

CONSIDERATION OF LAND OF LOWER PRIORITY [ORS 197.298(1)(d)]

ORS 197.298 (1)(d):

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

ORS 197.298(2):

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

OAR 660-024-0060(1)(d):

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

ORS 197.298(3)

“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

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

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

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”

After the City examined and excluded all land of higher priority for expansion under ORS 197.298 (1)(b) and (1)(c), and found those lands unsuitable and thus inadequate to accommodate the land need, the City’s next two steps were to identify fourth priority land adjacent to and in the vicinity of the UGB that is potentially suitable to meet the need deficiency, [ORS 197.298 (1)(d)] and to evaluate potentially suitable land “by agriculture or forest land capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.” [ORS 197.298(2)] In this next step, the City identified candidate UGB study areas lands for further evaluation and comparison under ORS 197.298(3) by 1) identifying fourth priority lands; and 2) prioritizing those lands as required under ORS 197.298(2):

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

The statute directs the City to further prioritize lands land designated in an acknowledged comprehensive plan for agriculture or forestry for inclusion on the basis of the capability classification system or cubic foot class.

The statute directs the City to identify and evaluate both agriculture and forest lands in this step and without prioritize one over the other. Instead, the statute directs the analysis to consider “fourth priority land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.”

IDENTIFY FOURTH PRIORITY LAND DESIGNATED IN AN ACKNOWLEDGED COMPREHENSIVE PLAN FOR AGRICULTURE OR FORESTRY OR BOTH

With the exception of its western boundary located along Interstate Highway 5, nearly all of Springfield’s UGB is surrounded by land designated in an acknowledged comprehensive plan for agriculture and forestry. As shown in Table 13, land designated in an acknowledged comprehensive plan for agriculture or forestry is present in every area adjacent to and in the vicinity of Springfield’s UGB.

Table 13: Study Areas Containing Fourth Priority Agriculture and Forest Land		
North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Table 13 indicates study area groupings that contain areas designated for agriculture in the Lane Rural Comprehensive Plan with beige color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for forestry in the Lane Rural Comprehensive Plan with olive green color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for agriculture and forestry in the Lane Rural Comprehensive Plan with both colors.

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060

(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c), Goal 14, Boundary Location Factor 3; and Goal 14, Boundary Location, Factor 4.

To perform analysis of the much larger set of fourth priority lands adjacent or in the vicinity of the UGB, the City conducted analysis by geographic area groupings in its next step. Table 14 provides a general descriptive summary of the Fourth Priority lands adjacent to and in the vicinity of the UGB. Lands in the Preliminary Study area are organized geographically and are named consistently with the names used in the second and third priority lands analyses.

This step identified candidate fourth priority land that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each grouping in Table 14 includes maps and information to identify agriculture or forest plan designations, dominant soil capability classifications and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) in each area to provide data to inform its determination of which fourth priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

For the purposes of the preliminary screening of fourth priority land in Table 14, the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable
- Wetlands – areas identified in the national wetlands inventory or Springfield's local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

OAR 660-009-0005(2)

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

infrastructure deficiencies, parcel fragmentation, or natural hazard areas.” [emphasis added]

OAR 660-009-0005(11)

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

The development constraints applied in the City’s analysis are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

For the purposes of increasingly detailed analysis to determine suitability of potentially suitable fourth priority land in Table X to meet the site needs of the City’s target employers and in addition to excluding lands with slopes 15% or greater, the City applied the following needed site characteristic parameters applicable to the City’s target employment industries¹:

- Springfield’s target manufacturing industries require sites sloped 5% or less.
- Springfield’s target commercial and mixed use employers require sites sloped 7% or less.

The constraint of “infrastructure deficiencies that temporarily or permanently limit or prevent the use of land for economic development” is identified separately in the Public Facilities Analysis.

The City used industry standard GIS mapping and measuring tools and methods to quantify parcel and constraints data for evaluation as groupings were selected for further analysis in the UGB study.

Table 14 provides a general descriptive summary of the Fourth Priority lands in the vicinity of the UGB. Table 14 provides a context photo² and two side-by-side maps of each Preliminary Study area grouping: 1) an excerpt from the Lane County Map viewer plan map indicating LRCP plan designation;^{3 4} and 2) an excerpt from Map 4: LRCP plan designation, ECONorthwest, December 2008 indicating soil classification.

These map excerpts are color keyed as shown on the following page.

¹ CIBL/EOA pp. iii-iv, pages 82-95, Appendix C., pages 167-178.

² Context photos are screenshots from Bing maps accessed March 10-11 via links in RLID.

³ <http://lcmmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>
accessed March 10, 2016

⁴ land designated Agriculture in the Metro Plan west of I-5 is shown in a different brown map color and is indicated by an “A” on the parcel. For example, the land west of I-5 west of the North Gateway study area and west of Armitage Rd. is designated “Agriculture” in the Metro Plan and zoned EFU30.

LRCP plan designation map legend	Soil classification map legend
<p>Rural Plan Designation</p> <p>RCP Plan Designation</p> <ul style="list-style-type: none"> F - Forest A - Agricultural ML - Marginal C - Commercial I - Industrial R - Residential NRES - Non Resource P - Parks AIR - Airport NR:CA - Natural Resource Conservation Area E - Estuary DR - Destination Resort NR:M - Natural Resource : Mineral PF - Public Facility NR:W - Natural Resource : Wildlife 	<p>capability class</p> <ul style="list-style-type: none"> Class 1 Class 2 Class 3 Class 4 Class 5 Class 6 Class 7 Class 8

Where shown, the red line in the small maps below is the UGB.

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

In addition to the summary data compiled in Table 14, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated soils, parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on resource land parcels in the preliminary study area as factual basis to justify excluding ORS 197.298 lands parcels from further analysis.

Table 14: General Description of Fourth Priority Land

North Gateway



- The North Gateway preliminary study area consists solely of the land east of Interstate Highway 5 between the Springfield UGB and the McKenzie River. Lands east and north of the river are in the McKenzie View study area grouping.
- With the exception of the NW corner of the study area (Armitage Park), the North Gateway site is designated Agriculture.
- The area has large, potentially suitable parcels that abut the Springfield UGB and land designated Campus Industrial in the Metro Plan, including parcels 20 acres and larger.
- Area abuts and is highly visible from Interstate Highway 5.
- Area is flat with some slopes along the banks of the river, slough, freeway and the Sprague overpass

embankment

- Floodway, riparian resources and wetlands along the river and Maple Island Slough, hydric soils
- Entire study area is in the floodplain
- Soil classification is mixed. Area comprises Class II, IV, VII, and VIII. Predominantly Class II overall, with Class VII and VIII soils along the river and sloughs.
- The parcels adjacent to and abutting UGB in the southern portion of the area have higher priority for inclusion under ORS 197.298 because the tracts are not composed predominantly of soils classified as prime, unique, Class I or II and high value (ORS 215.710(3)(a)-(d):⁵
 - 1703154000 400 54% of tract is not high value farmland (Class II, IV, VII, VIII)
 - 17031000 2500 56% of tract is not high value farmland (Class II, IV, VII, VIII)
- 17031000 2400 89% of tract is high value farmland (Class II, IV and VIII)
- Parcels north of Sprague consist of predominantly high value soils – lower priority for expansion.
- Presence of hydric soils may indicate wetlands.
- Sensitive Drinking Water Protection Overlay zone: I-5 well (located on EWEB site)
- 1703154000 801 is developed with EWEB power electrical transmission facilities and Rainbow/SUB wells
- Accessed via Corporate Way from the south or via Gateway St. - North Game Farm Rd - Armitage Rd - Sprague Rd Overpass from the south or west.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



1703154000 400



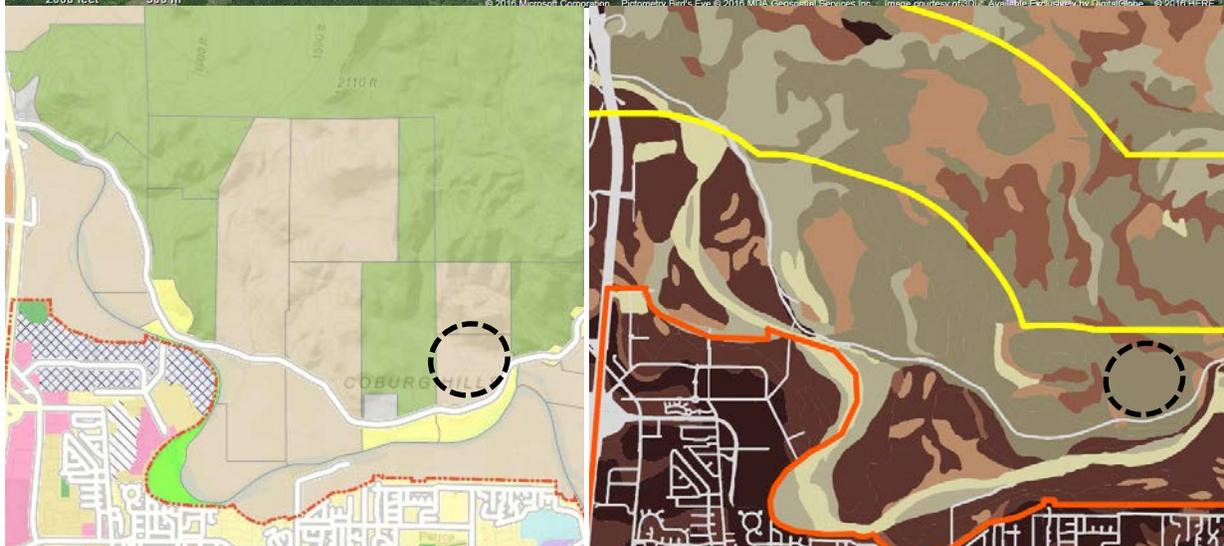
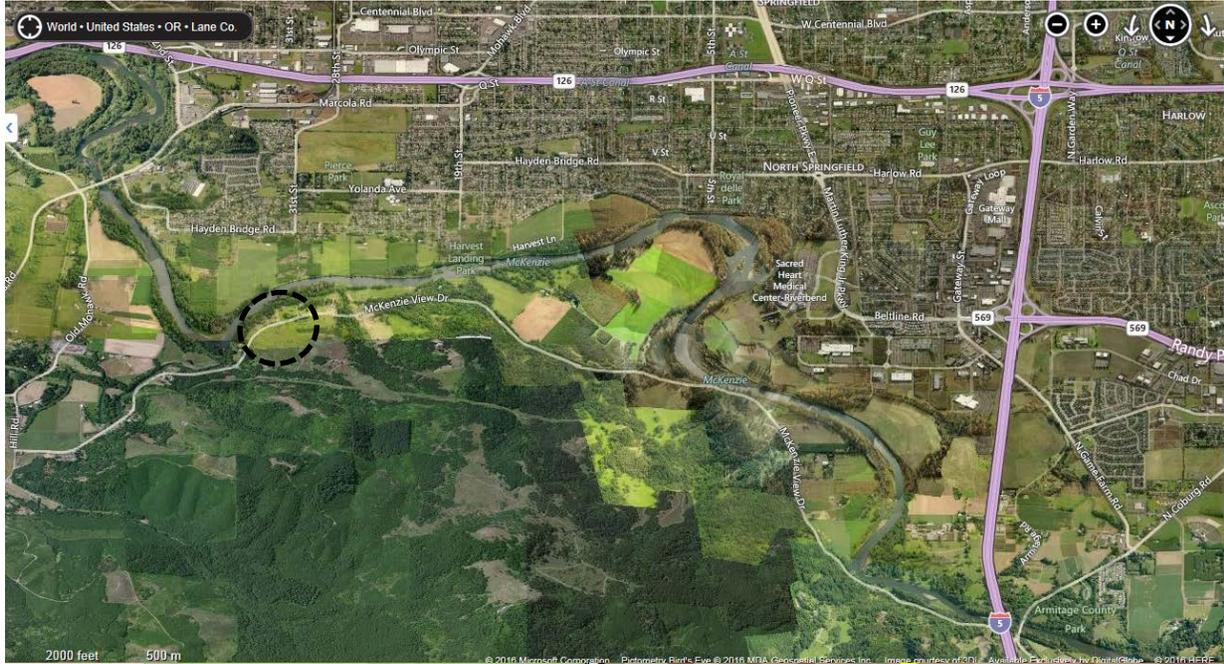
170310000 2500



170310000 2400

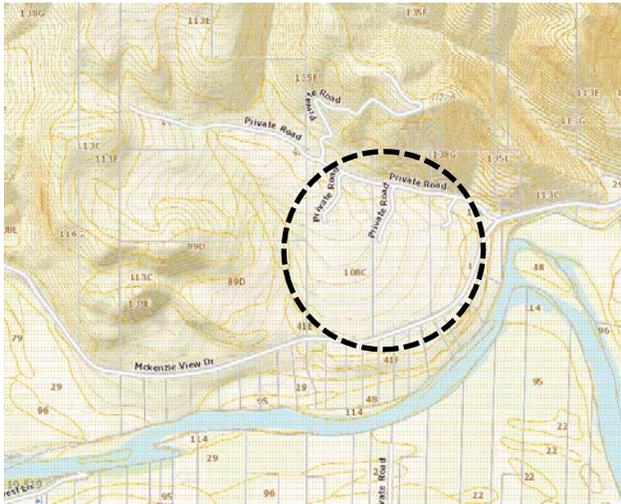
⁵ The City used RLID data to calculate % of soil units in a tract.

McKenzie View

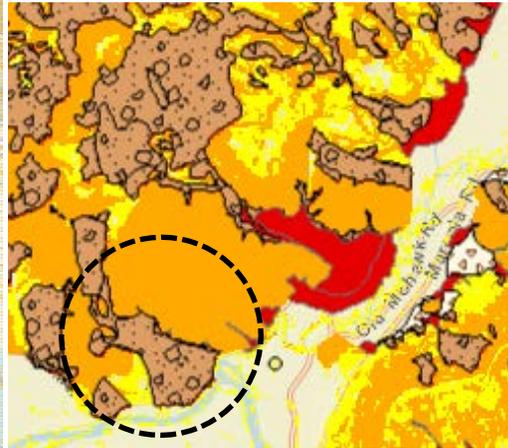


- The McKenzie View preliminary study area consists of the land north of the McKenzie River between Interstate Highway 5 and Marcola Road (Hayden Bridge).
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises Class I, II, III, IV, VI, VII, and VIII. Predominantly Class II soils along the river. Predominantly Class VI in the hills.
- Large parcels are across the river, none are adjacent to UGB.
- Slopes and soils:
 - Predominantly slopes >15% I-5 to Mohawk River on north side of McKenzie View Drive except one area of slopes <15% is shown on map, soil is Class VI (108C- Philomath 3-12% slopes)
 - 17021800 402
 - 17021800 403

- 17021800 404
- Slopes 15% or less I-5 to Mohawk River on south side of McKenzie View Drive Lands slopes are predominantly Class II
- DOGAMI mapped landslide hazards in Coburg Hills
- Floodway, riparian resources and wetlands along the river
- accessed via Coburg Rd - McKenzie View Drive; or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.

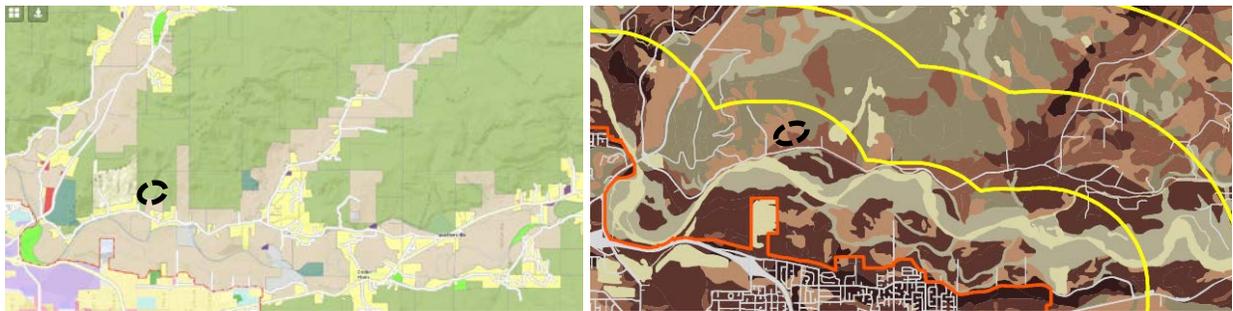


McKenzie View site topography and Cl. VI soil



McKenzie View site DOGAMI hazards

Oxbow/Camp Creek



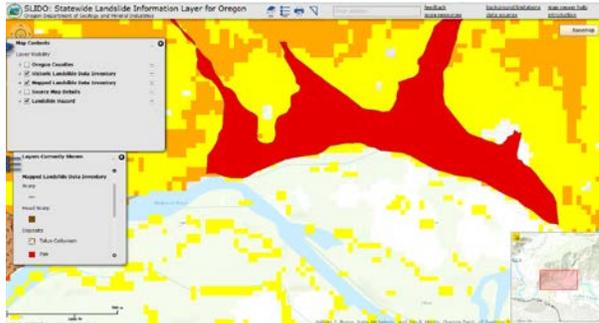
- The Oxbow/Camp Creek preliminary study area consists of the land north of the McKenzie River between Marcola Road (Hayden Bridge) and Hendricks Bridge, excluding the Mohawk Valley.
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises CI I, II, II, IV, VI, VII, VIII soils. Predominantly Class II soils along the river. Predominantly Class VI in the hills. Some Class I along Upper Camp Creek.
- Large, unconstrained parcels are located across the river, not adjacent to UGB.
- Large unconstrained parcels south of Camp Creek Road are predominantly Class II soils.
- Unconstrained portions of parcels north of Camp Creek Road are predominantly Class III soils (105A Pengra 1-4% slopes, and Class VI 108F Philomath 12-45% slope)
 - 17022200 200 approx. 31 acres Class III, slopes 15% or less (4% 105A), EFU
 - 17022200 103 approx. 11 acres Class III, slopes 15% or less (105A – Pengra 1-4% slopes, 113E, 102C), EFU
 - 17022300 300 approx. 6.8 acres Class III, slopes 15% or less (105A – Pengra 1-4% (105A – Pengra 1-4% slopes, 47% 108C Philomath, EFU, BPA easement
- Large unconstrained parcels west of Upper Camp Creek Road are Class I, II and III soils lower priority for expansion
- DOGAMI mapped landslide hazards in Coburg Hills
- riparian resources and wetlands along the McKenzie River

- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk Road – Mohawk Road
- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



17022200 200

17022200 103



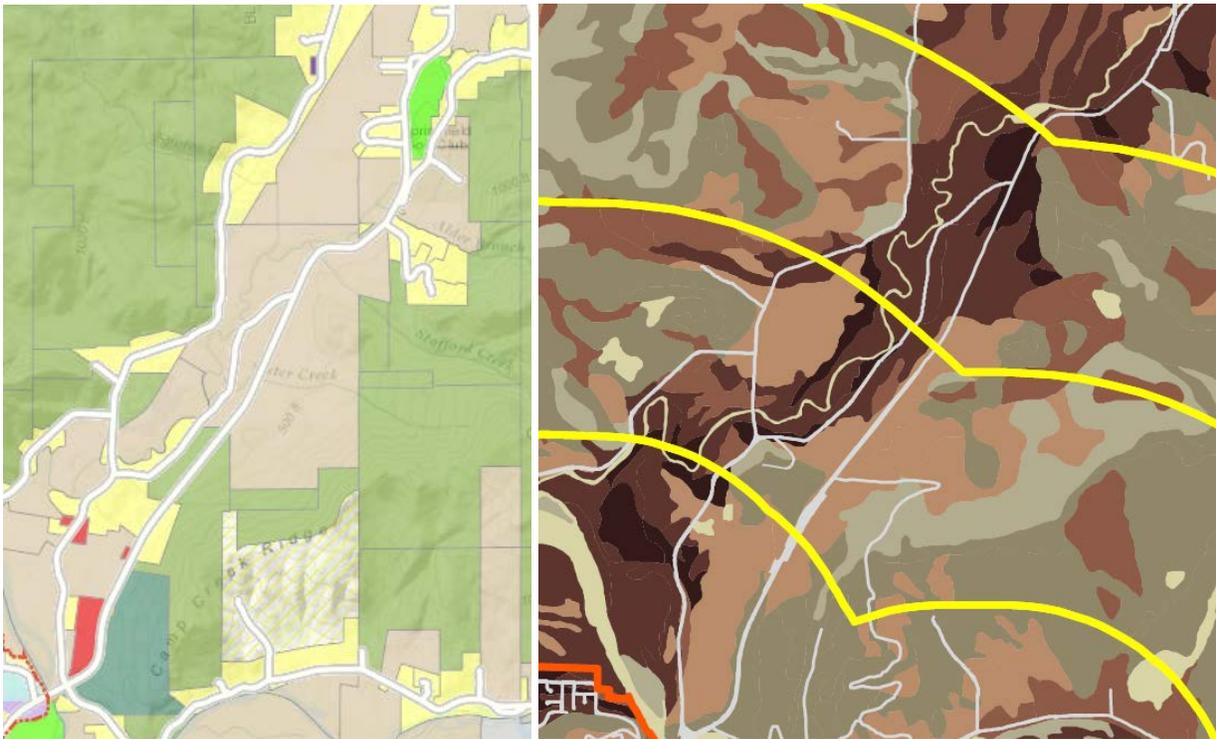
DOGAMI mapped landslide hazards north of Camp Creek Rd.

Hayden Bridge



- The Hayden Bridge preliminary study area consists of the land between the UGB and the McKenzie River extending between the vicinity of Harvest Lane and Marcola Road and the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- Part of a larger block of agricultural land that extends north of the McKenzie River into the McKenzie View and Mohawk study areas
- Predominantly Class II soils. Area comprises Class II, III and IV.
- The area has large parcels that abut and are split by the Springfield UGB along Hayden Bridge Road, including several parcels larger than 20 acres.
- The area abuts urbanizable land designated for and developed with urban and urbanizable Low Density Residential uses.
- Topography is flat.
- Floodway, riparian resources and wetlands along the river
- Drinking Water Protection Overlay District: Pierce and Chase wells
- Accessed via Hayden Bridge Road and Harvest Lane
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.

Mohawk



- The Mohawk preliminary study area consists of the land north of the McKenzie River along Marcola Road (Hayden Bridge)
- Land is across the McKenzie River from Springfield
- Fourth Priority lands are designated Agriculture and Forest.
- Large parcels are across the river, not adjacent to UGB
- DOGAMI mapped landslide hazards in Coburg Hills and Camp Creek Ridge
- Floodway, riparian resources and wetlands along the McKenzie and Mohawk Rivers
- Presence of hydric soils
- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk

Road – Mohawk Road

- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.
- Predominantly forestland
- Agricultural soil classification is mixed. Predominantly Class II with some Class I along the Mohawk and McKenzie Rivers. Area comprises Class I, II, III, IV, VI, and VII.
- Part of larger block of agricultural land that includes the Hayden Bridge and McKenzie View areas
- Large, unconstrained parcels west of Mohawk Road have Class I/II soils; and Class II/III (130 Waldo High Value), 1A Abiqua, 78 McAlpin High Value
- Large unconstrained parcels east of Mohawk Road are Class IV soils: predominantly 85 Natroy High Value/78 McAlpin High Value
- Lower priority for inclusion under ORS 197.298 because unconstrained large parcels consist of predominantly high value capability class soils.
- Presence of hydric soils may indicate wetlands.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

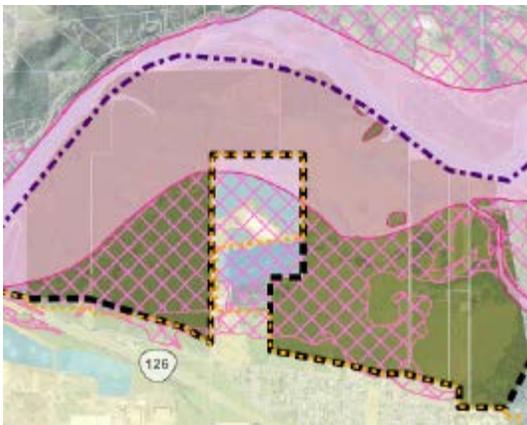
North Springfield Highway



- The North Springfield Highway preliminary study area consists of the land between the UGB and the McKenzie River west to east between the Oxbow and Ruff Park, and extending north-south between the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- part of a larger block of agricultural land that extends on both sides of the McKenzie River west into the McKenzie View and Mohawk study areas an east to the Far East study area.
- Predominantly Class II soils. Area comprises Class I, II, III, IV, VII soils.
- The area has very large parcels (predominantly Class II, mixed with I, II and IV) that abut the Springfield UGB along High Banks Road at 52nd Street
- The parcels adjacent to and abutting UGB in the southern portion of the area have lower priority for inclusion under ORS 197.298 because they consist of predominantly high value soils.
- The area abuts land in the UGB designated for and developed with Heavy Industrial (Bluewater Boats),

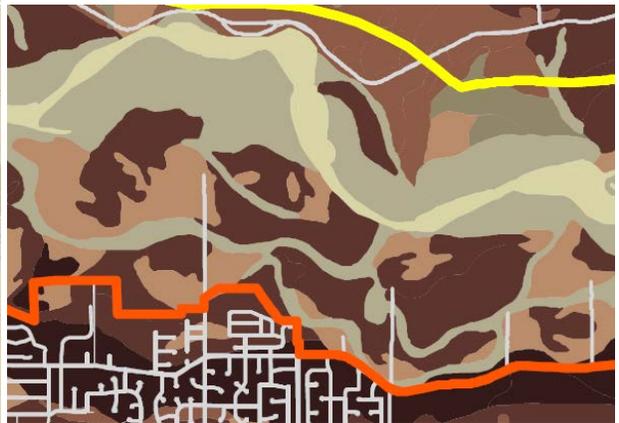
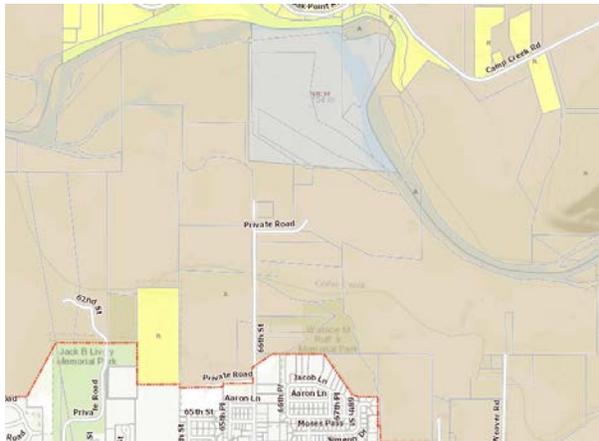
Low Density Residential and Park uses.

