provide general depictions of the existing transportation system in Springfield and in the areas outside the UGB. The City’s findings under Goal 12 provide more information about transportation facilities and applicable policies.

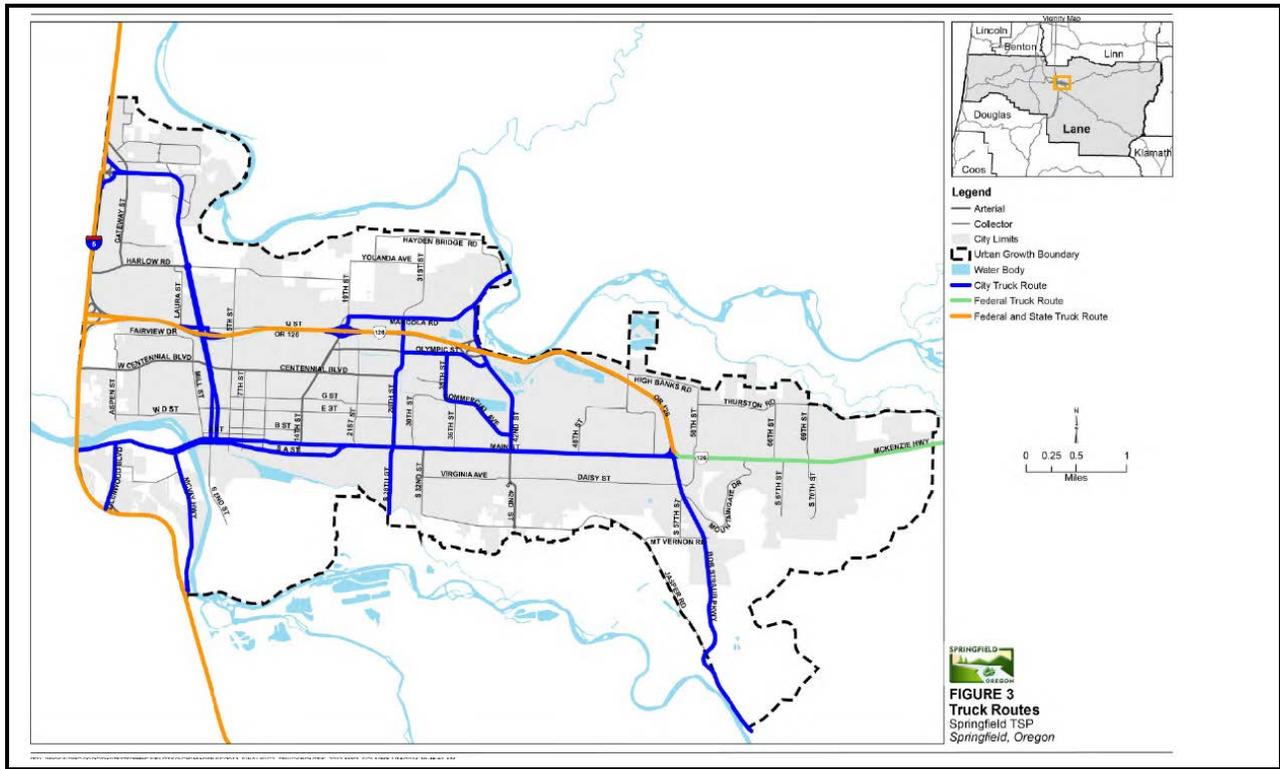
Springfield TSP Map Functional Classifications (2014) depicts the existing transportation system backbone to compare the location of existing facilities in relationship with lands outside the UGB. Lack of transportation facilities is a constraint that influences and place limitations on potential service extensions to lands beyond the existing UGB.

Springfield TSP Functional Classifications (2014)



The following map depicts existing Federal, State, and Local truck routes to compare the location of existing facilities in relationship with lands outside the UGB. Location relative to transportation facilities that are designated, designed and built to support truck traffic is a consideration that influences and place limitations on potential service extensions to serve industrial and commercial lands within and beyond the existing UGB.

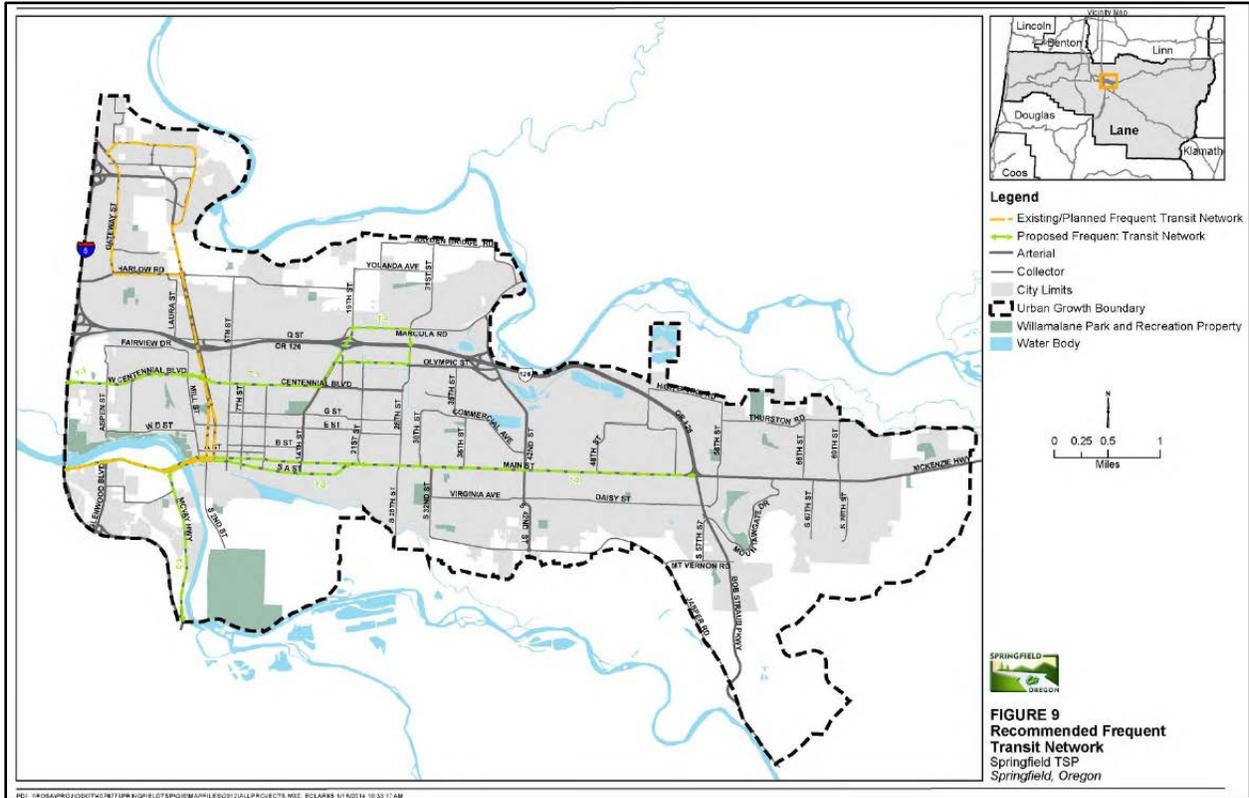
Springfield TSP Truck Routes



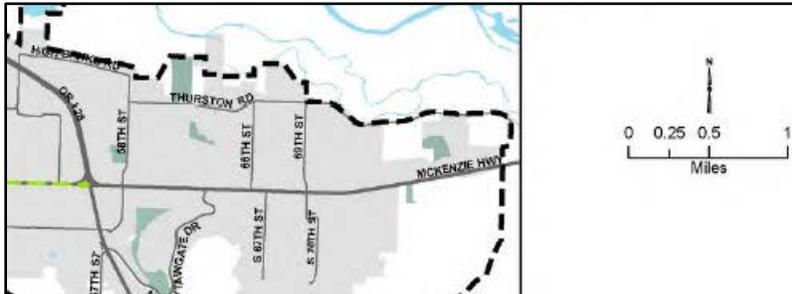
Planned Frequent Transit Service Network. The following map depicts the existing and planned frequent transit network to compare the location of existing and planned transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to

serve urban development is an important consideration to ensure that new employment areas are accessible to the population, including the transportation disadvantaged.

Springfield TSP Figure 9 Recommended Frequent Transit Network



As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.3 miles west of the eastern UGB extent on Main Street/Highway 126.



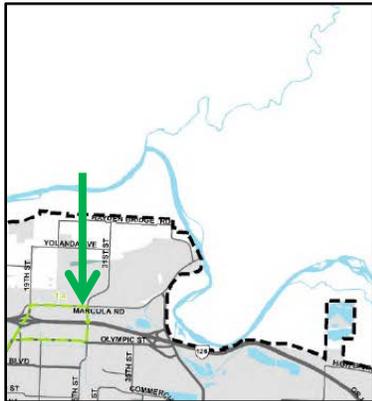
Detail of Springfield TSP Figure 9 Recommended Frequent Transit Network map

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is currently located approximately 0.25 miles from the northern extent UGB (International Way/Maple Island Rd.).



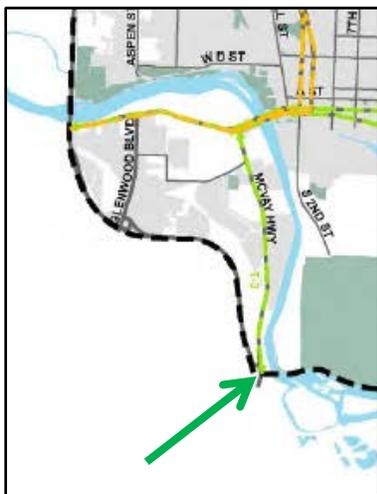
Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 1.25 miles to the northern extent of the UGB at Marcola Rd/Hayden Bridge.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to the southern extent of the UGB at McVay in Glenwood.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend on Main Street approximately 0.75 miles from the southern extent of the UGB at South 28th Street and

on South A approximately ½ mile from the UGB. Existing frequent transit service is on Main Street.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.75 miles to the southeastern extent of the UGB at Jasper Road.

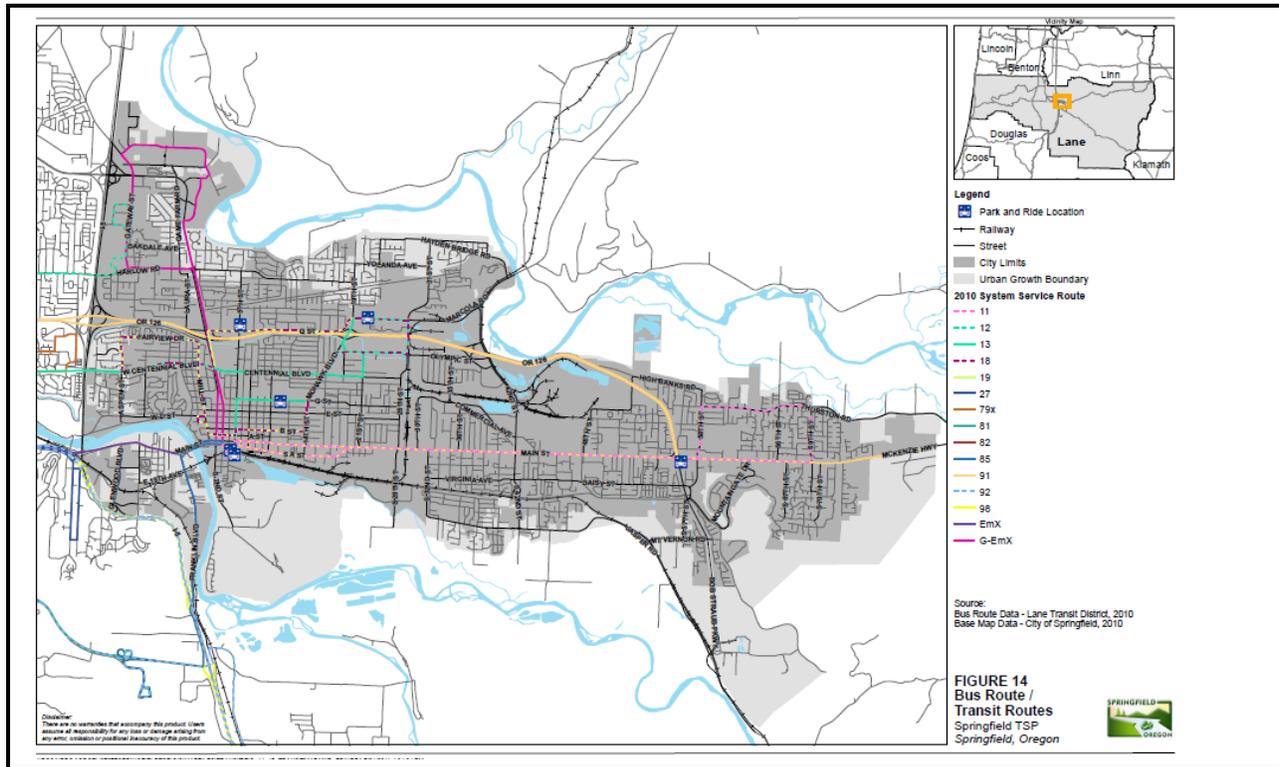


Detail of Springfield TSP Figure 9

Existing Transit Service Routes

The following map depicts existing bus/transit routes operating in 2010 to demonstrate the location of existing transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to serve urban development is an important consideration to ensure that new employment areas are accessible to the population.

Springfield TSP Existing Conditions Bus Routes/Transit Routes



As shown in the following details of the Lane Transit District System Map, three exception areas — the Far East, Seavey Loop/Goshen and Jasper Bridge B — are currently served by the public transit system or have existing routes in the vicinity of the exception area.

In 2010, Route 91 McKenzie Bridge provides service along East Main/Highway 126 via Route 91 with limited service and trips:

91 - McKenzie Br - Route Description

The route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on 7th Avenue. The bus crosses the Ferry Street Bridge and travels on I-105/Highway 126 to arrive at Thurston Station (Bay B). It continues along Main Street/Highway 126 to serve Walterville, Leaburg, Vida, Nimrod, Finn Rock, Blue River, McKenzie Bridge and McKenzie River Ranger Station. To return the bus travels on the same route to Eugene Station.

