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March 14, 2010

Springfield Planning Commission
City of Springfield
225 Fifth Street
Springfield, OR 97477

Lane County Planning Commission
Lane County
125 East 8th Avenue
Eugene, OR 97401

Re: Draft Springfield 2030 Refinement Plan

Dear Springfield and Lane County Planning Commissioners:

Please place these comments in the record of the draft *Springfield 2030 Refinement Plan*. 1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas.

We support your efforts to plan for Springfield's future and maintain a keen interest in the outcome of these proceedings. We do have several areas of concern regarding this proposal, and hope you will decide to request correction of identified errors, provision of additional information, and substantial changes to certain assumptions and policy choices.

The *Springfield 2030 Refinement Plan* outlines laudable goals, including increased employment opportunities, redevelopment within existing areas of the city, and minimizing intrusion into valuable farm and forest land. Nonetheless, this proposal is based in part on questionable assumptions and policy choices that seem to work against these laudable goals in ways that could lead to expensive and unnecessary over-expansion of the UGB and undercut efforts to support redevelopment. In addition, the technical analysis, while extensive, contains several internal inconsistencies and does not always match the stated assumptions in the text.

Participants in land use proceedings have differing views, but there is one thing that everyone ought to be able to agree on: Springfield's future growth will be severely constrained by limitations imposed by the natural world. The June 10, 2009 memo from ECONorthwest titled *Requirements for UGB Alternatives Analysis and Preliminary Land Use Concepts* evaluates the entire area surrounding Springfield for potential to site future development. This memo makes it clear that even if one sets aside the worthy goal of protecting productive forests and farmlands,

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there are still significant limitations to Springfield's future expansion: Eugene to the west, and mountains, rivers and wetlands in the other three directions.

The memo finds less than 2000 acres of "suitable" development land exist, scattered in nine small areas surrounding Springfield. There should be no illusions about the dearth of additional land, once these small pockets of remaining land are used up. It should be a priority of county and city leaders to ensure that from here on out, what little land that remains is wisely used. The *Economic Opportunities Analysis (EOA)*, which is one component of the *Springfield 2030 Refinement Plan*, recommends overall job densities far below the historical average. For industries on large sites, proposed densities are often less than one job per acre. If these low job densities are pursued, then Springfield will have given away much of the last of its good developable land while receiving very little in return in the way of job growth. This will hurt Springfield's economy in the long run.

A large supply of new urbanizable land beyond the current urban area will also undercut Springfield's efforts to revitalize and redevelop the downtown and Glenwood areas and impede potential future efforts to revitalize other areas like East Main Street. A more compact UGB will reduce the cost of extending infrastructure beyond the edge of existing development, reduce commute times and transportation costs for Springfield residents, and better meet coming greenhouse gas reduction targets. All these things support values nearly everyone cares about: a higher quality of life, better affordability and a healthier environment.

Our concerns with this proposal are broken out into five categories:

I. APPARENT ERRORS AND OVERSIGHTS

1) There is a large difference between the percentage of jobs assumed to be sited on already developed land in the *EOA* November 2008 version (24%) and the *EOA* September 2009 version (52%). In the 11/08 draft, 24% of the jobs were assumed to be sited on already developed land. In the 11/09 revision, this figure was increased to 52%. This change should have resulted in a decrease in the amount of new land needed. However, there was no change in the land need between the two versions.

2) There appears to be a discrepancy between the redevelopable land reported in Table 2-10 and Table 5-1. For example, Table 2-10 shows two 20-to-50 parcels (together comprising 63 acres), along with an 89-acre parcel in the 50+ acres category. However, Table 5-1 claims there is only one 20-50 acre redevelopable parcel and nothing over 50 acres.

3) Vacant lands at RiverBend and Marcola Meadows are not included in Table 2-5 because they are master planned, but it is not clear that the jobs that will be sited on those lands were accounted for elsewhere in the *EOA*.

4) Jobs on parcels under five acres do not appear to be properly accounted for.

We have discussed the foregoing concerns with Springfield staff, and believe they will be addressing all of them in the near future, perhaps as soon as this week. **We request that the record be held open until April 20 to allow Springfield staff time to provide additional**

information and/or make necessary changes, and to give the public a chance to respond to the new information.