- Slopes are flat.
- Floodway, riparian resources and wetlands along the river
- Floodplain
- Drinking Water Protection Overlay zone: Plat 1 and 2 wells
- Convenient access to Interstate Highway 5 via Interstate Highway 105/State Highway 126B at 52nd Street
- 52nd Street (inside the UGB from the south to High Banks Rd.) is classified as a Major Collector Street in the TSP. High Banks Road between 52nd and 58th is classified as a Major Collector Street in the TSP.
- Filbert orchards
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.
- Area has suitable large parcels larger than 20 acres.



Floodway extent (area in solid pink color)

Thurston

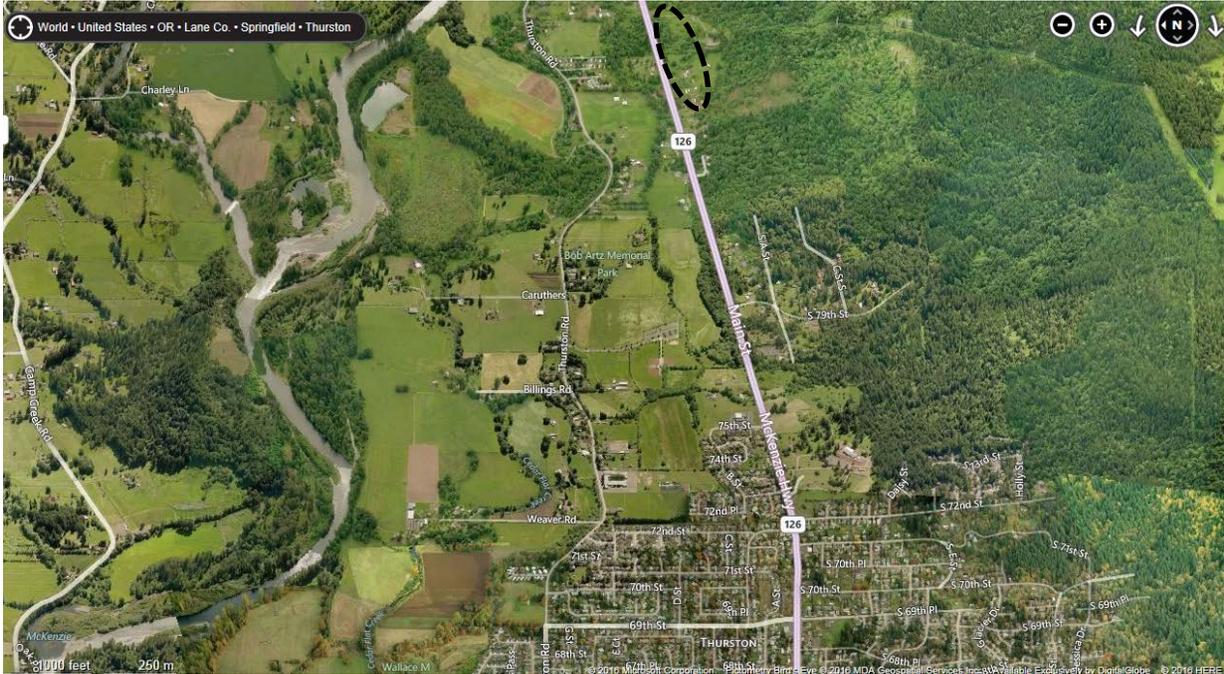


- Abuts UGB
- Part of a large block of agricultural land.
- Soils capability classification is mixed. Area comprises Class I, II, IV and VII, predominantly Class II.
- Constrained by floodway, riparian resources (McKenzie River, Cedar Creek), wetlands
- Drinking Water Protection Overlay District: Thurston, Thurston Middle School, Platt 1 and Platt 2 wells
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.



Floodway extent (solid pink color)

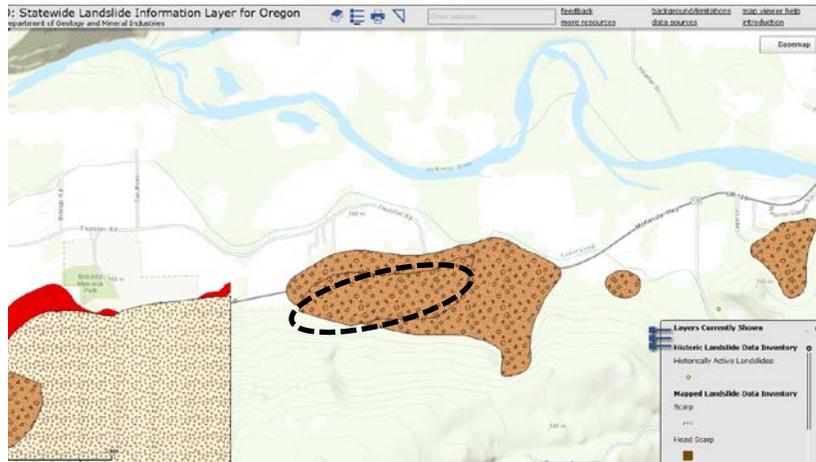
Far East



- Area comprises Class I, II, III, IV, VI, VI, VII, VIII soils; predominantly Class II and flat topography north of Highway 126; predominantly Class IV south of Highway 126 constrained by slopes 20-30%; (52D Hazelair 7-20 % slopes)
- Large Agriculture parcels 6-13 acres in size north of Highway 126 comprise predominantly Class I and II soils.
- Most of the lands south of Highway 126 are sloped 15% or greater. Forest parcels 6-24 acres in size on the south side comprise Class IV soils and are constrained by slopes. Portions of (5) Forest parcels have slopes 15% or less in the area indicated on the maps above.
- DOGAMI landslide hazards
- Floodway north of Cedar Creek, riparian resources McKenzie River, Cedar Creek
- Drinking Water Protection Overlay District: Thurston Middle School and Thurston wells
- Sand and Gravel natural resources
- Adjacent City Low Density Residential development, and County Rural residential development, mobile home park
- Unconstrained large parcels (north of Highway 126) are lower priority for expansion under ORS 197.298

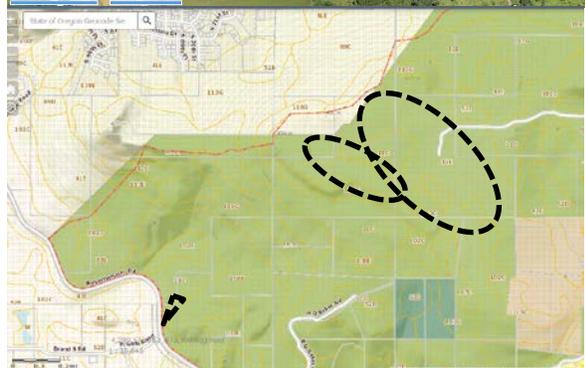
based on predominance of Class I and II soils.

- The area north of Highway 126 was excluded on the basis of soils capability classification.
- Unconstrained large parcels (south of Highway 126) are higher priority for expansion under ORS 197.298, but slopes 7-35% exceed suitability for industrial and commercial mixed use office development. This area was excluded on the basis of specific land needs (197.298(3)(a)) because sloped topography greater than 7% is not suitable for the needed uses.



DOGAMI mapped landslides

South Hills

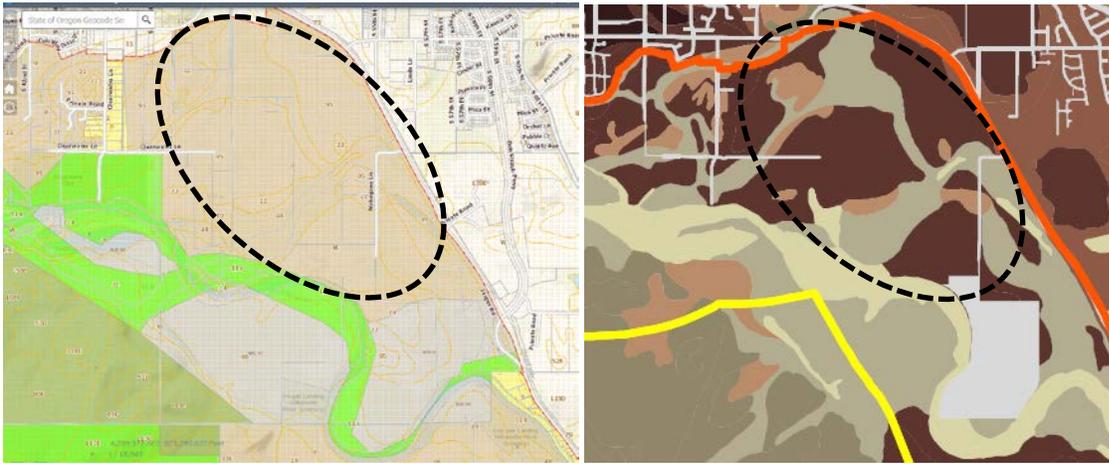


- Lands are designated Forest and Agriculture
- Soil capability class is mixed. Area comprises Class III, IV, VI, VII soils.
- Some parcels about the UGB along the SE ridgeline, remote, isolated
- Large parcels, mostly in public ownership (Willamalane,⁶ BLM)
- Most of the South Hills are constrained by slopes >15% and thus not suitable for industrial and commercial mixed use employment purposes
- One 200+ acre area of flatter slopes comprises Class III soils (11C Bellpine⁷ soil, 3-12% slopes; 12E Bellpine 2-30% slopes; 52D Hazelair 7-20% slopes), is remote from Springfield.
- 18021100 302 11.8 unconstrained acres, slopes constraints and irregular shape make site unsuitable for large lot development, isolated Class VI (102C Panther 2 to 12% slopes)
- DOGAMI mapped landslide hazards
- The lands with flatter slopes are predominantly high value soils, lower priority for expansion under ORS 197.298, remote from Springfield
- Study area comprises higher priority soils under ORS 197.298, but lands with higher priority soils are not suitable for employment purposes.

⁶ The Willamalane parks and open space acquisition includes 232 acres outside the UGB, described in Willamalane *Draft Thurston Hills Natural Area Management Plan*, March 2016, pp. 1-12 and “Map 1.”

⁷ Class III Bellpine is identified in OAR 660-033-0030(8)(a) as meeting the definition of “High Value Farmland”

West Jasper/Mahogany



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class II, IV, VII, and VIII.
- Predominantly flat topography
- Wetlands, hydric soils
- Study area includes productive farmland
- 2 BPA easements cross the study area
- Suitable large parcels abut UGB along Jasper Road, including parcels larger than 20 and 50 acres
- EFU tracts comprising predominantly CI II high value soils, lower priority for expansion⁸:

⁸ See detailed maps in the record: West Jasper/Mahogany study area

- 18020400 1600
- 18020400 2701
- 18020900 2600
- 18020100 500
- 18020900 1402
- 18020900 1403
- 18020800 200
- (5) EFU tracts are not predominantly high value farmland, higher priority for expansion:
 - 18020900 200 (62.4 acres): 53% cl VII and VIII, 44% Cl II
 - 18020900 301 (8.4 acres) 64% Cl VII, 17% Cl III, 10% Cl VIII water, 9% Cl II
 - 18020900 203 (22.7 acres): 78% Cl VII, 8% Cl VIII water, 12% Cl III, 2% Cl II
 - 18020400 2401 (6.1 acres): 28% Cl VII, 26% Cl III, 46% Cl II
 - 18020400 3000 (54.5 acres):
- 18020900 1300 is public land: Oregon Dept. of State Lands
- Proximate (across Jasper Road) to un-annexed land designated for Industrial uses inside the UGB (Jasper-Natron) and land within the City Limits that is planned and partially developed with residential uses (Jasper Meadows), school and park uses.
- Area was identified by staff (2013) as a potential employment area worthy of further study in the UGB Study Area and was included in draft alternatives reviewed by the Springfield City Council in 2013-2014.



18020400 3000



18020400 2701



18020400 2401



18020900 203

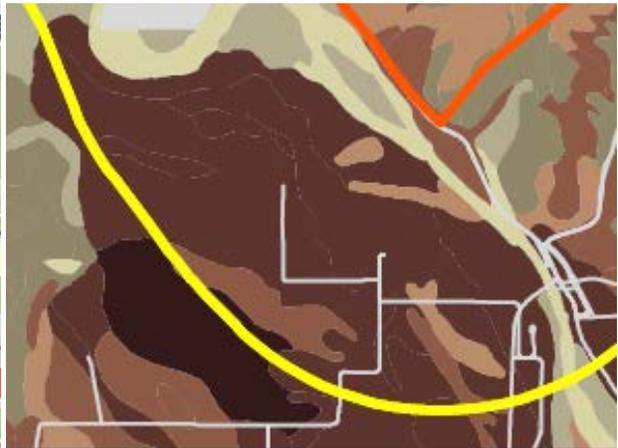
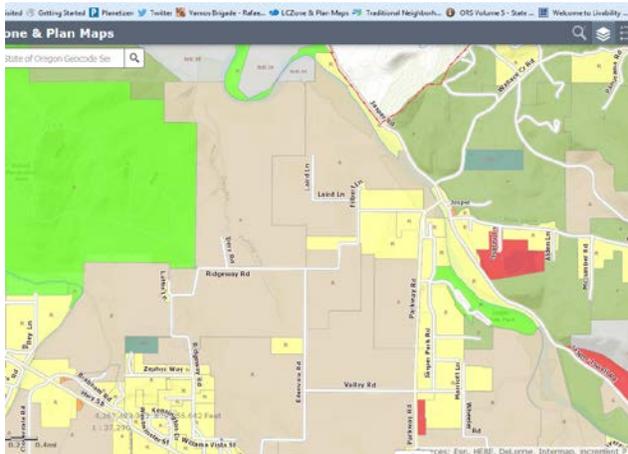
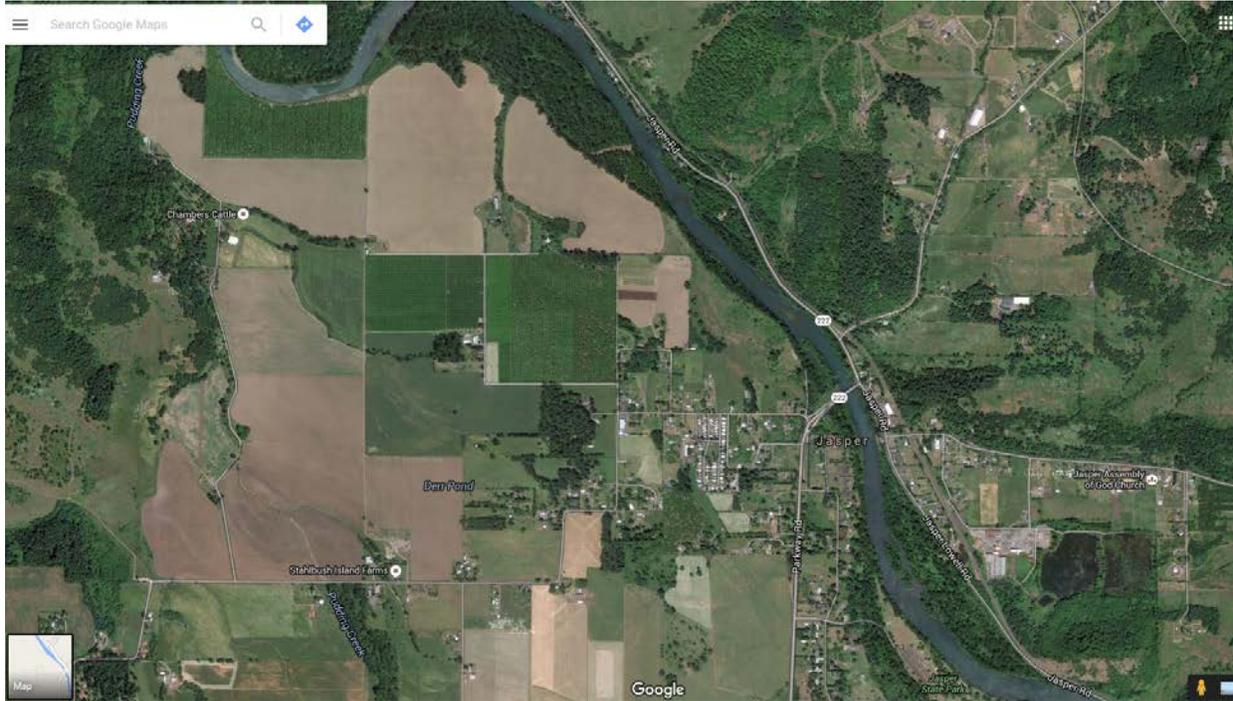


18020900 200



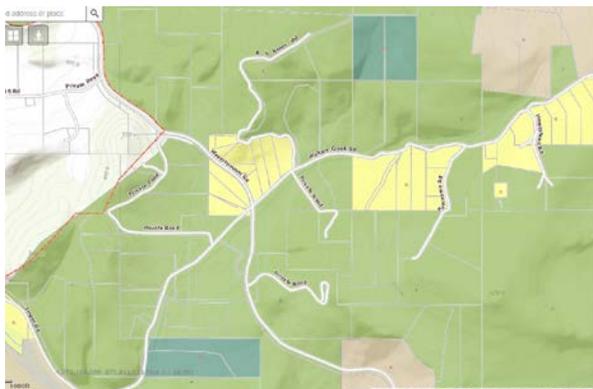
18020900 301

Jasper Bridge



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class I, II, II, and IV. Predominantly Class II.
- Productive farmland
- Predominantly flat topography
- Wetlands
- Large block of Class I and II soils – lower priority for expansion under ORD 197.298

Wallace Creek



- Designated Forest
- Abuts UGB along ridgeline
- Constrained by slopes >15%
- Soil capability class is mixed. Area comprises Class II, III, IV, VI, VII soils.
- Philomath 3-12% (olive green), McAlpin (intersection w/ Wey. Rd.) HazelAire 2-7%
- Flatter slope areas are Class II, III and IV soils.
 - 1802140000 801: 52% CI II and III (Bellpine HV), lower priority for expansion
 - 1802140000 501: 79% CI II, lower priority
 - 1802140000 905: 50% Class III (Bellpine HV), low priority, slopes 12-20%

 - 1802140000 900: 51% CI VI, 49% CI. II (inc. 41% Bellpine CI III HV)
 - 1802140000 800: 66% CI III, 28% CI VI, 6% CI II
 - 1802140000 500: 46% CI III, 28% CI VI, 14% CI IV, 11% CI II, 1% CI VI
 - 1802140000 903: 89% CI III, 7 ac. wetland

- 1802140000 902: 94% CI III
- 1802140000 1303: 19 ac. 77% CI VI



1802140000 900



1802140000 800



1802140000 500



1802140000 902 & 903



1802140000 1303

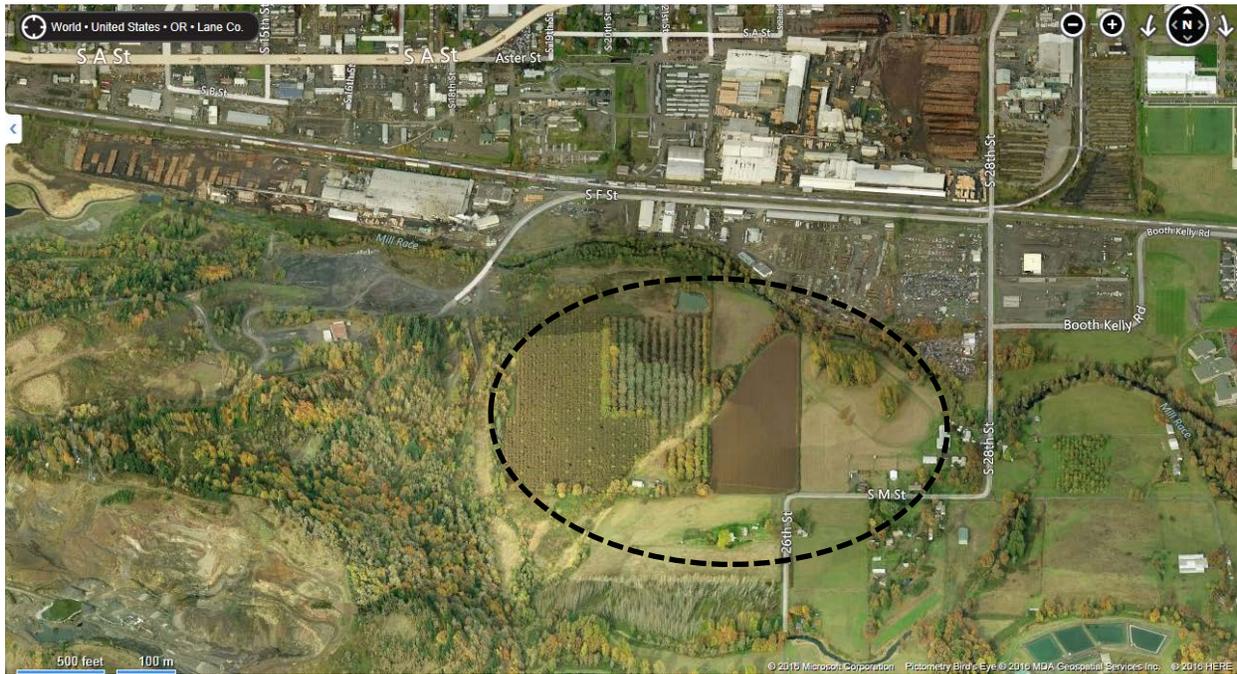


Slopes >15%



Hydric soils and NWI wetlands

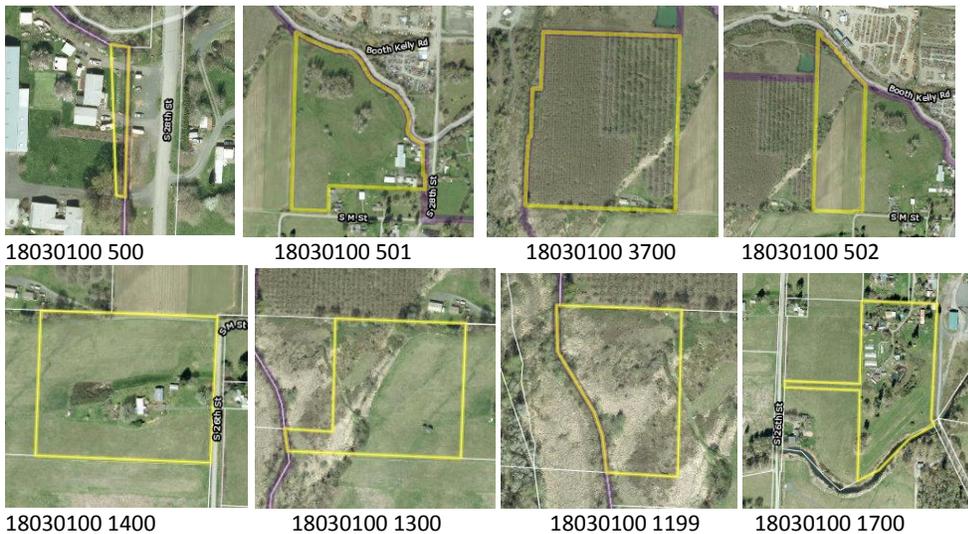
Mill Race



- The Mill Race preliminary study area grouping consists of the land south of the UGB along South 28th, South M and South 26th Streets. Area is immediately east of Springfield/Quarry Butte and south of the Mill Race, a tributary of the Willamette River. The land to the west is an operating rock quarry (Knife River).
- The Mill Race employment land study area grouping is designated Agriculture. The area abuts publically-owned and privately-owned land designated Agriculture and Parks.
- The area has large, potentially suitable parcels including parcels 20 acres and larger that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Heavy Industrial.
- Area is flat with some slopes along the banks of the Mill Race
- riparian resources and wetlands along the Mill Race and other waterways
- portions of study area are in the floodplain
- Highly sensitive Drinking Water Protection Overlay zone and immediately adjacent to SUB Willamette

Wellfield, Springfield's primary drinking water source.

- Soil classification predominantly Class II overall, with some Class III and IV.
- Lower priority for expansion under ORS 197.298.
- Not excluded due to its location immediately adjacent to existing industrial land inside the UGB, its proximity to existing truck routes, public transit, and rail facilities, and presence of a 57-acre tract (in SUB's ownership) and a 21.1 acre tract comprising developable land not outside of the flood plain.
- SUB Tract (57.2 acres) abuts SUB land inside the UGB, abuts Swanson Mill site (currently being rebuilt and upgraded after the 2014 fire), and has access easements through to F Street.⁹
 - 18030100 3700/18030100 502
- 18030100 501 abuts UGB is a 20-acre site, abuts UGB
- Smaller 5-10 ac sites in study area:
 - 18030100 1400/ 18030100 1300/ 18030100 1199
 - 18030100 1700
 - 18030100 1701/18030100 1702
- Access to the area to and from Interstate Highway 5 is via South 28th Street, classified as a Major Collector in the TSP; and South M and South 26th (Lane County road); and South F Street (via SUB access easement on Swanson property)— a Local Street in the TSP.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



⁹ See 4-29-14 email from SUB General Manager Jeff Nelson to staff Pauly: "when SUB purchased the KR property, SUB made sure that emergency vehicles can access through KR's property via the Swanson easement (for all the area, not just the three parcels) to comply with the Fire Marshall's requirements for emergency vehicle access circulation." See letters from SUB General Manager Jeff Nelson, dated 9-10-13 and 5-1-14 to Springfield Mayor and Council regarding SUB's request to bring the tract purchased from Knife River into the UGB to be designated for employment uses; thus the City assumed this publicly-owned land is a candidate site for inclusion in the UGB to meet employment land needs.



18030100 1701

18030100 1702

Seavey Loop

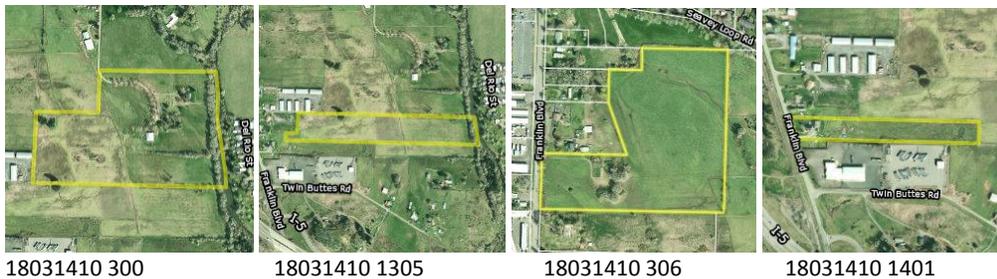


- Designated Agriculture
- Soil capability class is mixed. Area comprises Class II, III, IV, and VI, soils.
- Soils predominantly Class II, and Class III and IV High Value and Prime (same priority as CI II), lower priority for expansion
- Part of a larger block of high value agricultural land
- Tracts with Class VI soils are constrained by slopes and very restrictive BPA easements.
- North and Eastern portions of study area are entirely in the floodway.
- Hydric soils
- Area contains parcel larger than 20 acres, including a multiple-parcel tract of land owned by one family, but parcels comprise predominantly High Value Ag. soils, lower priority for expansion.