During morning trips the bus serves McKenzie River Drive between Blue River and McKenzie Bridge before arriving at the Ranger Station. After noon, this area will be served after departing from the Ranger Station to head back to Eugene Station

Route Variation: The weekday 5:30 PM trip; the route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on Broadway which becomes Franklin Boulevard where it serves the Onyx Street. Franklin Boulevard becomes South

A Street where the bus serves Springfield Station (Bay H). The bus continues East down South A Street to Main Street until reaching Thurston Station (Bay B). The bus travels on regular routing after Thurston Station.

The weekday 6:14 AM trip which begins at the McKenzie River Ranger Station and follows the same limited routing in reverse upon reaching Springfield Station. However, the bus travels from Franklin Boulevard East on 11th to Eugene Station.

Route 91 Map



Routes 91 and 11 detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 91 transit service to eastern UGB extent. UGB is indicated by light gray.



As shown in the following description and route map detail of the Lane Transit District System Map, Route 92 Lowell/LCC provides limited service and trips connecting Eugene, Pleasant Hill and Lowell via Franklin Blvd. in the vicinity of the Seavey Loop/Goshen exception area, and following Highway 58 in the vicinity of exception area Jasper Bridge B:

92 - Lowell/LCC - Route Description⁴⁰

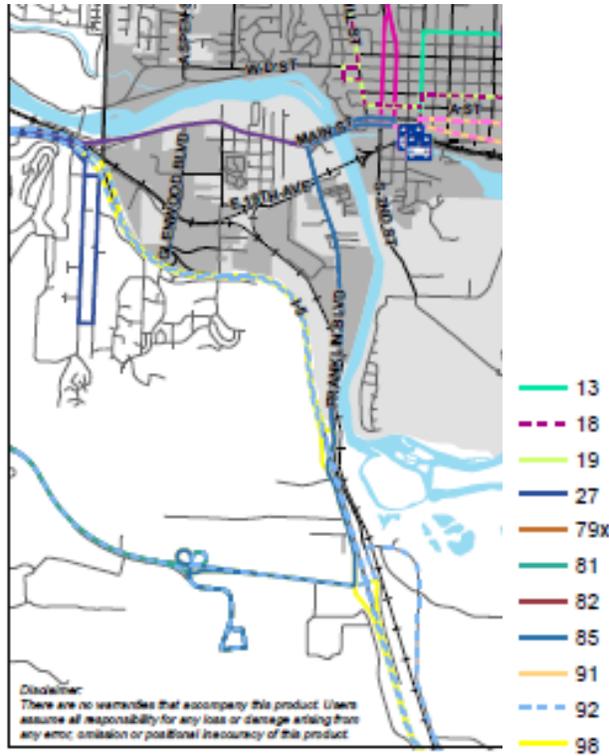
The route begins at Eugene Station (Bay I) and travels South on Willamette Street, East on 13th Avenue, and South on Pearl Street where it serves the West side of South Eugene High School before continuing South on Amazon Parkway. Upon reaching Amazon Station (Bay C), the bus turns East and travel on 30th Avenue to the Lane Community College exit, and South on Gonyea where it serves Lane Community College Station (Bay E), and Main Campus. The bus departs Lane Community College Station on Gonyea Road and travels East on 30th Avenue across I-5 onto Franklin Boulevard, and travels onto Seavey Loop Road. The bus continues towards Goshen and takes HWY 58 Eastbound where it serves Pleasant Hill. The bus travels North on Pioneer Street to Lowell, crossing Dexter Reservoir, West on East Main Street, North on Moss Street, and East on 2nd Street. The bus turns South on Pioneer Street and continues to Hwy 58 West to travel the regular routing to return to Eugene Station. Route Variation: The 6:32 PM trip leaving Lowell. The bus heads East on Jasper-Lowell Road and resumes on regular inbound routing until the bus reaches 20th Avenue. The 6:32 PM trip does not service LCC. The bus continues West on 30th Avenue and serves Amazon Station (Bay A). It continues North on Amazon Parkway, West on 19th Avenue, North on Oak Street, and West on 13th Avenue where it serves Sacred Heart Medical Center University District and UO Station (Bay B). The bus will head North on Kincaid Street and West on 11th Avenue to Eugene Station.

LTD Route 92 Map

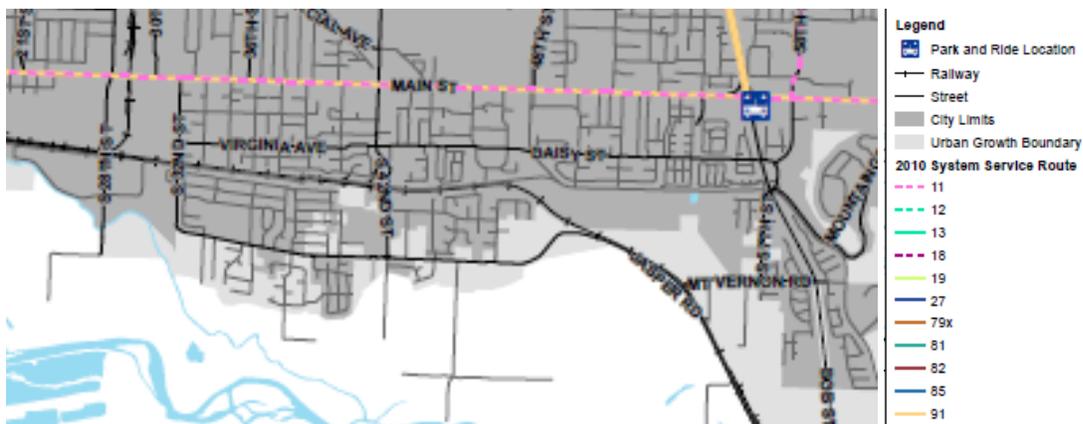


⁴⁰ LTD website <https://www.ltd.org/92-lowell-lcc-route-description/>

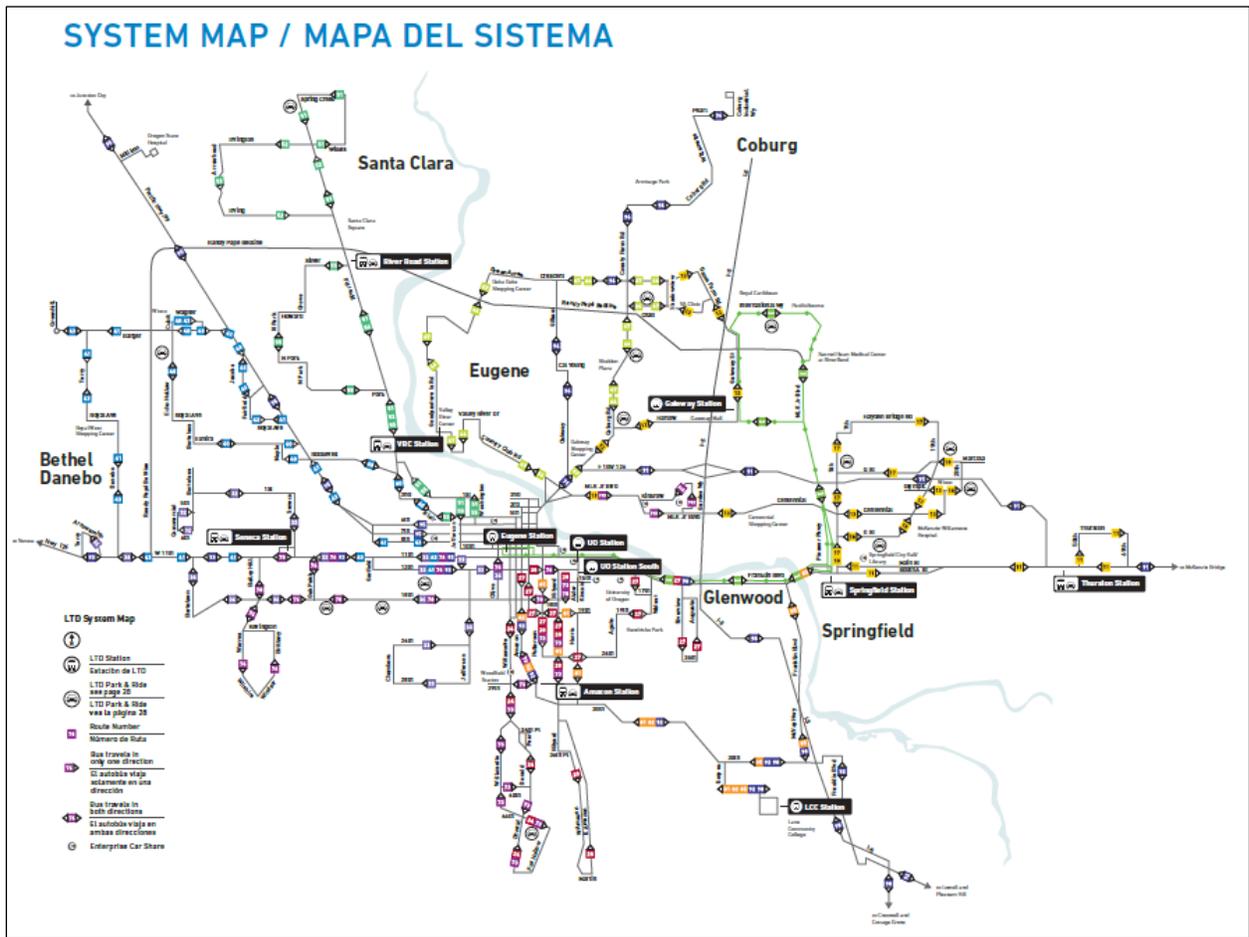
Route 92 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 92 transit service to the southern UGB extent. UGB is indicated by light gray.



Route 11 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the relative location of existing Route 11 transit service to the southern UGB extent along Jasper Road. UGB is indicated by light gray.



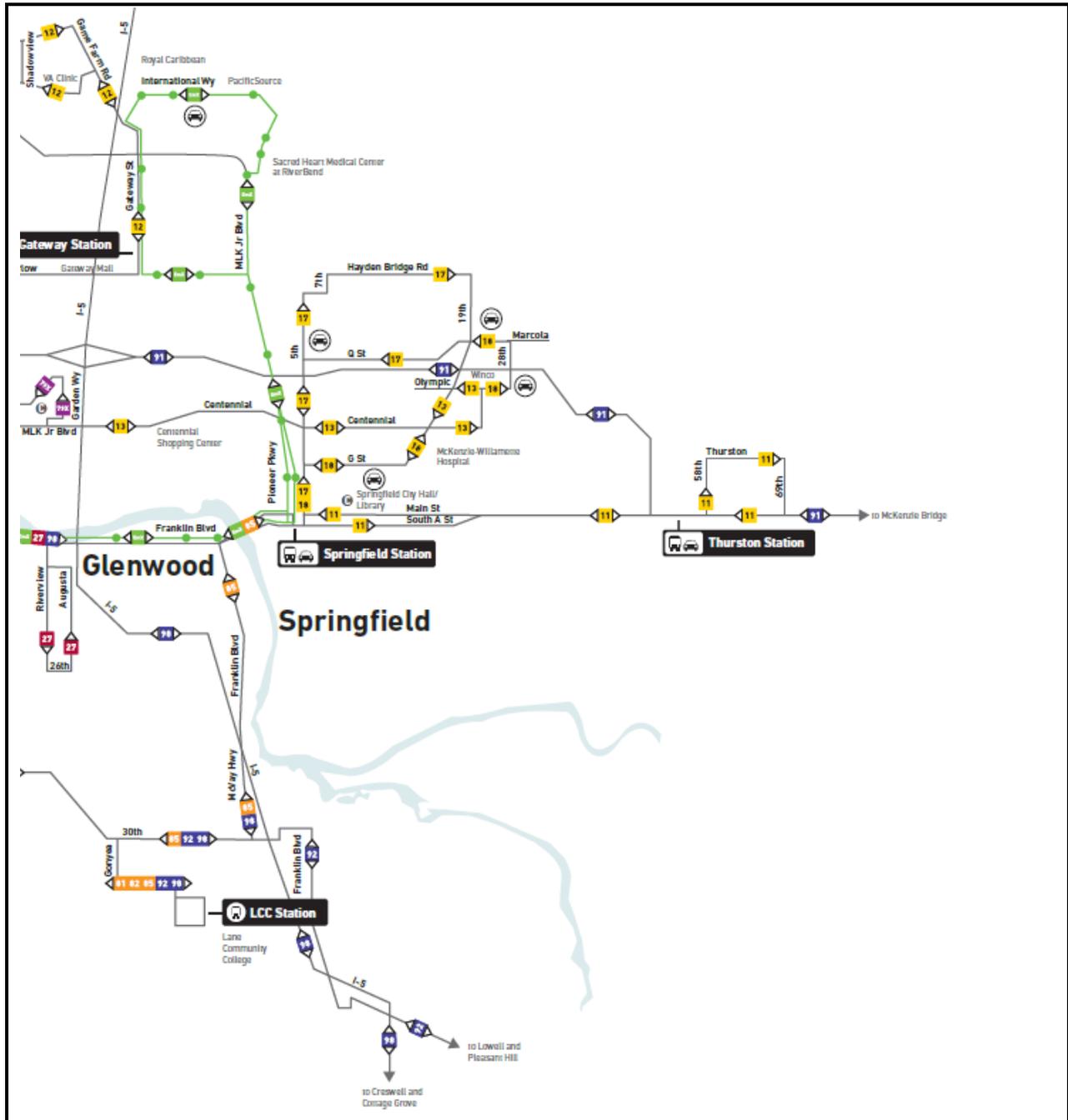
Except where noted above, second and third priority exception and non-resource lands and marginal land areas are located distant to the Lane Transit District System.