5) Failure to Consider Use of Constrained Land For Parks. The *Residential Land and Housing Needs Analysis (RLHNA)*, which is one component of the *Springfield 2030 Refinement Plan*, wrongly assumes that constrained land has no parkland capacity. Springfield has significant parklands located on constrained land, such as the 100-acre natural park at the summit of Potato Hill. In its November 23, 2009 letter, Willamalane stated that natural and linear parks "can be located largely on constrained land." However, Springfield staff haven't changed this assumption because, according to staff, they do not know how many acres of each type of park the city should plan for since Willamalane's plan doesn't provide acreage totals by type. It appears that Willamalane would need to provide more guidance to enable the *RLHNA* to be corrected to reflect the true situation with constrained land. **We request that Willamalane be asked to provide a breakout of future park needs by type, and that Springfield staff then use that information to correct the *RLHNA*. Alternatively, staff could be directed to assume that the ratio of existing Willamalane natural and linear parks to total existing Willamalane parks will continue in future years.**

6) Failure to Consider Parkland Outside UGB. The *RLHNA* wrongly assumes that all parkland must be inside the UGB, despite the fact that 30% of Willamalane's current holdings are outside the UGB. Willamalane's service area is not coterminous with the Springfield UGB, and the park needs of Springfield residents are partially met by Willamalane's parklands located outside the UGB. It is reasonable to conclude that this situation will continue in the future. **We request that the *RLHNA* be revised to assume that 30% of future park needs will be provided for outside the UGB, continuing the historical trend.**

7) Double-Counting of Employment Land Need. There appears to be double counting in the *EOA* of employment land need for schools, parks, hospitals, city workers, and other public and semi-public uses described in the *RLHNA*. Since a substantial amount of land is set aside by the *RLHNA* for these uses, jobs that will be sited on those lands must not be counted a second time in the *EOA*.

According to page 121 of the *EOA*, Springfield determined its employment land needs based on OAR 660-024-0040(8)(a)(A), which allows an assumption that employment will grow at the same job growth rate provided in the most recent forecast published by the Oregon Employment Department. If this job growth rate is applied to a current employment base that includes the kinds of employment described in the *RLHNA*, those jobs would be double-counted in the *EOA*.

Table C-1 on page 123 of the *EOA* breaks out the current employment base into categories, and many of these include uses that are also addressed in the *RLHNA*. The Admin. & Support & Waste Mgt Services, Private Educational Services, Health Care & Social Assistance, Arts, Entertainment, & Recreation, and Government categories collectively provide over one-third of the jobs tallied in this table. While surely many of these jobs are not covered in the *RLHNA*, it appears highly likely that some of them are. Below is Table 6-2 from page 64 of the *RLHNA*, which clearly shows that a great deal of land is being set aside for these purposes:

Table 6-2. Summary of public and semi-public land need by type, Springfield UGB, 2010-2030

Type of Use	Acres	Acres / 1000 Persons	Assumed	
			Need (Ac/1000 Persons)	Estimated Acres 2010- 2030
Government	581	8.8	3.0	44
Utilities	134	2.0	2.0	30
Parks	563	8.5	14.0	357
Schools	277	4.2	0.9	14
Church/Charities/Other	81	1.2	1.2	18
Total	1,636	24.7	21.1	463

Source: City of Springfield GIS data; analysis by ECONorthwest

We request that Table C-1 on page 123 of the *EOA* be revised to remove all jobs from the base tally that are for uses provided for in the *RLHNA*.

II. INSUFFICIENT INFORMATION

8) **Exclusion of Land Over 25% Slope.** The *RLHNA* assumes that all land over 25% slope has no capacity for any use, not even parkland, despite Springfield's long practice of siting both housing and natural parks on such land. Table 3-3 of the *RLHNA* shows 1,447 acres of buildable land, plus another 824 acres of "constrained" land that is excluded from the inventory. The *RLHNA* does not indicate how many of these 824 acres were excluded solely due to slope, so it is impossible to understand the ramifications of the underlying assumption that these sloped lands have no capacity. We have been requesting this information for several months, and Springfield staff has recently indicated that they will most likely be able to provide this data. **We request that the record be held open until April 20 to allow time for staff to provide this information, and to give the public sufficient time to respond.**