- 18031410 300: 62% High Value Ag.
- 18031410 1305: 74% High Value Ag
- 18021410 1400: 100% High Value Ag
- 18031100 1600: 100% High Value Ag
- 18031130 3900: 61% High Value Ag
- 18031410 306: 77% High Value Ag
- 18031410 307: 74% High Value Ag
- 18031410 305: 100% High Value Ag
- 18031100 1604: 81% High Value Ag

- 18031410 1401: 36% High Value Ag, higher priority for expansion, 5 ac.

- NOTE: One EFU tract 18031440 501, 504 and 505 (20.1 ac.) is completely surrounded by exception land and I-5, and does not comprise predominantly high value ag soils, thus is considered second priority land. This tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.
- See additional description of this Study Area under Second Priority Exception Areas
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



¹⁰ It should be noted that the Alvey Substation located south of this area “is a high voltage substation hub for BPA’s high voltage transmission network 115kV and above. It is not a distribution substation. Lines go out of BPA’s substation that feed to local distribution substations that transform the voltage from 115kV to a lower distribution voltage.” “If a large user were to locate in the College View area, they would not receive service directly from BPA’s substation, however a new High Voltage to Low Voltage distribution network substation could be built.” (email from Jeff Nelson to staff Pauly, SUB, 9-11-14)



Floodway extent

Clearwater



- Designated agriculture
- Potentially suitable parcels including parcels 10 and 20 acres and larger parcels that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Low Density Residential
- Area is flat with some slopes along the banks of the Middle Fork Willamette river
- Riparian resources and wetlands along the river and Mill Race and Gorrie Creek
- Portions of study area are in the floodplain; floodway along the river
- Sensitive Drinking Water Protection Overlay zone and near SUB's Willamette Wellfield, Springfield's primary drinking water source.
- Soil classifications are mixed, predominantly Class II overall, with some Class IV and VII.
- Public parkland in the vicinity
- Hydric soils
- Parcels comprising <50% High Value Ag soils
 - 18020800 100 (16.2 acres) 54% non high value (Cl. VIII, II VII)
 - 18020500 2801 (29 ac.)* 58% non high value (Cl VII, VI, II)

- 18020500 1928 (10 ac.)* 33% CI VII, 34% CI IV, 33% CI II
- Parcels comprising more than 50% High Value Ag soils:
 - 18020500 2800 (39.5 ac.) 63% CI II, low priority for expansion
 - 18020500 2600 (22 ac.)* 72% CI II, low priority for expansion
 - 18020500 2202 (21 ac.)* 96% CI II, low priority for expansion
 - 18020500 1900 (10.3 ac.)* 80% CI II, low priority for expansion
 - 18020500 1708 (5.8 ac.)* 66% CI II, low priority for expansion
 - 18020500 1800 (36 ac.)* 63% CI II, low priority for expansion
 - 18020600 4202 (21 ac.)* 73% CI II, low priority for expansion
- 18020500 1909, 18020600 1001 are public land owned by Springfield School District
- Area was identified by the RLS and CIBL Technical and Stakeholder Advisory Committees as a potential future residential expansion area but not suitable for industrial and commercial development.



PRIORITIZE FOURTH PRIORITY AGRICULTURAL AND FOREST LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

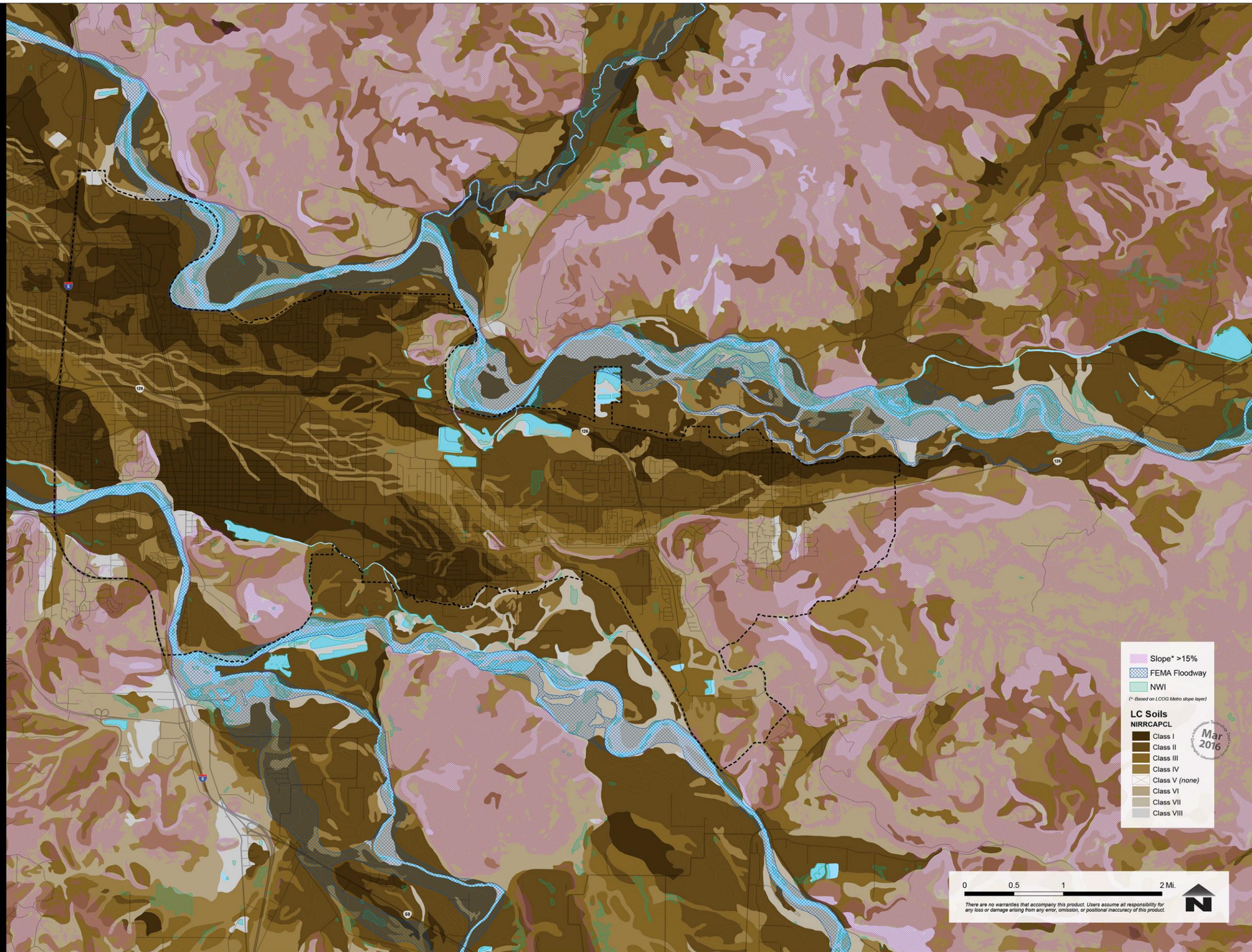
ORS 197.298(2):

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

The City conducted an area-wide high level assessment of soil capability classification to determine and compare the capability classification system or by cubic foot site class of lands adjacent to the UGB that are designated for agriculture, forestry or both.

Table 14 above provides additional information to compare general soil classifications between the study area groupings and parcels within groupings.

SPRINGFIELD 2030 REFINEMENT PLAN: Soil Capability and Constraints



Slope* >15%

FEMA Floodway

NWI

(*Based on LCOG Metro slope layer)

LC Soils
NIRRCAPCL

- Class I
- Class II
- Class III
- Class IV
- Class V (none)
- Class VI
- Class VII
- Class VIII

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There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Analysis of Capability Classification in the Springfield UGB Study Area [ORS 197.298(2)]

This section of the report explains how the City addressed ORS 197.298 (1)(d) and (2) when the City identified the capability classifications of soils found in the potential urban growth areas surrounding Springfield’s UGB, and when the City mapped the UGB study area to analyze fourth priority lands designated for agriculture and forestry in the Lane Rural Comprehensive Plan. As supported by ample evidence in the record documenting the City’s iterative planning process beginning in 2008, the City’s UGB location alternatives analysis examined capability classifications of all land surrounding the UGB in the initial, preliminary and final stages of the UGB study area alternatives analysis.

Methodology. The capability classifications mapping for the initial analysis included all land in the vicinity of the UGB, and extending several miles out to the north, east and south.¹¹ To compare and evaluate land under ORS 197.298 (1)(d) and (2), the City used the United States Department of Agriculture Natural Resources Conservation Service (NRCS) Lane County Soil Survey data to prepare maps of the lands adjacent to the UGB depicting soil classifications I through VIII.¹² These maps provided the factual base for conducting analysis to determine the location of prime agricultural soils and the geographic relationship of those soils to the existing UGB and potential UGB expansion areas.

In addition to providing a factual basis for the City’s prioritization of lands designated for agriculture and/or forestry by capability classification, this section of the report provides evidence and findings to address the City’s analysis under Goal 14, Boundary Location Factor 4 for comparing land groupings within the fourth priority under ORS 197.298; and to justify the City’s ultimate choice of expansion areas under Goal 14, Boundary Location Factor 4 — balanced with the other Goal 14, Boundary Location Factors.

As stated on the USDA NRCS Soils website, a published soil survey is a detailed report on the soils of an area. The soil survey has maps with soil boundaries and photos, descriptions, and tables of soil properties and features. Soil surveys are used by farmers, real estate agents, land use planners, engineers and others who desire information about the soil resource.¹³

Land Capability Classification is defined in the NRCS Technical Reference NSSH Part 622.02:

- a. *“Definition. Land capability classification is a system of grouping soils primarily on the basis of their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time.*
- b. *Classes. Land capability classification is subdivided into capability class and capability subclass nationally. Some States also assign a capability unit.*

¹¹ Lands west of Interstate Highway 5 were assumed to be within the City of Eugene’s jurisdictional area as described in the Metro Plan and were not included in Springfield’s analysis.

¹² Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

¹³ USDA NRCS website http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/?cid=nrcs142p2_053375, accessed 12-15-15.

- c. *Significance. Land capability classification has value as a grouping of soils. National Resource Inventory information, the Farmland Protection Policy Act, and many field office technical guides have been assembled according to these classes. The system has been adopted in many textbooks and has wide public acceptance. Some State legislation has used the system for various applications. Users should reference [Agriculture Handbook No. 210](#) for a listing of assumptions and broad wording used to define the capability class and capability subclass.*
- d. *Application. All map unit components, including miscellaneous areas, are assigned a capability class and subclass. Agriculture Handbook No. 210 provides general guidance, and individual State guides provide assignments of the class and subclass applicable to the State. Land capability units can be used to differentiate subclasses at the discretion of the State. Capability class and subclass are assigned to map unit components in the official soil survey database.”¹⁴*

As stated in the National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS:

“Capability units are soil groups within a subclass. The soils in a capability unit are enough alike to be suited to the same crops and pasture plants, to require similar management, and to have similar productivity. Capability units are generally designated by adding an Arabic numeral to the subclass symbol, for example, 2e-4 and 3e-6. The use of this category of the land capability classification is a state option. This category of the system is not stored in the NRCS soil survey database.”¹⁵

As stated in the Forward to the Agriculture Handbook No. 210 p. iii:

“Since soil surveys are based on all the characteristics of soils that influence their use and management, interpretations are needed for each of the many uses.”¹⁶

and

“In using the capability classification, the reader must continually recall that it is an interpretation. Like other interpretations, it depends on the probable interactions between the kind of soil and the alternative systems of management. Our management systems are continually changing. Economic conditions change. Our knowledge grows. Land users are continually being offered new things, such as new machines, chemicals, and plant varieties.”¹⁷

and

“The new technology applies unevenly to the various kinds of soil. Thus the grouping of any one kind of soil does not stay the same with changes in technology. That is, new combinations of practices increase the productivity of some soils more than others, so some are going up in scale whereas others are going down, relatively. Some of our most

¹⁴ National Soil Survey Handbook, Part 622, USDA, NRCS
http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/ref/?cid=nrcs142p2_054226#ex6 accessed 12-16-15.

¹⁵ National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS, provided to staff by Eugene USDA/NRCS District Conservationist Tom Burnham, 12-16-15.

¹⁶ Agriculture Handbook No. 210, Land Capability Classification, USDA Soil Conservation Service,

¹⁷ Ibid.

productive soils of today were considered poorly suited to crops a few years ago. On the other hand, some other soils that were once regarded as good for cropping are now being used more productively for growing pulpwood. These facts in no way suggest that we should not make interpretations. In fact, they become increasingly important as technology grows. But these facts do mean that soils need to be reinterpreted and regrouped after significant changes in economic conditions and technology.”¹⁸

and

“...other important interpretations are made of soil surveys. Examples include groupings of soils according to crop-yield predictions, woodland suitability, range potentiality, wildlife habitat, suitability for special crops, and engineering behavior. Many other kinds of special groupings are used to meet local needs.”¹⁹

The City used NRCS SSURGO data to map soils and their capability classifications.²⁰ Staff contacted Cory Owens, USDA NRCS State Soil Scientist²¹ to confirm that the capability classifications I-VIII in the SSURGO data base are a component of the official soil survey database.

For more detailed study area and parcel-level analysis, the City applied the NRCS SSURGO map data to the City’s maps of study areas.²² The City also accessed NRCS soils data from the Regional Land Information Database (RLID) in Lane County and accessed soil map units on a parcel by using the Lane County Plan and Zone online Map viewer. Soils information in RLID is derived by overlay of Lane County regional GIS taxlot layer with soil units mapped by USDA Natural Resource Conservation Service (NRCS). In addition to the names and relative extents of the soil “map units” which occur on the taxlot, limited soil characteristics are displayed in RLID. For Lane County, the RLID data shows the name and number of the soil map unit and the percentage of each mapped soil unit on a parcel. In addition to GIS analysis of the NRCS data, the City utilized the parcel-based soils data in RLID in the boundary alternatives analysis. In RLID, the “Ag Class” value (formally known as Non-Irrigated Land Capability Class) represents the dominant capability class, under non-irrigated conditions, for each map unit, based on composition percentage of all components in the map unit. Land capability classification relates to the suitability of soils for most kinds of field crops. Capability classes are designated by the numbers I through VIII, which indicate progressively greater limitations and narrower choices for practical use:

Class I soils have few limitations that restrict their use.

Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.

Class III soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ NRCS Lane County Soil Survey

²¹ telephone communication between staff Pauly and NRCS staff Cory Owens, 12-17-15

²² Email from staff Mike Engelmann to staff Pauly, 12-17-15

Class IV soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.

Class V soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VI soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VII soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.

Class VIII soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or esthetic purposes.

In RLID, the “Hydric” value indicates the percentage of each map unit that meets the definition of hydric soils. Map units are composed of one or more map unit components or soil types, each of which is rated as hydric soil or not hydric. Map units that are made up dominantly of hydric soils may have small areas of minor non-hydric components in higher positions on the landscape, and map units that are made up dominantly of non-hydric soils may have small areas of minor hydric components in lower positions on the landscape. Each map unit is rated based on its respective components and the percentage of each component within the map unit.

OAR 660-033-0030(2) states: *“When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried.”*

ORS 215.710 lists the soils to be considered high value farmland: land in a tract composed predominantly of soils that are irrigated and classified prime, unique, Class I or Class II; or non-irrigated and classified prime, unique, Class I or Class II. In addition, for lands in the Willamette Valley, tracts composed predominantly of certain Class III or IV soils listed in ORS 215.710(3)(a)-(d) and soils west of the Cascades listed in (4)(a)-(d) are considered high value.

OAR 660-033-0030 (8)(a) "High-Value Farmland" means land in a tract composed predominantly of soils that are:

(A) Irrigated and classified prime, unique, Class I or II; or

(B) Not irrigated and classified prime, unique, Class I or II.

(c) In addition to that land described in subsection (a) of this section, high-value farmland, if in the Willamette Valley, includes tracts composed predominantly of the

following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils:

(A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The UGB Preliminary Study Area contains fourth priority land tracts composed predominantly of soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils.

In addition to prioritizing lands on the basis of capability classification as required by ORS 197.298, the City is required to apply Goal 14 Factors 3 and 4 to compare and evaluate candidate agricultural lands for inclusion in the UGB. In addition to requesting input from agency staff, the public and property owners to conduct the evaluation of alternatives, city staff conducted a literature search of relevant literature on this topic from the Oregon Department of Agriculture to supplement this report. The Department’s 2007 report “*Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands*”, January 2007²³ states:

“Analysis of site and situation is best understood as an examination of both the capability (ability of the land to produce an agricultural product) and the suitability (ability to conduct viable farm use) of any given tract of land to be utilized for farm use. The key factors employed to identify significant and intact agricultural lands are discussed below.”

“Capability factors

The physical ability of land to produce an agricultural product is a key and dominant factor in any assessment. Quantity and quality of soils and water play a significant role in the viability of agricultural production.”

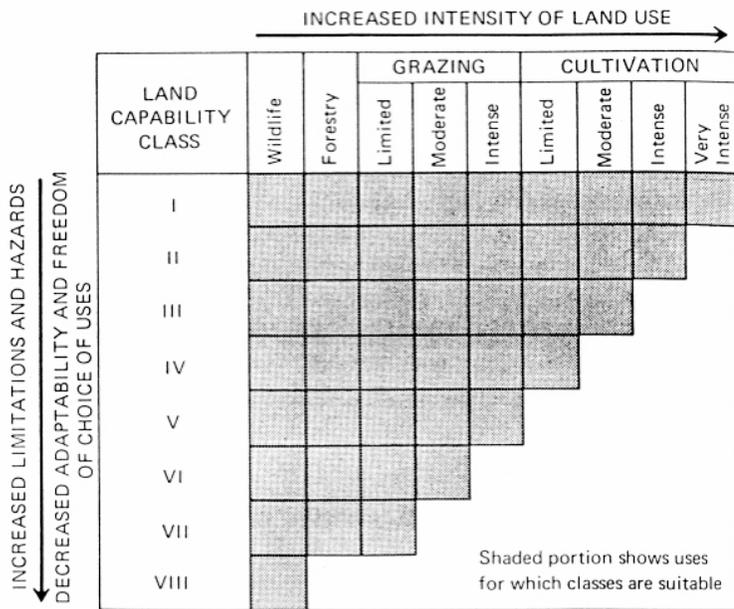
Soils: USDA NRCS agricultural capability class and importance (prime, unique, important farmlands). Because soils play a key role in the required Goal 14 analysis and Oregon land use issues, a more detailed discussion is provided below.

Soils surveys are based on all the characteristics of soils, including climate, that influence their use and management. Interpretations are provided within soil surveys for various land uses, including agriculture. Among these interpretations is the grouping of soils into

²³ Pages 13-14

agricultural capability classes. This classification system places soils in eight capability classes. The better the agricultural capability (decreasing from I-VIII), the less management (input) is required by the operator to produce a crop. Soil quality is also a key to the production options available to a grower.

The soils in the first four classes (I-IV), under typical/good management practices, are considered arable and are capable of producing adapted plants and common cultivated field crops and pasture plants. Some soils in classes V-VII are capable of producing specialized crops and even field and vegetable crops under special management.”



“Soils can also be designated as prime, unique, or high-value farmland:

Prime Farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber and oilseed crops. It must be available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not exclusively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.”

“Unique farmland is land other than prime farmland that is used for the production of specific high value food and fiber crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce economically sustained

high quality and/or high yields of a specific crop when treated and managed according to acceptable farming methods. Some examples of crops are tree nuts, cranberries, wine grapes, and tree fruits.”

“High Value Farmland is defined in ORS 215.710(1), (3) and (4) and OAR 660-033-0020(8)(a), (c), (d) and (e). “High Value Farmland” is land in a tract composed predominantly (50.1%) of certain specified soils commonly referred to as “High Value Farmland Soils.” These soils (alone or in combination) are the following:

1. Those soils classified by the Natural Resource Conservation Service (NRCS) as:

a. Prime, Unique, Capability Class 1 or Capability Class 2 not irrigated; or

b. Prime, Unique, Capability Class 1 or Capability Class 2 if irrigated; and

2. Certain specifically listed Capability Class 3 and 4 soils for the:

a. Willamette Valley; and

b. Oregon Coast west of the summit of the Coast Range if used in conjunction with a dairy operation on January 1, 1993; and

“High-value farmland also includes other lands planted in specified perennials based on the 1993 Farm Service Agency air photos.”

“Water: Availability of water for irrigation of agricultural crops and livestock watering. Water is key to the production of many high-value crops. However, many crops, including high-value crops, can be produced using dryland agricultural practices. Dryland production is most feasible where precipitation is adequate to allow economic return on a nonirrigated crop. New technologies in delivery and storage can compensate for limited availability.”

“Water availability is both an asset and a threat to regional agricultural. Current availability is overall good throughout the region. Expansion in some areas, especially where groundwater is the major source, is severely limited by ground water limitations. Such limitations do not impair the use of existing water rights. It is especially important to recognize existing agricultural irrigation in groundwater restricted areas because new irrigation rights currently are difficult to obtain.”

“Most of the suitability factors can be related to the position of farming operations as part of a large block of agricultural land or other resource lands. Protecting and maintaining large blocks of agricultural land is key to maintaining the integrity of working lands. Integrity involves many issues including the ability to operate with limited conflicts, curtail speculative land values and maintain a critical mass of land sufficient to leverage the infrastructure needs of the industry. (emphasis added)

- *Land use pattern: Adjacent and area land use pattern (nonfarm uses, exception areas). Includes analysis of edges that provide workable buffers between agricultural lands and nonfarm uses.*
- *Agricultural land use pattern within the subject agricultural area: The types of crops grown and the ability of farming operations/practices associated with the producing these crops to co-exist with other land uses in the area can be an important factor.*
- *Parcelization (number and size), tenure and ownership pattern: In analyzing suitability, parcelization is important, but not always as a stand-alone factor. All other factors being equal, smaller parcels under multiple ownerships are less favorable for long-term commercial farm use. The practice of renting or leasing smaller (and larger) parcels is very common in the region and needs to be taken into account. Long term, if the smaller parcels are protected for farm use, they frequently become available for rent, lease or acquisition for farm use, especially if they do not contain dwellings.*
- *Agriculture infrastructure: Elements such as transportation, irrigation delivery, labor availability, processing and other service needs, agricultural special districts, drainage facilities, etc., can be important factors in the long-term viability of an area. It is important to note that, unlike the infrastructure needs for new urban development, the agricultural infrastructure is in most cases already in place and has been and is being maintained and updated on an ongoing basis.*
- *Zoning, within subject agricultural area: Many lands currently employed in farm use within the Metro region are not zoned for exclusive farm use. The long-term suitability of such areas is impacted by the nonfarm uses that may be permitted and by the ability to further partition or subdivide the area.*
- *Location in relationship to adjacent lands zoned for nonresource development:*
- *The number, size and length of edges with urban and other nonfarm development impact the efficiency and effectiveness of agricultural practices and can impact land values.*
- *The scale, shape and size of protrusions of nonresource lands into agricultural lands also impact efficient and effective agricultural operations.*
- *Certain nonfarm uses are more compatible with agricultural operations than others.*
- *The ability to further partition or subdivide.*
- *Location/availability of edges and buffers that help insulate and protect agricultural operations from nearby nonfarm use.*

Other factors

- *Concentration/clusters of farms:*
- *The dependence between farms: ability for sharing of labor, housing, equipment and other needed services can be critical to the bottom line.*
- *The ability to leverage agriculture's infrastructure needs by maintaining economies of scale.*
- *A cluster of farms can also have marketing value. Customers like to make one trip to obtain berries, fruits, vegetables and other products in one area.*
- *Agri-tourism can also benefit from clusters. Examples include winery tours, marketing by the Tri County Farm Fresh Food Guide, and the Hood River Valley "Fruit Loop."*

"Trends in regional agriculture create different needs, opportunities and abilities for the industry. Consumer trends are increasingly dynamic and segmented, creating new markets; markets that are rapidly changing and demanding more specialty products. Specifically:

- *Global trade opportunities and concerns.*
- *Demand for organic, sustainable, high quality foods both in the home and at restaurants.*
- *Farmers markets, direct marketing opportunities, development of specialty and niche crops.*
- *"Agri-tourism*
- *Increasing demand for biofuels/energy development. Agricultural practices associated with the production of commodities used in the production of biofuels tend to be more extensive in nature, usually do not require irrigation and tend to require the use of larger machinery.*
- *Growing recognition of food security issues and demand for products from the local food shed.*
- *Federal Farm Bill. New conservation incentives and other programs related to renewable energy and farmland protection could help region farms cope.*

Location within and near a major metropolitan region can be a major asset in light of the trends outlined above. Many of the intensive, high-value, niche and specialty crops in increasing demand can be produced under circumstances not otherwise conducive to more recognized agricultural production in the region."²⁴

²⁴ *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands, Oregon Department of Agriculture, 2007*

The Department of Agriculture’s inventory and analysis for Portland Metro identified varying intensities, scale and suitability situations within the region’s agricultural lands. The study identified an agricultural lands hierarchy that recognized three levels of agricultural lands found in the Portland Metro region:

- **“Foundation Agricultural Lands:** *agricultural lands that provide the core support to the region’s agricultural base. These lands anchor the region’s larger agricultural base. They incubate and support the larger agricultural industry and are vital to its long-term viability. They have the attributes necessary to sustain current agricultural operations and to adapt to changing technologies and consumer demands.”*
- **“Important Agricultural Lands:** *agricultural lands that are suited to agricultural production and contribute to or have the capacity to contribute to the commercial agricultural economy. These lands maintain the ability to remain viable over the long term. They have the potential to be Foundation Agricultural Lands, but tend to be not utilized to their full potential. Trends in regional agricultural could lead to a greater development of the agricultural capacity of these areas.*
- **Conflicted Agricultural Lands** *are agricultural lands whose agricultural capability (soils/water) is more times than not considered excellent but whose suitability is questionable primarily due to questions of integrity and ability to operate. These questions lead to issues of long-term viability. These lands are influenced by factors that diminish long-term certainty, which in turn tends to limit investment in agricultural operations by area farmers. These lands could become Important Agricultural Lands with changes in circumstances and trends in the industry. There may be individual or multiple operations within these areas that are conducting efficient, effective and viable operations.”²⁵*

The City’s data base and methodology for identifying and evaluating soils for the purpose of ORS 197.298 and Goal 14 is reasonable and consistent with the law.