⁴¹ Lane Transit District website, <https://www.ltd.org/system-map/>

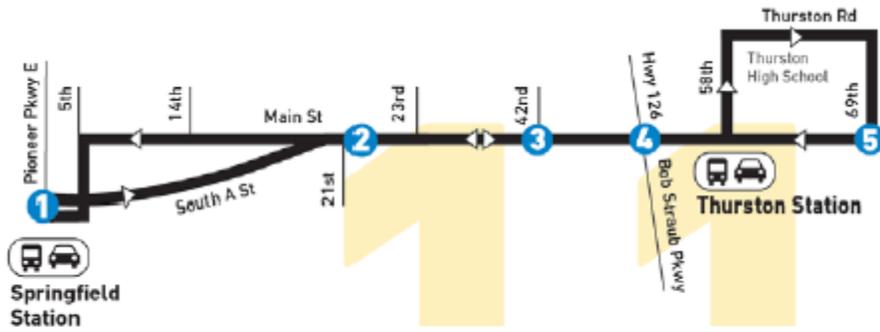
Springfield Detail of Lane Transit District System Map 2015⁴²

Green routes indicate existing EmX Bus Rapid Transit System frequent transit service.⁴³



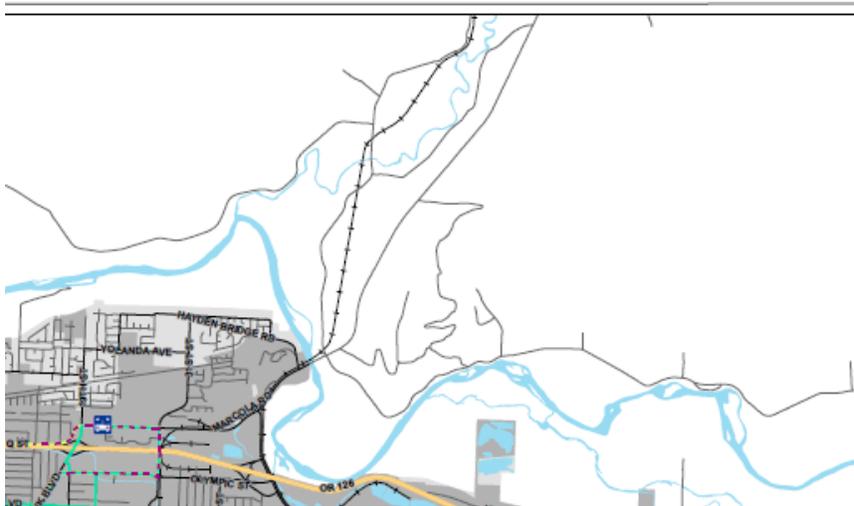
⁴² Lane Transit District website, <https://www.ltd.org/maps-stations-routing/> accessed 2-1-15.

⁴³ The Main Street route study to select a Preferred Alternative for service improvements between Springfield Station and Thurston Station is underway in 2016.

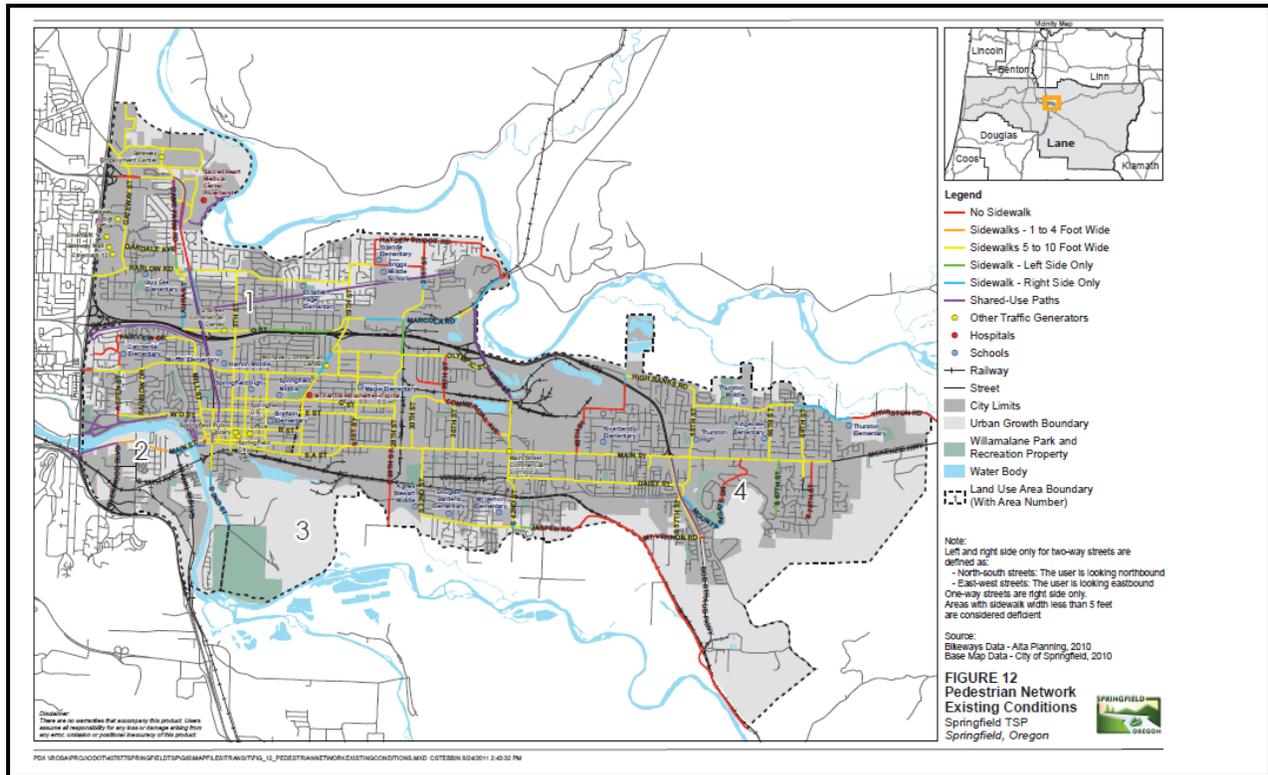


Route 11

Route 11 currently provides services in the Main Street corridor east to 58th Street (Thurston High School) continuing on Thurston Road east to 69th Street and back west to Thurston Station.



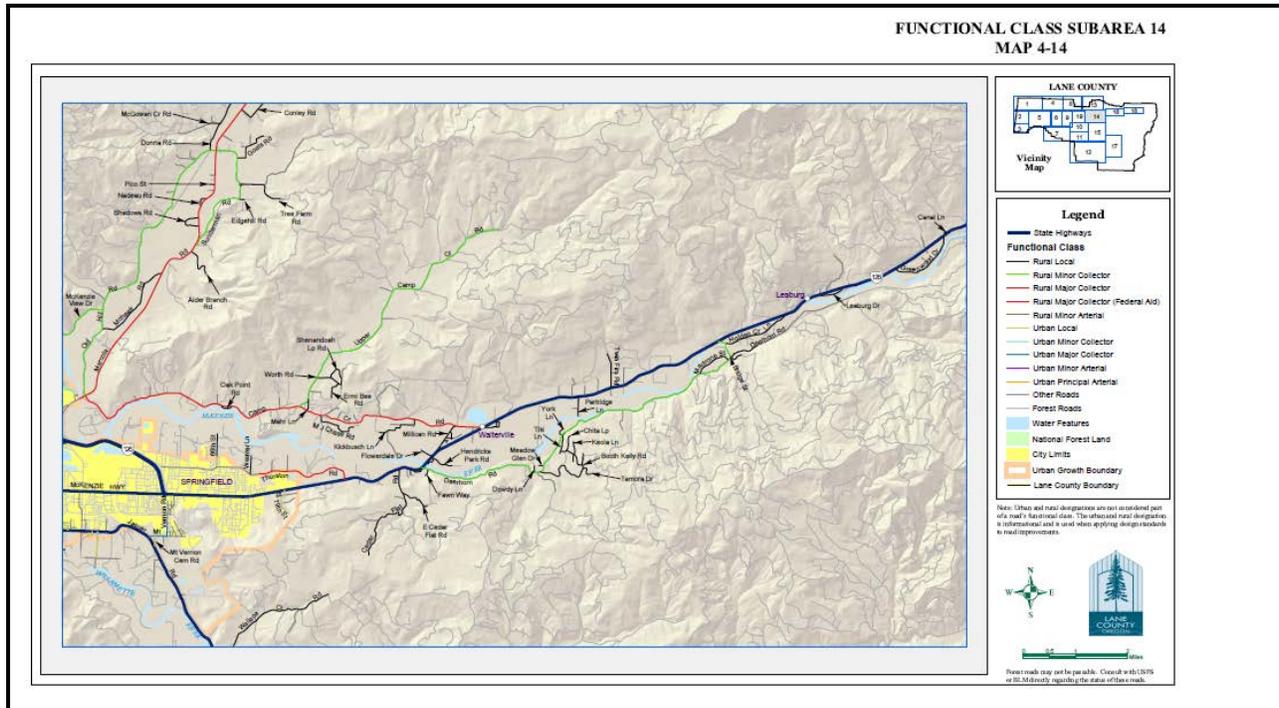
Springfield TSP Existing Conditions Pedestrian Network



The preceding map depicts Springfield’s existing network of pedestrian facilities, as of 2010. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. The accessibility of transit services is dependent upon one’s ability walk safely to and from a transit stop. Proximity to existing and planned networked pedestrian facilities is an important consideration to ensure that new employment areas are accessible to the workforce population, including the transportation disadvantaged and employees who choose alternative modes of transportation.

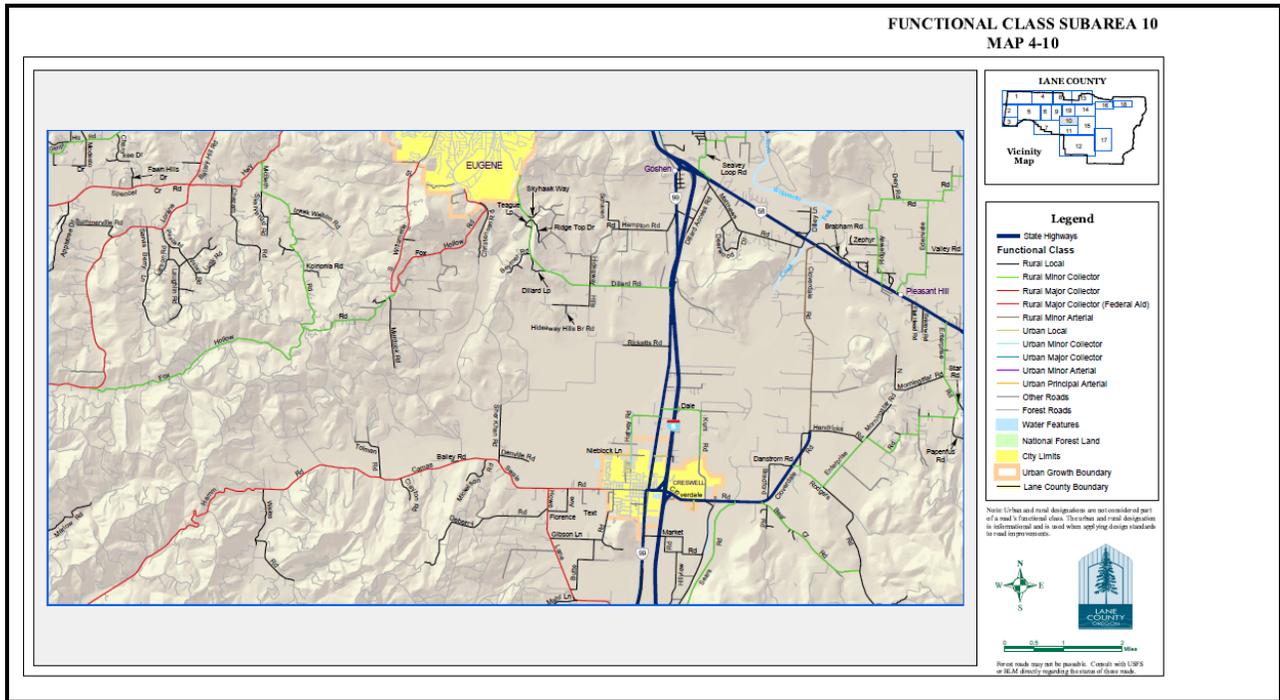
The following maps depict Lane County’s existing transportation system to explain the location of existing facilities in relationship with lands outside the UGB. The maps also depict topography as it relates to the location of the rural road network. Topography is a constraint that influences and places limitations on potential transportation extensions to lands beyond the existing UGB and to potential connectivity with lands inside the existing UGB.

Lane County TSP Functional Class Subarea 14



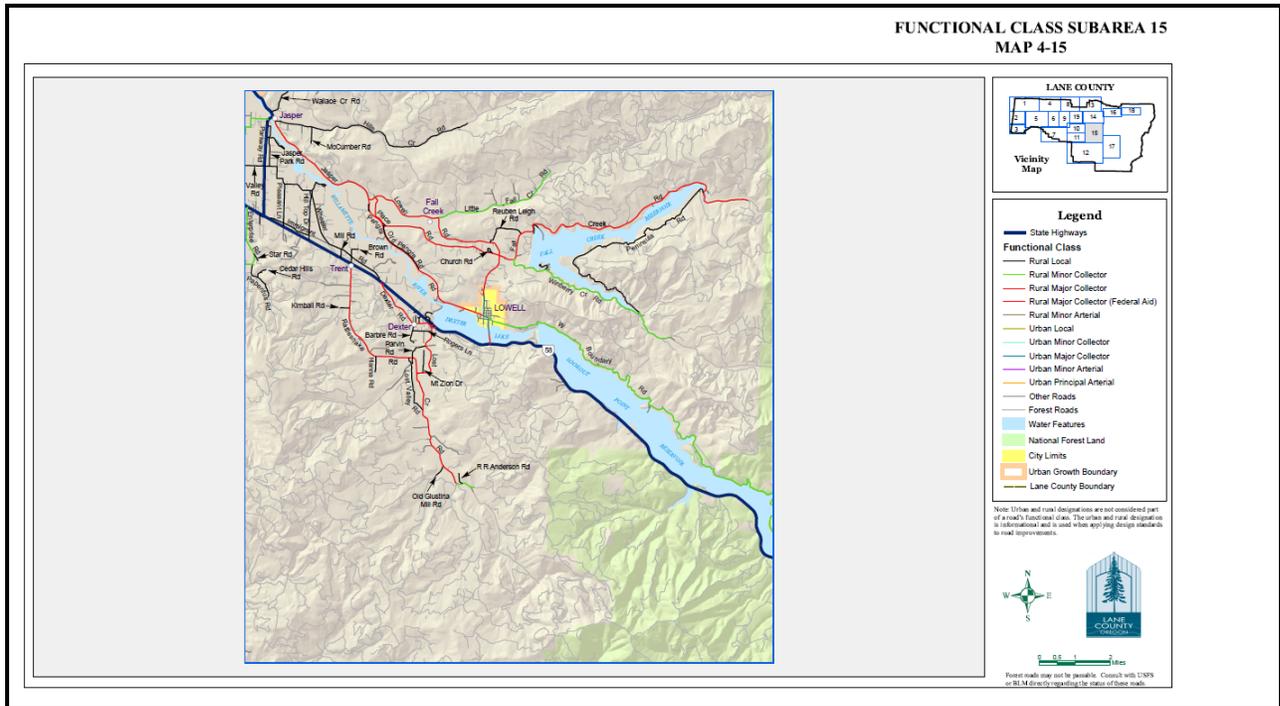
The preceding map depicts Lane County's rural road network proximate to the **Far East, Thurston, Mohawk, Oxbow/Camp Creek, South Hills, Wallace Creek, and Clearwater** second priority exception areas. The preceding map depicts Lane County's rural road network in the vicinity of the **Mohawk, Wallace Creek and Oxbow/Camp Creek** third priority marginal land areas.