9) **RLHNA's Non-Residential Land Need.** The *RLHNA's* assumed land need for non-residential uses such as schools, parks, roads, etc. is 74% of the net land needed for housing, triple what the OAR 660-024-0040(10) safe harbor allows. Safe harbor allowances are generally accepted as reasonable. Such a large increase beyond what is generally accepted as reasonable warrants closer scrutiny. Springfield staff has said that the requested land need is based on past statistics; however, these statistics are not found in the *RLHNA*. **We request that Springfield staff be asked to provide statistics and corroborating data demonstrating that this is true.**

10) **Use of the "High" Land Need Option.** The mere preference for a larger UGB expansion cannot substitute for evidence and findings that explain why the high rate is the most accurate. There are many factors, such as economic downturns, demographic shifts, regional and local growth management policies, and the ability of local governments to finance growth-related infrastructure, which could conceivably influence a choice to select a "high" or "low" option. The *EOA* does not appear to consider any of these issues, and also does not present an alternate set of land need numbers, in the event that the final arbiters decide that the "low" option is more realistic. **We request that for comparison purposes, the *EOA* be revised to present an alternate set of land need numbers based on the "low" land need scenario.**

11) Nodal Development. As pointed out by DLCD in its December 4, 2009 comments, the *EOA* should explicitly explain how its projections regarding employment density and site sizes match up with Springfield's commitment under TransPlan to locate an increased percentage of new employment in nodal development zones. **We request that Springfield staff provide clarification as to how the proposal complies with adopted nodal development strategies.**

III. CALCULATION OF JOB GROWTH

12) Effect of Peace Health. As previously discussed, according to page 121 of the *EOA*, Springfield determined its employment land needs based on OAR 660-024-0040(8)(a)(A), a safe harbor provision which allows an assumption that employment will grow at the same job growth rate provided in the most recent forecast published by the Oregon Employment Department. On page 123 of the *EOA*, the 3,400 jobs recently transplanted from Eugene to the new PeaceHealth hospital complex are discussed. This is a regional development and a one-time anomaly, and should not form the basis of future job projections. According to page 123, the PeaceHealth jobs comprise nearly 10% of Springfield's current employment, and future job growth is assumed to be just a percentage of the current employment figure. Use of this one-time employment event as a base for predictions inflates future job growth. **We request that the 3,400 PeaceHealth jobs be removed from the baseline job total to create more realistic assumptions about the size of future employers and the rate of future job growth.**

IV. REDEVELOPMENT ASSUMPTIONS

13) Redevelopment Factors. Pages 21 through 24 of the *EOA* present a cursory look at the redevelopment potential of employment sites throughout Springfield. On page 21, the *EOA* acknowledges that "factors that affect redevelopment are complicated and include location, surrounding uses, current use, land and improvement values and other factors." However, the only factor considered by the *EOA* in assessing redevelopment potential was the land/improvement value. Only those parcels with less than .3-to-1 improvement-to-land value were considered redevelopable.

There are, by the authors' admission, many other important factors to consider; yet none are, without any justification. There are a number of "legacy" industries in Springfield, such as the struggling Weyerhaeuser paper factory and the Rosboro log yard. The mothballed Sony factory is another example of a site that will be redeveloped, not because of low land-to-improvement values, but because the venture itself proved unsuccessful. The future viability of Springfield's various industries has to be considered when assessing redevelopment potential. There are potentially hundreds of acres of redevelopable factory sites that the *EOA* has not considered because of the improper focus on only one of the many factors affecting redevelopment potential. **We request that the *EOA* be revised to include an analysis of how location, surrounding uses, current uses, and expected economic changes affect redevelopment potential.**

14) Parcel Assembly. The *EOA* does not appear to account for the possibility of smaller parcels being assembled into larger sites. The recent Peace Health acquisition is a real-world example of how this often happens. **We request that the *EOA* be revised to consider the feasibility of assembling smaller parcels to create larger sites.**

V. LARGE SITES & JOB DENSITY

15) **Historic Site Needs vs. Assumed Future Need.** Table C-10 on page 141 of the *EOA* identifies the number of needed sites by size based on historic employment patterns. The final line, however, presents a range of needed sites that is far greater than the number of sites based on historic development patterns, both for every specific site size and in aggregate. This "overage" is carried over into Table C-11. The following table summarizes the substantial difference between the historic land need pattern and what is presumed to be needed in the future.