Evaluation results. The City’s initial wide-ranging look at soil classifications in 2008 provided a “big picture” of where prime agricultural soils and important agricultural lands are located in relationship with Springfield’s UGB and future growth needs. This assessment was confirmed through the City’s multi-year Citizen Involvement process and input from local agricultural experts and practitioners. This is important and germane to the City’s UGB study because Oregon law and the Oregon Department of Agriculture identify the importance of large blocks of agricultural land as an important factor in maintaining the states’s agricultural land base:

ORS 215.243 (2)

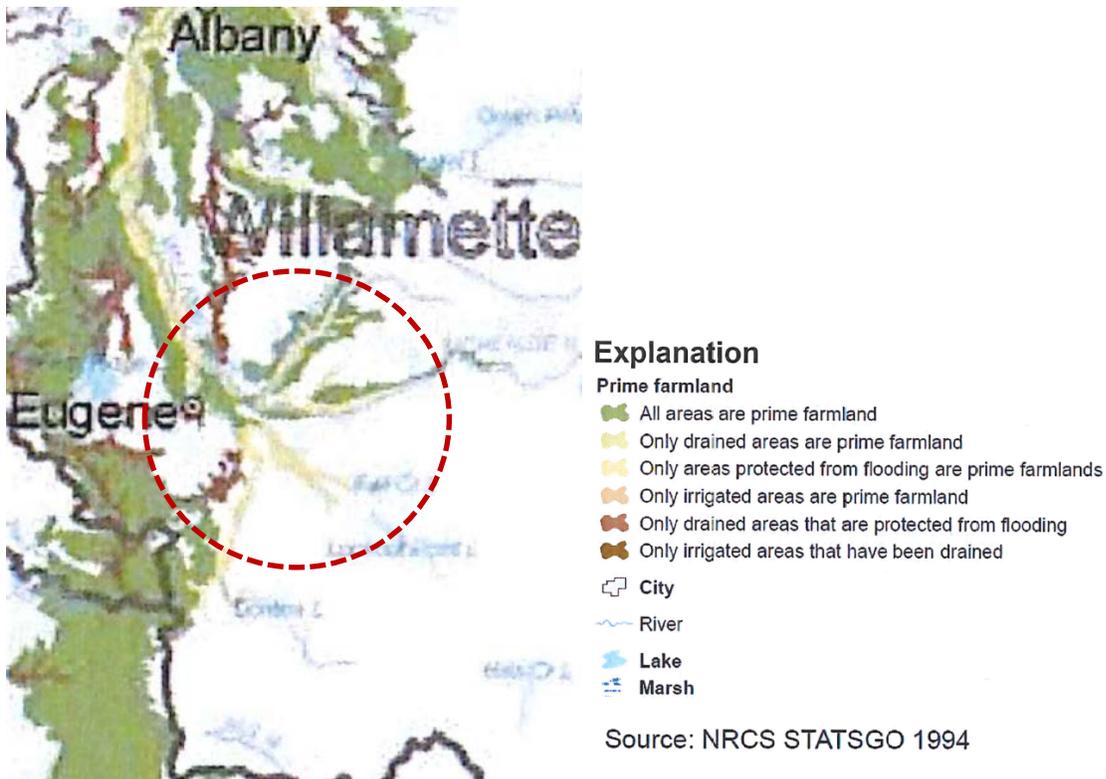
“The preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state’s economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation. (emphasis added)

²⁵ Ibid

“Expansion of urban development into rural areas is a matter of public concern because of the unnecessary increases in costs of community services, conflicts between farm and urban activities and the loss of open space and natural beauty around urban centers occurring as the result of such expansion.”

The average size of a farm in Lane County (2012) is 83 acres.²⁶

An enlargement of the map “Prime Farmlands in Oregon” of the vicinity of the Springfield UGB Vicinity²⁷ illustrates the general location of large blocks of prime farmland in relationship to the Springfield/Eugene metro area:



²⁶ USDA Census of Agriculture 2012, County Profile, Lane County, Oregon, http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Oregon/cp41039.pdf accessed 12-16-15.

²⁷ *Integrated Water Resources Strategy, Map Gallery*, Oregon Water Resources Dept., 2010, p. 6.

Insert 11 x 17 page: Map 4: Study Area Soil Class, ECONorthwest, December 2008

As clearly shown in Map 2: Alternatives Analysis Soils and Constraints (derived from NRCS SSURGO data)—in which the darkest brown colors on the map indicate locations of Class I (soils with few limitations that restrict their use) and Class II (soils with moderate limitations that reduce the choice of plants or that require moderate conservation practices)— the largest blocks of predominantly Class I and II soils outside of the Springfield UGB are located:

- south of the Willamette River, south of the Springfield UGB and east of Interstate Highway 5 (Seavey Loop area);
- southeast of the UGB, between the Willamette River and Pudding Creek, north of Highway 58 (Jasper Bridge area), and extending farther south to the Pleasant Hill area.

The City identified two prime farmland areas consisting of the largest blocks of predominantly Class I and II soils outside of the Springfield UGB when it prioritized and evaluated lands based on capability classification, and when it considered and compared potential UGB expansion areas that would avoid or reduce impacts to those two prime farmland areas.

It should be noted here that both of these prime farm soil areas are located in the immediate vicinity of second priority exception areas, thus the City was required under ORS 197.298 to consider second priority Seavey Loop and Jasper Bridge areas as candidate lands for urbanization regardless of this fact. The City’s analysis provided explanation of why the Seavey Loop/College View study area and Jasper Bridge exception parcels were eliminated from consideration for employment land due to lack of suitable parcel sizes and physical constraints that preclude the ability to provide public facilities and services within the planning period. It should also be noted that the City received large volumes of comments from the public expressing concerns about and preferences for the importance of maintaining the Seavey Loop agricultural area for agriculture.

Other Class I and II soil areas, both in the vicinity of the UGB, and several miles out from the UGB are in smaller blocks or are more mixed.

- Generally, the northern edge of the existing Springfield UGB follows the McKenzie River and its flood plain. Lands outside of and adjacent to the UGB and on the Springfield side of the McKenzie River are predominantly Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southern portion of the existing Springfield UGB between the UGB and the Willamette River comprises lands consisting primarily of Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southeast portion of the existing Springfield UGB follows the ridgeline of the Thurston South Hills (“South Hills” Study Area grouping). The Thurston South Hills lands outside of and adjacent to the UGB are predominantly a mix of Class VI, IV, and VII soils.
- Generally, lands located farther south of the UGB, south of the Willamette River and its side channels comprise the largest blocks of Class I and II soils.

To conduct the soils analysis, the City identified general geographic groupings of all land areas in the vicinity of the UGB and named the areas for ease of reference, mapping and communication purposes. The City did not arbitrarily delineate UGB study areas for the purpose of conducting a quantitative analysis. Instead, the City reviewed NRCS Lane County Soil Survey soils series maps, sorted soil series into Classes I through VIII and conducted a visual qualitative assessment to determine the presence and general location of high value agricultural soils in the vicinity of the Springfield UGB.

For the purpose of prioritizing agriculture or forest land by capability classification, the City conducted a general visual assessment of mapped capability class to begin to sort lands in the order of highest capability classification as shown in Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008. This assessment includes all land, including the second and third priority lands previously discussed. It addresses mapped capability classification only and does not apply or address interplay of constraints such as slopes, rivers, floodway, existing development, etc.²⁸

The soils in the vicinity of the Springfield UGB are located generally as follows:

Class I Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class I soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Far East Springfield
- North Springfield Highway
- Thurston
- Jasper Bridge
- Seavey Loop²⁹

As shown in Map 4, the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area are Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II Soils

Within the preliminary Springfield UGB Study area, Class II soils are found in the following areas:

²⁸ The City prepared a map Soil Capability and Constraints, depicting soil capability classes and absolute development constraints, March 2016.

²⁹ In a meeting with staff Pauly, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.e

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

Each Preliminary study area grouping comprises at least some Class II soils. The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek. The study area with the smallest size mapped Class II areas are South Hills and Wallace Creek.

The City's UGB employment land expansion includes Class II soils in the North Gateway and Mill Race areas.

Class III Soils

Within the preliminary Springfield UGB Study area, Class III soils are found in the following areas:

- McKenzie View
- Mohawk
- Hayden Bridge
- Oxbow/Camp Creek
- North Springfield Highway
- Far East Springfield
- South Hills
- Wallace Creek

- Jasper Bridge
- Mill Race
- Seavey Loop

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprise at least some Class III soils. The largest contiguous areas of Class III soils are in Oxbow/Camp Creek.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

Underlined soils are present in UGB Preliminary Study Area.

The City’s UGB employment land expansion includes Class III soils in the Mill Race area.

Class IV Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class IV soils are found in the following areas:

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

Each Preliminary study area grouping comprises at least some Class IV soils. The largest contiguous areas of Class IV soil in the vicinity of Springfield’s UGB are South Hills (Forest land) and Mohawk (agricultural land). Class IV soil are also located between the McKenzie Highway and South Hills in the Far East Springfield area.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The City’s UGB employment land expansion includes Class IV soils in the North Gateway and Mill Race areas.

Class V Soils

No Class V soils are found within the Springfield UGB study area adjacent to the UGB.

Class VI Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VI soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Far East
- South Hills
- Wallace Creek
- Seavey Loop

The largest contiguous areas of Class IV soil in the vicinity of Springfield’s UGB are McKenzie View, Mohawk, Camp Creek and South Hills

Class VI soils in the McKenzie View/Coburg Hills area are steep slopes with numerous landslide areas mapped in DOGAMI SLIDO.

Class VI soils in the Mohawk Valley area (east side of valley) include numerous areas are mapped in DOGAMI SLIDO as landslide talus/colluvium, and fans.

The City’s UGB employment land expansion does not include Class VI soils.

Class VII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East
- South Hills
- Wallace Creek
- West Jasper/Mahogany
- Clearwater
- Seavey Loop

The City's UGB expansion includes Class VII soils.

Class VIII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VIII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Far East
- South Hills
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

This classification includes W Water, 114 Riverwash, 110 Pits, 127C Urban land-Hazelair-Dixonville

The City's UGB expansion includes Class VIII soils in the North Gateway (Natural Resource designation) and Mill Race (Public/Semi-Public designation) areas.

UGB Study Area Soils Summary:

In the vicinity of the Springfield UGB, the City concluded that largest contiguous areas of Class I and II high value farmland soils are located:³⁰

- Farmland east of Mt. Pisgah and west of Jasper Road
- Seavey Loop area east of Mt. Pisgah and along Highway 58

Generally speaking, in the Springfield area Class VIII, VII and VI soils are located in the hills and along the McKenzie and Willamette river channels, sloughs and floodways and generally are not suitable for developing urban industrial and office employment centers. No Class V soils are present in the area.

The City’s analysis evaluated agriculture and forest-designated land with Class VIII, VII, VI, (no class V), IV, III, II and I capability classifications to identify potential candidate expansion areas.

The City’s analysis properly assigned higher priority to land of lower capability as measured by the NRCS capability classification system when it evaluated and selected potential candidate UGB expansion areas, consistent with ORS 197.298 (1) and (2).³¹

Table 15: Evaluation of Potentially Suitable Fourth Priority Land

Map and Tax Lot	Capability Class %	Soil Map Units/Slopes	Suitable employment site for inclusion in UGB?
North Gateway Site (Note Class II land north of Sprague was excluded)			
1703154000 400 (102 ac.)* High value farmland comprises 45% of tract	45% CI II 35% CI VII 15% CI IV 6% CI VIII Hydric soils	95 Newberg 48 Fluvents 22 Camas 114 Riverwash Flat topo	YES Proximity Topo Public Facilities ESEE
170310000 2500 (68.3 ac.)* High value farmland comprises 44% of tract	46% CI II 34% CI IV 16% CI VII 4% CI VIII Hydric soils	96 Newberg 22 Camas 48 Fluvents 114 Riverwash Flat topo	YES Proximity Topo Public Facilities ESEE
170310000 2400 (22.8 ac.)* High value farmland comprises 89% of portion of tract east of I-5 (area west of I-5 is excluded from this study)	89% CI II 4% CI VII 7% CI VIII Hydric soils	Flat site 96 Newberg 22 Camas, 114 Riverwash	YES Proximity Topo Public Facilities ESEE
McKenzie View Site (Note Class I and II land was excluded)			
17021800 402 17021800 403 17021800 404	VI	108C- Philomath 3-12% slopes	NO Public Facilities Slopes Proximity Landslide hazard ESEE

³⁰ Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

³¹ The City’s record includes descriptions of the applicable soil series from the NRCS Soil Survey of Lane County.

Oxbow/Camp Creek (Note Class I and II land was excluded)			
17022200 200 17022200 103 17022300 300 approx. 6.8 acres are Class III, slopes 15% or less	III	105A – Pengra 1-4% slopes, 113E 102C 108C – Philomath	NO Public Facilities Proximity Landslide hazard BPA easement ESEE
17022300 700, 703, 704	III (high value farmland)	11C Bellpine 3-12% (high value farmland)	NO Soil Capability Slopes Proximity Public Facilities ESEE
Far East (South) (Note Class I and II lands and lands north of Hwy 126 were excluded)			
1702364000 200 1702364000 100 1701310000 603 1701310000 600 1701310000 500 43E	III	52D Hazelaire 7-20% slopes 43E Dixonville-Philomath-Hazelaire Complex, 12-35% slopes	NO Slopes Landslide hazard ESEE
West Jasper/Mahogany (Note Class II land was excluded)			
18020900 301 (8.4 acres)* 18020900 200 (62.4 acres)*	64% CI VII, 17% CI III, 10% CI VIII water, 9% CI II 53% cl VII and VIII, 44% cl II	95 Newberg 48 Fluvents 52B Hazelaire 2-7 % slopes hydric soils	NO Proximity Public Facilities ESEE
18020400 3000 (54.5 acres)*	75% CI VII, 25% CI II	48 Fluvents 95 Newberg 73 Linslaw 121B Salkum, 2-8% slopes hydric soils	NO Proximity Public Facilities ESEE
1802090000 203 (22.7 acres)*	86% water and fluvents CI VIII, VII, 2% CI II	48 Fluvents 52B Hazelaire 2-7 % slopes 73 Linslaw 95 Newberg hydric soils	NO Proximity Public Facilities ESEE
18020400 2401 (6.1 acres)*	54% non farm, 46% CI VII, II, IV	95 Newberg 48 Fluvent 52B Hazelaire 2-7 % hydric soils	NO Proximity Public Facilities ESEE
Clearwater			
18020500 2800 (39.5 ac.)*	63% CI II 23% CI VII 14% CI IV	95 & 96 Newberg 48 Fluvents 22 Camas	NO Capability Classification Proximity Public Facilities

			ESEE
18020500 2600 (22 ac.)*	72% CI II 14% CI IV 14% CI VII	95 & 96 Newberg 22 Camas 48 Fluvents	NO Capability Classification Proximity Public Facilities ESEE
18020800 100 (16.2 ac.)*	46% CI II 40% CI VIII 14% CI VII	95 Newberg 110 Pits 48 Fluvents	NO Proximity Public Facilities ESEE
18020500 1928 (10 ac.)*	34% CI IV 33% CI VII 33% CI II	22 Camas 48 Fluvents 95 Newberg	NO Proximity Public Facilities ESEE
18020500 2801 (29 ac.)*	56% CI VII 3% CI VI 36% CI II	48 Fluvents 113E Rittner 12-30% slopes 96 Newberg, Salkum 2-8% slopes	NO Proximity Public Facilities ESEE
Wallace Creek			
1802140000 900 (17 ac.)*	51% CI VI	102C Panther 2-12% slopes 11D Bellpine 12-20% slopes 52B Hazelair 2-7% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
18021400 800 (8.3 ac.)*	66% CI III 28% CI VI 6% CI II	52B Hazelair 2-7 % slopes 102C Panther 2-12% slopes 78 McAlpin hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 903 (7 ac.)* 1802140000 902 (4.8 ac.)*	89% CI III 11% 94% CI III	130 Waldo 102C Panther 2-12% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 500 (20.8 ac.)*	46% CI III 28% CI VI 14% CI IV 11% CI II 1% CI VI	130 Waldo 108C Philomath, 3-12% 52D Hazelair, 14% 78 McAlpin 102C Panther 2-12% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 1303 (19 ac.)*	77% CI VI 22% CI III	108C Philomath, 3-12% 130 Waldo/Hazelair/Dupee hydric soils	NO Proximity Public Facilities ESEE
Mill Race			
SUB Tract 18030100 3700 (SUB)(36.7 ac.)* 18030100 502 (SUB) (20.5 ac.)*	95% CI II 3 % CI III HV 85% CI II 13% CI III	26 Chehalis, 29 Cloquato, 95& 96 Newberg, 79 McBee (Prime) 96 Newberg, 79 McBee (Prime), 29 Cloquato, 26	YES Proximity Topo Public Facilities ESEE

	1% CI VIII water	Chehalis, W water	YES Proximity Topo Public Facilities ESEE
18030100 501 (22.1 ac.)*	99% CI II 1% Water	96 Newberg	YES Proximity Topo Public Facilities ESEE
18030100 1400 (9.9 ac.)*	100% High value ag: 63% CI II, 36% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg	YES Proximity Topo Public Facilities ESEE
18030100 1300 (8.32 ac.)*	100% High value ag: 44% CI II, 56% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg 26 Chehalis	
18030100 1199 (3.4 ac.)*	100% High value ag: 82% CI II, 17% CI III McBee (HV)	26 Chehalis 95 Newberg 79 McBee	
18030100 1700 (10 ac.)*	56% CI II 44% CI III	95 & 96 Newberg, 29 Cloquato, 22 Camas	YES Proximity Topo Public Facilities ESEE
18030100 1701(5 ac.)*	100% CI II	96 Newberg, 29 Cloquato	YES Proximity Topo Public Facilities ESEE
18030100 1702(5.3 ac.)*	77% CI II 34% CI IV	95 & 96 Newberg, 29 Cloquato 22 Camas	
Seavey Loop			
18031410 300 (36 ac.)*	62% High Value Ag: 42% CI II 9% CI III Prime 28% CI III 11% CI IV High Value 11% CI VI	78 McAlpin, 26 Chehalis 79 McBee ³² 130 Waldo 85 Natroy ³³ 43C Dixonville-Philomath- Hazelair complex	NO Soil Capability Public Facilities Proximity ESEE
18031410 1305 (15.6 ac.)*	74% High Value Ag: 72% CI IV High Value 1% CI III 1% CI II 24% CI VI	85 Natroy 79 McBee 78 McAlpin 43C Dixonville-Philomath- Hazelair complex	
18021410 1400 (5 ac.)*	100% High Value Ag:	85 Natroy	

³² McBee is listed in the NRCS Soil Survey of Lane County as prime farmland soil.

³³ Natroy in the Willamette Valley is identified as high value farmland in ORS 215.710

18031100 1600 (3.8 ac.)*	100% CI IV High Value		
18031130 3900 (3.1 ac.)*	100% High Value Ag: 71% CI II 30% CI II High Value	26 Chehalis 79 McBee	
	61% High Value Ag: 61% CI III Prime 38% CI IV	79 McBee 43C Dixonville-Philomath-Hazelair complex Hydric soils	
18031410 306 (20 ac.)*	77% High Value Ag: 40% CI II 14% CI III Prime 23% CI IV High Value 15% CI IV 9% CI VI	118 Salem, 26 Chehalis 79 McBee 85 Natroy 43C Dixonville-Philomath-Hazelair complex 12-35% slopes 43C Dixonville-Philomath-Hazelair complex 3-12% slopes 102 C Panther	NO Soil Capability Public Facilities Proximity ESEE

* absolute development constraints are not deducted from parcel acreage in this table

EXCLUDE HIGHER PRIORITY FOURTH PRIORITY AGRICULTURAL LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

In the next step in the process, the City excluded fourth priority lands on the basis of the capability classification system or by cubic foot site class of lands adjacent to the UGB.

Class I capability lands excluded.

The City excluded all the lands within the preliminary Springfield UGB Study area with Class I capability from further consideration:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Thurston
- Far East Springfield
- North Springfield Highway
- Jasper Bridge

- Seavey Loop³⁴

The City excluded the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area: Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II capability lands excluded.

Most of the preliminary study area groupings comprise at least some Class II soils. With the exception of the South Hills and Wallace Creek, the preliminary study areas adjacent to the UGB comprise Class II soils. To provide unconstrained, suitably sloped, and serviceable land for industrial and commercial mixed use office employment in an efficient growth pattern in accord with all applicable statutes, administrative rules and comprehensive plan policies, the City determined it would need to include some Class II soils in the UGB expansion. Thus the City could not exclude all lands with Class II soils at this point in the analysis. Thus the City sought to limit and lessen the impacts of such an expansion on farmland by avoiding the largest areas of Class II soils and other High Value Farmland as defined in ORS 215.710 and OAR 660-033-0030(8)(a) when it selected candidate fourth priority parcels for expansion. By expanding on land with more mixed soils, the City's expansion has less overall impact on large blocks of prime soils and prime farmland in the vicinity of the UGB and less overall impact on the viability of larger agricultural areas in the vicinity of the UGB.³⁵ The City's reasoning to fully meet the intent of ORS 197.298 and the Goal 14 Factors 1-4 is consistent with the law.

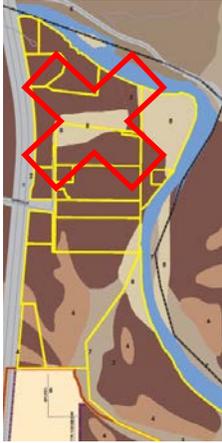
The City's analysis identified and compared the proportion of Class II and other High Value and Prime Farmland soils on potentially suitable candidate parcels when the City determined which parcels comprise predominantly High Value soils; when the City relied on that data to determine prioritization of fourth priority lands under ORS 197.298; and when the City applied Goal 14 Factors 1-4 to candidate fourth priority lands.

The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek areas. The City determined that those study areas have lower priority for inclusion if found to be suitable to meet the identified land need.

The North Gateway site north of Sprague Road comprises predominantly Class II soils. The City excluded that area from consideration:

³⁴ In a meeting with staff Pauly on 1-13-13, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.

³⁵ For example, *Agronomic Suitability Analysis of Wicklund Trust Property*, Northwest Consulting, Jan. 27, 2009, pp. 2-4 describes the perceived effect of adjacent urbanization on the economic viability of farm operations and the unknown effect on adjacent farmland if subject property were to be removed from production. See also attached corroborating letter from Chad Egge, farmer of subject property 2005-2009.



Class II area excluded

The City excluded all Class II areas in McKenzie View. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Oxbow/Camp Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Far East and all adjacent agricultural lands north of Highway 126. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in West Jasper/Mahogany. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Clearwater. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Wallace Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Seavey Loop. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes lands predominantly Class II in Mill Race. The City identified suitable parcels comprising Class II soils in Table 15.

The City's UGB expansion includes Class II soils within mixed soil areas in North Gateway. The City identified suitable parcels comprising Class II soils in Table 15.

Class III capability lands excluded.

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprises at least some Class III soils. Some Class III soils are considered High Value and Prime Farmland within the Willamette Valley.

The largest contiguous areas of Class III soils are in Oxbow/Camp Creek. The City excluded Class III (Bellpine) High Value Farmland areas in Oxbow/Camp Creek. Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded Class III (McBee) Prime Farmland areas in Seavey Loop that are mixed with Class II High Value and Class IV Prime Farmland soils. These Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes Class III soils in Mill Race that are mixed with Class II and Class IV.

Class IV capability lands excluded.

The City excluded Class IV (Natroy) High Value Farmland areas in Seavey Loop that are mixed with Class II and Class III High Value Farmland soils. These Class IV sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VI soils excluded.

The City's UGB expansion does not include Class VI soils. The City evaluated the potentially suitable lands comprising Class VI soils and ultimately rejected those sites from consideration. These Class VI sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VII soils are higher priority for expansion.

The City's UGB expansion includes Class VII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VII soils and ultimately rejected those sites from consideration. These Class VII sites were also excluded on the basis of physical public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VIII soils are higher priority for expansion.

The City's UGB expansion includes Class VIII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VIII soils and ultimately rejected those sites from consideration. It should be noted that the Class VIII capability classification in Lane County includes Water. These Class VIII sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Table 16: Fourth Priority Agriculture and Forest Land Excluded on the Basis of Predominant Capability Classification

North Gateway (North of Sprague) Class II	McKenzie Class I and II	View	Oxbow/Camp Class I, II and III High Value	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East (North of Hwy 126)	South Hills Class III High Value		West Jasper/Mahogany Class II	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

Areas designated Agriculture are shown in beige color. Areas designated Forest are shown in green color. Areas with both designations are shown with both colors.

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

OAR 660-024-0060(1)(d):

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

ORS 197.298(3)

“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

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

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

or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”

As explained above, the City excluded fourth priority lands on the basis of 1) soil capability classification; and 2) specific types of land needs. As previously explained above and in the CIBL/EOA, the City screened each study area grouping to identify lands with slopes 15% or less and comprising at least 5

acres without absolute development constraints that make lands unbuildable for industrial or commercial employment uses. In this step, the City’s methodology excluded lands of higher priority capability classification because those lands are encumbered by absolute development constraints to the extent that the City’s specific types of identified cannot be reasonably accommodated [ORS 197.298 (3)(a)]. This report and the local record provide adequate evidence of the thorough and painstaking process conducted by City staff to screen candidate lands adjacent to the UGB to evaluate alternative locations. The City’s methodology and reasoning for excluding lands of lower priority capability classification is appropriate and consistent with the law.

Exclude higher priority lands where specific types of identified land needs cannot be reasonably accommodated [ORS 197.298(3)(a)] and/or where future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints [ORS 197.298(3)(b)]

In the next step, the City excluded the fourth priority lands that are *not* potentially suitable to provide sites with the needed site characteristics to satisfy the identified employment land need deficiency.

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

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

OAR660-024-0060(5)

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

Identification of Potentially Suitable and Serviceable Land

At this stage in the analysis, the city had identified lands of suitable parcel sizes (at least 5 acres of unconstrained land - free of absolute development constraints. These candidate sites were then evaluated to determine whether topographic or other physical constraints preclude reasonable service provision and consideration of site location and other physical characteristics of needed sites to accommodate target industry employment types identified in the CIBL/EOA. The City’s Public Services Analysis compared relative physical distance to the public facilities and services needed to serve

industrial and office commercial employment land uses, including the target industries identified in the CIBL/EOA.