Lane County TSP Functional Class Subarea 10



The preceding map depicts Lane County’s rural road network in the vicinity of the **Seavey Loop**, and **Seavey Loop/Goshen** second priority exception areas.

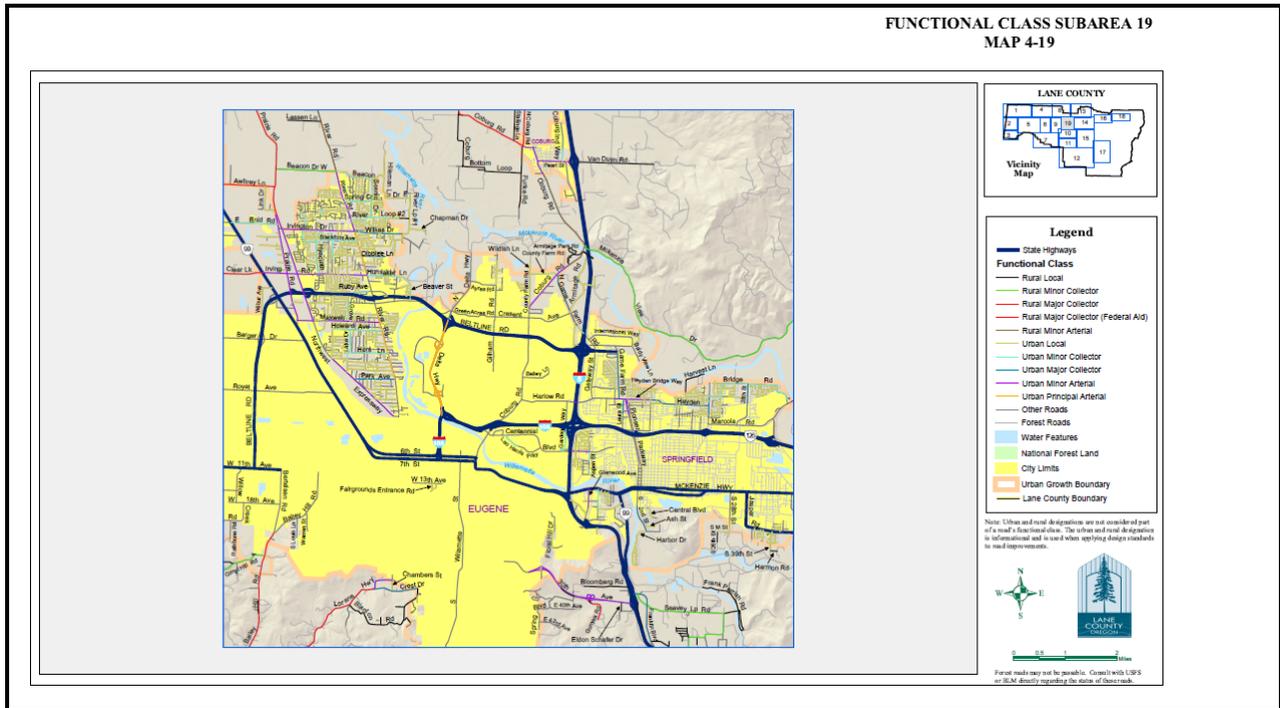
Lane County TSP Functional Class Subarea 15



The preceding map depicts Lane County’s rural road network in the vicinity of the **Wallace Creek** and **Jasper Bridge** second priority exception areas, and Wallace Creek third priority marginal areas.

Lane County TSP Functional Class Subarea 19

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.⁴⁴ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. Cost of service was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude are reasonable and supported by evidence.

⁴⁴ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

Table 5: Second Priority Land Public Facilities and Services Analysis Summary

McKenzie View B Exception Parcels:	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services Would need to bore under river (if permitted) to extend public water service main Nearest water transmission line is a 24" line in the vicinity of 28th Street/Yolanda, approximately 6,000-8000 feet from the parcels
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street. Would need to upgrade Vera pump station. Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Separated from urban services by the McKenzie River No developed system or outfalls in vicinity New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. The McKenzie River is federally classified as critical salmonid habitat.
Transportation (including transit service)	<ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Access to exception parcels from Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 5 miles from UGB at Hayden Bridge. All roads will need improvement to accommodate industrial or commercial development and multi-modal access Upgrade McKenzie View Drive to urban standards and provide capacity improvements Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length."⁴⁵ No transit services, pedestrian facilities or ADA access in area. Same findings as Mohawk re upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
Urban services conclusion/	The City excluded the McKenzie View Exception parcels from consideration because this areas does not provide and cannot reasonably be expected to be provided with

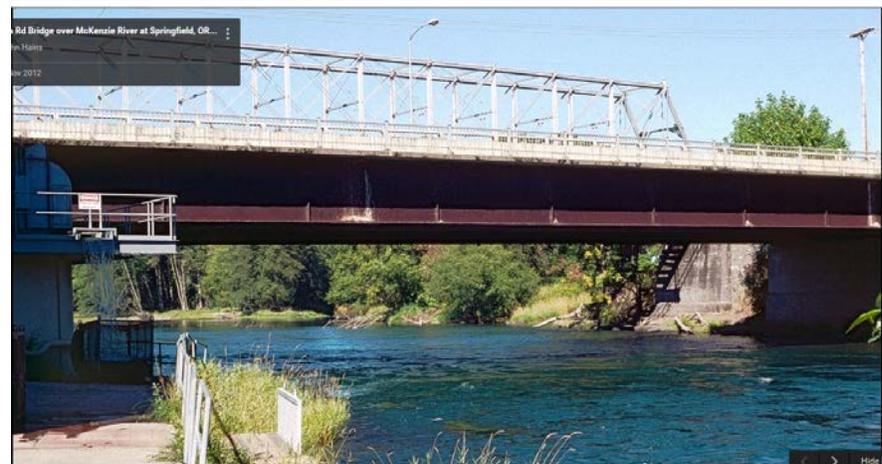
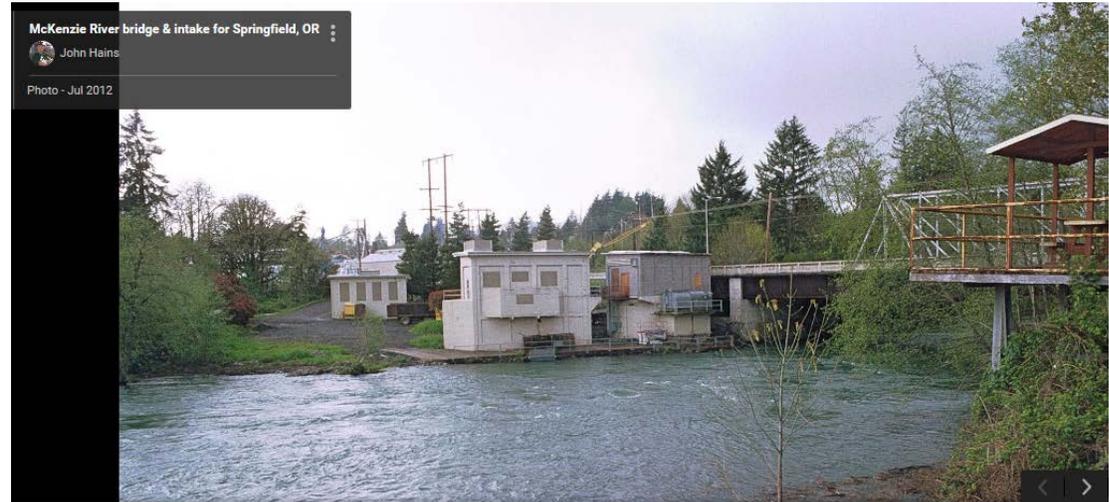
⁴⁵ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

<p>physical constraints McKenzie View Exception</p>	<p>the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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Mohawk A, B, and C Exception Parcels:

<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible⁴⁶ • Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge
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Photos: EWEB Intake at Hayden Bridge and existing Hayden Bridge (Marcola Road crossing McKenzie)



⁴⁶ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Mohawk A, 3 miles to Mohawk B parcels, and 4 miles to Mohawk C parcels • Mohawk C parcels are located more than 2 miles from UGB
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule⁴⁷) • Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake⁴⁸ • No developed system in vicinity • Mohawk C parcels >2 miles from UGB
Transportation (including transit service)	<p>4 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Access to exception parcels from Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide).^{49 50} Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards⁵¹ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange⁵² • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector

⁴⁷ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁴⁸ See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB’s Hayden Bridge McKenzie River water intake facility.

⁴⁹ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

⁵⁰ Source of road widths: Lane County Roads Inventory,

http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

⁵¹ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

⁵² See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system.” Project #R-35 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP, Appendix A, p. 14.

	<p>system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St</p> <ul style="list-style-type: none"> • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Isolated from I-5 interchange. Mohawk A parcels are located 1 mile from Highway 126/I-105, and 5 miles from I-5; Mohawk C parcels >2 miles from UGB • Steep slopes east of Marcola Rd. • Access to Mohawk A, B and C would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁵³ • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: “The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station.”⁵⁴
<p>Urban services conclusion/ physical constraints Mohawk Exception</p>	<p>The City excluded the Mohawk Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in 660-009-0005(9).</p>
<p>Oxbow/Camp Creek Exception Parcels</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest water transmission line is a 16” line Marcola Rd. /Hayden Bridge • River is a barrier to extension of water transmission that makes extension of public water system infeasible⁵⁵ • Same findings as Mohawk

⁵³ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16.

⁵⁴ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

⁵⁵ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Hayden Bridge, and approximately 6,000 feet to the westernmost parcel. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)⁵⁶ • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access to exception parcels from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide). Roads may need improvement to accommodate additional development and multi-modal access: • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁵⁷ • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable
Urban services conclusion: Oxbow/Camp	<p>The City excluded the Oxbow/Camp Creek Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation</p>

⁵⁶ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁵⁷ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

Creek Exception	infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Jasper Bridge Exception Parcels	
Water	<p>A: 5 Difficult B: 4 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Must cross Willamette River with urban services to serve Jasper Bridge A (west side) parcels. • The nearest water transmission line is 2-3 miles from the exception parcels: the 24” “Natron” water line, extended in 2013 to the SW corner of the school district property. The 16” line at Westwind/Linda Lane provides a looped system. • A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • The nearest sewer is 2-3 miles from these parcels. The Jasper Trunk terminus at S. 57th is a 12” main. Nearest 27” main is at 42nd St. Multiple pump stations would be needed, or a new treatment facility if permitting would allow. • Would require pump stations and trunk line extensions to cross Willamette River to serve west side parcels. • Jasper trunk sewer may not have adequate capacity to serve industrial uses, so a new parallel trunk may be necessary • May be more feasible to serve from Pleasant Hill if a public collection/treatment system is developed for that area in the future • Geology may allow boring under river in this location
Stormwater	<p>2 Easier</p> <ul style="list-style-type: none"> • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. This area would be a new basin. • Development of the area may require land acquisition to safely convey stormwater runoff to the river. • Would require new outfall(s) to Willamette River. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access from Jasper Road but urban standards and capacity improvements would be necessary.⁵⁸ • Topography limits expansion of Jasper Rd.

⁵⁸ Project #US-12 Jasper Road-South 42nd Street to northwest of Mt. Vernon Road, and Project # US-13 Bob Straub Parkway – Mt. Vernon Rd to UGB are identified as a “Beyond 20-year Projects,” TSP Projects Located on Lane CO Facilities list, in the 2035 Springfield TSP, Attachment A.

	<ul style="list-style-type: none"> • West side parcels: The existing 1952 metal truss Jasper Bridge⁵⁹ has low service life and would need to be upgraded or replaced to handle increased traffic generation and to provide multi-modal access to Jasper Bridge A west side parcels. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”^{60,61} • Access to west side parcels would route traffic through existing rural residential development on Edenvale Rd. • County facilities Jasper – Lowell Road, Jasper Rd. and Hills Creek Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁶² • Needs internal collector system • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{63 64} • Bob Straub Parkway – Mt. Vernon to UGB needs to be improved to a three-lane cross section with sidewalks and bike facilities.⁶⁵ • No pedestrian facilities or ADA access in area. • Nearest public transit service is at Thurston Station on Main Street, >3 miles away.⁶⁶
<p>Urban services conclusion: Jasper Bridge Exception</p>	<p>The City excluded the Jasper Bridge Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>

⁵⁹ Jasper Bridge (ODOT 04117A) is identified in the ODOT 2015 *Bridge Condition Report* as “Low Service Life”, a candidate for repair or replacement; bridge #07890 at MP 5.64 has timber substructure deficiencies.

