Date: 25 February, 2014

Dept. Land Conservation & Development
635 Capitol Street NE, Suite 150
Salem, Oregon 97301

re: Newberg Letter of 02/20/2014
Dear LCDC Chair and Members:

After close examination of Newberg’s written rebuttal, it is my opinion that Newberg is using identical and overly-specific site requirements to reject any parcels beyond those included within their proposed UGB. Using Newberg’s definitions, no industry could exist without an endless stream of heavy trucks moving to and from a smoke-belching factory where hard-hats and ear protection were mandatory equipment. I believe this model is at best outdated, and cannot be employed as justification for bypassing Goal 14 requirements for prior utilization of existing low-priority land.

The city has placed high-tech manufacturing at the top of its wish list, and you will recall I addressed LCDC on the relatively bland site requirements sought by my previous high-tech employer during four separate moves. Newberg staff had previously received similar information in a May, 2012 letter from DWFritz company president Dennis Fritz, wherein Mr. Fritz outlined employment and site requirements for a high-tech robotics engineering firm such as his. Of the approx. 220 available higher-priority acres shown in my 02/13 video presentation to LCDC, at least half of those sites could likely be utilized for a variety of low-impact but high-profit industries. I would again remind all parties that high-tech employment is less dependent upon site size and slope than on a pleasant environment with ready access to a highly educated workforce.

Newberg is arguing that industry can’t succeed adjacent to a residential neighborhood, yet the city already has residential housing and a city park adjoining a paper mill1 with over 200 employees. The SP Newsprint company is indeed heavy industry, and is served by both rail and semi-trailer truck transport. Another example would be Climax Machine2 tools, as previously described in Planner Brierly’s presentation. Climax frequently operates beyond regular business hours, yet is both adjacent to and across the road from dense residential (mobile home) property.

Having heard the city’s 02/13 presentation, and after careful review of their follow-up rebuttal, I continue to believe the city has made excessive use of a broad-brush approach to disqualify higher-priority sites in favor of satisfying a preexisting agreement with one or more private land owners outside the current Newberg UGB. I further believe the city has incorrectly stated or implied that any new industry would by default generate disruptive traffic and/or an unacceptable noise level. Given the evidence, I do not believe Newberg’s application conforms to Goal 14 requirements:

1. Efficient accommodation of identified land needs.
2. Orderly and economic provision of public facilities and services.
3. Comparative environmental, energy, economic and social consequence.

I urge you to remand the UGB amendment to Newberg with instructions to remove the contested agricultural land and to instead accommodate Newberg’s industrial land needs by utilizing existing properties within the current UGB as well as higher-priority lands within urban reserves and exception areas.

Sincerely,

Lee M. Does

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1. SP Newsprint, 1400 Wynooski St., Newberg
2. Climax Portable Machine & Welding, 2712 E 2nd St, Newberg