As previously explained in the City’s findings under Goal 9, the CIBL/EOA ³⁶ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.”

To identify *potentially* suitable land to meet employment land needs, the City applied the following factors³⁷ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include fourth priority lands in the next stage of the evaluation process:

- Exclude lands that are not buildable³⁸
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the process screened candidate lands to identify and compare lands having the site characteristics necessary for the operation of the target industrial and other employment industries identified in the CIBL/EOA. Springfield’s EOA identifies a need for sites larger than 20 acres. As previously explained in this report, higher priority exception areas and marginal lands sites in the vicinity of the UGB will not provide suitable employment sites for the 2010-2030 planning period. Exception areas and marginal lands are inadequate to accommodate the type of employment land needed, thus the City’s analysis considered land designated in the acknowledged Lane Rural Comprehensive Plan for agriculture or forestry or both.

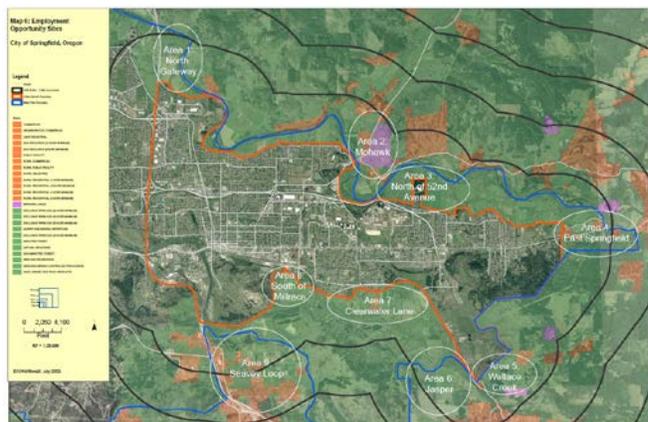
Background regarding City’s process to identify candidate lands based upon specific land needs. The following information is provided to explain how the City’s alternatives analysis integrated public input received through a multi-year iterative planning process, and to explain maps and other materials dated 2008-2010 that are in the City’s local record and/or have been integrated into this report.

Early in the City’s land assessment process (2008-2009), the CIBL Technical and Stakeholder committees identified an initial set of lands they deemed worthy of further analysis to determine their suitability for urbanization. This input was based on early GIS screening of land surrounding the UGB by consultant ECONorthwest to locate priority lands under ORS 197.298, large parcel sizes, and land free of absolute development constraints. At that time and based on Springfield’s preliminary draft analysis of residential and employment land needs, it was anticipated that UGB expansion would be required to meet both

³⁶ CIBL/EOA Table S-5, page x.

³⁸ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

employment *and* residential land needs. The record provides documentation of the 2008-2009 analysis process, including maps that assumed expansion for residential purposes in addition to employment purposes.^{39 40} For example, as shown in the following map dated 2008, nine areas were initially considered for further analysis and discussion through the City's the public involvement process 2008-2010. Other areas or specific parcels were proposed throughout the public involvement process and public hearing conducted by the Springfield and Lane County Planning Commissions in Feb-May 2010.



Initial study area identification: 2008-2009 CIBL/EOA public involvement process

The UGB study area established by the City includes land that was previously identified in the initial 2008-2009 Commercial and Industrial Lands Study planning process (CIBL Technical Advisory Committee and Stakeholder Advisory Committee, public workshops, open houses and public hearings) as having a reasonable potential to satisfy the residential and employment land need deficiencies that had been estimated at that time. The City's initial 2008-2009 Commercial and Industrial Lands Study planning process identified areas for evaluation and consideration based on an expected need for a larger UGB expansion to meet *both* residential and employment land needs. The City's final land need is for fewer acres of employment land — 223 acres — compared with the 640-acre deficit identified in the 2009 Draft CIBL/EOA. The City went on to meet its residential land deficit without expanding the UGB.

The City's final UGB expansion proposal also includes existing Willamalane parks and SUB public facilities to address concerns raised by the public, planning commissioners and elected officials during the 2008-2010 public involvement process.

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

³⁹ It is important to note that 2008-2009 analysis maps in the local record also relied upon older data sets that were later found to be incomplete or incorrect. For example, the floodway data for the Seavey Loop area was found to be inaccurate and was updated subsequently. This had the effect of substantially reducing the amount of unconstrained acreage from the area shown in the earlier 2008-2009 maps.

⁴⁰ The Metro Plan boundary was amended subsequent to the creation of the 2008-2009 maps.

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

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

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

OAR 660-024-0060 (5)

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

The Goal 9 rule clearly allows and requires the City to identify the typical attributes of employment land sites necessary to accommodate the industries and employers that will support the City's economic development objectives, based on the Economic Opportunities Analysis. The Goal 9 rule clearly allows and requires the City to designate suitable, serviceable sites, types and locations for employment uses — through its comprehensive plan and through appropriate implementing measures including amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. [OAR 660-009-0005(11)]

"Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. [OAR 660-009-0005(12)]

As described in the preceding text and graphics, the City excluded parcels smaller than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) from consideration when it analyzed the potentially suitable acreage within a grouping of parcels of a particular soil capability classification, as permitted under OAR 660-024-0060(5).

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

After excluding lands based on soil capability classification, the City's analysis identified parcel groupings in Table 15 that contain *potentially* suitable fourth priority land. These areas were identified for additional analysis study to determine serviceability and suitability to determine which candidate lands lands in the vicinity of the UGB can "reasonably accommodate" the identified employment land need.

Public Services Analysis of Potentially Suitable Fourth Priority Land

OAR 660-024-0060(7)

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

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

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of fourth priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 17 and as further supported by evidence in the record.

Table 17 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table 17 is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report pages 212-235. The Public Facilities and Services Analysis identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The Public Services Analysis section of this report on pages 211-235 provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City

referenced when it described the physical location and proximity of existing facilities to *potentially* suitable areas, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.2989(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding areas from consideration in the previous step.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1=EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.⁴¹ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. The cost of providing infrastructure and services was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 17 — as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate fourth priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

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

⁴¹ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

Table 17: Fourth Priority Land: Public Facilities and Services Analysis Summary

North Gateway	
The City excluded North Gateway — North of Sprague Road lands on the basis of agricultural capability classification.	
North Gateway – UGB to Sprague Road:	
Water	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City limits • An existing 12” line in Maple Island Road is 200 feet from the area. • An existing 24” line in Corporate Way is approximately 450 feet from the area. • An existing 12” line in Sportsway (Royal Caribbean) is approximately 310 feet from the area or 1000 feet from the area via Sportsway.
Wastewater	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City limits • Existing sewer connections are located approximately 500 feet (at Corporate Way) and 1,700 feet (at Royal Caribbean) to the area. • A pressure main will need to be extended from the end of the existing 8-inch main on the south side of the Royal Caribbean site north to the area. • A pressure main will need to be extended from the existing 8-inch main in Corporate Way north to the area. • Pump station upgrades will be required for the existing pump station at International Way and International Court. • Pump station upgrades will likely be needed for the existing pump station at Deadmond Ferry Road and Game Farm Road to accommodate the additional flows from the Corporate Way line. • Internal improvements needed within the area: a new medium sized wastewater pump station located at the intersection of Sports Way extension and the existing UGB, and a new small sized wastewater pump station located at the existing UGB to connect to the pressure main extension from Corporate Way.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Abuts City limits • Stormwater management through the use of on-site retention and/or infiltration may be possible but limited by proximity to Springfield Utility Board’s I-5 well field. • Physical connections to the McKenzie River or Maple Island Slough can be made with little or no impact on existing systems, although Maple Island Slough is currently blocked from flowing into the McKenzie River. A flow path would need to be restored if a significant amount of runoff is directed to the Slough. • The McKenzie River is federally classified as critical salmonid habitat. • Restoring a flow path from Maple Island Slough to the river will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and waters of the United States, and potential wetlands. • New stormwater outfalls to the McKenzie River will also involve several other regulatory agencies for the same reasons as outfalls to Maple Island Slough. • Multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or the Maple Island Slough, and the limitations regarding on-site stormwater management, stormwater service for this area may present significant challenges and require atypical restrictions and limits.
Transportation including Transit	5 Difficult (Trip capacity)

	<p>1 Easier (Transit service)</p> <ul style="list-style-type: none"> • Abuts City limits • Nine offsite road extensions/improvements may be needed to provide service to the area: <ul style="list-style-type: none"> ○ Extension of Maple Island Slough Road northerly towards the Maple Island Slough then extending westerly to the connection with Sports Way.⁴² ○ Extension of Sports Way northerly to the existing UGB line. ○ Sprague Road overpass will likely need to be improved or reconstructed to accommodate traffic load and meet current design standards. Associated with this improvement, are improvements to Sprague Road westerly to Armitage Road. ○ Armitage Road will likely need to be widened from Sprague Road to North Game Farm Road. ○ Intersection improvements may be needed at Armitage Road and North Game Farm Road, such as the addition of a left turn lane and signal modifications. ○ A bridge connection may be needed from the extended Maple Island Slough Road to Tax Lot 170315400040 in order to reduce impacts to natural resource areas and to the flood plain carrying capacity. ○ Current studies for the Gateway/Beltline intersection and the Beltline/I-5 interchange show that current and planned development within the current UGB may not be able to be accommodated within the planning horizon, and potential mitigation projects have been identified. The additional vehicle trips from the North Gateway Area will require additional lane and intersection capacity that is not available in the planned mitigation projects, so that additional capacity will need to be provided.⁴³ ○ Extension of Maple Island Slough Road Southerly from Game Farm Road to a connection point with Beltline Road.⁴⁴ ○ The addition of capacity improvements will likely be needed for the interchange operations at Beltline Road and Interstate 5.⁴⁵ • Internal improvement needed within the area: Bridge connection from Tax Lot 17031540004000 over the Maple island Slough to Tax Lot 1703100002500 to provide internal circulation and reduce impacts to natural resource areas and to the flood plain carrying capacity. • Capacity constraints at Gateway/Beltline and Beltline/I-5 will pose significant challenges for development within the planning horizon. • The need to construct bridges to provide services and internal circulation will pose significant challenges for development within the planning horizon. • International Way is part of an existing and planned Frequent Transit Network route in the TSP and RTP. Area is within ½ mile of the existing EmX bus rapid transit line (RiverBend-Gateway) and EmX station located at International Way/Maple Island Road.
<p>Urban services conclusion/ physical constraints North Gateway</p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the North Gateway Fourth Priority lands south of Sprague Road in the UGB.</p> <ul style="list-style-type: none"> • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9).

⁴² Roadway project is shown in Springfield TSP Figure 10 Recommended Roadway Network.

⁴³ “Gateway-Beltline intersection capacity improvements” is a project identified in the Springfield TSP.

⁴⁴ Project is identified in the Springfield TSP.

⁴⁵ Project is identified in the Springfield TSP.

Fourth Priority lands	<ul style="list-style-type: none"> • Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. • Transportation constraints may present significant challenges for development within the planning horizon and may require atypical restrictions, limits or solutions.
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McKenzie View

The City excluded unconstrained **McKenzie View** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.

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 potentially suitable parcels • Services would need to be extended through un-annexed land.
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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. • Services would need to be extended through un-annexed land.
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Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • Isolated by distance and topography from existing urban services. • No developed system or outfalls in vicinity • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The McKenzie River is federally classified as critical salmonid habitat. • Services would need to be extended through un-annexed land.
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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 Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 4 miles from UGB at
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	<p>Hayden Bridge.</p> <ul style="list-style-type: none"> No access to Springfield or to I-5 except via Coburg Rd or Marcola Rd unless a new bridge over the McKenzie River is built. Depending upon new bridge location, existing Springfield street network would need to be upgraded and collectors/arterials added to provide transportation capacity. All roads will need improvement to accommodate industrial or commercial development and multi-modal access Services would need to be extended through un-annexed land. Intersection improvements needed at Coburg Rd & McKenzie View Drive Upgrade McKenzie View Drive to urban standards and provide capacity improvements Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." ⁴⁶ No transit services, pedestrian facilities or ADA access in area. Same findings as Mohawk area regarding a need for upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
<p>Urban services conclusion/ physical constraints McKenzie View Fourth Priority lands</p>	<p>The City excluded the McKenzie View Fourth Priority lands from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
Oxbow/Camp Creek	
<p>The City excluded lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.</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 infeasible ⁴⁷ Same findings as Mohawk are applicable. Services would need to be extended through un-annexed land.
<p>Wastewater</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

⁴⁶ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

⁴⁷ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

	<ul style="list-style-type: none"> • Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Hayden Bridge. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
Stormwater	<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)⁴⁸ • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable • Services would need to be extended through un-annexed land.
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide). Roads may need improvement to accommodate additional development and multi-modal access: <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁴⁹ • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
Urban services conclusion: Oxbow/Camp Creek Fourth	<p>The City excluded the Oxbow/Camp Creek area from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided</p>

⁴⁸ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁴⁹ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

Priority lands	with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Hayden Bridge	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Mohawk	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Water	<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 infeasible⁵⁰ • Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge
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 • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from UGB, and 4 miles to outer areas
Stormwater	<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 Rule⁵¹) • Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake⁵² • 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

⁵⁰ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

⁵¹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁵² See email from City Civil Engineer Clayton McEachern P.E., to staff Pauly, dated 2/8/16 describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB’s Hayden Bridge McKenzie River water intake facility.

	<p>Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide).⁵³ ⁵⁴ Roads may need improvement to accommodate additional development and provide multi-modal access:</p> <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards⁵⁵ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange⁵⁶ • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length."⁵⁷ • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: "The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."⁵⁸
<p>Urban services conclusion/ physical constraints Mohawk</p>	<p>The City excluded the Mohawk Fourth Priority lands from consideration on the basis of agricultural capability classification. These lands do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to</p>

⁵³ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

⁵⁴ Source of road widths: Lane County Roads Inventory, http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

⁵⁵ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.

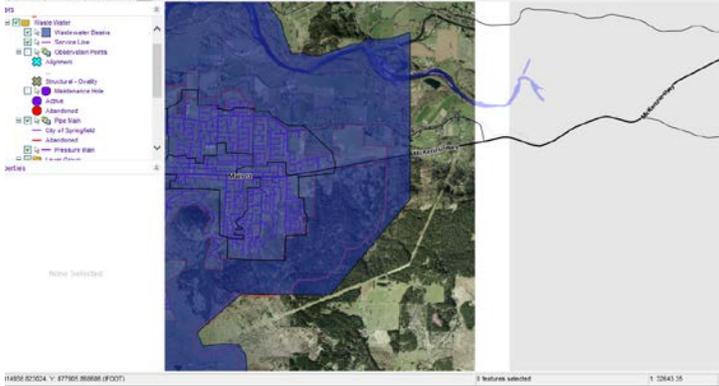
⁵⁶ See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.

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

⁵⁸ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

Fourth Priority lands	physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
North Springfield Highway	
The City excluded unconstrained parcels on the basis of agricultural capability classification.	
Water	1 Easier <ul style="list-style-type: none"> • Abuts City Limits • An older 12” line in High Banks road is approximately 270 feet from the area. • A newer 24” line is in 52nd Street to serve Hyland Business Park, approximately 1300 feet from the area via High Banks Road.
Wastewater	1 Easier <ul style="list-style-type: none"> • Abuts City Limits • A new large wastewater pump station is required to get flow from this area into the existing 15-inch main in High Banks Road. For this study, the location for the new large pump station was assumed to be in the vicinity of High Banks Road and 52nd Street. • Internal improvements needed within the area: new small sized wastewater pump stations located in the vicinity of Tax Lot 1702280000304 and Northwest portion of the Tax Lot 1702280000103.
Stormwater	5 Difficult <ul style="list-style-type: none"> • Abuts City Limits • Physical connections to Cedar Creek or the McKenzie River can be made with little or no impact on existing stormwater systems. Oregon’s Three Basin Rule (OAR 340-041-0350) restricts new stormwater outfalls and other discharges to the McKenzie River upstream of Hayden Bridge. • New stormwater outfalls to Cedar Creek or to the McKenzie River will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board’s wells. • The McKenzie River and Cedar Creek are federally classified as critical salmonid habitat. Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or Cedar Creek, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
Transportation (including transit service)	2 Easier <ul style="list-style-type: none"> • Abuts City Limits • Four offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> ○ A new at grade intersection or interchange will be needed at the intersection of OR Highway 126 and 52nd Street. ○ Intersection improvements for increased capacity will be needed at the intersection of Main Street and OR Highway 126. ○ A new at grade intersection improvement will be needed for the intersection of 52nd Street and High Banks Road. ○ A new at grade intersection improvement will be needed for the intersection of 58th Street and High Banks Road. • Internal improvements needed within the area: bridge connections over existing ditches

	and creeks to access the northern portion of the area.
Urban services conclusion/ physical constraints North Springfield Highway Fourth Priority lands	<ul style="list-style-type: none"> • Area is serviceable for water, wastewater and transportation as described in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services. • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration.
Thurston	
The City excluded unconstrained land comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
Far East	
The City excluded unconstrained land comprising predominantly Class I and II soils (north of Highway 126) on the basis of soils capability classification.	
The unconstrained land south of Highway 126 was excluded on the basis of specific land needs (197.298(3)(a)).	
Water	<p>Within one mile of UGB 2: Medium</p> <p>More than one mile from UGB: 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. • Services would need to be extended through un-annexed land. • Distant from SUB service area. • Higher elevations would require pumping and reservoir.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • The nearest service connection of sufficient size for industrial and commercial uses is the 15" line at Main Street/S. 72nd, approximately 1.5 miles to the western boundary of the area • Services would need to be extended through un-annexed land. • May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. • New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). • Services would need to be extended through un-annexed land. • Steep slopes south of McKenzie Hwy/Main St.

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Far East, Thurston and Oxbow/Camp Creek areas</p>
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • No developed system in vicinity • Cedar Creek drainage basin is nearing stormwater receiving capacity^{59, 60} (unfunded upgrade project is identified in CIP). • No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)⁶¹ • Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically⁶² requires 8-10% of parcel area. • Services would need to be extended through un-annexed land.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • Access is from E. Main Street/McKenzie Hwy (State Highway), with secondary access from Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB⁶³ • Intersection improvements at Thurston Rd. and E. Main St.

⁵⁹ City of Springfield Stormwater Facilities Master Plan, Oct. 2008; City of Springfield Stormwater Management Plan, updated 2010, <http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf>, accessed 2/8/16.

⁶⁰ City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

⁶¹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered “essential fish habitat” for threatened and endangered species (Table 11, p. 20).

⁶² Eugene Stormwater Management Manual “Simplified Method”, Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

⁶³ Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of \$4,800,000.

	<ul style="list-style-type: none"> • Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. ^{64, 65} • Services would need to be extended through un-annexed land. • Frequent transit service is not planned beyond Thurston Station.
<p>Urban services conclusion: Far East Fourth Priority lands</p>	<p>Far East Fourth Priority lands within 1 mile of the UGB were considered physically serviceable for water and transportation during the 20-year planning period ending 2030 as described in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration. • Area is physically constrained for wastewater service. Distance would likely preclude feasible extension of wastewater service within the 20-year planning period. <p>The City excluded the Far East Fourth Priority lands farther than 1 mile from the UGB from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
South Hills	
<p>The City excluded unconstrained lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained lands on the basis of specific land needs (197.298(3)(a)).</p>	
West Jasper/Mahogany	
<p>The City excluded unconstrained lands comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	

⁶⁴ Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁶⁵ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A.

Water	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> The nearest lines of sufficient size to serve industrial or commercial employment uses are the 16" line in South 57th /Mount Vernon Rd. and 16" line at Linda Lane, located approximately ½ mile from the eastern boundary of the area at Mahogany Lane. Services would need to be extended under the Union Pacific railroad line and across Jasper Road.⁶⁶
Wastewater	<p>1 Easier</p> <ul style="list-style-type: none"> The Jasper Trunk sewer 27" line is located approximately 200 feet to the east across Jasper Road and the railroad to the boundary of this area. Services would need to be extended through un-annexed land and would require easements to facilitate feasible service connections A large wastewater pump station will be needed in the vicinity of the intersection of Mt. Vernon Road and Jasper Road, on the north side of the Union Pacific Railroad mainline to get flows from Mahogany Lane area into the Jasper Trunk Sewer. Capacity in this Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.
Transportation including Transit	<p>5 Difficult</p> <ul style="list-style-type: none"> Eight offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal. Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity. Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal. Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. Improvement of the entire length of Jasper Road to urban standards and upgrade to

⁶⁶ Bart McKee, SUB stated that it would be physically possible to bore under the railroad in the vicinity to extend water service to the area.

	<p>4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor.</p> <ul style="list-style-type: none"> ○ 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. <ul style="list-style-type: none"> ● Internal improvements needed within the area: <ul style="list-style-type: none"> ○ A new small sized wastewater pump station will likely be needed located in the vicinity of the southerly end of Tax Lot 1802090000600. ○ A new small sized wastewater pump station will likely be needed located in the vicinity of the easterly side of Tax Lot 1802090000200. ○ 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. ○ Improvements to the existing Mahogany Lane will be needed for additional capacity. ○ The potential for two bridge connections over flood plain designated sloughs to facilitate internal circulation.
<p>Urban services conclusion: West Jasper/ Mahogany Fourth Priority lands</p>	<p>Area was considered physically serviceable during the 20-year planning period ending 2030 as defined in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> ● Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). ● Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. ● Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. ● The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Jasper Bridge	
<p>The City excluded area comprising predominantly Class I and II soils on the basis of agricultural capability classification.</p>	
<p>Urban services conclusion: Jasper Bridge Fourth Priority lands</p>	<p>The City excluded the Jasper Bridge Fourth priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
Clearwater	
<p>The City excluded unconstrained parcels comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	
Water	3 Medium Difficult

	<ul style="list-style-type: none"> • 16" line in the vicinity of Daisy and 48th Street (Westwind) is approximately ½ mile north of the UGB • Nearest 12" line is in South 42nd approximately ¼ mile to the UGB via 42nd Street
Wastewater	<p>2 Easier</p> <ul style="list-style-type: none"> • The Jasper Trunk sewer 27" line is located along Jasper Road. • Distance to potentially suitable land varies from approximately 330 feet at 42nd Street to 200 feet (across Jasper Slough) at 41st/Filbert Meadows to 1364 feet at South 39th • Services would need to be extended through un-annexed developed residential land to reach some portions of this area.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. • Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. • The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.
Transportation	<p>5 Difficult</p> <ul style="list-style-type: none"> • Clearwater Lane would need to be upgraded to urban standards and may be of to serve industrial and commercial employment uses.⁶⁷ • Secondary access would be required. • Offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> ○ Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal. ○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity. ○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal. ○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. ○ Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. ○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. ○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.

⁶⁷ Urban Standards Project US-14: Clearwater Lane – south of Jasper Road to UGB is identified in TSP Projects located on Lane County facilities in the TSP Table 1 as a Priority Project in the 20-year project list.

	<ul style="list-style-type: none"> Internal improvements be needed within the area: small-medium sized wastewater pump station to get flow to Jasper Trunk Nearest transit service is along Main Street, approximately ¾ mile to UGB/northern boundary of area A planned bike boulevard along Virginia-Daisy is approximately ½ mile to UGB/northern boundary of area.
Urban services conclusion: Clearwater Fourth Priority lands	<p>Area is physically serviceable as defined in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services.</p> <ul style="list-style-type: none"> Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Mill Race	
Water	<p>1 Easier</p> <ul style="list-style-type: none"> There is ample existing water distribution infrastructure already located within this area to serve industrial and commercial employment uses. SUB's existing 60" line in South 28th Street extends south of the Mill Race along the eastern boundary of this area.⁶⁸ Existing 20" and 16" lines cross the Mill Race. A 16" line extends south to wellfield site via easements on private lands. A new 24" line was recently installed along the north side of the Mill Race. A T was installed in F Street to extend a 12" line to serve properties adjacent to the Swanson Mill site. There are no major improvements anticipated to meet the internal water service needs within this area.
Wastewater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> The nearest wastewater line is the 48" trunk line in F Street at 28th Street, located approximately 1400-1700 feet from the area. A new small sized wastewater pump station located near the south side of the South 28th Street Bridge over the Mill Race will be needed to provide service to this area. A main line extension in south 28th Street from the South F Street interceptor to the new pump station will be needed. Abuts City limits There are no major improvements anticipated to meet the internal wastewater needs to serve this area.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Physical connections to the Springfield Mill Race, Gory Creek or Quarry Creek can be made with little or no impact on existing systems, although the flow capacity of the two creeks would likely need to be increased before additional runoff could be directed to them. New stormwater outfalls to any of these three receiving waters will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and

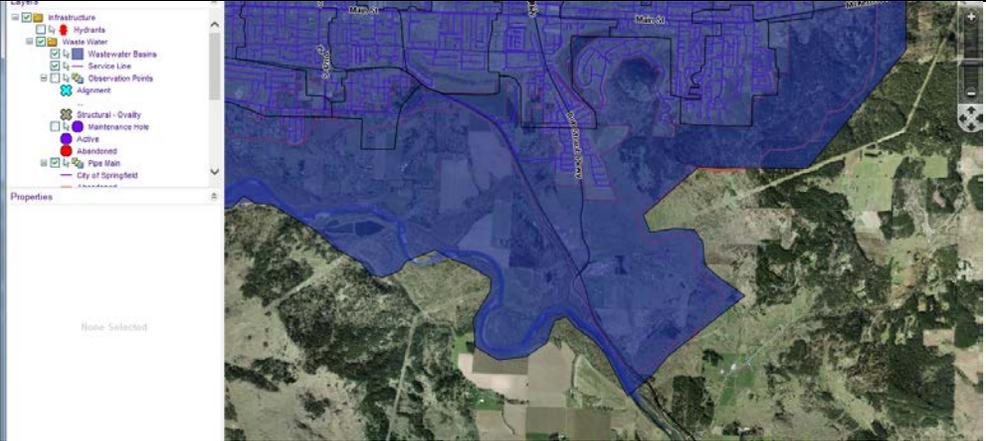
⁶⁸ Updated water line information provided by Bart McKee, SUB (telephone call with staff Pauly, April 5, 2016).