⁶⁰ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁶¹ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

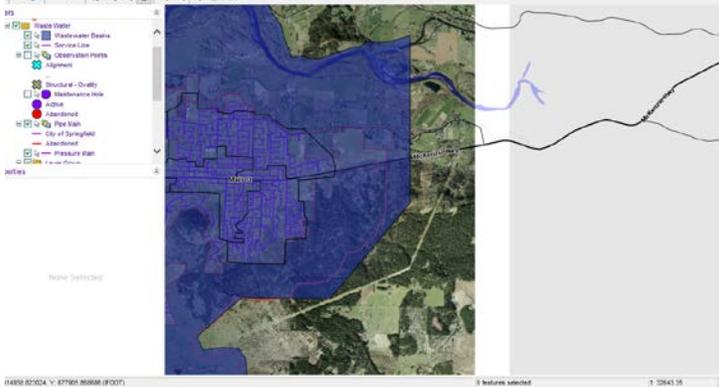
⁶² *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

⁶³ Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁶⁴ Project #R-58 OR 126/52nd St Interchange Improvements and #R-59 and R-43 OR 126/Main Interchange Improvements are identified as “20-year Priority Projects” in the 2035 Springfield TSP, Attachment A, p.9. Est. cost of #43 is 50 million.

⁶⁵ Project #US-13 is identified as a “Beyond 20-year Project,” list of TSP Projects Located on Lane CO Facilities, Springfield 2035 TSP, Attachment A.

⁶⁶ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

Far East Exception A and B Parcels	
Water	<p>A: 1 Easier</p> <ul style="list-style-type: none"> The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126, approximately ½ mile from exception parcel 1702336241500. <p>B: 5 Difficult</p> <ul style="list-style-type: none"> Separated from urban services by distance and topography. The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126. Distant from SUB service area. Higher elevation would require pumping and reservoir.
Wastewater	<p>A: 1 Easier</p> <p>B: 5 Difficult - Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). Steep slopes south of McKenzie Hwy/Main St.  <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Far East, Thurston and Oxbow/Camp Creek areas</p>
Stormwater	<p>A: 3 Medium Difficult</p> <p>B: 5 Difficult</p> <ul style="list-style-type: none"> No developed system in vicinity Cedar Creek drainage basin is nearing stormwater receiving capacity^{67, 68} (unfunded upgrade project is identified in CIP). No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)⁶⁹

⁶⁷ City of Springfield Stormwater Facilities Master Plan, Oct. 2008; City of Springfield Stormwater Management Plan, updated 2010, <http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf>, accessed 2/8/16.

⁶⁸ City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

⁶⁹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered "essential fish habitat" for threatened and endangered species (Table 11, p. 20).

	<ul style="list-style-type: none"> • Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically⁷⁰ requires 8-10% of parcel area.
Transportation (including transit service)	<p>A: 1 Easier</p> <p>B: 5 Difficult. Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> • Access to A and B from E. Main Street/McKenzie Hwy (State Highway) and Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB⁷¹ • Intersection improvements at Thurston Rd. and E. Main St. • Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{72, 73}
Urban services conclusion: Far East Exception	<p>Far East Exception A parcels were considered physically serviceable during the 20-year planning period ending 2030, as defined in OAR 660-009(9). The relative proximity of the easternmost parcels in this area to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. The City excluded the Far East Exception B parcels from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as</p>

⁷⁰ Eugene Stormwater Management Manual “Simplified Method”, Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

⁷¹ Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of \$4,800,000.

⁷² Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷³ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A.

defined in OAR 660-009-0005(9).

Wallace Creek Exception Parcels

Water

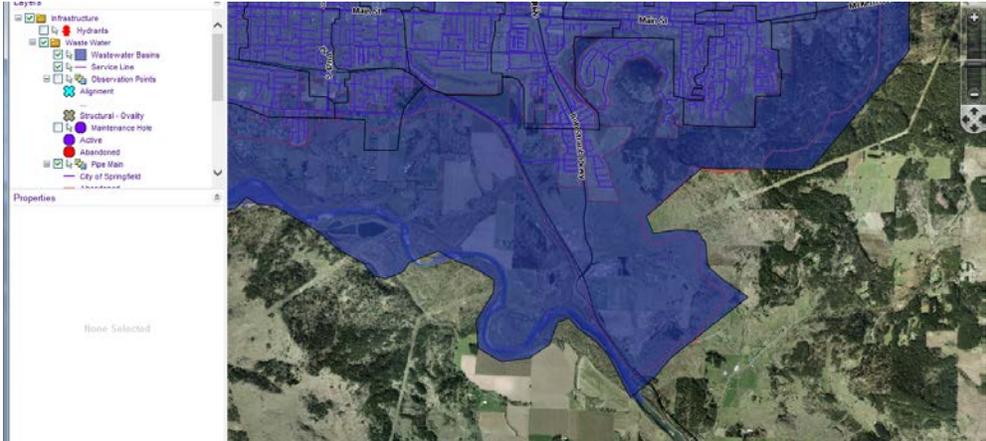
5 Difficult

- Separated from urban services by distance and topography.
- Exception parcels are located more than 3 miles from the nearest water main.
- The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system.
- A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.
- Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative.
- No developed system in vicinity

Wastewater

4 Difficult

- Isolated by distance and topography from existing urban services
- No developed system in vicinity.
- Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area.
- The nearest sewer is 2-3 miles from the parcels. The Jasper Trunk terminus at S. 57th is a 12" main. Nearest 27" main is at 42nd St.
- It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography.
- Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary.



City of Springfield wastewater basin (shown in blue) and service main in relationship with **Wallace Creek, South Hills, West Jasper Mahogany, and Jasper Bridge** areas

Stormwater

5 Difficult

- Upgrade existing Wallace Creek outfall to Middle Fork Willamette River
- No developed system in vicinity
- Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems.
- Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek
- New stormwater outfalls will involve several other regulatory agencies because the

	<p>work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands.</p> <ul style="list-style-type: none"> • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board’s Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
<p>Transportation (including transit service)</p>	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access limited to one way in/out • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area • Access via Jasper Rd., but urban standards and capacity improvements needed⁷⁴: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.⁷⁵ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of the Webb property (Tax Lot 1802090000103), which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”⁷⁶ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.⁷⁷ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered.

⁷⁴ See Jasper Bridge exception area

⁷⁵ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

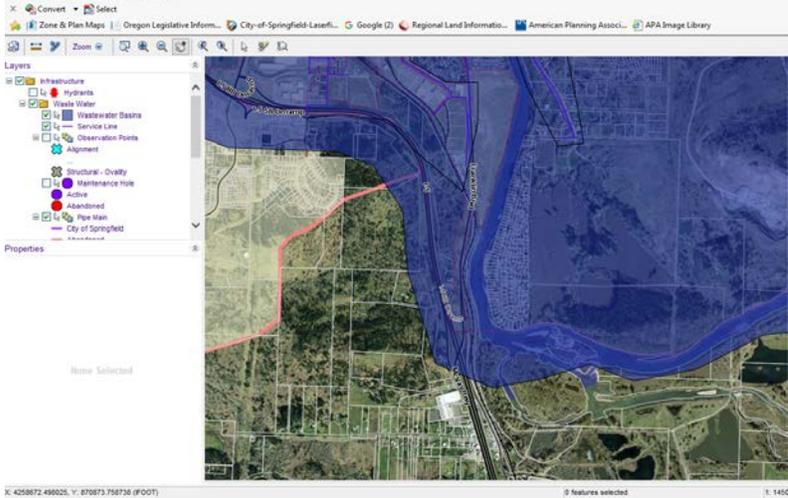
⁷⁶ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁷⁷ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

	<p>ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{78, 79}</p>
<p>Urban services conclusion: Wallace Creek Exception</p>	<p>The City excluded the Wallace Creek exception parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Seavey Loop Exception B, C and E Parcels: Second Priority</p>	
<p>Water</p>	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Existing public rural water system and service provided by Willamette Water Company Exception B, C and E parcels are located more than 2 miles from the nearest SUB water main, a 16" line in McVay.
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> No developed system in vicinity Isolated by distance and topography from existing urban services Would require sewer extension from the Franklin/McVay trunk 18" line in Glenwood B: 2 miles to serve the parcel at south end of College View; C: 2.4 miles to serve Twin Buttes parcels; E: 1.75 miles to 2 miles to serve So. Franklin parcels Would require upgrades to existing Glenwood MWMC pump station Would require a new small sized wastewater pump station located near the intersection of 30th Avenue and College View Road. Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties. Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road. Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there will be long-term operational costs associated with providing service to this area.

⁷⁸ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷⁹ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Seavey Loop study area</p>
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Physical connections to Oxley Slough and/or the Coast Fork Willamette River can be made with little or no impact on existing stormwater systems, although the connection locations may need to be outside of the proposed expansion area. • New stormwater outfalls to Oxley Slough and/or the Coast Fork Willamette River receiving waters will involve several other regulatory agencies because the work would affect riparian areas, excavation in the waters of the state and waters of the United States, and potential wetlands. • While the Coast Fork Willamette River is not federally classified as critical salmonid habitat, the State has designated the Coast Fork Willamette River as essential salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board’s wells and no other wellhead protection zones have been identified to our knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Proximate to I-5, but access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end is underneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30th Street interchange. “Need to further study capacity at the I-5/30th Street interchange and the I-5/Hwy 58th interchange. Improvements at one or both locations may be needed depending on size and location of expansion area.”⁸⁰

⁸⁰ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

- City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades.⁸¹
- City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD).
- Existing rail underpass at Franklin is very narrow and restricts truck passage.
- Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels
- Isolated from urban transportation system
- May trigger capacity improvements for McVay Highway in Glenwood
- Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5.
- “Difficult to serve with transit except via one-directional route variation from current #92 Lowell/LCC route which only runs 3 trips per weekday.”⁸² No pedestrian facilities or ADA access in area.



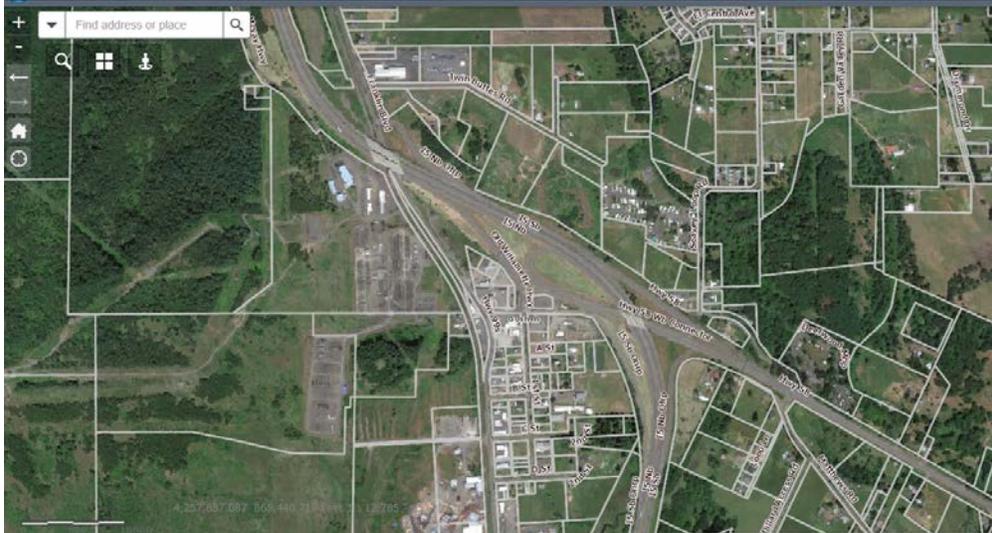
I-5, Franklin, and rail overpass at northern entrance to Seavey Loop area

⁸¹ At a meeting of the College View Stakeholder Working Group meeting, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept (as mapped on that date).

⁸² Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.



I-5/30th ramp, Franklin Blvd., College View Rd. and railroad corridor

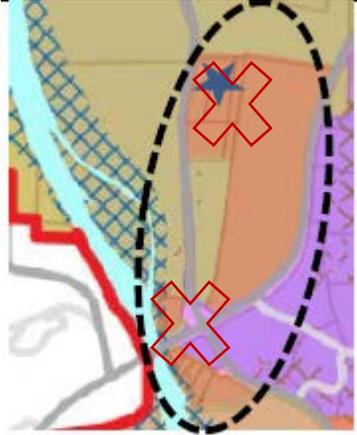
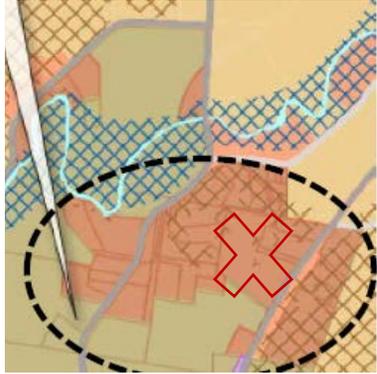
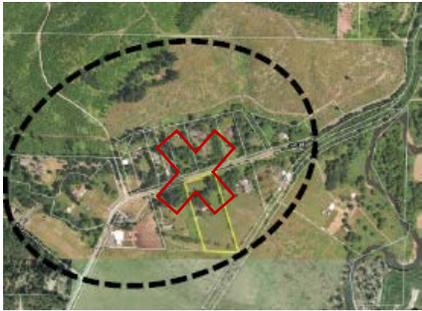
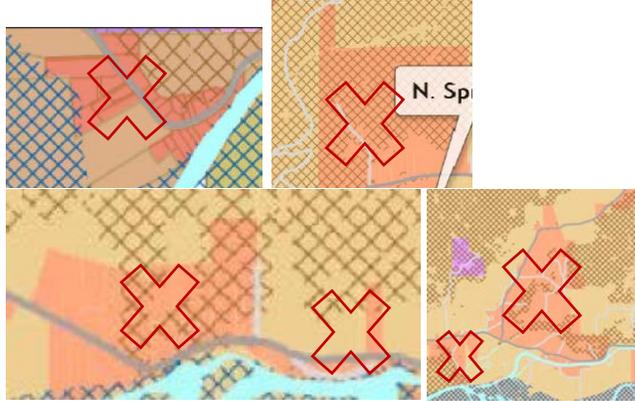
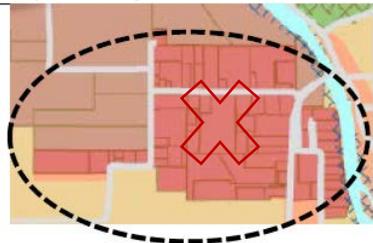


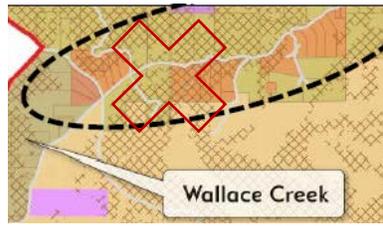
Access to I-5 is via South Franklin/Hwy 99, under I-5 overpass, and via Hwy 58 ramp

Urban services conclusion:
Seavey Loop Exception B, C and E

The City excluded the **Seavey Loop B, C and E** exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

Table 6: Second priority exception parcels excluded: public facilities constraints [ORS 197.298(3)(b)]

<p>McKenzie View B</p> 	<p>Mohawk A</p> 	<p>Mohawk B</p> 
<p>Mohawk C</p> 	<p>Oxbow/Camp Creek</p> 	
<p>Far East Springfield B</p> 	<p>Jasper Bridge A</p> 	

<p>Jasper Bridge B</p> 	<p>Seavey Loop B</p> 	<p>Seavey Loop C</p> 
<p>Seavey Loop E</p> 		<p>Wallace Creek</p> 

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels when it identified potentially suitable ORS 197.298 second priority exception land parcels; and that the City conducted the public services analysis in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system.

