August 23, 2013

Department of Land Conservation & Development
635 Capitol St. NE Suite 150
Salem, Oregon 97301

Attn: Jim Rue, Director
Angela Lazarean, Willamette Valley Regional Representative
Larry French, Periodic Review Specialist

RE: Urban Growth Boundary Amendment adopted 7-18-13
Planning Docket PA-01-10
Applicant: City of Newberg
Yamhill County Ordinance 882

I submit the following to state my objections to the 7-18-13 adoption by Yamhill county commissioners of city of Newberg's UGB amendment. I believe to expand the boundary is not appropriate in that the city has not met all the criteria under Goal 14 and State Statute.

I have participated in many public meetings/hearings of the UGB expansion since the first original presentation and public hearing for the city of Newberg's plan of an Industrial Park development. I have spoken in person at some of the meetings held in Newberg, firstly at Adec and Senior center many years ago at the inception and presentation to the public of the idea. I have also made numerous written statements on the issue, which are on record.

Firstly, I believe the city has violated Goal 14 in that the city has failed to take into consideration the existing lands already within the present urban growth boundary. The options open and readily available are along existing road of South Springbrook and another along Zimri Drive. These two areas alone give more than adequate varied sites and sizes for the stated anticipated growth needs for industrial sites as stated in city's data needs projections. These sites also have excellent existing traffic flow patterns which would eliminate the need for major arterial alterations. These areas should have been given more serious consideration prior to focus on expansion of UGB boundary onto prime farm land.

It is my understanding that Goal 14 precludes expansion of boundary lines where growth needs can be met by utilizing lands already within UGB existing boundary. These existing properties can meet the city's needs and I believe the city has violated this very clearly defined rule.
Secondly, I believe the city has not observed the definitive priority rules pertaining to reserves and exception lands under ORS 197.298 covering urban reserve areas and exception areas. These lands are the South Springbrook urban reserve area and the Dundee/Newberg Corridor areas. These rules are specific in that urban reserves and exception areas should be used prior to expanding onto prime farm land areas. Further the rules specifically cover that should some reserve lands not be adequate to accommodate projected needs, rulings are specific in detail as to applicable and reasonable usage from within each of the first, second, third and fourth stages of priority usage. The city and county should adhere to these clearly stated rules for utilizing urban reserves and exception lands before expansion of existing boundary.

It appears to me that the language in current policy/rules is clear for designated higher priority lands and existing land already within boundary. These parcels should be utilized prior to expansion of boundary onto farmland. I believe, therefore, that it is in order for DLCD to send the decision back to City Newberg with instructions to delete/remove the agricultural farm land and to utilize instead those areas already within UGB; to accommodate the anticipated industrial needs within UGB and on higher-priority land in urban reserves and exception areas.

This would be more appropriate action and remain within the scope of the existing goals and rules.....

Respectfully submitted

Shirley Cooper
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cc. Newberg Planning Dept.
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Yamhill County Commissioners
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