	SITE SIZE					
	<1	1 to 2	2 to 5	5	20 to 50	>50
Table C-10 Historic Pattern	181	38	30	20	2	2
Table C-11 Assumed Future Need	225	60	48	30	5	3
Difference	124%	158%	160%	150%	250%	150%

We find no explanation for why future employment will require up to 250% more land per job than has historically been the case, other than this note immediately preceding Table C-10: *"Range of needed sites presents a range of needed sites based on the employment forecast, historical development patterns, and potential for redevelopment."*

Upon examination of the "employment forecast", which is presumably found in Table C-9, we find no rationale for decreasing future job densities. There is also no explanation of how "potential for redevelopment" factors into this calculation. It would also not be valid to decrease future job density based on an argument that extra sites are needed to provide market choice, since market choice is embedded in the very concept of a long-term (20-year) supply of land within a UGB. **We request that the *EOA* be revised to assume no greater land need than the historic pattern shown in Table C-10.**

16) **Targeted Industries.** The *EOA* identifies, in Table S-1 and on pages 49-51, certain targeted industries that Springfield hopes to attract. These targeted industries purportedly form the basis of the needed site characteristics that justify the proposed UGB expansion.

However, the businesses actually claimed to be needed don't match up with the targeted industries. A review of the targeted industries in Table S-1 shows that Springfield has decided to attract small-scale manufacturing, not large-scale, and that some industries were avoided altogether. For example, on page 59, the *EOA* identifies a need of a 35-50 acre site for warehouse distribution, but this is not one of the targeted industries listed on pages 49-51. **We request that the *EOA* be revised to remove land set aside for industries that are not among the identified "target industries" listed in Table S-1.**

17) **Site Size Requirements.** There is a disconnect between the site sizes listed in Table C-5's list of "Typical Lot Size Requirements" and the site sizes claimed to be needed in Table C-11. For example, every manufacturing industry listed in Table C-5 needs sites from 5-30 acres, with the exception of high-tech fab plants which are listed at 50-100 acres. Despite this, page 61 recommends two sites in the 35-50 acre range, two sites in the 80-120 acre range, and one site in

the 150-250 acre range. Table C-11 includes an additional 25-50 acre site not mentioned on page 61. There is no explanation of why such large sites are needed. **We request that the EOA be revised to reduce the lot sizes listed in Table C-11 to match the needed site sizes listed in Table C-5.**

18) Office and Industrial Parks. Page 7 of the Springfield staff memo dated 1/19/10 states that "industrial sites may be used for one firm or may be used for an industrial park, to provide space for multiple, smaller firms." If this is the city's intention, then it discredits the entire basis for the EOA's claim that a UGB expansion is needed in order to provide very large sites to attract special-needs industries. Without the "need" for these large sites, there would be no justification for a UGB expansion. If the city does not have a plan in place to ensure that these large sites are retained for the use of one large business, then this entire process amounts to little more than an end run around the usual limitations on UGB expansions. One might well conclude that if staff believes these large sites may one day be used for "multiple, smaller firms," the city has its own doubts about the viability of the EOA's assumptions. **We request that the EOA be revised to eliminate large sites intended for office parks, industrial parks, and other such uses that involve multiple businesses on one site.**

19) Job Density. Table C-9 on page 141 forecasts the future jobs expected to be created in Springfield, and breaks these out by both building type and site size. When considered alongside Table C-11's estimate for lands needs, the future job densities envisioned by the EOA for large parcels become evident, and should be cause for concern. Below are the portions of these two tables that deal with industrial jobs:

Table C-9. Forecast of growth employment by building type and site size, Springfield, 2010 to 2030

Building Type	Site Size (acres)						Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	Greater than 50	
Warehousing & Distribution	46	21	9	221	41	12	350
General Industrial	141	161	167	168	20	302	959

Table C-11. Estimated needed sites by site size and building type, Springfield, 2010 to 2030

Building Type	Site Size (acres)						Total Sites
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	Greater than 50	
Warehousing & Distribution			3	5	1		9
General Industrial	5	7	10	11	3	3	39

We see that only 53 jobs are expected in the Warehousing and Distribution sector on parcels 20 acres in size or larger, yet the EOA recommends setting aside a 20-50 acre parcel for this very purpose. For General Industrial on parcels 20 acres in size or larger, the EOA expects only 322 jobs, yet recommends three sites in the 20-50 acre range, and three sites in the 50+ range.