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels all exception parcels as the factual basis to justify excluding ORS 197.298 second priority exception land parcels from further analysis.

Although second priority areas McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels were excluded from further consideration under OAR 660-009-0005(12) above (in Table 4), because they lacked the appropriate site characteristics, areas McKenzie View A, West Jasper/Mahogany, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels could

also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

Exception areas excluded based upon specific land needs (197.298(3)(a)) in a previous step: **McKenzie View A*, West Jasper/Mahogany*, Clearwater*, Seavey Loop A*, Seavey Loop D*, Seavey Loop F*, Seavey Loop/Goshen***

Exception areas excluded based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(b)): **Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E**

After excluding exception areas based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(a) and (b)), one *potentially* suitable and serviceable exception area remains a candidate for UGB expansion: **Far East A**. As shown in Table 7, this area has 2 parcels 5 acres or larger, a total of 13.3 acres. These parcels are not contiguous to one another.

**Table 7:
Potentially Suitable & Serviceable Second Priority Exception Land Parcels**

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
Far East A	2	0	2	1702362401500; 6.4 acres 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12% ⁸³	RR2 RR2



Star indicates 5-acre residential parcels

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step,

⁸³ According to RLID, the mapped NRCS soil series for this parcel is “43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes

the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City’s evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City’s conclusions regarding which lands to exclude are reasonable and supported by evidence.

At this point in the analysis, the City identified two *potentially* suitable first priority land parcels that are physically serviceable within Preliminary Study Area Grouping Far East A, but had not yet evaluated the area through the lenses of Goal 14 Location Factors 3 and 4.

At this point in the analysis, the City determined that the amount of suitable land in the first priority category would not be sufficient to meet the employment land deficiency. The City determined that the need for sites 20 acres and larger cannot be met on second priority land. The City identified two exception parcels in Far East A that are potentially suitable and serviceable to meet need for 5-acre sites if services can be provided within the planning period.

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Location Factors 3 and 4. The amount and type of *potentially* suitable first priority land parcels does not exceed the amount necessary to satisfy the need deficiency. The City applied Goal 14 Location Factors 3 and 4 to evaluate *potentially* suitable exception and land sites to satisfy the employment land need deficiency.

OAR 660-024-0060(1)

“(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.”

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable⁸⁴

⁸⁴ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which exception parcels were potentially suitable based on their size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that exception area parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other exception lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. The following section of this report addresses the first application of Goal 14 Location Factor 3 to second priority land parcels considered for inclusion in the UGB.

Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

McKenzie View, Oxbow/Camp Creek, Mohawk, West Jasper/Mahogany, East Springfield, Wallace Creek, Jasper Bridge, Clearwater, and Seavey Loop were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City’s reasoning is based on a high level planning estimates of cost per linear mile⁸⁵, factors easily multiplied by the numbers of miles indicated in Table 5 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis. For example, the City estimated extension of wastewater main to serve the Seavey Loop areas outlined in the Map “Springfield 2030 Plan: Potential UGB Expansion Engineering

⁸⁵ For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer’s memorandum. “These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost.”

Feasibility Analysis, April 2014”⁸⁶ to cost 13 million dollars based on a unit cost of \$428/liner foot to extend the pressure main and a unity cost of 3.5 million to upgrade an MWMC pump station. These costs are for the offsite portion of the infrastructure extension to reach the outside boundary of the area shown in the referenced map and do not include the cost to the development site from that boundary.

Goal 14 Location Factor 3 and 4 Evaluation of *Potentially Suitable* Exception Land

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — as the basis for comparing relative costs associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB, and thus to compare *economic* consequences (ESEE) of alternative expansion areas under Goal 14 Location Factor 3 in the next step in the UGB Alternatives Analysis. At this point in the analysis, the City excluded lands based on cost of needed infrastructure relative to the amount of suitable exception land to be served.

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis and associated text in this report — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — to compare the relative social, environmental and energy (ESEE) consequences associated with constructing public facilities, providing public services and urbanizing land to support industrial and commercial mixed-use development in alternative locations, and thus to compare the ESEE consequences of alternative expansion areas under Goal 14 Location Factor 3 in later steps in in the UGB Alternatives Analysis.

Only one exception area was found to be *potentially* suitable and serviceable — **Far East A**, thus no further comparison with other second priority land under Goal 14 Location Factor 3 or Factor 4 was required.

Goal 14 Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences

The City evaluated the **Far East A** exception land parcel(s) further under a Goal 14 Location Factor 3 analysis: the comparative environmental, social, energy, and economic (ESEE) consequences.

Economic Consequences

The City’s Economic Opportunities Analysis Final report explains the importance of and the City of Springfield’s need to maintaining an inventory of suitable sites for industrial and commercial development to support a strong diverse economy and to provide for the city’s employment needs as required under Goal 9. To provide an adequate amount and suitable type of land for target industrial

⁸⁶ Ibid.

and commercial mixed use employers, the City needs to add suitable sites 5 acres and larger that are sloped less than 7% maximum for office uses and 5% or less for manufacturing uses. Economically feasible serviceability is an important factor in the City’s determination of whether it is reasonable to assume that a particular site is suitable for industrial or commercial use to meet the city’s identified site needs for employment land suitability as defined in OAR 660-009-0005(9).

The City reasoned that the following facts regarding **Far East A** exception land parcel(s) are relevant when considering the **economic** consequences of urbanization to establish a land supply for industrial and office commercial employment land uses in this location:

- The suitable acreage in Parcel 1 (6.4 acres) and Parcel 2 (6.9 acres) is marginal to meet Springfield’s identified land needs. CIBL/EOA Table 5-2 states that the average size of needed sites in the 5-20 acre category is 10 acres for an industrial site and 9.3 acres for a commercial and mixed use site.⁸⁷ Thus these two sites are too small to be suitable for industrial uses and are both smaller than the 9.3-acre average size of needed sites in the 5-20 acre category.
- 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12%
- The topography of the **Far East A** Parcel 2 site is limited to meet Springfield’s identified industrial and commercial site needs. Springfield’s target manufacturing industries require sites sloped 5% or less. Springfield’s target commercial and mixed use employers require sites sloped 7% or less. The City determined through GIS analysis⁸⁸, the portions of parcels 1 and 2 that is sloped 7% or less and 5% or less. Both parcels are developed with rural homes and structures.

Parcel #	Contiguous acres 7% or less slope	Contiguous acres 5% or less slope	Notes
Parcel 1: 1702362401500	7.2 ac.	5.9 ac.	developed residential use occupies highway side of parcel
Parcel 2: 1701312001500	5.5 ac. ⁸⁹	2.8 ac	Robinson parcel, recently removed from Metro Plan

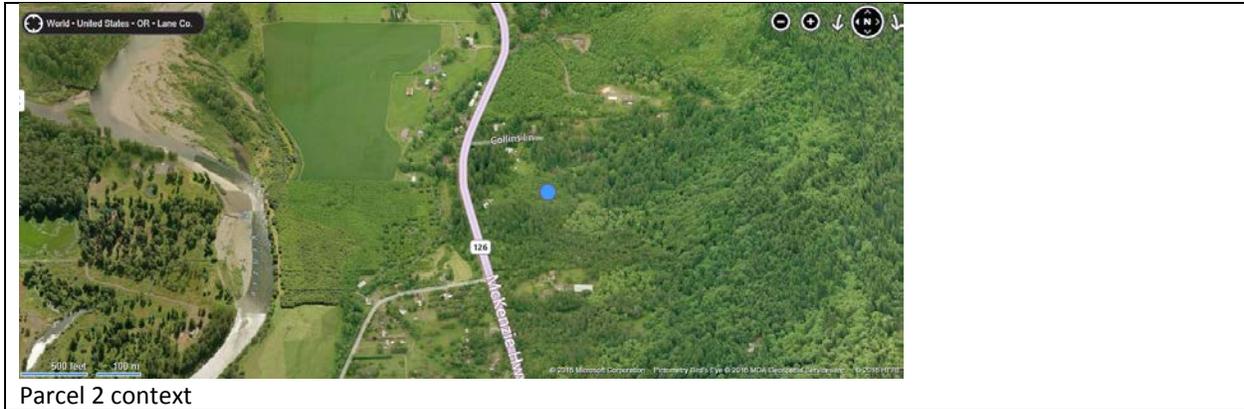


Parcel 2 context

⁸⁷ CIBL/EOA, p. 78.

⁸⁸ based on 2m resolution elevation data obtained from LCOG, email from staff Engelmann to staff Pauly, March 10,2016

⁸⁹ According to RLID, the mapped NRCS soil series for this parcel is “43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes, 100%”. The City’s GIS slopes analysis shows 6.9 acre sloped <15%



- As shown in Table 2, the area has only 2 parcels 5 acres or larger, a total of 13.3 acres and suitable acreage includes sloped land in excess of 5 and 7%.
- Suitable acreage in Parcel 1 and Parcel 2 is insufficient to justify the offsite cost to extend water and wastewater to Parcel 2.
- The suitable parcels are not contiguous to one another, thus cost share between property owners is unlikely.
- Offsite cost comes at relatively higher public cost than onsite connections to water, wastewater, stormwater and transportation systems.
- It is not reasonable to assume that the amount of potentially suitable land within Far East A would justify the cost to extend public infrastructure to the site.

Far East A parcels were considered physically serviceable. The relative distance to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. However, there are only two sites 5 acres or larger (and the site abutting the UGB is sloped 12% or more), thus it would not be practical or feasible to extend infrastructure to serve one or two 5 acre sites.

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on **economic** consequences, because urbanization will not be economically feasible.

Environmental and Energy Consequences

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **environmental and energy** consequences of urbanization in this location:

- As shown in TSP Figure 12, no existing or planned pedestrian facilities serve east Main Street/Highway 126 east of 70th Street. No existing or planned pedestrian facilities serve Thurston Road east of 69th Street.
- As shown in TSP Figure 10 Main Street/Highway 126 and Thurston Road to the UGB extent are within the Recommended Roadway Network.
- As shown in TSP Figure 3, Main Street/Highway 126 is a Federal Truck Route.

- As shown in TSP Figure 9, planned frequent transit service network routes, the nearest connect is at Main Street/Highway 126 and Straub Parkway.

Geologic Hazards

The City referenced data in [Oregon HazVu](#), DOGAMI's online interactive geohazard map to identify hazard area areas. State of Oregon Department of Geology and Mineral Industries <http://oregongeology.org/pubs/>

Given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The DOGAMI website states that "the map offers a general look at regions that may be at risk for landslides, and will be used to help prioritize areas for future in-depth landslide mapping and study;" and "The Statewide Landslide Information Database of Oregon (SLIDO) project was created to improve our understanding of the landslide hazard in Oregon and to provide a statewide base level of landslide data. The original studies vary widely in scale, scope, and focus, which is reflected in a wide range in the accuracy, detail, and completeness with which landslides are mapped." The map indicates areas of low, moderate, high and very high landslide susceptibility for counties, incorporated cities, and some watersheds. The DOGAMI website states: "Landslide susceptibility is the likelihood that a location will have landslides in the future." DOGAMI maps are for informational purposes and are not regulatory.

The DOGAMI website states:

"One of the most common and devastating geologic hazards in Oregon is landslides. Average annual repair costs for landslides in Oregon exceed \$10 million, and severe winter storm losses can exceed \$100 million (Wang, Y., Summers, R. D., and Hofmeister, R. J., 2002, Landslide loss estimation pilot project in Oregon: Oregon Department of Geology and Mineral Industries Open-File Report O-02-05, 23 p.). As population growth continues to expand and development into landslide susceptible terrain occurs, greater losses are likely to result. In order to begin reducing losses from landslides, widespread endeavors are necessary at all community levels from state government to individual family homes. One successful way to reduce losses from landslides is through pre-disaster mitigation, which can be performed at many scales from statewide to local. To begin pre-disaster mitigation, the landslide hazard must be located. Once the hazard is located, the population and infrastructure vulnerable to the hazard can be identified and the risk mitigated." (emphasis added)

The DOGAMI website states:

"The primary purpose of SLIDO is to provide the best currently available mapping of landslide features throughout Oregon. The database should serve as useful tool for differentiating broad areas of higher and lower hazards and as a starting point for more

detailed study. This spatial information is basic to emergency management and land-use applications, including:

- Identify vulnerable areas that may require planning considerations
- *Estimate potential losses from specific hazard events (before or after a disaster hits)*
- *Decide how to allocate resources for most effective and efficient response and recovery*
- *Prioritize mitigation measures that need to be implemented to reduce future losses”*
(emphasis added)

The City considered the DOGAMI SLIDO data for the purposes of informing the next steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield’s employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the second priority category.

