



February 17, 2010

Springfield Planning Commission  
Lane County Planning Commission  
c/o Linda Pauly, Springfield Planner  
City of Springfield  
225 Fifth Street  
Springfield, OR 97477

Phone:  
(541) 686-8833  
Fax:  
(541) 345-2034

975 Oak Street  
Suite 800  
Eugene, Oregon  
97401-3156

Re: Metro Plan Amendment: Springfield 2030 Refinement Plan  
File No. LRP 2009-00014/PA 09-6018

Mailing Address:  
P.O. Box 1147  
Eugene, Oregon  
97440-1147

Dear Planning Commissioners:

Email:  
info@gleaveslaw.com  
Web-Site:  
www.gleaveslaw.com

This firm represents Puzzle Parts, LLC, the owner of a 68+ acre parcel immediately north of and adjacent to the present urban growth boundary and bordering I-5 on its east side. The North Gateway area is identified as a potential area of urban growth boundary expansion for the purpose of inclusion of 350 acres of employment lands. The Puzzle Parts parcel is highlighted in Exhibit A.

**A. Need for large parcels for employment lands.**

The Economic Opportunities Analysis (EOA) establishes the need for inclusion in the urban growth boundary of large parcels to accommodate employment lands.

As pointed out in the Briefing Memorandum (Attachment 1-3 to 1-4) to the memorandum for the February 17, 2010 hearing, the Springfield Commercial and Buildable Lands (CIBL) inventory and the EOA establish:

- Springfield will need employment land with characteristics that cannot be found within the existing UGB.
- The employment lands need that may not be met within the UGB are for sites five acres and larger.
- \* \* \* \* \*
- Springfield's inventory lacks employment sites of sufficient size, location and configuration to provide an adequate competitive supply of suitable

Frederick A. Batson  
Jon V. Buerstette  
Patricia L. Chapman\*\*  
Joshua A. Clark  
Michael T. Faulconer\*\*  
Howard F. Feinman  
Thomas P. E. Herrmann\*  
Dan Webb Howard\*\*  
Cassie K. Kellogg  
Stephen O. Lane  
Valeri L. Love  
William H. Martin\*  
Walter W. Miller  
Laura T. Z. Montgomery\*  
Thomas K. N. Moseman  
Laurie A. Nelson  
Kirk M. Reynolds  
Ian T. Richardson  
Martha J. Rodman  
Harvey W. Rogers  
Robert S. Russell  
Douglas R. Schultz  
Malcolm H. Scott  
Joshua K. Smith  
James W. Spickerman  
Jane M. Yates

\*Also admitted  
in Washington

\*\*Also admitted  
in California

land to respond to economic development opportunities as they arise. Sites suitable for commercial and industrial land uses (flat sites, frontage on arterials, access to rail and freeways, separation from residential uses, etc.) are already developed and/or designated for these uses.

- The City currently has only one buildable site 20 acres or larger.
- Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often traded-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses. ..."

As stated more specifically in the EOA:

"Springfield has a need for 450 acres of industrial land on six sites. Springfield has a need for three 50 acre sites, and need for three 100 acre sites." (Springfield EOA Executive Summary, page v.)

#### **B. Characteristics of sites needed for employment land.**

At pages vii - viii of the Springfield EOA Executive Summary, the following characteristics are noted as desirable for commercial and industrial sites:

- "(1) **Site size.** The analysis concludes that Springfield will need to add land to its UGB for sites larger than five acres. Site sizes vary from five to 20 acres to greater than 50 acres.
- (2) **Street Access.** These larger sites will all need to have access to major streets within Springfield, with some sites located near an interchange on I-5. Traffic from the sites should not be routed through residential neighborhoods.
- (3) **Topography.** The sites should be relatively flat, with not more than 15% slope; with sites that are ideally less than 5% slope.
- (4) **Access to services.** City services should be accessible to the site....
- (5) **Land ownership.** Sites with a single owner are strongly preferred, to reduce the cost of land assembly."

**C. North Gateway alternative area site characteristics.**

The December 30, 2008 memorandum from EcoNorthwest to the Springfield City Council and Planning Commission evaluates the various opportunity areas and their site characteristics and suitability. Table 2 at Attachment 3-10 lists the following site characteristics that make the North Gateway area suitable:

"Potentially 50+ acre site(s)  
Located near I-5 interchange  
Relatively flat  
Surrounding uses compatible with warehousing and industrial uses  
Visible from I-5 or arterial streets"

Set forth as "Comments" are the following:

"Potential demand for land in the North Gateway area (according to Jack Roberts)  
Willing multiple owners (according to Jack Roberts)"

OAR 660-009-0005(2) defines "development constraints" to include "parcel fragmentation." Beyond the fact that the North Gateway area contains four parcels in excess of 20 acres in size, one parcel exceeding 50 acres in size, and one parcel exceeding 100 acres in size, 80 percent of the total expansion area is owned or controlled by only three entities or individuals. See Exhibit B attached. This means the problems created by parcelization in similarly large potential areas for UGB expansion do not exist here.

**D. Inclusion of "suitable" land to address "special needs" in evaluating alternatives.**

OAR 660-024-0050(4) requires cities to amend an urban growth boundary's response to land deficiencies:

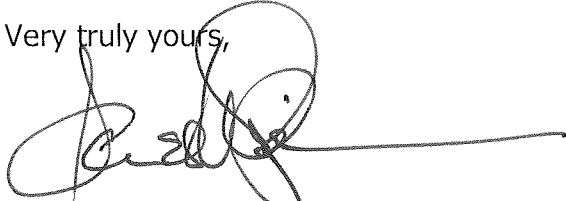
"(4) If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable...."

The CIBL and EOA clearly establish the need for large parcels with certain site characteristics and that such parcels are not available and cannot be made to be available within the present UGB. Alternative Area 1, the North Gateway area, is

Springfield Planning Commission  
Lane County Planning Commission  
February 17, 2010  
Page 4

the sole alternative that can address those needs by making available larger parcels with optimum site characteristics. We urge you to adopt either Concept no. 1 or no. 3 calling for inclusion of the North Gateway area within the urban growth boundary.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James W. Spickerman', with a long horizontal line extending to the right.

James W. Spickerman  
spickerman@gleaveslaw.com

jca  
cc: Puzzle Parts, LLC

Attachments (2)

---