Table 5-2. Average size of needed sites, Springfield UGB

	Site Size (acres)					Greater than 50
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	
Industrial	0.5	1.5	3.0	15.0	50.0	100.0
Commercial and Mixed Use	0.3	1.5	3.0	15.0	40.0	50.0

According to the above Table 5-2, the site size selected for purposes of UGB expansion on industrial parcels is 50 acres for the 20-50 acre category, and 100 acres for the 50+ designation. That produces a total of 500 acres devoted to industrial uses on sites over 20 acres in size (4x50 + 3x100). We're promised a total of just 375 jobs in exchange for 500 acres of irreplaceable, flat, unconstrained buildable land. By any measure, at well under one new job per acre, this would be a poor choice for Springfield given the previously discussed lack of buildable land in the area.

Every type of new job growth on every parcel size under 20 acres produces superior job densities, with the general rule that the smaller the parcel, the more efficient the job creation. For example, consider the 1,024 new office jobs expected to need 100 sites under one acre. Using an average size of .3 acres per site (Table 5-2), we will have 1,024 new jobs on just 30 acres, for a job density of 34 jobs per acre.

Table C-9. Forecast of growth employment by Springfield, 2010 to 2030

Building Type	Site Size		
	Less than 1	1 to 2	2 to 5
Warehousing & Distribution	46	21	9
General Industrial	141	161	167
Office	1,024	448	400
Retail	143	65	116
Other Services	817	451	460
Total	2,171	1,148	1,153

Table C-11. Estimated needed sites by Springfield, 2010 to 2030

Building Type	Site Size		
	Less than 1	1 to 2	2 to 5
Warehousing & Distribution			3
General Industrial	5	7	10
Office	100	20	20
Retail	70	15	10
Other Services	50	18	5
Total	225	60	48

Put another way, why should we waste nearly 500 acres of prime development land to site a paltry 375 new warehousing and industrial jobs, when that same number of jobs could be had on just 11 acres of scattered infill sites of less than a half-acre each? Springfield's economic future depends on wise use of the limited land it has left. As discussed earlier, there are natural limits that will constrain Springfield's growth, and it is shortsighted to ignore this fact.

Looking at the above tables, the EOA expects 4,472 new jobs on sites less than 5 acres in size. Below is a calculation of the total land area needed for all these jobs using the average site sizes provided in Table 5-2:

TOTAL ACREAGE NEEDED ON SITES UNDER 5 ACRES				
	<1	1 to 2	2 to 5	TOTAL
Warehousing/Distribution	0	0	9	9
General Industrial	3	11	30	43
Office	30	30	60	120
Retail	21	23	30	74
Other Services	15	27	15	57
TOTAL	69	90	144	303

The resulting future job density on sites under 5 acres is found by dividing the 4,472 new jobs by the needed 303 acres, for an overall density of almost 15 jobs per acre. This is 20 times more dense than the unimpressive .75 jobs per acre described above for industrial parcels 20 acres and larger.

On page 15, Table 2-6 says that Springfield has 823 acres of vacant, suitable employment land inside the UGB. Table C-9 says that Springfield will add 10,178 new jobs in the next 20 years. At a density of just 12 jobs per acre, all of those jobs could be sited on vacant land already within the UGB. Beyond this, there are still several large sites, such as the Weyerhaeuser factory, that are not considered redevelopable by this *EOA* but that can provide even more opportunity for Springfield's economy.

Being frugal with these precious flat sites, instead of wasting much of the last remaining developable land within the valley, would preserve Springfield's options for the future. We have only been here for a bit more than a hundred years; we ought to have a plan that makes sense for much longer than that. Springfield no longer has the luxury to be inefficient with its growth, if it wants to build a thriving and sustainable local economy. Recognizing and working with natural limits, instead of ignoring them, will produce the best results over the long term. **We ask that the *EOA* be revised to eliminate large site uses that produce overly low job densities; at minimum this would include the 500 acres of industrial sites 20 acres and larger which are expected to support only 375 jobs.**

Thank you for the opportunity to comment.

Sincerely,



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Cc (electronic): Lane County Board of Commissioners
 DLCD