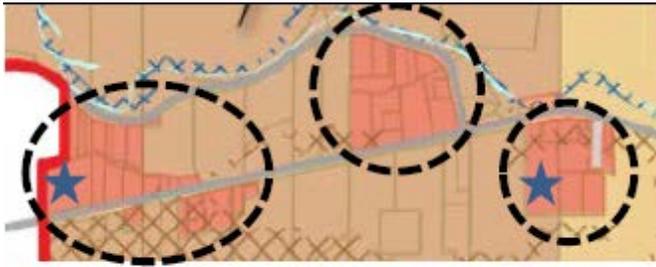
The City appropriately considered the general DOGAMI SLIDO data in relationship to the UGB Preliminary Study Area to discern and differentiate broad areas of higher and lower landslide hazards to identify potentially vulnerable areas within the Preliminary Study Area that may require land use planning considerations.

The City appropriately used the general DOGAMI SLIDO data when it identified the UGB Preliminary Study Area groupings in the vicinity of documented landslide hazards to determine where there exists an increased likelihood that a location will have landslides in the future and where relatively greater losses are likely to result. Comparatively, the City considered areas without known landslide hazards to be more suitable for urbanization than areas with documented landslide hazards.

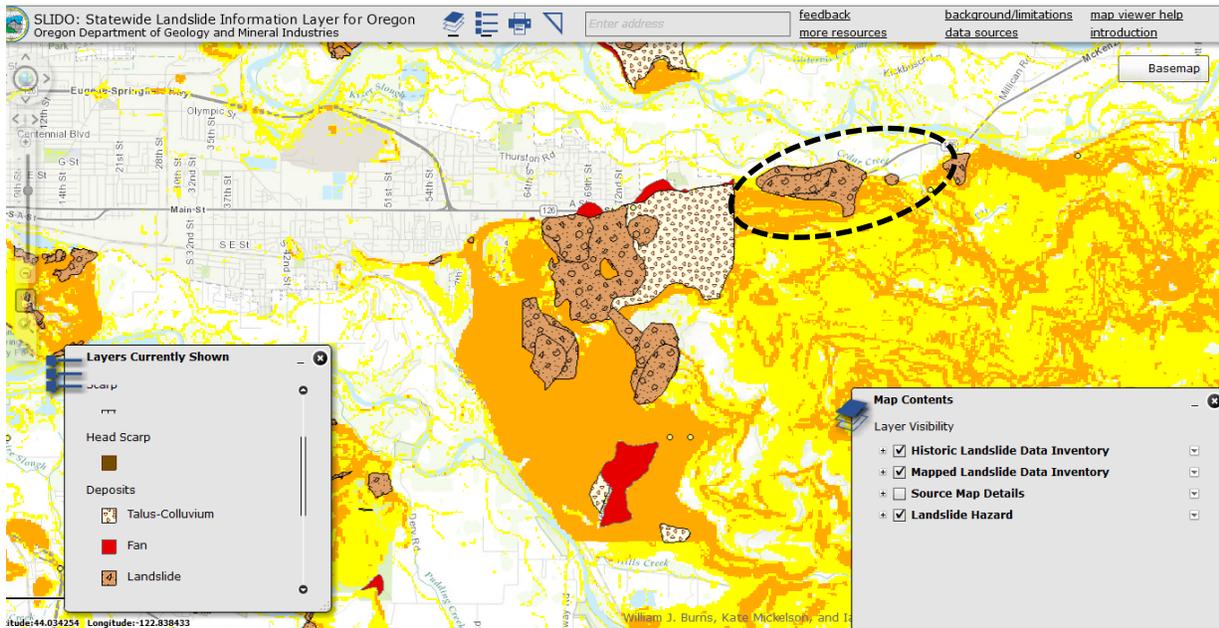
Oregon Statewide Planning Goal 7 directs local governments to “adopt comprehensive plans (inventories, policies and implementing measures) to reduce risk to people and property from natural hazards” including landslides. Springfield has acknowledged comprehensive plan policies and implementing measures to reduce risk to people and property from landslide hazards, including Springfield Development Code Section 3.3-500 Hillside Development Overlay District standards. These policies and standards were developed to address development of lands already inside the UGB that are planned to accommodate urban levels of development. New hazard information published by the State, such as the DOGAMI SLIDO data is useful to local governments as they plan expansions of their UGBs to accommodate forecast urban growth.

The City’s review of The DOGAMI SLIDO map data identified the presence of documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/Camp Creek, **Far East**, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

DOGAMI SLIDO maps⁹⁰ of the South Hills area indicate the presence of landslide hazards in the in the immediate vicinity of the **Far East Springfield** Preliminary Study Area grouping.



Star indicates 5-acre residential parcels



Detail: DOGAMI SLIDO Far East landslide hazard area

The presence of landslide hazards influence future urbanization patterns by potentially increasing risk to public health, safety and welfare both onsite and offsite of the parcels of land being developed and/or by imposing constraints that could preclude development or contribute to the infeasibility of developing a particular site to accommodate the types of particular industrial and other employment uses identified in the CIBL/EOA. Although the City did not identify the presence of landslide hazards as an absolute development constraint for the purposes of the Commercial and Industrial Lands Inventory, the City considered areas with known landslide hazards as comparatively less “suitable” to meet the need for large site industrial and commercial mixed use employment site needs when it determined suitability of land for urban growth including but not limited to physically developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield’s employment land needs; and when it examined and compared the ESEE consequences of urbanizing lands with or without known landslide hazards within the second priority category.

⁹⁰ Ibid.

The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.⁹¹

For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to be landslide-susceptible.

According to DOGAMI⁹² staff, when grading and excavation remove land from the basal area of a slide or when drainage is altered in a way that directs water to a slide, those actions serve to destabilize the slide. The DOGAMI map clearly indicates that McKenzie Highway 126 traverses the basal area of a slide area.

For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will be more costly to build and maintain than urbanization and development outside of areas with terrain not known to be landslide-susceptible, because such development must meet more rigorous engineering, architectural and construction requirements. The public cost of constructing infrastructure, providing services and maintaining infrastructure in sloped terrain is comparatively higher than developing public facilities on flatter areas.

For purposes of the ESEE environmental and social consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will result in higher risk to public health and safety than developing public facilities on with terrain not known to be landslide-susceptible.

The City finds that the **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on comparative **environmental** and **energy** consequences.

Social Consequences

⁹¹ Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

⁹² Radio interview with DOGAMI Chief Scientist Ian Madin, on Jefferson Exchange program, 1280AM, March 10, 2016 explaining the SLIDO map data project.

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **social** consequences of urbanization in this location:

OAR 660-009-0005 (3) states:

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

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial employment land uses because of the following **social** consequences:

- The Goal 9 rule’s definition of “industrial” clearly recognizes that “Industrial uses may have external impacts on surrounding uses;” and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.
- Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.[OAR 660-009-0005(3)]
- The **Far East A** exception area is already committed to rural residential uses on small parcels.
- Based on the UGB Alternatives Analysis, input from the CIBL Technical Advisory Committee and the public, the **Far East A** area is better suited to residential uses than industrial or office commercial employment uses.
- The cost of extending offsite infrastructure to serve industrial and commercial mixed use development sites will create a public cost, as the city has limited legal authority to exact off-site improvements. Exactions must be proportional to the impacts of the development.

ORS 197.298(1)(b) Goal 14 Location Factor 3 Conclusion – Second Priority Lands Analysis

The City excluded Far East A lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3). The City determined that the cost to serve 2 parcels 5 acres or larger — a total of 13.3 acres — is not economically feasible. These parcels are not contiguous to one another. McKenzie View A Preliminary Study Area grouping cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need. The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at the exception site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the consequences of urbanization in this location:

- Excellent Class I and II agricultural soils exist on and immediately abutting and between the potentially suitable exception parcels. The land along the McKenzie River is prime class I and II farm land.

ORS 197.298 (1)(b) Goal 14 Location Factor 4 Conclusion – Second Priority Lands Analysis: Goal 14 Location Factor 4 implicitly requires that the City’s determination to exclude the exception area sites it considered and rejected must also be justified based on consideration of Goal 14 Location Factor 4: Compatibility with nearby ag and forest land. The City’s findings provide evidence to explain why this is the case.

As previously stated, the lands adjacent to the UGB that are identified in the Lane Rural Comprehensive Plan as exception or nonresource land are identified by orange color in Map 1 Priority Areas and Constraints Analysis. As shown in that map, Springfield is unlike many Oregon cities in that there are few exceptions areas in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 and thus not suitable for meeting Springfield’s large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to natural barriers formed by the McKenzie and Middle Fork Willamette rivers, steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes >15%.

The City’s description of exception land Table 2 provides evidence to demonstrate that expanding the UGB onto exception lands in all instances would actually promote urban sprawl by “opening up” new corridors of urbanization into, through, and adjacent to extensive large blocks of resource land areas north of the McKenzie River, up the McKenzie River, and south of the Springfield UGB. In all but two instances (Far East Springfield which has one exception parcel 5 acres or larger abutting the UGB, and Clearwater, which has no parcel 5 acres or larger), exception areas are located remote to the UGB and would require leapfrogging across land unsuitable for urbanization to extend infrastructure and services to remote parcels of land.

The analysis of efficient accommodation of identified land needs under Goal 14, factor 1, allows a local government to consider the ability of a site to accommodate a compact urban form. The term “maximum efficiency of land uses” invokes a concern for avoiding leapfrog or sprawling development inconsistent with the density and connectivity associated with urban development. In addition to being highly inefficient, impractical and financially infeasible, it would have consequences that could pose impacts to nearby ag and forest land and uses thereon, including but not limited to increased traffic conflicts with farm or forestry vehicles.

Also it should be noted that some exception parcels, while developed, committed and zoned for rural uses, comprise Class 1 and 2 agricultural soils that, if included in the UGB, would become urbanizable. Throughout the analysis, staff noted the presence of agricultural uses in many of these areas that currently provide opportunities for small “micro” farms close to the urban area that contribute to the local food system economy.⁹³

ORS 197.298 (1)(b) Conclusions – Second Priority Lands Analysis

ORS 197.298 requires that urbanization be directed to the second priority exception or non-resource lands to accommodate the land need if the second priority lands can “reasonably accommodate” the identified land need. As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of second priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all exception land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that second priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City’s decision was reached after identifying and evaluating all exception and non-resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable exception parcels 5 acres or larger (including contiguous parcels <5 acres under same ownership) without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield*

⁹³ **Citation:** Local Food system report in the record

Metropolitan Area Public Facilities and Services Plan, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the exception and non-resource lands adjacent to the UGB because exception and non-resource lands cannot "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, second priority exception and non-resource lands are inadequate to accommodate the amount of land needed because specific types of identified land needs cannot be reasonably accommodated on exception and non-resource lands, and future urban services could not reasonably be provided to the exception and non-resource lands due to topographical or other physical constraints.

The City's conclusion that exception and non-resource lands adjacent to the UGB these lands could not reasonably be provided with urban services within the 2010-2030 planning period based on topographical or other physical constraints was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints (**Far East A**), the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to the Far East A area compare unfavorably to directing urbanization to other lands because land is not suitable to meet the site needs of target industries and the amount of unconstrained land is economically infeasible to serve with public water and wastewater facilities on a cost basis. The City concluded that urbanization of Far East A is not economically viable on a service cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **Far East A** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14 Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of Far East A and other exception land is not economically viable on a service cost basis and is more likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [Goal 14 Boundary Location Factor 4] conclusions here.

Thus, urbanization of exception land compares unfavorably with other lands the City considered for inclusion in the UGB.

The City's evaluation properly considered second priority exception and non-resource lands as alternative boundary locations consistent with ORS 197.298 and Goal 14 Boundary Location Factors 3 and 4.

The City's conclusion that directing urbanization to the Far East A exception area would not "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The City's conclusion that directing urbanization to the Far East A exception area to accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger compares unfavorably to directing urbanization to other lands was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Therefore, second priority exception and non-resource area lands are inadequate to accommodate the amount of land needed.

The City's conclusion that second priority exception and non-resource lands are inadequate to accommodate the amount of employment land needed because specific types of identified land needs was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The preceding analysis provide substantive evidence to explain why the city concluded that most of the 72 isolated, remote and scattered second priority exception land parcels 5 acres or larger are not serviceable and suitable to meet Springfield's employment land needs and why the few, scattered parcels that may be serviceable are of insufficient size, quantity and location to be provided with economically feasible and cost efficient infrastructure and services.

To accommodate the identified land need, the City identified and evaluated the next priority of land under ORS 197.298.

ORS 197.298 (1)(c):

"If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition)."

OAR 660-024-0060(1)

"(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same

method specified in subsections (a) and (b) of this section until the land need is accommodated.”

IDENTIFY THIRD PRIORITY MARGINAL LAND

Next, the City’s analysis identified third priority marginal lands adjacent to the UGB. As shown in Table 7, marginal lands exist in three areas adjacent to Springfield’s UGB: Oxbow/Camp Creek, Mohawk and Wallace Creek.

Table 7 Preliminary Study Areas Containing Third Priority Marginal Lands:

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints provides a general descriptive summary of the Third Priority marginal lands in the vicinity of the UGB. Where shown, the red line in the small maps below is the UGB. Underlined parcel numbers indicate parcels with 5 or more unconstrained acres.

Table 8: Third Priority Marginal Lands Parcels and Constraints

<p>Mohawk Marginal⁹⁴</p> <ul style="list-style-type: none"> • Skyline Ranch plat, 20-acre rural residential lots • Slopes > 25%, slopes 15-25% cover most of area • Some parcels with flatter topography are located in the SW portion of this area: <ul style="list-style-type: none"> ○ <u>17-02-20-00 428: 5.8 acres</u> <15% slopes, developed w/New Song Church, hydric soils 	
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⁹⁴ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing marginal land area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with marginal parcels highlighted and slope calculations for parcels.