	<p>waters of the United States, and potential wetlands. New stormwater outfalls to the Springfield Mill Race are also regulated by an intergovernmental agreement with the US Army Corps of Engineers as part of the Mill Race enhancement project.</p> <ul style="list-style-type: none"> • Stormwater management through the use of on-site retention and/or infiltration would likely be limited in this area due to its proximity to Springfield Utility Board’s Willamette well field. • Abuts City limits • The Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. • Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek, and the limitations regarding on-site stormwater management. • There are no major improvements anticipated to meet the internal stormwater needs to serve this area.
<p>Transportation</p>	<p>4 Difficult Abuts City limits Five offsite road extensions/improvements are needed to provide service to the area:</p> <ul style="list-style-type: none"> • South 28th Street will need to be improved from Main Street southerly to the existing UGB near the Mill Race.⁶⁹ • Crossing improvements for the intersection of South 28th Street and the Union Pacific Railroad will be needed. • Upgrades to the existing South 28th Street bridge at the Mill Race may be required due to weight limit restrictions. • Intersection improvements will be needed at the intersection of Main Street and South 28th Street. • A secondary access will be needed. Options include improving access via South F Street or bridge over the Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Service to this area may be feasible; however providing service will have significant challenges due to the need for improving access and providing secondary access. This access may require constructing a bridge over Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Existing frequent transit service is available on Main Street, approximately .75 miles from the UGB at 28th Street. The Main Street Corridor is a planned Frequent Transit Network route in the TSP and RTP. The area is within ½ mile of the Main Street Corridor (South A). • Planned and funded bicycle facilities along the Mill Race/Booth Kelly Road will provide ped/bike connectivity between Main Street, Downtown Springfield and Mid-Springfield and the existing Middle Fork Path recreational path system immediately adjacent to this area. • There are no major improvements anticipated to meet the internal transportation needs to serve this area.
<p>Urban services conclusion:</p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the Mill Race Fourth Priority lands in the UGB.⁷⁰</p>

⁶⁹ Urban Standards Project US-7: South 28th Street – F Street to UGB is identified in TSP Projects located on Lane County facilities, Table 4 as a Beyond 20-year project.

Mill Race Fourth Priority lands	<ul style="list-style-type: none"> • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). • Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.
Wallace Creek	
The City excluded unconstrained lands comprising predominantly Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.	
Water	5 Difficult <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • Located more than 3 miles from the nearest water main. • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity
Wastewater	5 Difficult <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • No developed system in vicinity. • Wallace Creek Rd.'s narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area. • The Jasper Trunk sewer is 2-3 miles away. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.

⁷⁰ See proposed Metro Plan Amendment for parcel numbers designated Urban Holding Area – Employment. Note other publicly owned lands in this area designated Public/Semi Public that the City added to the UGB to accommodate existing and planned SUB water treatment facilities and Willamalane parks.

	 <p>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</p>
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board’s Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	<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 needed⁷¹: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

⁷¹ See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.⁷² • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”⁷³ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.⁷⁴ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{75, 76}
<p>Urban services conclusion: Wallace Creek Fourth Priority lands</p>	<p>The City excluded the Wallace Creek area from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
Seavey Loop	
<p>The City excluded unconstrained lands comprising predominantly Class II, Class III High Value Farmland and Class</p>	

⁷² Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

⁷³ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁷⁴ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

⁷⁵ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷⁶ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

IV Prime soils on the basis of agricultural capability classification.

Water

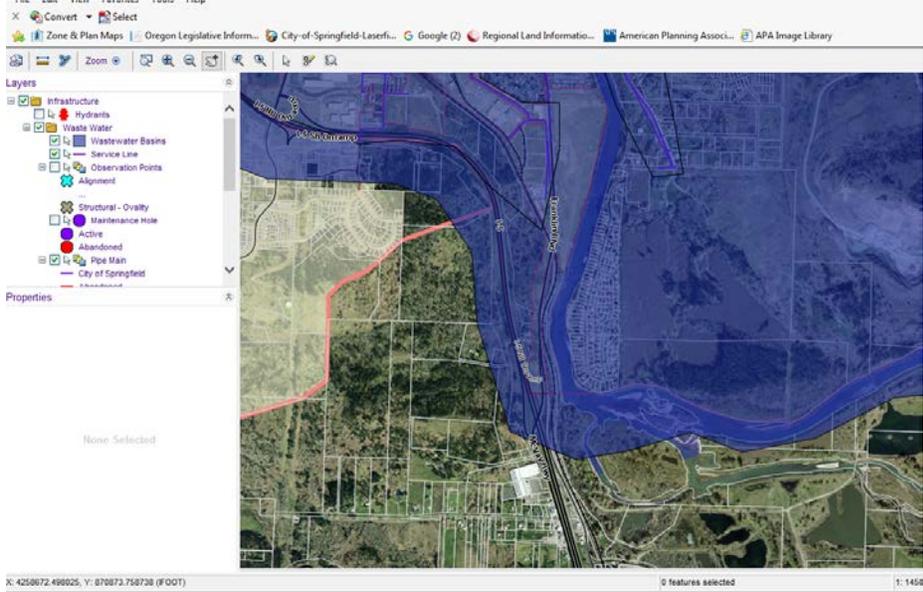
3 Medium Difficult

- Existing rural water system and service provided by Willamette Water Company
- Potentially suitable lands are located more than 2 miles from the nearest SUB water main, a 16" line in McVay

Wastewater

5 Difficult

- No developed system in vicinity
- Isolated by distance and topography from existing urban services
- Would require extension of a pressure main from the Franklin/McVay trunk 18" line in Glenwood, approximately 2 miles to the western boundary of the potentially suitable lands.
- Would require upgrades to existing Glenwood MWMC pump station.
- A new large sized wastewater pump station located near the intersection of Seavey Loop and Franklin Boulevard will be needed.
- Would require a new small sized wastewater pump station located in the vicinity of the intersection of 30th Avenue and College View Road.
- Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties.
- Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road.
- Would require a new small sized wastewater pump station located in the vicinity of Seavey Loop Road near the West property line of the Tax Lot 1803141000305.
- Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there would be long-term operational costs associated with providing this service.



City of Springfield wastewater basin (shown in blue) and service main in relationship with Seavey Loop study area

Stormwater

5 Difficult

	<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 the City’s knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Proximate to I-5, but freeway access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end of area is from beneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30th 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.”⁷⁷ • City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades.⁷⁸ • City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD). • Existing rail underpass at Franklin is very narrow and restricts truck passage. • Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels • Isolated from urban transportation system • May trigger capacity improvements for McVay Highway in Glenwood • Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5. • “Difficult to serve with transit except via one-directional route variation form current #92 Lowell/LCC route which only runs 3 trips per weekday.”⁷⁹ No pedestrian facilities or ADA access in area.
Urban services	<p>The City excluded the Seavey Loop Fourth Priority lands from consideration because</p>

⁷⁷ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.
⁷⁸ At the College View Stakeholder Working Group meeting on March 4, 2015, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept as mapped on that date.
⁷⁹ Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.

<p>conclusion: Seavey Loop Fourth Priority lands</p>	<p>these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services extensions and upgrades necessary to serve urban employment uses within the planning period. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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IDENTIFY FOURTH PRIORITY LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

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

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

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.⁸⁰ Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

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

⁸⁰ Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

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

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

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

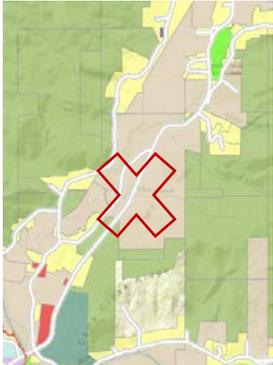
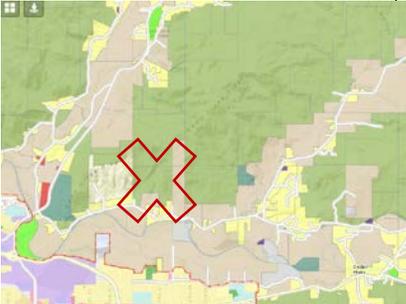
The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and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

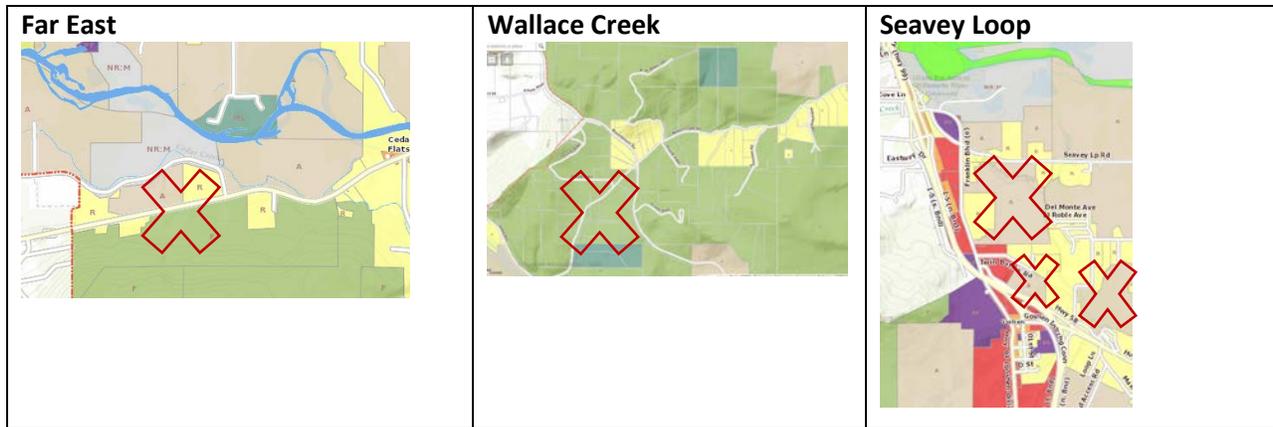
To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*”, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when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

Table 18: Fourth priority land excluded based upon specific land needs [ORS 197.298(3)(a)]

<p>Far East</p> 	<p>West Jasper/Mahogany</p> 	<p>Clearwater</p> 
<p>South Hills</p> 	<p>Wallace Creek</p> 	

Table 19: Fourth priority land excluded: public facilities constraints [ORS 197.298(3)(b)]

<p>McKenzie View</p> 	<p>Mohawk</p> 	<p>Oxbow/Camp Creek</p> 
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ORS 197.298 (1)(b) Goal 14 Location Factor 3 and Factor 4 – Fourth Priority Lands Analysis

To continue its evaluation of *potentially* suitable land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the **North Gateway, McKenzie View, Mohawk, Oxbow/Camp Creek, North Springfield Highway, Far East, West Jasper/Mahogany, Clearwater, Wallace Creek, Mill Race and Seavey Loop** areas based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

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

- Exclude lands that are not buildable⁸¹
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which fourth priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area

⁸¹ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

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

EVALUATE FOURTH PRIORITY LAND HAVING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

In the next step the City applied Goal 14, Boundary Location, Factor 3 and 4 to compare fourth priority lands under ORS 197.298.

- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

Goal 14, Boundary Location, Factor 3 ESEE Consequences

In addition to information comparing ESEE consequences in the preceding sections of this report, the following section provides additional evidence and findings to address and compare the ESEE consequences of expanding the UGB to include alternative candidate lands. This section of the report explains how the City compared the ESEE consequences of urbanizing potentially suitable and serviceable candidate lands. The City reasoned that the following topics and facts are relevant to its comparative evaluation of candidate lands. Since relevant topics address multiple Environmental, Economic, Social and Energy consequence, ESEE consequences are addressed by topic.

Geologic Hazards

As previously stated, given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The City considered the DOGAMI SLIDO data for the purposes of informing subsequent steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the each priority category. As previously stated, the City's review of The DOGAMI SLIDO map data identified the presence of

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

The City's review of The DOGAMI SLIDO map data identified no documented landslide hazards or relatively lower landslide susceptibility (Low to Moderate) in the UGB Preliminary Study Areas Jasper Bridge A and B, West Jasper/Mahogany, Clearwater, Mill Race, and North Gateway. North Springfield Highway study area grouping has one mapped historically active landslide and low to moderate landslide susceptibility.

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

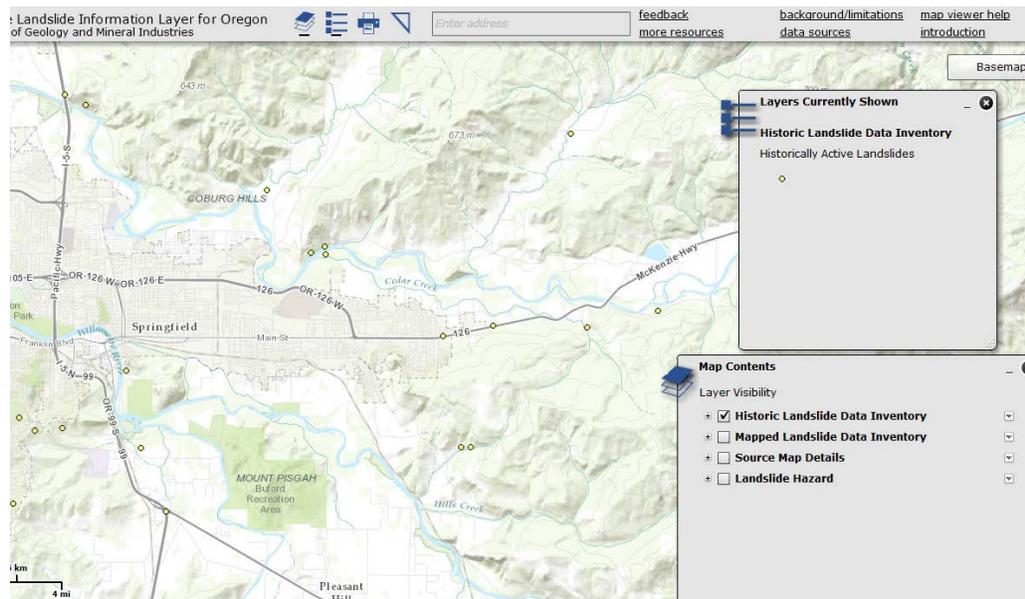
The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.⁸²

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

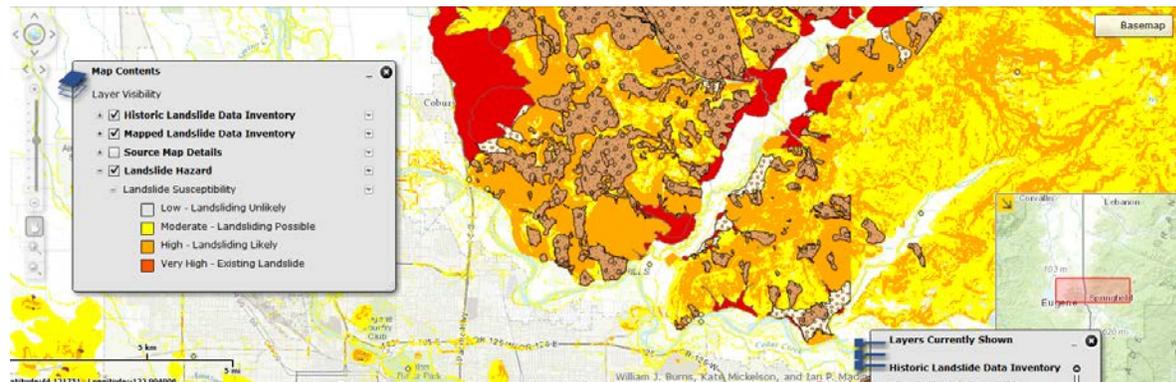
For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occur in hillside areas with terrain known to be landslide-susceptible will be more costly to

⁸² Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

meet more rigorous engineering, architectural and construction requirements than urbanization and development outside of areas with terrain not known to be landslide-susceptible.



DOGAMI SLIDO maps⁸³ of the Coburg Hills area indicate the presence of existing and historic landslides throughout the Coburg Hills, north of Springfield and the McKenzie River. For example, as shown in the following detail from the map, the hills are generally mapped with landslide hazards susceptibility ratings of “Very high – existing landslide,” “High - landsliding likely,” and “Moderate – landsliding possible.”

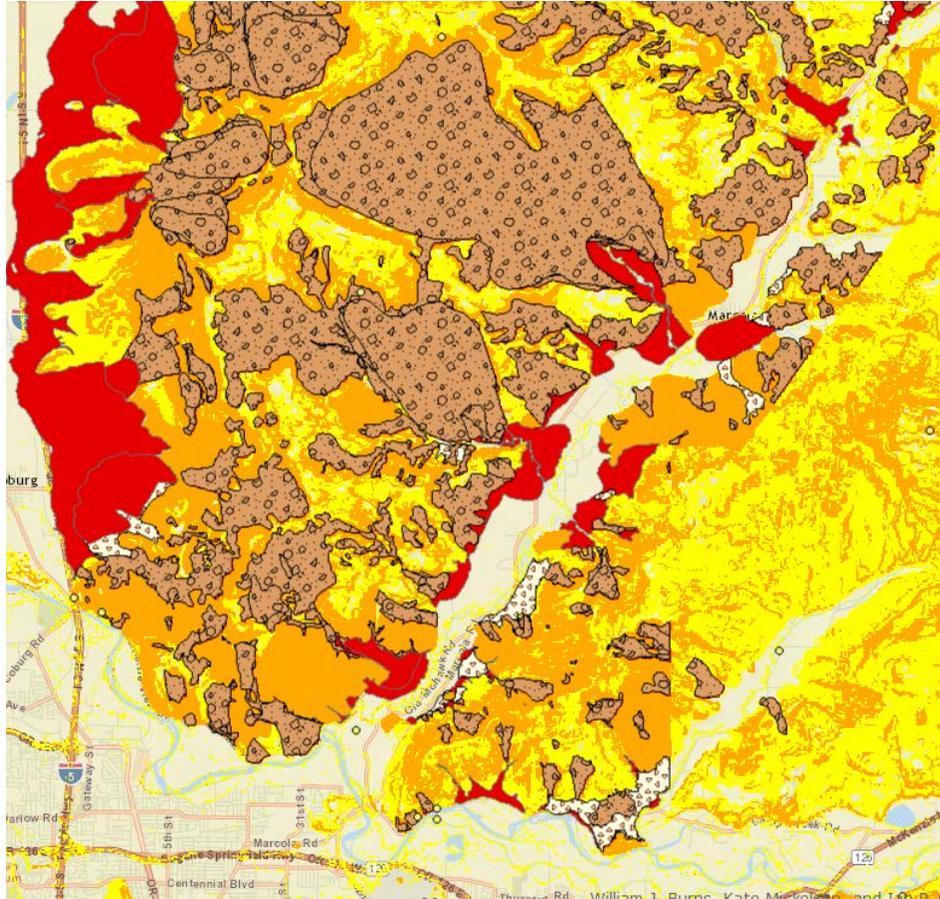


DOGAMI SLIDO Coburg Hills landslide hazard area: **McKenzie View B, Mohawk A, B and C and Oxbow/ Camp Creek Preliminary Study Area groupings**

⁸³ DOGAMI SLIDO viewer, <http://www.oregongeology.org/sub/slido/>

The website states: “Although the data have been processed successfully on a computer system at the Oregon Department of Geology and Mineral Industries (DOGAMI), no warranty expressed or implied is made regarding the accuracy or utility of the data on any other system or for general or scientific purposes, nor shall the act of distribution constitute any such warranty. This disclaimer applies both to individual use of the data and aggregate use with other data. We also urge you to pay careful attention to the contents of the metadata with these data and to the compilation process and limitations described therein. The Oregon Department of Geology and Mineral Industries shall not be held liable for improper or incorrect use of the data described and/or contained herein. Data are not intended for site-specific investigations.”

DOGAMI SLIDO maps⁸⁴ of the Coburg Hills area indicate the presence of landslide hazards in the near vicinity of the **McKenzie View A, B, Mohawk A, B and C** and **Oxbow/ Camp Creek** Preliminary Study Area groupings and adjacent resource lands.

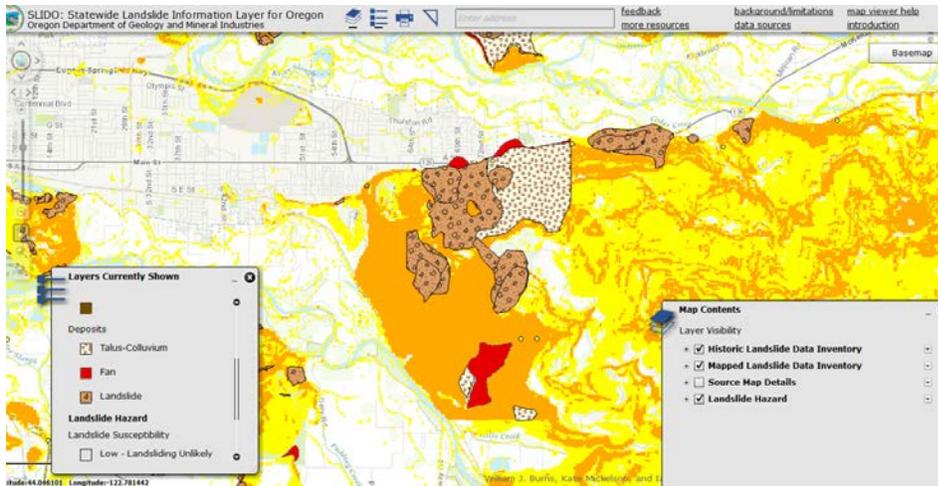


Detail: DOGAMI SLIDO McKenzie View A, B; Mohawk A, B and C; and Oxbow/Camp Creek areas

DOGAMI SLIDO maps⁸⁵ of the South Hills area indicate the presence of high landslide hazards and landslides in the near vicinity of the **Wallace Creek** Preliminary Study Area grouping.

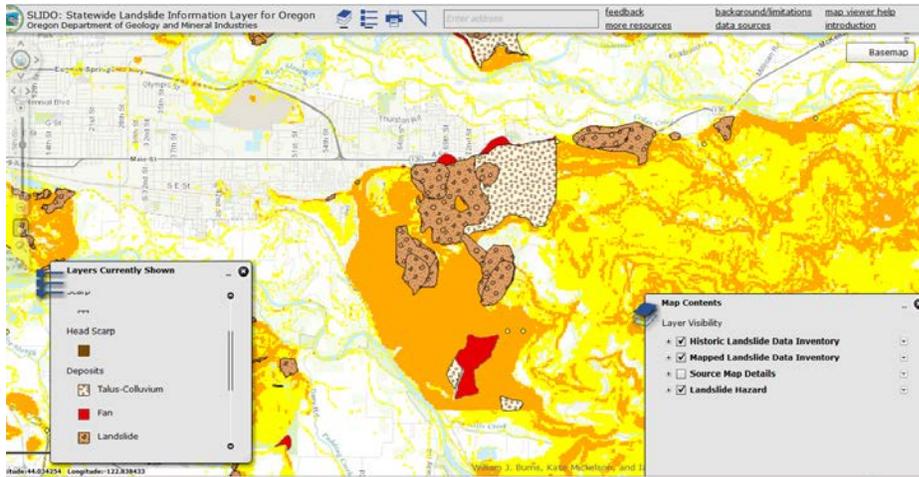
⁸⁴ Ibid.

⁸⁵ Ibid.

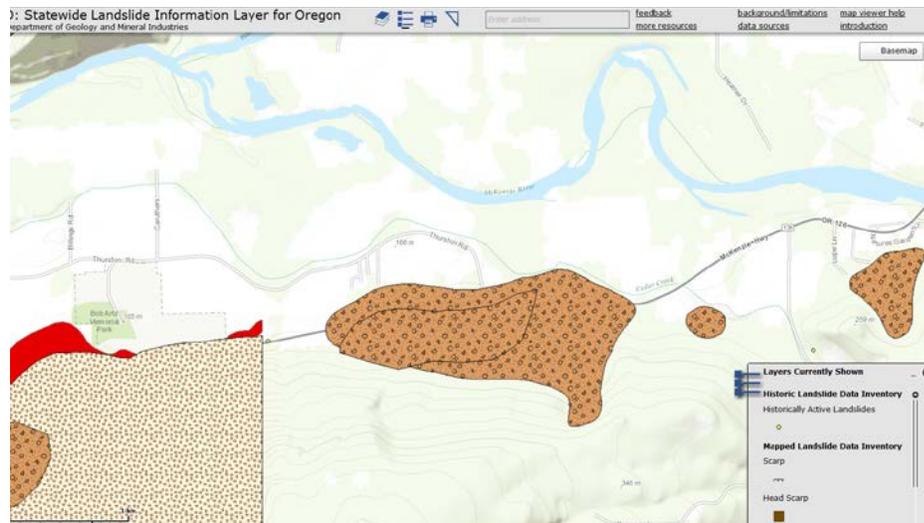


Detail DOGAMI SLIDO Wallace Creek landslide hazard area

DOGAMI SLIDO maps⁸⁶ of the South Hills area indicate the presence of landslide hazards in the near vicinity of the **Far East Springfield** and **South Hills Preliminary Study Area** groupings



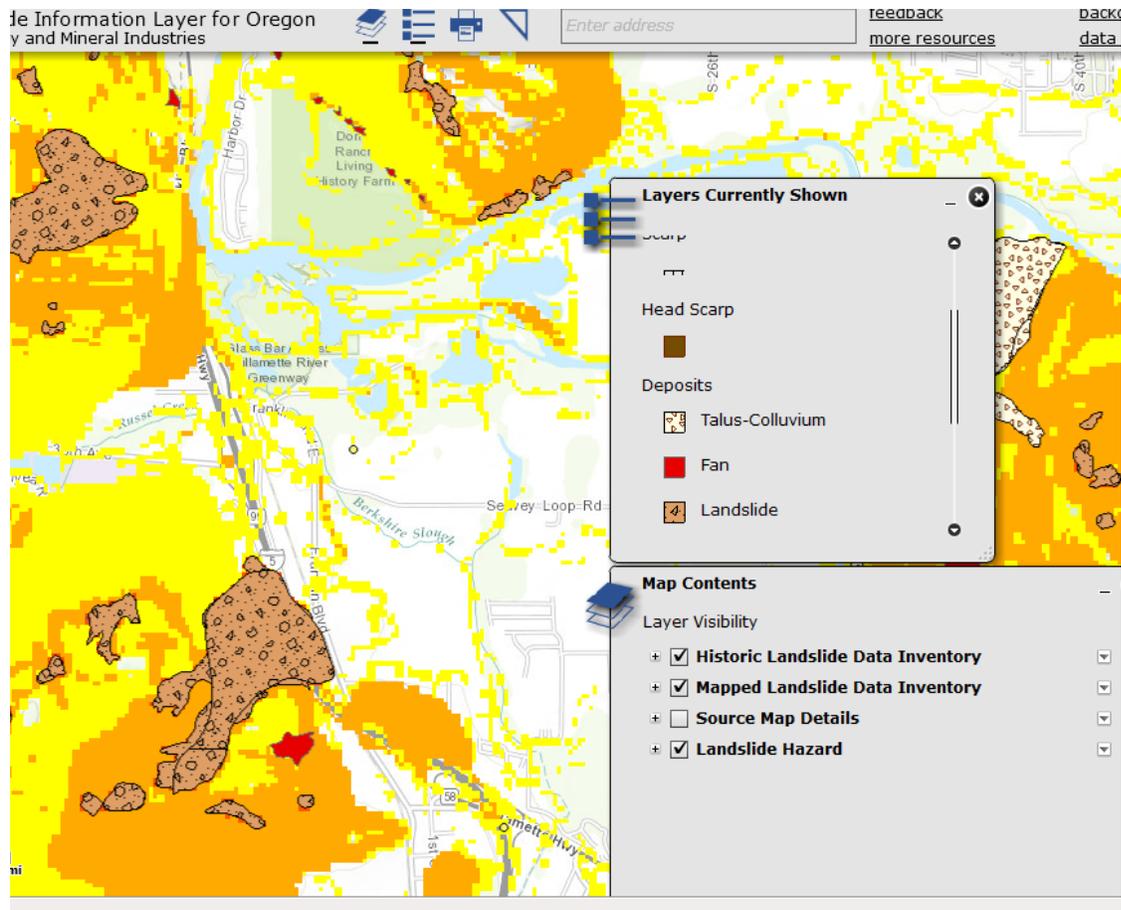
⁸⁶ Ibid.



Detail: DOGAMI SLIDO **Far East** landslide hazard area

DOGAMI SLIDO maps⁸⁷ of the area southwest of the UGB indicate the presence of landslide hazards in the near vicinity of the **Seavey Loop B and C Exception Area** Preliminary Study Area groupings and adjacent resource lands.

⁸⁷ Ibid.



DOGAMI SLIDO Seavey Loop B and C mapped landslide hazard areas

The City applied the following criteria when it evaluated and compared transportation related impacts and ESEE consequences of urbanizing alternative locations. The City reasoned that the following criteria and facts are relevant to its comparative evaluation of candidate lands:

Transportation Impacts Related to Distance from City and Major Transportation Facilities

Location of area causes conflicts with State Planning Goals and local plan policies related to maintaining efficient, compact urban form by causing comparatively substantial additional vehicle miles travelled to and from new employment center land uses.

Location and physical constraints of area causes conflicts with Federal, State or Local policies regarding safety or performance standards of the transportation system, including freight mobility, roadway, transit, bicycle and pedestrian facilities.

A more distant location of an area from urban infrastructure and services results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A location requiring a river crossing results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A development project that results in vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

Generally, development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Similarly, development projects that decrease vehicle miles traveled in the project area compared to existing conditions may be considered to have a less than significant transportation impact.

Vehicle miles traveled is an appropriate metric to evaluate a project's transportation impacts.

Comparative assessment of ESEE impacts associated with certain transportation projects must address the potential for induced travel. Adding additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts.

Transportation projects that reduce, or have no impact on, vehicle miles traveled may be presumed to cause a less significant transportation environmental impact.

If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations (such as homes, employment and services), area demographics, etc.

For the purposes of the UGB Alternatives Analysis, the City assumed that the target industrial and other employment uses requiring sites 5 acres and larger — as identified in the EOA — would induce travel and transportation-related impacts similar to the travel and impacts of existing industrial and other employment uses in Springfield — such as the employment sectors located in the International Way Campus Industrial district.

For the purposes of the UGB Alternatives Analysis, the City assumed that adding or improving additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts relative to trip length, as identified in the City's Public Facilities Analysis.

ESEE Environmental/Air Quality/Energy Consequences

Accounting for vehicle miles traveled (VMT) is a measure used in connection with long range planning, or as part of the analysis of a project's greenhouse gas emissions or energy impacts. Methods of some estimating vehicle miles traveled include: ⁸⁸

*“**Trip-based assessment** of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally most common, method of counting VMT. A **tour-based assessment** counts the entire home-back-to-home tour that includes the project.*

Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip. ...a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.

Characteristics of an office project can also affect an employee's VMT even beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT.”(emphasis added)

Based on this reasoning and for the purposes of this ESEE analysis, the City assumed that the more distant the exception area is located from the City, the greater the distance the potential urban employment site/workplace will be located from the City and from transit. This greater distance is more likely to cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT.

Urbanizing areas more distant from the City, will result in relative increases in VMT and transportation impacts within the existing UGB as more employees need to own a car to reach their more distant workplaces.

Designating land for employment centers within or proximate to multimodal transportation networks will have the consequence of adding new users to systems. This can cause mixed cumulative impacts:

“When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new users as an adverse impact. Any travel-

⁸⁸ “Technical Advisory of Evaluating Transportation Impacts in CEQA,” California Governor's Office of Planning and Research, Jan. 20, 2016, pp. 13-14.

efficient infill development is likely to add riders to transit systems, potentially slowing transit vehicle mobility, but also potentially improving overall destination proximity. Meanwhile, such development improves regional vehicle flow generally by loading less vehicle travel onto the regional network than if that development was to occur elsewhere.”⁸⁹

“Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system.”⁹⁰

“Projects that would likely lead to an increase in VMT, (including for purposes of accurately estimating GHG and other impacts that are affected by VMT), generally include:

- Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.”*

Projects that would not likely lead to a substantial or measureable increase in VMT, generally include:

- Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle lanes.*
- Roadway shoulder enhancements to provide “breakdown space,” otherwise improve safety or provide bicycle access.*
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety.*
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes.*
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit*
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially decrease impedance to use*
- Reduction in number of through lanes, e.g. a “road diet”*
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g. HOV, HOT, or trucks) from general vehicles*

⁸⁹ Ibid. p. 26.

⁹⁰ “Technical Advisory of Evaluating Transportation Impacts in CEQA,” California Governor’s Office of Planning and Research, Jan. 20, 2016

- *Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features*
- *Traffic metering systems*
- *Timing of signals to optimize vehicle, bicycle or pedestrian flow*
- *Installation of roundabouts*
- *Installation or reconfiguration of traffic calming devices*
- *Adoption of or increase in tolls*
- *Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase (e.g., encourage carpooling, fund transit enhancements like bus rapid transit or passenger rail in the tolled corridor)*
- *Initiation of new transit service*
- *Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes*
- *Removal of off-street parking spaces*
- *Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).*
- *Addition of traffic wayfinding signage*
- *Rehabilitation and maintenance projects that do not add motor vehicle capacity*
- *Any lane addition under 0.3 miles in length, including addition of any auxiliary lane less than 0.3 miles in length”⁹¹*

Causes of Induced VMT. Induced VMT occurs where roadway capacity is expanded in a congested area, leading to an initial appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:

- *Longer trips. The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are further away, increasing trip length and VMT.*
- *Changes in mode choice. When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases VMT.*
- *Route changes. Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease VMT depending on whether it shortens or lengthens trips.*
- *Newly generated trips. Increasing travel speeds can induce additional trips, which increases VMT. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those ends via automobile trips as a result of increased speeds.*
- *Land Use Changes. Faster travel times along a corridor lead to land development further along that corridor; that development generates and attracts longer trips, which increases VMT. Over several years, this component of induced VMT can be substantial, e.g. approximately half of the total effect on VMT.*

These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer.”⁹²

⁹¹ Ibid.

⁹² Ibid

ESEE Energy Consequences

“Targets to reduce existing VMT to curb greenhouse gases, and other pollutants do not translate directly into VMT thresholds for individual projects for numerous reasons, however, including the following:

Some, though not all, of the emissions reductions needed to achieve those targets will be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content.

New projects alone will not sufficiently reduce VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.

Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.”⁹³

Because regional location is the most important determinant of VMT, locating vehicular trip-inducing urban land uses in travel efficient locations is widely recognized as one effective means of reducing VMT, and thus reducing energy consumption associated with transportation. Based on this accepted fact, it is reasonable for the City to assume that the more remote the location from Springfield, the higher the VMT associated with development would result. For the purposes of the UGB Alternatives Analysis, the City assumed locations farther from Springfield — as identified by relative trip length in the City’s Public Facilities Analysis — would result in increased VMT and increase in impacts associated with VMT compared to areas closer to Springfield.

The relative proximity of the North Gateway and Mill Race sites to the region’s existing and planned public frequent transit network system is the basis for the City’s assumption that those two locations provide travel-efficient locations relative to the other alternatives studied and thus would result in comparatively higher percentage of commute trips by transit and fewer vehicular commute trips to employment centers.

ESEE Economic Consequences

OAR 660-009-0005 (3) states:

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

⁹³ Ibid.

The Goal 9 rule’s definition of “industrial” clearly recognizes that “Industrial uses may have external impacts on surrounding uses;” and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.

The City’s description of candidate study areas identifies the land uses surrounding each candidate area.

For the purposes of the UGB Alternatives Analysis, the City assumed that candidate study areas sharing boundaries with lands designated, zoned and developed with urban industrial and other employment uses have comparative economic advantages over areas that do not share boundaries with lands designated, zoned and developed with urban industrial and other employment uses, because aggregating employment uses results in greater efficiencies in infrastructure, services and transportation. [OAR 660-009-0005 (3)] The North Gateway and Mill Race sites abut industrial lands inside the UGB.

As previously stated, increased distance from Springfield increases the public costs to construct maintain and operate infrastructure and services. Developing sites closer to Springfield decreases the public costs to construct maintain and operate infrastructure and services.

As previously stated, increased distance from Springfield increases travel times for transporting goods and services, and employee travel time, resulting in relatively higher cost to businesses and employees.

Social Consequences Comparison

The majority of second priority exception lands in the vicinity of the UGB are designated and zoned for and developed with rural residential uses, thus exception land parcel(s) are already developed and committed to rural uses, primarily rural residential uses.

Expanding the UGB to include any of the exception areas studied would encompass lands designated and zoned for and developed with rural residential uses that lack the characteristics of needed employment sites.

When exceptions areas were designated by Lane County in the Lane Rural Comprehensive Plan, and zoned Rural Residential, those lands were committed to rural uses in accord with the administrative rules in Division 4 interpreting the Goal 2 exception process in effect at the time they were designated. As stated in OAR 660-004-0010, *“The exceptions process is generally applicable to all or part of those statewide goals that prescribe or restrict certain uses of resource land, restrict urban uses on rural land, or limit the provision of certain public facilities and services.”*

Including developed Rural Residential exception or marginal lands nthe UGB that are not suitable to accommodate Springfield’s needed industrial and commercial mixed use employment uses on large sites 5 acres or larger and 20 acres or larger, would make those lands “urbanizable.” The City would be required to redesignate and rezone rural residential lands for employment use. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to

result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.⁹⁴

If the City were to expand the UGB to include Third or Fourth priority resource lands in remote locations from Springfield, unsuitable intervening resource, exception and marginal rural lands remaining outside the UGB would likely be affected by the siting of urban industrial and commercial uses. Industrial and commercial uses are not typically considered compatible with residential uses, and land use buffers would typically be required, reducing the overall developable acreage of a site. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.

Goal 14 Location Factor 3 Conclusions – Fourth Priority Lands Analysis

The City's analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3) confirmed exclusion of lands in the previous steps:

- **This step confirmed exclusion of McKenzie View land** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Oxbow/Camp Creek** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Mohawk** (cost inhibitive infrastructure upgrades to cross river, distance, unsuitable location, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of North Springfield Highway** (environmental, flooding, stormwater discharge regulations, habitat)
- **This step confirmed exclusion of West Jasper/Mahogany (cost/benefit, cost inhibitive infrastructure upgrades, no transit, environmental, habitat, social, farmland)**
- **This step confirmed exclusion of Clearwater** (no transit, social, farmland)
- **This step confirmed exclusion of Wallace Creek lands on the basis of** (cost/benefit, landslide hazards, cost inhibitive infrastructure upgrades, contrary to compact urban development, no transit)
- This step confirmed exclusion of **Far East** (cost/benefit, cost inhibitive infrastructure upgrades, farmland, contrary to compact urban development, no transit, landslide hazards)
- This step confirmed exclusion of **Seavey Loop** (contrary to compact urban development, cost inhibitive infrastructure upgrades, cost/benefit, social, farmland)

The City determined that the cost to serve potentially suitable lands within these areas is not feasible within the planning period.

⁹⁴ See the record at [X](#) documenting input from Seavey Loop neighbors regarding the City's consideration of the College View study area

The City determined that these areas cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need.

The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at these site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

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

Goal 14 Factor requires the City to address how development of urban industrial and commercial employment uses within the UGB expansion area would be compatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB. Given that ORS 197.298 requires the City to site urban uses on farmland as the fourth priority, and given that the City has no suitable Second or Third Priority lands to accommodate the employment land need, the City must meet a high bar to demonstrate that the farmland it chose to include in the UGB expansion was carefully and thoughtfully selected after a thorough comparison of all alternative areas within the same priority to consider how future urbanization to accommodate target industry employment uses would be compatible/incompatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The City reasoned that the following facts are relevant to the Factor 4 comparison because maintaining a compact urban form reduces opportunities for land use conflicts between urban industrial and commercial employment uses and agricultural and forest activities.

The North Gateway and Mill Race suitable employment lands are contiguous with the Springfield City limits. Expanding the UGB on land contiguous to the City will result in a more compact, efficient urban form with relatively less potential for conflict with surrounding agricultural and forest activities occurring on farm and forest land outside the UGB than would result from expanding in alternative sites. Compact, efficient urban form is consistent with Metro Plan policy and Oregon law and Goal 14 Factors 1 and 2.

The result of expanding onto more distant and non-contiguous lands would a “leapfrogging” development pattern over, past or through unsuitable agricultural or forest land, inducing addition or expansion of urban corridors through the rural Lane County landscape. The purpose of a UGB is to separate urbanizable from rural land. Establishment of corridors to serve distant development creates or increases edge effects. Edges, where they occur along and though farm or forest land areas, inherently create or increase physical opportunities for land use conflicts and contribute to urban sprawl. In addition to being inefficient and contrary to the Oregon Statewide Planning Goals, development of urban corridors through farm or forest land by extending and upgrading infrastructure through intervening unsuitable lands between the City limits and suitable sites would be more likely to

create or increase compatibility impacts with nearby agricultural and forest activities occurring on farm and forest land outside the UGB including but not limited to increased volume and speed of vehicle trips on rural roads, inducement of land use changes from rural to urban on intervening unsuitable lands, and land value speculation that has deleterious effects on local viability of farming.

The City's Public Facilities Analysis provides a summary of transportation and infrastructure extensions or improvements that would be needed to serve each alternative area, including the approximate length of service extensions and location of transportation system improvements that would be triggered by development in each area.

Urbanization of the North Gateway and Mill Race suitable employment lands will not affect forestry activities because the sites do not share edges with lands designated Forest in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Forest.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities because the sites do not share edges with lands designated Agriculture in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Agriculture.

Urbanization of the North Gateway suitable employment lands will move the urbanizable edge farther north and thus has potential to affect agriculture activities occurring on lands between the proposed new edge of the UGB (at Sprague Road) and the McKenzie River. Agriculture uses in the area north of Sprague Road include the former Bloomer's Nursery (closed in 2016), and staff observed livestock grazing activity on the tracts between Sprague Road and the McKenzie River. Trucks, contractor and customer vehicles have operated on Sprague Road to access Bloomer's over the past years and no deleterious impacts to agriculture uses north of Sprague Road have been identified through the City's multi-year public involvement process. The City's Public Facilities Analysis identifies a need to improve Sprague Road to serve North Gateway suitable employment lands. Transportation impacts generated by development and any mitigation required to address those impacts are determined at time of plan amendment and zone change, annexation and the City development approval process in coordination with ODOT and other agencies and with input from potentially affected parties.

Urbanization of the North Gateway suitable employment lands will not affect agriculture activities occurring on lands on the opposite side of the McKenzie River because the river serves as a buffer between land uses. Additional buffering will be provided between the river and future development sites by the Natural Resource plan designation applied to the floodway area. The Transportation and infrastructure extensions or improvements to serve the North Gateway suitable employment lands will not require crossing the McKenzie River or adjacent rural lands.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities south of the Willamette River (Seavey Loop) because the river and intervening public, parks and open space lands serves as a buffer.

The City confirmed its exclusion of other fourth priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4) through the Alternatives Analysis process, as summarized in Tables 13 and 15 of this report. Table 13 General Description of Fourth Priority land provides maps and text to identify the location of each alternative area studied by the City in relationship with surrounding lands designated Agriculture or Forest in the Lane Rural Comprehensive Plan and the relative proximity of each area to the City. Table 17 Fourth Priority Land Public Facilities and Services Analysis Summary describes the facilities that would be needed to serve each area.

- This step confirmed exclusion of McKenzie View
- This step confirmed exclusion of Hayden Bridge
- This step confirmed exclusion of Thurston
- This step confirmed exclusion of Mohawk
- This step confirmed exclusion of Oxbow/Camp Creek
- This step confirmed exclusion of Far East
- This step confirmed exclusion of Clearwater
- This step confirmed exclusion of West Jasper/Mahogany
- This step confirmed exclusion of Jasper Bridge
- This step confirmed exclusion of South Hills
- This step confirmed exclusion of Wallace Creek
- This step confirmed exclusion of Seavey Loop

The City contacted USDA NRCS and Oregon Department of Agriculture staff to request technical assistance regarding statutes and administrative rules that are relevant when addressing soil capability classification⁹⁵ and relevant resources to consult as the City addressed Factor 4.

OAR 660-033-0030(2)

“When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried. However, whether land is “suitable for farm use” requires an inquiry into factors beyond the mere identification of scientific soil classifications. The factors are listed in the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). This inquiry requires the consideration of conditions existing outside the lot or parcel being inventoried. Even if a

⁹⁵ As recommended by USDA and OR Dept. of Ag staff, City staff consulted the most recent Census of Agriculture and special tabulations from the census developed by Oregon State University, the Oregon Department of Agriculture, the United States Department of Agriculture's NRCS, the Oregon State University Extension Service and the county assessor's office to obtain data to determine the nature of the existing commercial agricultural enterprise within the area for the purposes of this study.

lot or parcel is not predominantly Class I-IV soils or suitable for farm use, Goal 3 nonetheless defines as agricultural "Lands in other classes which are necessary to permit farm practices to be undertaken on adjacent or nearby lands." A determination that a lot or parcel is not agricultural land requires findings supported by substantial evidence that addresses each of the factors set forth in 660-033-0020(1)."

As previously stated, the City excluded fourth priority lands from consideration on the basis of soil capability classification.

- The City excluded **North Gateway — North of Sprague Road** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **McKenzie View** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Oxbow/Camp Creek** lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Hayden Bridge** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Mohawk** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **North Springfield Highway** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Thurston** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Far East — North of Highway 126** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **South Hills** lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **West Jasper/Mahogany** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Jasper Bridge** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Clearwater** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Wallace Creek** lands comprising predominantly Class II and III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Seavey Loop** lands comprising predominantly Class II, Class III High Value and Class IV Prime Farmland soils on the basis of agricultural capability classification.

As previously stated, the City also excluded lands comprising soils of higher priority for expansion in the Clearwater, West Jasper/Mahogany, Wallace Creek, Thurston, Far East, Mohawk, Oxbow/Camp Creek and South Hills areas (identified in Table 13) on the basis of Specific Land Needs [ORS 197.298(3)(a)]; on

the basis of inability to reasonably provide urban services due to physical constraints [ORS 197.298(3)(b)]; and on the basis of comparative ESEE consequences.

Another, additional reason the City chose not to expand the UGB to include several non-contiguous parcels with soils of higher priority in the Clearwater, West Jasper/Mahogany, Wallace Thurston, Far East, Mohawk and Oxbow/Camp Creek areas (identified in Table 13), even though those parcels are not predominantly Class I-IV soils, is because the City reasoned that those lands are suitable and will remain suitable for farm use consistent with their Agriculture designation and Exclusive Farm Use zoning in the Lane Rural Comprehensive Plan because those lands are *“are necessary to permit farm practices to be undertaken on adjacent or nearby lands,”* consistent with the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). The City assumed, based on the input it received from property owners, farmers, citizens and agriculture experts over the multi-year public involvement process, that the agricultural lands it excluded are — and will remain through the 2010-2030 planning period — more *“suitable for farm use as defined in ORS 215.203(2)(a), taking into consideration soil fertility; suitability for grazing; climatic conditions; existing and future availability of water for farm irrigation purposes; existing land use patterns; technological and energy inputs required; and accepted farming practices;”* than the two areas (North Gateway UGB to Sprague Road and Mill Race) the City chose to include in the UGB to meet its specific employment land needs.

The City reasoned that the agricultural lands it excluded will remain *“necessary to permit farm practices to be undertaken on adjacent or nearby agricultural lands.”*

The City reasoned that the agricultural lands it excluded will continue to support Commercial Agricultural Enterprise consisting of farm operations that will contribute in a substantial way to the area's existing agricultural economy; and help maintain agricultural processors and established farm markets.

The City reasoned that the agricultural lands it excluded will continue to support farm use as defined in ORS 215.203 and OAR Division 33 on lands designated Agriculture and zoned Exclusive Farm Use in the Lane Rural Comprehensive Plan by maintaining viable use of abutting high value farmland parcels [OAR 660-033-0030(2)], and by maintaining contiguous connected blocks of farmland through the planning period.

The City reasoned that the following facts and criteria are relevant to comparing the consequences of urbanization related to agriculture and forest uses within the locations it evaluated for inclusion in the UGB:

- Class I and II and high value or prime III or IV agricultural soils exist on and immediately abutting the areas.
- Agriculture area is physically buffered from the urban area by the river.
- Nonfarm (residential uses) exist throughout the area and there is little documented history of conflicts with agricultural operations in the area.

- Tract and field sizes are appropriate for the character of agriculture in the area.
- Existing land use regulations – EFU and exceptions zoning limit the ability to further divide area agricultural lands
- Opportunities for the direct marketing and promotion of agricultural products exists. Farm stands, U-picks and small farms producing high-value products for sale to the urban market are not uncommon and are increasing in the area. This lends itself to greater opportunities for farms to produce crops that cater to the ever-growing demand for locally produced food and other agricultural products.
- Comparative length of shared edge with the UGB.
- Comparative length of needed urban services extensions and improvements that would be required through or along bordering farm or forest lands.

Based on balanced consideration of the factors addressed above, the City reasoned that the potentially suitable Fourth Priority sites it excluded are better suited for the continued production of agricultural and forest products within the planning period because those areas are relatively well buffered and protected from urbanization by their distance, by their location within large blocks of farm and/or forest land, by their location on the opposite side of the McKenzie or Willamette Rivers, and by their relatively remote locations accessed via rural roads of narrow width restricted by geology and slopes and via weight-restricted bridges.

Based on balanced consideration of the factors addressed above, and based on evidence in the record, the City reasoned that the agricultural lands it included — North Gateway UGB to Sprague Road and Mill Race — are comparatively less suited for the continued production of agricultural products within the planning period because these areas are not well buffered from the City. Both areas abut the City limits and existing industrial land developed with industrial uses.

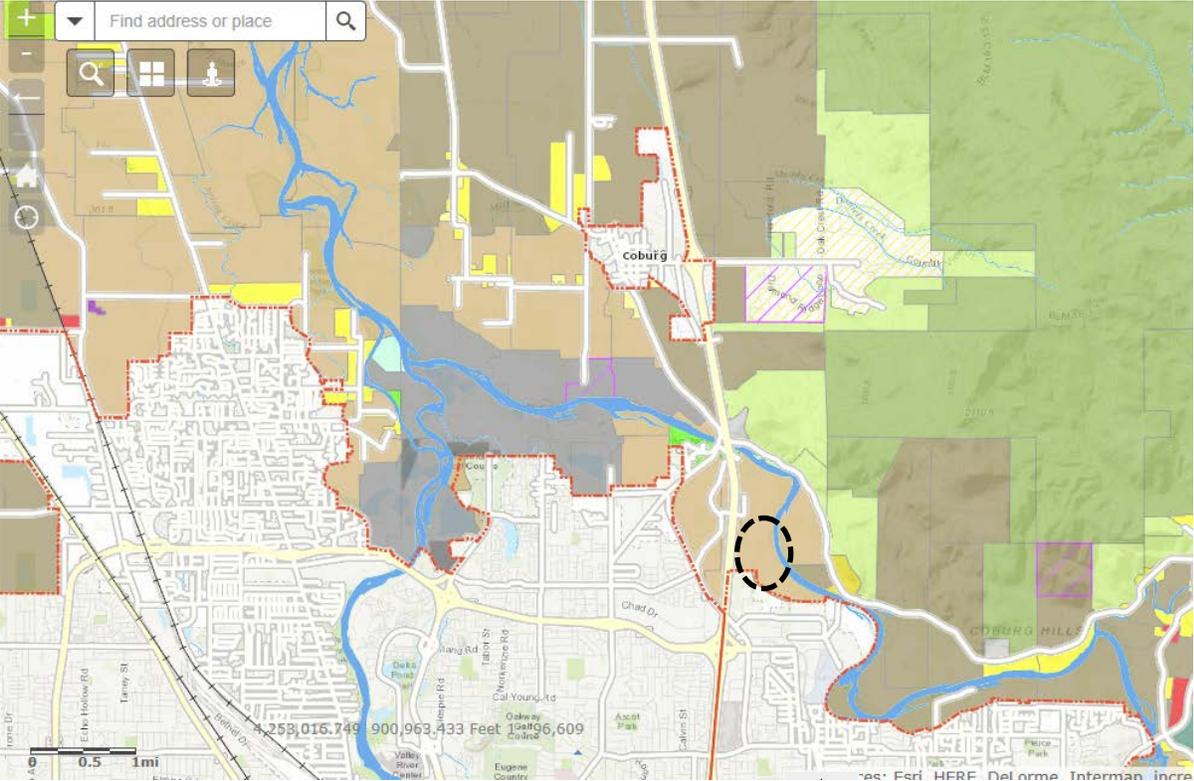
Any expansion of the UGB inherently alters the pattern of land uses in a given area as urbanizable lands develop over time. The City’s analysis and the conclusions reached are reasonable and supported by ample evidence. The following maps are included to illustrate how the City’s UGB expansion will result in a minimal overall alteration of the pattern of land uses in the Metro area, with an emphasis on how the expansion could amount and affect pattern of agricultural land uses in the region.

The following map⁹⁶ depicts the location of the proposed North Gateway UGB expansion (214 gross acres including right of way/132.1 unconstrained employment land acres) in relationship to resource land designated Agricultural (tan color) in the LRCP between the Springfield, Coburg and Eugene UGBs/urbanizable lands. The map shows how this block of farmland is already split (and rendered less viable) by Interstate Highway 5.

⁹⁶ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

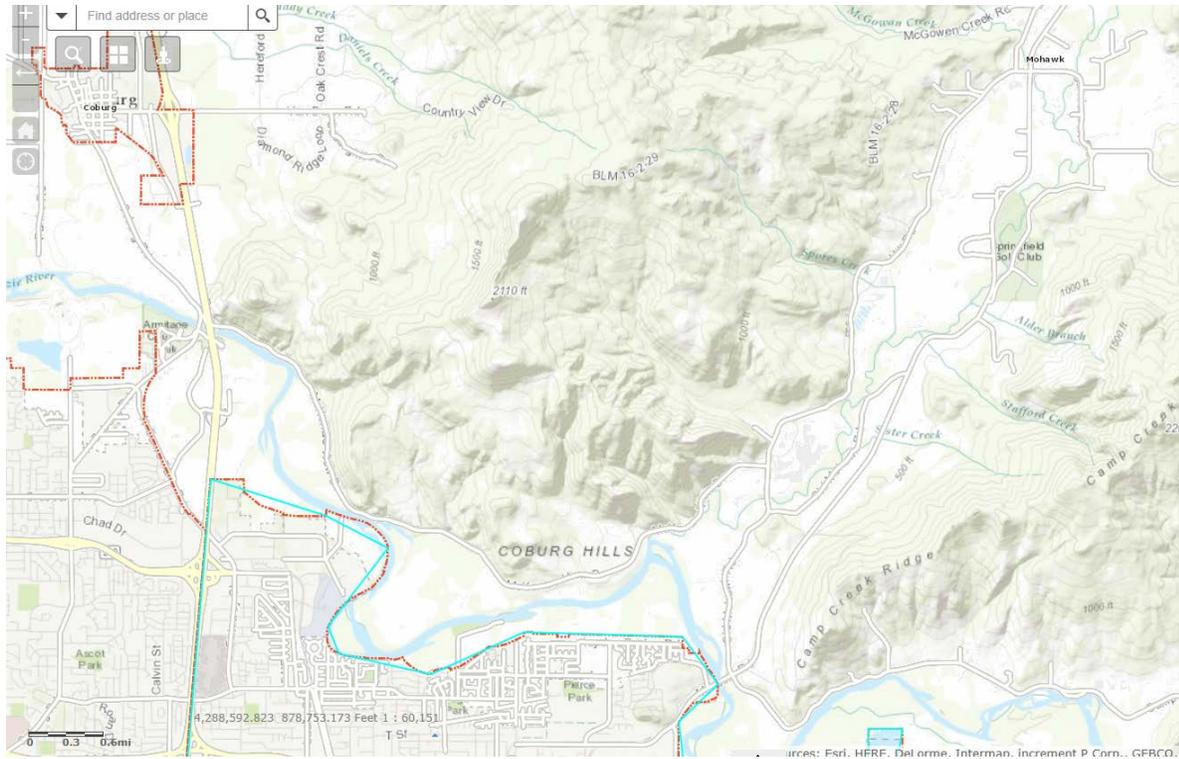


Sprague Road Overpass



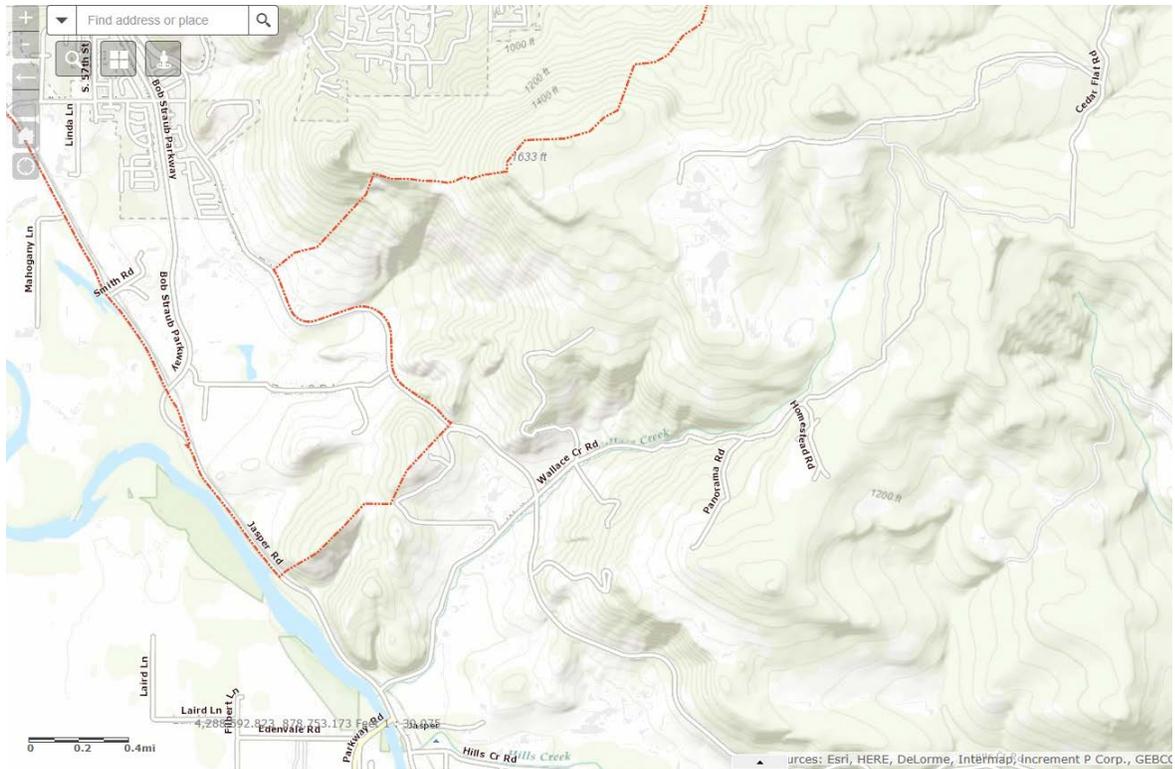
Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed North Gateway UGB employment land expansion relative to farmland north and west of Springfield UGB – farmland shown in beige color



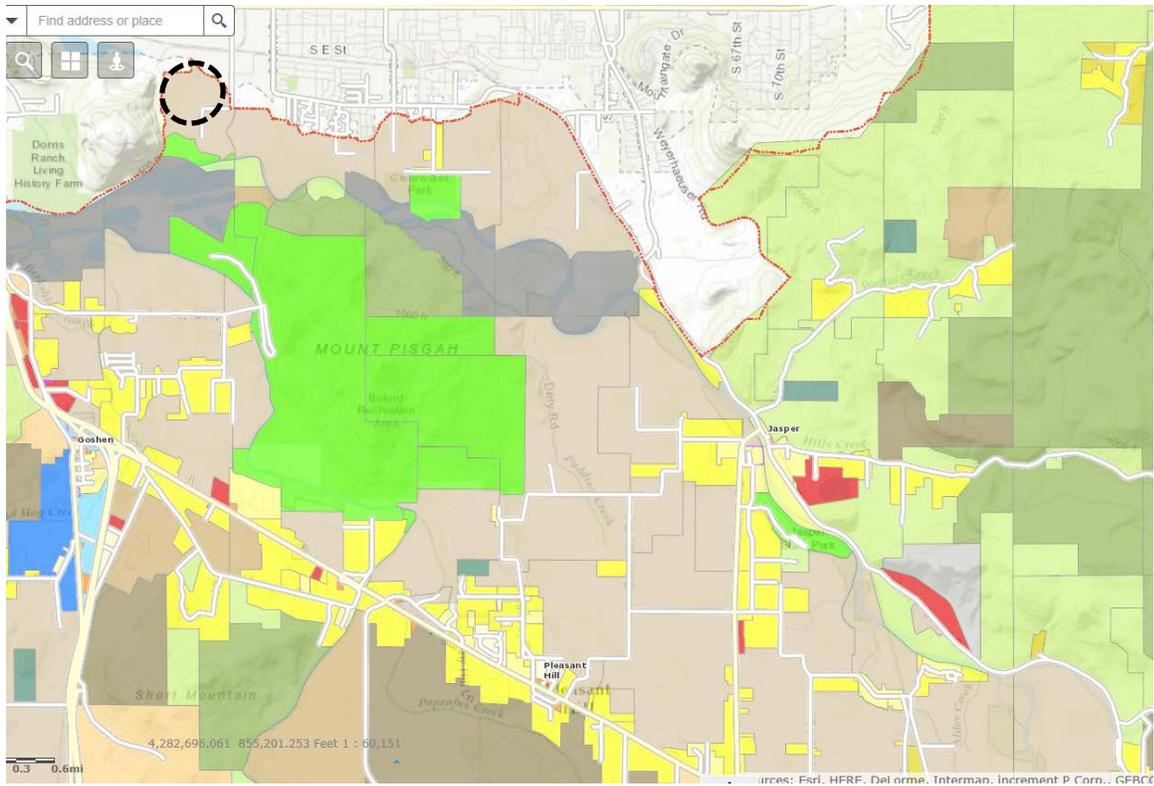
Topographic Constraints North of McKenzie River:
McKenzie View, Mohawk, and Camp Creek Study Areas⁹⁷

⁹⁷ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>



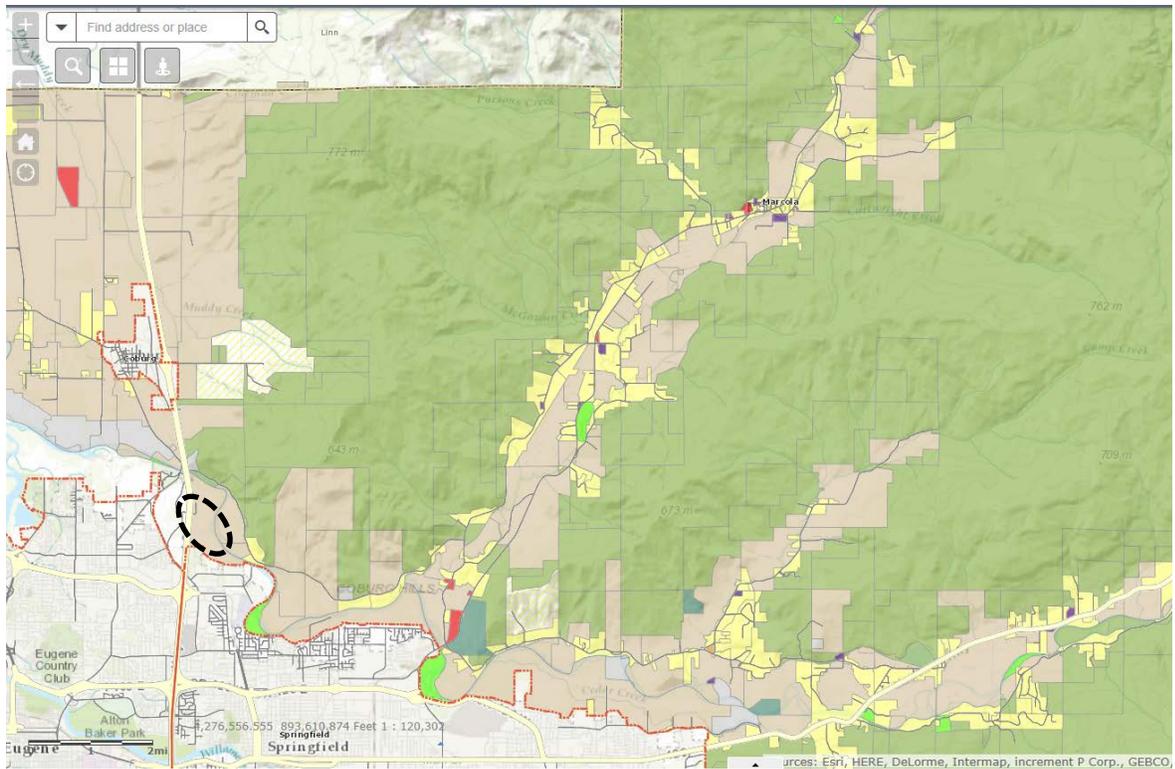
Topographic Constraints Southeast of UGB:
Wallace Creek Study Area⁹⁸

⁹⁸ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

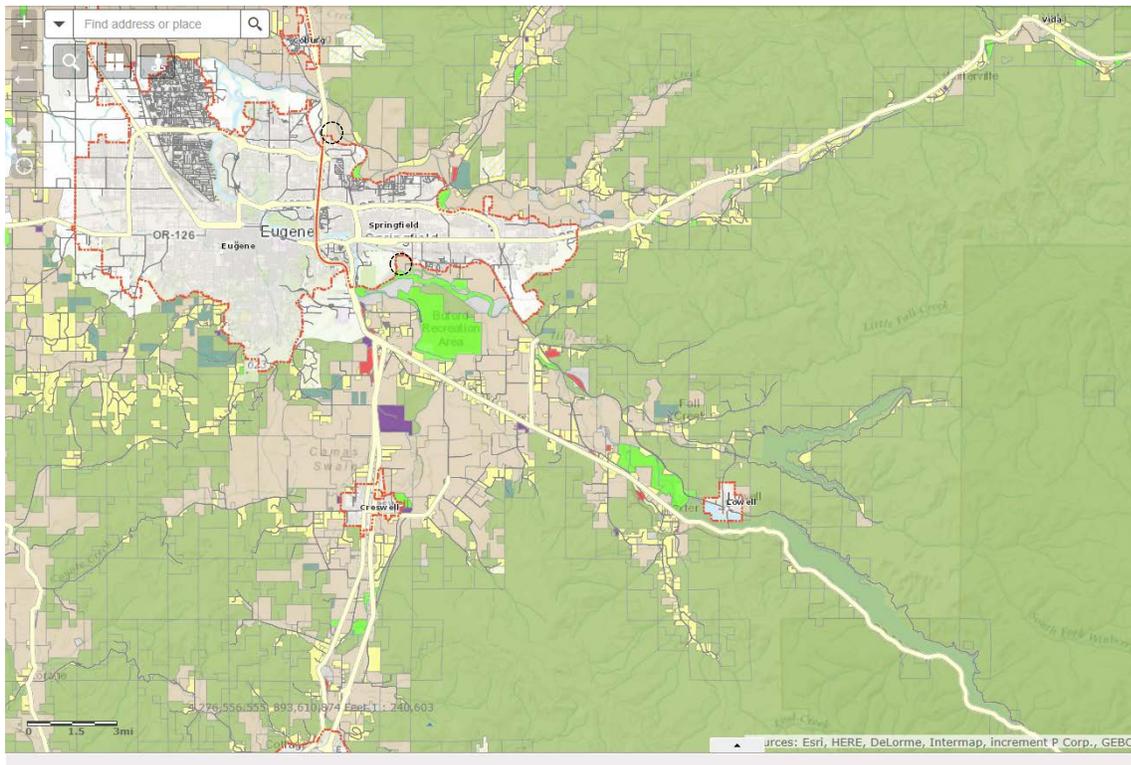


Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed Mill Race UGB employment land expansion relative to farmland south of Springfield UGB – farmland shown in beige color



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands
 North Gateway UGB Employment Land Expansion



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands

Farmland Surrounding Eugene-Springfield Metro Area within Lane County – shown in beige color, Forestland shown in green.

○ = indicates Springfield UGB Employment Land Expansion

The preceding map depicts the location of land designated Agriculture in the Lane Rural Comprehensive Plan. The larger areas of land designated Agriculture are located south of the Springfield UGB.

The City’s analysis excluded the areas listed in Table 20 from further consideration.

Table 20: Fourth Priority Agriculture and Forest Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences

North Gateway (North of Sprague)	McKenzie	View	Oxbow/Camp	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East	South Hills		West Jasper/Mahogany	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

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

The City determined that fourth priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City's decision was reached after identifying and evaluating resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough evaluation, the City determined that urbanization would be directed to North Gateway UGB to Sprague Road and to Mill Race because these lands provide comparative advantages over other areas and therefore can "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints, the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to these two areas compare favorably to directing urbanization to other lands because land is suitable to meet the site needs of target industries and the amount of unconstrained land is more economically feasible to serve with public water and wastewater facilities on a cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **areas** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14

Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of North Gateway UGB to Sprague Road and Mill Race is more economically viable on a service cost basis and is less likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [

Thus, urbanization of the North Gateway UGB to Sprague Road site and Mill Race site compares favorably with other lands the City considered for inclusion in the UGB.

The City’s conclusion was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Table 21: Springfield UGB Expansion and Land Use Designations

Area	Suitable Employment Acres Designated Urban Holding Area – Employment (UHA-E)	Acres Designated Natural Resource (NR)	Acres Designated Public/Semi Public (P/SP)	Gross Acres (inc. right of way)
North Gateway	132.1	53.3	9.7	212.4
Mill Race	125	0	373.1	508.1
Other Parkland	0	0	72	72
Total Land Added	Total Suitable 257.1	Total Natural Resource 53.3	Total Public /Semi Public 454.8	792.5

Goal 14 Location Factors 1 and 2

In the next step the City applied and balanced Goal 14, Boundary Location Factors 1 and 2 to confirm selection of the parcels to be included in the UGB for industrial and commercial mixed use employment purposes.

Goal 14 Factor 1: Efficient accommodation of identified land needs. The North Gateway UGB expansion accommodates employment land needs efficiently. The three suitable North Gateway employment sites abut the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The North Gateway UGB expansion designates 139.4 acres of land in three contiguous tracts for employment (Urban Holding Area – Employment plan designation). Of the 139.4 acres so designated, 132.1 acres are unconstrained and suitable for development. 7.3 acres comprise waterways, riparian

resources, wetlands and slopes >15%. The City assumed that the public streets and facilities needed to serve development will be accommodated within the 139.4 acres designated Urban Holding Area – Employment.

The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing employment center. Two of the three sites about the City's International Way Campus Industrial employment center (existing employers include Royal Caribbean, Symantec, Richardson Sports, Pacific Source, Hawes Investments, and Oregon Medical Labs.)

The North Gateway UGB expansion adds 214 gross acres to the UGB. Gross acreage includes lands the City designated to ensure efficient, appropriate land use, to accommodate existing and planned public facilities, and to limit development to protect important natural resources: 53.3 floodway-constrained acres on two tracts fronting the McKenzie River "Natural Resource;" and 9.7 acres designated Public/Semi Public (EWEB parcel abutting I-5 that is developed with electric facilities and public water wells and Sprague Road right of way). Gross acreage includes 9.9 acres of right of way along Interstate Highway 5. The proposed UGB is along the centerline of the freeway, a consistent northerly extension of the existing centerline UGB.

The Mill Race UGB expansion accommodates employment land needs efficiently. The three suitable employment sites about the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The three sites comprise 78.3 suitable, contiguous unconstrained acres, large enough to accommodate a target industry employment use requiring a site size equal to or larger than the average Springfield large site size (63 acres)⁹⁹. The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing Heavy Industrial area.

As shown in the Map: Proposed UGB Expansion Area - Mill Race August 2015 (Ordinance Exhibit A , the City also included the 13 smaller parcels (ranging in size from 0.3 to 9.2 unconstrained acres) that are located between the suitable SUB and Johnson tracts and the publicly owned lands to the south the City is including and designating Public/Semi Public to accommodate existing Willamalane parks and SUB Willamette Well field and treatment plant. The City reasoned that if these lands are not included, they will become entirely surrounded by the UGB. The City reasoned that bringing these "extra" lands that are currently designated Agriculture in the Lane Rural Comprehensive Plan and zoned EFU into the UGB makes better sense than leaving those lands outside the UGB and within Lane County's land use planning jurisdiction. At previous joint work sessions of the Springfield City Council and Lane County in review of the City's UGB amendment, elected officials recommended against leaving "strips" of land in County jurisdiction between the UGB and the river.

City to add to in this section after conducting additional stakeholder outreach, open houses and public hearing.

⁹⁹ EcoNorthwest, Springfield CIBL/EOA Summary Report, August 2015, page 16, Characteristics of Large Site Needs.

Seven of the parcels comprise frontage along South 28th, South M, or South 26th Streets, three roads that will be needed to urbanize the Mill Race area. Thus, portions of these lands may be needed within the planning period to provide additional right of way to enable primary or secondary access and other urban services to the SUB and Johnson employment land tracts when these existing rural roads are improved to urban standards. Existing SUB water lines are located within easements on the parcels fronting 28th Street, South M Street. The City reasoned that the “extra” lands are needed to provide services to the needed suitable tracts to the west and north.

The City also reasoned that additional riparian resource buffers are likely to be required within the Mill Race area that will reduce the developable acreage. As previously stated in the Public Facilities Analysis “the Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek and the limitations regarding on-site stormwater management.” The City adopted Urbanization Element policies to address the unique natural resources of the Mill Race area that may require atypical development standards to ensure that development does adversely impact critical drinking water and surface water resources. Thus the “extra” parcels of land are necessary to ensure that the Mill Race area has sufficient land to accommodate the atypical stormwater management facilities that will be required to develop this area in conformance with atypical regulatory restrictions, to protect highly sensitive groundwater or surface water resources and/or to provide additional salmonid habitat mitigation that may be required.

The result of including these parcels “inflates” the City’s UGB expansion by 34 “extra” acres of employment land over and above the City’s overall land need. The City finds that adding these 34 excess acres is reasonable. The lands will be zoned “Agriculture – Urban Holding Area” to allow continuation of existing rural levels of use. 34 acres is 25% of the total 133.2 acres the City designated for employment. 25% is a reasonable amount of land need to assume for public services.

The City included 373.1 acres of public land within the Mill Race area in the UGB. Those lands are developed with Willamalane parks and public facilities. The City designated these lands Public/Semi Public.

The Mill Race UGB expansion includes 508.1 gross acres. Gross acres include right of way, acres constrained by wetlands, slopes >15%, riparian resource areas and floodway. Of that total, 373.1 acres are designated Public/Semi Public to accommodate existing and planned parks and public water system facilities; 135 acres are designated for employment. 125 of the 135 employment acres are unconstrained and suitable.

The City’s Mill Race UGB expansion and its designation of land within the area use land efficiently.

The City’s UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres within two geographic areas – North Gateway and Mill Race.

The City's UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres designated for employment use to meet the City's employment land need of 223 acres.

In addition to previously meeting all residential needs without expanding the UGB, Springfield will meet all need for industrial and commercial sites 5 acres or less without expanding the UGB.

The City's UGB accommodates identified land needs efficiently.

The City chose sites that will yield a high percentage of unconstrained land that is suitable for development of the target industries employment uses the City seeks to accommodate.

Goal 14 Factor 2: Orderly and economic provision of public facilities and services. The North Gateway site is located next to Interstate Highway 5 and is visible from the freeway. Some employers prefer freeway visibility.

The City's UGB expansion includes 455 acres of existing publicly-owned land, parks and open space designated Public/Semi Public. These lands were included in the amended UGB at the request of Willamalane and SUB to facilitate orderly and economic management of parks and recreation services, orderly and economic provision of public facilities that may be needed for park and recreation uses or for development of public water system facilities needed to serve Springfield's needs.

ORS 197.298 / Goal 14 Conclusion: In summary, as explained in this report and based on the evidence herein and supported by additional evidence in the record, the City properly applied and followed the prioritization requirements in ORS 197.298 and Goal 14 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment. The State's acknowledgement of the locally adopted Springfield 2030 Comprehensive Plan and UGB Amendment will provide reasonable opportunities in Springfield for urban commercial and industrial needs for the 2010-2030 period through changes to the urban growth boundary. [ORS 197.712(2)(g)(B)]

The following findings and conclusions support the Commission's affirmation of the proposed Springfield 2030 Comprehensive Plan and UGB amendments as they apply or interpret applicable goals or rules in their review of the subject proposal.

ORS 197.707 Legislative intent states: *"It was the intent of the Legislative Assembly in enacting ORS chapters 195, 196, 197, 215 and 227 not to prohibit, deter, delay or increase the cost of appropriate development, but to enhance economic development and opportunity for the benefit of all citizens. [1983 c.827 §16]"*

ORS 197.712(1) Commission duties states: *"...in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state."*

ORS 197.712(2) Commission duties states that when LCDC applies and interprets existing goals or rules, the Commission shall implement the following:

(a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.

(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (emphasis added)

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. (emphasis added)

(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses. (emphasis added)

(g) Local governments shall provide:

(B) Reasonable opportunities for urban residential, commercial and industrial needs over time through changes to urban growth boundaries. (emphasis added)

The City's proposed Springfield 2030 Comprehensive Plan and UGB amendments are based on the Economic Opportunities Analysis — "*an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.*"

The Springfield Comprehensive Plan Economic Element "*contains policies concerning the economic development opportunities in the community,*" in response to the Economic Opportunities Analysis, prepared and locally adopted to implement the provisions of Goal 9 and OAR Division 9.

The Springfield Comprehensive Plan and UGB, as amended through State acknowledgement of the subject comprehensive plan and UGB amendment proposals, provide for "*at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,*" including applicable Metro area transportation and public facilities policies.

The City's Urbanization Element policies and "Urban Holding Area – Employment" land use designation protect lands added to the UGB from premature or incompatible interim development and ensure that the lands added to the UGB will "*provide an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,* including sites with the required characteristics typically needed to *accommodate specific industrial and commercial uses.* This, the lands the City added to the UGB to meet specific industrial and commercial needs are designated and zoned properly and adequately to retain those lands to accommodate those specific industrial and commercial uses.

The City's application of "Agriculture – Urban Holding Area" zoning to lands added to the UGB designated for specific industrial and commercial uses *provides for compatible interim uses on sites zoned for specific industrial and commercial uses* but does not allow interim uses that would preclude urban development of the land to accommodate the specific industrial and commercial needs identified in the Economic Opportunities Analysis and Economic Element policies.

Implementation of the City's Urbanization Element policies will ensure that lands added to the UGB can reasonably and efficiently be provided with urban services including but not limited to public sewer, water and transportation services, including public transit services to support the land uses contemplated in the comprehensive plan and land use regulations.

Springfield's 2030 Comprehensive plan policies, applicable Metro Plan designations, existing applicable Springfield refinement plan designations and policies, existing Springfield Zoning Map designations, and land use regulations implemented through the Springfield Development Code *provide for compatible uses on or near sites zoned for specific industrial and commercial uses.*

Through previous adoption in 2011 by the Springfield City Council and Lane County of the 2030 Residential Element policies and through implementation of those policies to meet residential land needs for the 2010-2030 planning period without expanding the UGB (2013 Glenwood plan amendments), the local governments have already provided reasonable opportunities for urban residential needs.

Through local adoption by the Springfield City Council and Lane County of the proposed Springfield 2030 Comprehensive Plan and UGB amendments, the local governments are *providing reasonable opportunities for urban commercial and industrial needs over time through changes to Springfield's urban growth boundaries.*

As explained in this report and as thoroughly documented through ample evidence provided in the record the Springfield 2030 Comprehensive Plan and UGB amendments are consistent with the applicable provisions of Oregon law.