- 17-02-20-00 0431: 8 acres <5% slope. 13.8 acres, 80 % of 13.8 ac. site is NRCS CI 8 (110—Pits)⁹⁵, 12% of site has 3-12% slopes, 8% has slopes<3%, vacant. Parcel 1 of Subdivision 2015-P2658.
- 17-02-20-00 0432: 9.3 acres slopes < 15% (3 acres <5%, 6.3 5-15%), hydric soils, vacant
- 17-02-20-00 0413: developed rural residential use on High Ranch Drive, small flatter topo area (<5 acres) along Marcola road edge of parcel
- 17-02-20-00 0412: 20.6 acres developed rural residential use on High Ranch Drive, small flatter topo area (~2 acres) along Marcola road edge of parcel, 56% of parcel has slopes > 12%, slopes up to 75%, hydric soils

- Other parcels in this area have slopes > 15% and are developed with rural residential uses.
- (3) parcels 5.8-9.3 unconstrained acres in this area

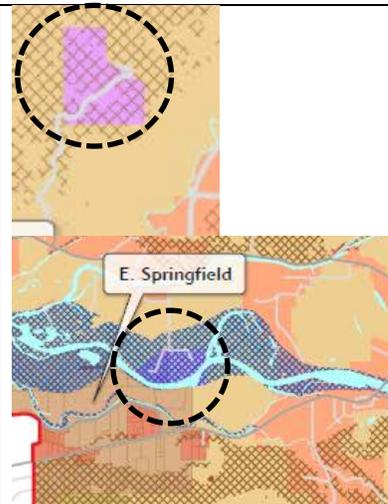


Oxbow/Camp Creek Marginal⁹⁶

- Three contiguous 15-acre parcels: 17022400 TL 406 (73% 12-45% slopes), TL 407 (94% 12-45% slopes), TL 408 (84% 12-45% slopes)
- Slopes 12-45%
- Remote from UGB
- Developed with rural residential uses.



- Marginal parcels on the McKenzie River 17-01-30-00 2300, 2301, 2302, 2303 are entirely in the floodway

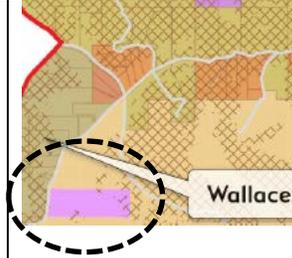


⁹⁵ Soil and slope percentages determined from NRCS data in the Lane County Regional Land Information Database. NRCS Soil Survey of Lane County, p. 123 defines soil map unit 110—Pits “as open excavations from which soil and commonly some of the underlying material have been removed.” ...Some pits “are being filled or will be filled with industrial waste or material from roadside cutbank slopes or ditch cleaning.”

⁹⁶ See maps in record A & T map 17-02-21-24 with marginal land parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

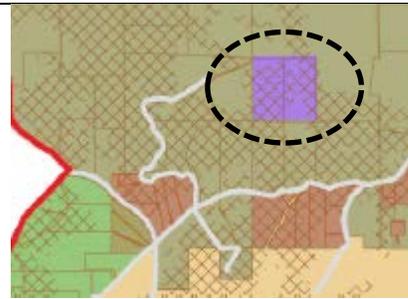
Wallace Creek Marginal A

- Within 1 mile of UGB via Jasper Rd. and Wallace Creek Rd.
- (2)20-acre parcels (separate ownership)
Some slopes 2-12%, some >15%
- 18-02-14-00 1002 17.9 unconstrained acres
- 18-02-14-00 1003 17.7 unconstrained acres
(Wallace Creek⁹⁷ 50' setback assumed)
- Wetlands and hydric soils are present along Wallace Creek, both sides of Wallace Creek Rd.



Wallace Creek Marginal B

- Predominantly slopes >15%
- 2 parcels, total of 40.3 acres, separate ownership, homes on each parcel
- 18-02-12-00 TL 302 3.8 acres unconstrained
- 18-02-12-00 TL 303 6.4 acres unconstrained
(unconstrained portion is developed with rural residence)



IDENTIFY THIRD PRIORITY MARGINAL LAND WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

⁹⁷ *Water Quality Results for the Middle and Coast Fork Willamette Watersheds and Eight Small Cities in the Upper Willamette Sub-basin: 2008- 2010, July 2011*, http://www.longtom.org/wp-content/uploads/2012/05/Upper-Willamette-WQ-Monitoring-Final-Report_2010.pdf report states: “Wallace Creek, a small tributary that enters the Middle Fork Willamette River downstream of Dexter Dam and which dries up in the summer, always met the State Standard for temperature but did not for dissolved oxygen and E. coli.”

Suitability Findings: Marginal Land

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors⁹⁸ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable⁹⁹
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the City's process identified which marginal land parcels could potentially be suitable to meet the City's need for employment land, including sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints that make lands not buildable, and excluded marginal land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites.

For the purpose of evaluating third priority marginal land, the City identified the following criteria to apply equally to all parcels within the Preliminary Study Area — in order of the land's priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Site size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres.

The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels <5 acres from further analysis.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial employment sites with relatively flat topography <5% and <7%.

Consistent with the absolute constraints applied in the Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA), the City identified the following factors as "absolute constraints" to development of employment uses and to providing urban services to employment land:

- Portions of tax lots with slopes>15%
- Portions of tax lots comprising waterways and inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots within riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently

⁹⁹ "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

The City identified parcels or portions of parcels with slopes <15% as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes >15% from further analysis.

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

None of the marginal land areas contains a potentially redevelopable parcel larger than 20 acres without absolute development constraints.

As shown in Table X, two marginal land groupings contain vacant or potentially redevelopable parcels 5-20 acres without absolute development constraints:

Table 9: Potentially Suitable Third Priority Marginal Land		
Area	Vacant or potentially redevelopable parcels larger than 20 acres without absolute development constraints?	Vacant or potentially redevelopable 5-20 acre parcels without absolute development constraints?
Mohawk	No	Yes
Oxbow/Camp Creek	No	No
Wallace Creek A	No	Yes
Wallace Creek B	No	Yes

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all third

priority marginal land parcels in the Preliminary UGB Study Area to identify potentially suitable third priority land to meet the employment land need. **These steps excluded the Oxbow/Camp Creek and Wallace Creek B marginal land parcels from further analysis.**

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors¹⁰⁰ (from an outline provided by DLCDC Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable¹⁰¹
- Exclude lands based upon specific land needs (197.298(3)(a))

Two marginal land areas — Mohawk and Wallace Creek A (indicated by a “yes” in Table 9) could potentially provide sites 5-20 acres in size without absolute development constraints to meet employment land needs.

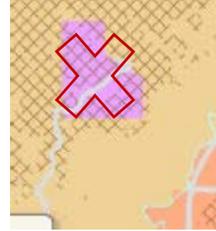
The City identified Mohawk and Wallace Creek A marginal land parcels as worthy of additional analysis to determine serviceability and suitability to meet the need for smaller 5-20 acre sites.

No marginal land area will provide a vacant or potentially redevelopable candidate site 20 acres and larger without absolute development constraints to meet employment land needs.

The City’s need for sites 20 acres and larger cannot be met by adding marginal land lands to the UGB.

The Oxbow/Camp Creek and Wallace Creek B marginal land parcels were excluded from further analysis.

Table 10: Third Priority Marginal land parcels excluded:

Oxbow/Camp Creek	Wallace Creek B	Mohawk
		

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed

¹⁰¹ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

Public Services Analysis of Potentially Suitable Third Priority Land

OAR 660-024-0060(7) states:

“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable third priority marginal land parcels within the Mohawk, Oxbow/Camp Creek, and Wallace Creek areas. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.¹⁰² Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

As previously explained in this report requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660,

¹⁰² Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

Just as the TSP must “evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;”[OAR 660-012-0035] the City’s UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.”

The transportation system must “support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.” [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*”, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of third priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 11 and as further supported by evidence in the record.

The Public Services Analysis section, on pages 211-251 of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City referenced when it described the physical location and proximity of existing facilities to *potentially* suitable parcels, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding from consideration the **Oxbow/Camp Creek, Wallace Creek B and Mohawk** marginal land parcels in the City's previous step.

Table 11 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1=EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.¹⁰³ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. Cost of service was not estimated or evaluated at this point in the analysis.

¹⁰³ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

The City’s conclusions regarding which lands to exclude are reasonable and supported by ample evidence.

Although third priority areas **Mohawk Marginal, Oxbow/Camp Creek Marginal and Wallace Creek B Marginal** were excluded from further consideration under OAR 660-009-0005(12) in the city’s previous step because these lands lacked the appropriate site characteristics, these areas could also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

Table 11 - Public Services Analysis of Potentially Suitable Marginal Land	
Mohawk Marginal Parcels	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible¹⁰⁴ • Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River, must cross river with urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. <p>Nearest collection system is a 10” line in Marcola Rd., 4 miles to outer areas</p>

¹⁰⁴ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule¹⁰⁵) • Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake¹⁰⁶ • No developed system in vicinity
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access to Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide).^{107 108} Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards¹⁰⁹ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange¹¹⁰ • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”¹¹¹ • No transit services, pedestrian facilities or ADA access in area. Nearest service is

¹⁰⁵ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

¹⁰⁶ See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB’s Hayden Bridge McKenzie River water intake facility.

¹⁰⁷ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

¹⁰⁸ Source of road widths: Lane County Roads Inventory,

http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

¹⁰⁹ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

¹¹⁰ See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system.” Project #R-35 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP, Appendix A, p. 14.

¹¹¹ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16.

	Route 17 Hayden Bridge Rd. and 19 th Street. Route Description: “The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station.” ¹¹²
Urban services conclusion: Mohawk Marginal	The City excluded the Mohawk Third Priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Wallace Creek A Marginal Parcels	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24” “Natron” water line, extended in 2013 to the SW corner of the school district property. The 16” line from Westwind/Linda Lane provides a looped system. • A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity • Marginal land parcels are located ~2.5 miles from the nearest water main. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.

¹¹² Email from LTD staff Will Mueller, dated June 28, 2013 provides 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"> • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity.
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity • Presence of wetland, Wallace Creek and intermittent streams on the two parcels may provide opportunity for stormwater conveyance and management if water quality standards can be met. • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Upgrade existing Wallace Creek stormwater outfall to Middle Fork Willamette River • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be possible in flatter topo areas of parcels.
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Would require secondary access • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed¹¹³: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.¹¹⁴ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad.

¹¹³ See Jasper Bridge exception area

¹¹⁴ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

	<ul style="list-style-type: none"> • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”¹¹⁵ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.¹¹⁶ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{117, 118}
<p>Urban services conclusion: Wallace Creek Marginal A</p>	<p>The City excluded the Wallace Creek Marginal A parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Wallace Creek B Marginal Parcels</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24” “Natron” water line, extended in 2013 to the SW corner of the school district property. The 16” line from Westwind/Linda Lane provides a looped system. • A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity

¹¹⁵ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

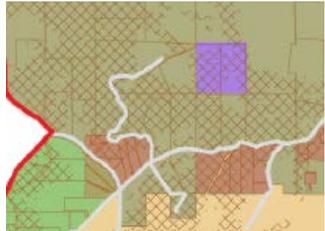
¹¹⁶ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

¹¹⁷ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

¹¹⁸ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	<ul style="list-style-type: none"> • Marginal land parcels are located more than 3 miles from the nearest water main.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity. • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area may require land acquisition to safely convey stormwater runoff to the River. • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography.
Transportation (including transit service)	<ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Would require secondary access • Marginal B parcels are remote, accessed via Jasper Rd.- Wallace Creek Rd. – to vicinity of R.R. Baker Rd. Topo separates from upper Wallace Creek Rd. • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed¹¹⁹: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

¹¹⁹ See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.¹²⁰ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”¹²¹ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.¹²² No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{123, 124} 
<p>Urban services conclusion: Wallace Creek Marginal B</p>	<p>The City excluded the Wallace Creek Marginal B parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of</p>

¹²⁰ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

¹²¹ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

¹²² Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

¹²³ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

¹²⁴ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	<p>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>
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The City relied on the findings in Table 11 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City’s evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable third priority marginal land by gathering and compiling data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. For the purpose of evaluating serviceability of parcels within the third priority [ORS 197.298(3)(b)], the City grouped the potentially suitable third priority parcels within general geographic areas. Based on this data, the City determined whether a parcel or group of marginal land parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City analyzed, evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB when it compiled data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. Based on this data, the City

determined whether and how providing a parcel or group of third priority marginal land parcels with the water, sewer/wastewater, stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of third priority marginal land parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of third priority land under ORS 197.298.

The City excluded the third priority lands based upon specific land needs (197.298(3)(a)):

- **This step excluded parcels with less than 5 unconstrained acres.**
- **The City excluded lands based on slopes exceeding 7%, distance to I-5**
- **This step excluded Oxbow/Camp Creek Marginal from further analysis.**
- **This step excluded Wallace Creek Marginal A from further analysis.**
- **This step confirmed exclusion of Wallace Creek Marginal B parcels.**
- **This step excluded Mohawk Marginal parcels.**

The City excluded the third priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))

- **This step confirmed exclusion of Mohawk Marginal parcels.**

- This step confirmed exclusion of Wallace Creek Marginal A parcels.
- This step confirmed exclusion of Oxbow/Camp Creek Marginal parcels.

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To confirm its evaluation of *potentially* suitable marginal land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable¹²⁵
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which third priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that third priority parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

Mohawk Marginal, Wallace Creek Marginal A, and Oxbow/Camp Creek Marginal were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative

¹²⁵ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City’s reasoning is based on a high level planning estimates of cost per linear mile¹²⁶, factors easily multiplied by the numbers of miles indicated in Table 11 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis.

- **This step confirmed exclusion of Mohawk Marginal parcels**
- **This step confirmed exclusion of Wallace Creek Marginal A**
- **This step confirmed exclusion of Oxbow/Camp Creek Marginal.**

Table 12 Third Priority Marginal Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences
McKenzie View
Mohawk
Wallace Creek A
Wallace Creek B

As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of third priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that third priority lands adjacent to or in the vicinity of the UGB are not suitable to meet the identified employment land need and cannot reasonably accommodate the identified employment land need. The City’s decision was reached after identifying and evaluating marginal land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing

¹²⁶ For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer’s memorandum. “These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost.”

territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

ORS 197.298 (1)(c) Conclusion – Third Priority Lands Analysis: After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the marginal lands adjacent to the UGB because marginal lands are not suitable and cannot reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, third priority marginal lands are inadequate to accommodate the amount of land because specific types of identified land needs cannot be reasonably accommodated on the marginal lands, and future urban services could not reasonably be provided to the marginal lands due to topographical or other physical constraints.

ORS 197.298 Conclusion: The City properly applied and followed the prioritization requirements in ORS 197.298 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment.