



Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

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January 7, 2011

TO: Land Conservation and Development Commission (LCDC)

FROM: Richard Whitman, Director
Steve Oulman, Regional Representative
Tom Hogue, Economic Development Specialist
Gloria Gardiner, Urban Specialist

SUBJECT: **Agenda Item 4 (Woodburn UGB Expansion), Department's Response to Written Argument, January 12-13, 2011, LCDC Meeting**

I. AGENDA ITEM SUMMARY

A. Type of Action and Commission Role

This is a hearing on a remand from the Oregon Court of Appeals of a prior commission order approving work task 2 of the City of Woodburn's periodic review and an expansion of the city's urban growth boundary (UGB). This memo provides the department's written response to written argument by parties to the appeal. The department's report and draft proposed order were circulated earlier, on November 12, 2010. At the conclusion of the hearing, the commission will deliberate and make a decision to: (a) approve the city's decision based on revised findings; (b) to approve the city's decision based on revised findings and new conditions; or (c) to remand the decision back to the city for further action by the city.

B. Staff Contact Information

Questions about this agenda item should be directed to Steven Oulman, AICP, Regional Representative, (503) 373-0050 ext. 259, steve.oulman@state.or.us.

II. SUMMARY OF RECOMMENDATION

Following its review of the written argument of the parties, the department continues to recommend that the commission approve the city's UGB expansion for the reasons described below. The department recommends that the commission's final order further address the arguments made by the parties.

III. MAJOR ISSUES RAISED, AND DEPARTMENT'S RESPONSE

A. What Were the Standards for the City's Decision and What Are the Standards for the Commission?

At the outset, it is important to emphasize that this is a remand of a prior decision of the commission, upholding the city's decision to expand its urban growth boundary (UGB). The city's decision was made on October 31, 2005 (more than five years ago). The commission's role in this proceeding is to review what the city (and county) did, and determine if the decision complied with the standards that applied to the city's decision *at that time, based on that record*. The commission is not substituting itself for the city, and making a new decision, today, starting from scratch. The issues before the commission are, if the commission accepts the department's proposed draft order, almost entirely evidentiary issues, on which the question is whether a reasonable person could have determined what the city did, based on the record before it.

1000 Friends et al. assume that the city's decision in 2005 was subject to the commission's Goal 14 rules (division 24) and the most recent version of the commission's Goal 9 rules. That simply is not correct. The division 24 rules were not adopted until a year *after* the city's decision, and the most recent Goal 9 rules were not adopted until shortly *after* the city's decision (they did not take effect for over a year after that). This is important, because it means that the commission's decision in this matter has limited precedential effect in terms of other jurisdictions.

B. What Amount of Land Does the City Need for Future Employment Uses?

The main issue raised by *1000 Friends et al.* is the *amount* of land needed by the City of Woodburn for future employment uses (and, in particular, for industrial and office uses). According to *1000 Friends et al.*, the city included about twice as much land for industrial and office employment as the city showed was needed over the 20-year planning period. The department believes that this is not the case, and that the city's decision complies with applicable standards, for two main reasons.

First, the city's determination of the number, size, type and location of sites needed for industrial and office uses during the twenty-year planning period was based on its determination that that *number*, those *sizes*, those locations, and those *types* of sites were necessary to yield the employment growth it forecasted (and sought, as a policy matter). That is the determination required by Goal 9, and if the city had included fewer sites it would not be meeting its demonstrated need for industrial land. The basic structure of the city's decision was as follows:

- The city and county prepared and adopted a coordinated population forecast for the city;
- The city adopted an employment forecast that was reasonably related to the population forecast, and that reflected a policy decision to increase the ratio of employment to residents in the city over time;
- The city prepared and adopted an economic development strategy, and an economic opportunities analysis that documented that its aggressive employment forecast was reasonable (due largely to the city's competitive advantages provided by its location along interstate 5, in relation to Salem and Portland, and its labor force);

- The city documented that the types of businesses that it had a competitive advantage in attracting and growing over the planning period had certain site requirements (primarily in terms of size and location relative to the freeway);
- The city determined what sites should be included within the UGB expansion in order for it to have a reasonable likelihood of achieving the future employment growth forecasted during the twenty-year period.

Those steps are a permissible means of complying with the requirements of Goals 9 and 14, and ORS 197.712, and they do *not* result in adding more land for employment uses than is needed over the twenty-year planning period.

The second reason that the department believes Woodburn has not added an excess of industrial and office land is that even under the employee per acre method of estimating future land need, the approximately 360 net acres of land that the city has added to its UGB for industrial and office uses in the Southwest Industrial Reserve is reasonably related to the amount of land shown to be needed under a traditional employee per acre methodology. In its written argument on remand, 1000 Friends creatively contrasts net and gross land need numbers, and figures for particular categories of employment land, to make it appear that the city is grossly inflating its land needs.¹ The department does not agree that the city has done so.

Comparing apples to apples, under an employee per acre approach, the city's consultants estimated a land need of 41.2 acres for office uses and 224.1 acres for industrial uses (both of these categories are included in the target industries identified in the city's EOA). Note that commercial and public uses were, with the exception of a small amount of commercial land, entirely accommodated within the prior UGB. These estimates, however, were carried out in October of 2003 when the city was using the *medium* forecast for employment, of 7,140 new jobs (all sectors). As explained in the city's findings and the draft proposed commission order, the city subsequently made a different policy decision, and changed its employment forecast to 8,374 new jobs (all sectors). Although no new estimate of land need using an employee per acre methodology was made, applying the ratio of the overall increase in forecasted employment growth during the 20-year planning period from 7,140 to 8,374 $((41.2 + 224.1) \times 8374/7140)$ would yield a total need for net (buildable) industrial and office land of 311 acres. This figure does not include that portion of future need met through redevelopment (the EcoNW analysis subtracted out a factor for redevelopment). For convenience, the key table in the city's record (Item 10, p. 1278) is reproduced below:

¹ 1000 Friends and the Oregon Court of Appeals both focused on language in the city's findings indicating that not all of the land within the expansion area may fully develop within the planning period. The department notes that there will almost *always* be further development capacity of land within an urban growth boundary, including land added most recently. If there were not further development capacity, there could be no redevelopment within the UGB. Business park type development is one of the main employment types anticipated by the city. See, e.g., rec. Item 10, pages 1284, 1285 (business park development for electrical equipment manufacturers, same for business services). Such development typically is in a campus setting where future expansion and redevelopment is possible. See rec. Item 10, pages 1063-65 (EOA).

DEMAND FOR COMMERCIAL AND INDUSTRIAL LAND

Table 1 shows the amount of new land and built space needed for each land use type in Woodburn over the 2000–2020 period. The results assume the medium employment forecast of 7,140 new jobs between 2000 and 2020. The amount of land needed (in acres) is calculated by dividing employment growth that will require new space by the employees/acre assumption for each land use type, with an adjustment for vacancy. Square feet of building space needed is calculated by multiplying employment growth that will require new building space by the square feet per employee assumption for each land use type, with an adjustment for vacancy.

Table 1. Woodburn vacant land and new built space need by land use type, medium employment forecast, 2000–2020

Type	Acres of land		Sq. Ft. of building space	
Commercial	70.6	19%	847,174	22%
Office	41.2	11%	577,391	15%
Industrial	224.1	61%	2,039,728	54%
Public	33.3	9%	332,800	9%
Total	369.3	100%	3,797,093	100%

Source: ECONorthwest.

Table 1 shows that about 370 acres of *new development* and 3.80 million square feet of building space are needed to accommodate the 6,346 new employees forecasted for the next 20 years to be accommodated in buildings that will be constructed on vacant land. Industrial uses are projected to need the most land and building space, almost 225 acres and 2.04 million square feet.

In sum, using an employee-per-acre approach, which the city was *not* required to do, approximately 310 acres of net buildable land would be required for industrial and employment uses in a UGB expansion in order to accommodate forecasted employment growth. Using its analysis of economic opportunities and required sites, the city added approximately 360 acres of net buildable land in the SWIR. Marion County Findings, at pages 14-15. Of that amount, 170 acres were in two large-lot sites that cannot be developed unless particular performance standards are met for new employment-intensive industries. Id., at page 15.

The fact that the employee-per-acre methodology yields a slightly lower number than a site-based approach does not mean that the city added more land than needed. In fact, the department believes that the relative proximity of the figures is important evidence that the city's economic development strategy and resulting site requirements were realistic and not overly aggressive. The department believes that the further a projection of land need based on site requirements departs from more traditional means of forecasting the need for land for employment opportunities, the greater the need for careful explanation of the basis for the former. In this case the two methods yield similar results. If a local government were to propose an employment lands expansion under the required sites methodology that was far out of line with a projection based on employees-per-acre, that would be an indication that the decision was proposing to add

more land than is needed, but that is not the case here, particularly where the city has shown strong economic advantages in terms of its location and labor supply that make more rapid and land-intensive growth possible. Rec. Item 10, pages 1031-1032. In sum, the department continues to believe that the city's decision complies with both Goal 9 and Goal 14.

Under the applicable standard, the question is whether a reasonable person could find as the city did, that there is a need for this amount of industrial and office land for the planning period. There is conflicting testimony, but there was credible expert testimony to the city and to the commission that the number, size, type and location of sites were required for the city to achieve its forecasted need for employment. LCDC Transcript, Rec. Item 2 at pages 54-55 (Transcript pages 52-54). That key testimony was an important basis for the commission's decision to uphold the city's UGB expansion in 2007, and the department is not aware of other evidence in the record that would make it unreasonable to rely on that testimony.

Finally, the department also notes the unusual nature of the performance standards that the city has placed on development of its two largest sites. Those requirements, adopted as an element of the city's UGB expansion, mandate that a large portion of the SWIR expansion area be developed only if performance standards for employment are met.

C. Location of Industrial Land Expansion

1000 Friends is correct that the Oregon Court of Appeals did not reach the arguments of the parties concerning *which* lands were selected by the city for its UGB expansion. Nevertheless, the department recommends that the commission revisit this issue in light of the arguments made by the parties to the Court of Appeals, and decide whether to supplement its findings.

On appeal to the court, 1000 Friends argued that instead of adding lands to the west of I-5 along Butteville Road, the city should have added lands to the south (east of I-5). The main reasons argued by 1000 Friends were that: (a) the lands along Butteville Road west of I-5 are class II farmlands (a lower priority for inclusion than lands with class III soils to the south); (b) expansion to the west of I-5 is more of an intrusion into important farming operations in the area around Woodburn (again, relative to the lands to the south); and (c) there is adequate access to I-5 from the SWIR UGB expansion area via planned road improvements east of I-5.

The city will bring an oversize exhibit to the commission hearing, showing soil classifications and the various UGB expansion areas. The department notes that most of the lands surrounding the city are class II, and that the area to the south referred to by 1000 Friends and analyzed by the city is not by any means a "clean" class III area. Rather, the area to the south is a mix of Class II and Class III (Class II lands must be included to get to Class III lands). The land to the west also is a mix of Class II and III soils, although more heavily weighted to Class II. The department believes that the city's findings adequately explain that (in particular for its large-lot sites) location in proximity to the I-5 interchange is a site requirement that justifies adding the lands to the west of I-5 rather than sites further south. Further, and contrary to 1000 Friends' argument to the Court of Appeals, the department believes that the record and the city's findings demonstrate that in order to succeed in balancing growth so that traffic impacts are balanced on both sides of the single I-5 interchange that is a critical link in any future growth in the city, a looped arterial

system connecting highway 99E with Butteville Road and the *west* side of the I-5 interchange is necessary. Restricting development to the east side of I-5 would load the resulting traffic on the already over-burdened east side of the interchange, contrary to the city's adopted transportation systems plan.

Regarding conflict with exiting agricultural operations, the city's findings contain an analysis showing that (based on advice from the department, and from Marion County) that it has planned for oversized road right-of-way within the UGB expansion area to provide separation from agricultural operations. The findings also show that the proposed uses are compatible with agricultural operations.

In sum, while the department recommends that the commission consider these issues on remand, and direct that its findings be supplemented to respond to the specific arguments of the parties to the Oregon Court of Appeals, the department continues to believe that the city has demonstrated that its decision regarding where to expand complies with the priorities of ORS 197.298, and with the Goal 14 factors. To the extent that the city has added some lands that contain a higher percentage of class II soils than alternative lands to the south of the expansion area, the department believes this decision is justified under ORS 197.298(3)(a) and (c): large lot industrial site with proximity to freeway, conditioned to restrict use to that specific type of employer (ORS 197.298(3)(a)), and inclusion of class II lands required to complete looped arterial system connecting to west side of I-5 interchange (ORS 197.298(3)(c)).

D. Late Submission of Materials Concerning New Population Projections

On January 5, 2011 (shortly before the department had intended to issue this report) the department received the attached letter from 1000 Friends et al. concerning population forecasts for the City of Woodburn. This letter was received well after the deadline set for submission of written argument, and caused some delay in the completion of this report.

The department recommends that the commission treat the letter as a request for it to consider new evidence, but the department also recommends that the commission not do so. The new coordinated forecast under ORS 195.036 is for a different planning period (starting in 2010) than the 2000-2020 period of the submittal under review. It was not before the city when it made its decision in 2005, and nothing in Goal 9 or Goal 2 requires the commission to remand this decision to the city for it to consider the new population forecast.

ATTACHMENT

A. Letter from 1000 Friends of Oregon et al.



534 SW Third Avenue, Suite 300 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • www.friends.org
 Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389
 Willamette Valley Office • 220 East 11th Avenue, Suite 5 • Eugene, OR 97401 • (541) 653-8703 • fax (503) 575-2416
 Central Oregon Office • 115 NW Oregon Ave #21 • Bend, OR 97701 • (541) 719-8221 • fax (866) 394-3089

January 5, 2010

VIA E-MAIL

Director Richard Whitman
 Steve Oulman
 Department of Land Conservation and Development
 635 Capitol Street Suite 150
 Salem, OR 97301

Re: Woodburn Periodic Review; remand from Oregon Court of Appeals

1000 Friends of Oregon asks the Department and Commission to take official notice of Marion County's updated, coordinated population forecast, adopted after the underlying Commission decision, which is the subject of the Court of Appeals remand.

The city of Woodburn's year 2000 population was 20,100. In the city's underlying UGB decision, Woodburn used a 2020 population forecast of 34,919. This was based on an average annual growth rate (AAGR) of 2.8%. This was coordinated with Marion County by county ordinance in 2004, and is in the record.

In September 2009, Marion County adopted a *new* coordinated population forecast for all cities in the county for the time frame 2010 to 2030. This coordinated forecast is online at <http://www.co.marion.or.us/PW/Planning/population.htm>. The coordinated population forecast for Woodburn for the year 2030 is 37,216.¹ This is based on a 2.04% AAGR, which is considerably lower than that used in Woodburn's UGB decision of 2.8%.

Of equal significance is that while Marion County used a medium range population forecast to coordinate, its comprehensive plan includes a range forecast of low, medium, and high population projections. The *high* projection for Woodburn² is based on an AAGR of 2.53%, still considerably less than that used by Woodburn in its UGB expansion.

In addition, Marion County's current coordinated forecast starts at a 2010 baseline of 24,866 and projects a **2020 population** of 31,243.³ This is almost 4,000 people, or more than 10% less, than the forecast Woodburn used.

¹ Marion County Ordinance No. 1291, Exhibit B, Table 22 (adopted October 7, 2009)

² Ordinance No. 1291, Exhibit B, Table 23. The high population projection for Woodburn for 2030 is 41,718.

³ Ordinance 1291, Exhibit B, Table 22.



Woodburn's reliance on a population forecast that not only is inconsistent with the current coordinated forecast, but is also simply inaccurate, is reinforced by data from the Portland State University Population Center. PSU's certified 2010 population for Woodburn is 23,150, substantially less than even the Marion County's baseline 2010 number.⁴

Woodburn's use of an inaccurate and outdated population projection and one that is not the most recent coordinated one infects its employment projection. Woodburn started with a 2000 total employment of 10,388 (covered and uncovered). It then assumed a 3.0% AAGR and arrived at a 2020 employment projection of 18,762 (covered and uncovered). This translates to an 81% increase in total employment over the planning period.⁵

In contrast, the Oregon Employment Department's most recent forecast (February 2010) forecasts only 10% total job growth for the 10 year period of 2008-2018 for Region 3 (Marion, Polk, Yamhill counties).⁶

We ask that the Department and Commission take official notice of these officially adopted population and employment forecasts. In particular, the coordinated population forecast is legally required to be relied upon by all jurisdictions in maintaining and updating their comprehensive plans. ORS 195.025, 195.036.

1000 Friends and the petitioners believe that LCDC must remand the underlying UGB decision to the city to legally address the Court of Appeal's decision. The coordinated population forecast and most recent state employment forecasts will have to be part of that remand.

Sincerely,

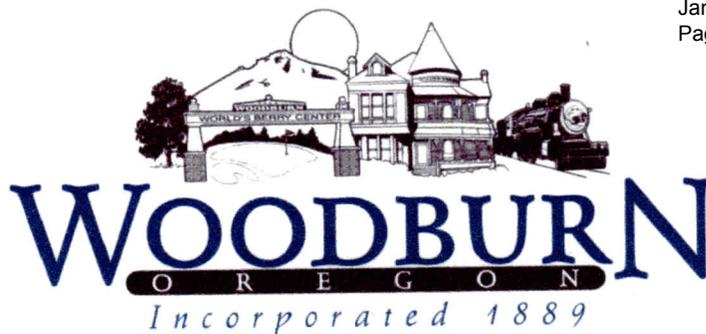


Mary Kyle McCurdy
Attorney for 1000 Friend of Oregon and Petitioners

⁴ See <http://www.pdx.edu/prc/>

⁵ This is in the Record at Item 10, p. 1095, Table 8.

⁶ http://www.qualityinfo.org/olmisj/ArticleReader?p_search=Region%203%202008-2018.&searchtech=1&itemid=00006883



January 10, 2011

Richard Whitman, Director
Department of Land Conservation and Development
635 Capitol Street, Suite 150
Salem, OR 97301

Re: Woodburn Periodic Review Remand from Court of Appeals

Dear Mr. Whitman:

This letter is the response of the City of Woodburn and Opus Northwest, LLC, respondents in *1000 Friends of Oregon v. LCDC*, 237 Or App 213, 239 P3d 272 (2010), to the letter submitted to you by 1000 Friends of Oregon and the other petitioners in that appeal (hereafter 1000 Friends) on January 5, 2011, only one week before the scheduled Commission hearing on the Court of Appeals' remand in the above referenced matter. 1000 Friends' letter asks you and the Commission to take "official notice" of an October 2009 Marion County population forecast, a 2010 population forecast by the PSU Population Research Center, and a February 2010 employment forecast by the Oregon Employment Department.

1000 Friends cites no authority for its request. Under the Periodic Review Rule, the Director and Commission have discretion to take official notice of "law." OAR 660-025-0085(5)(e). Of the three forecasts for which official notice is requested by 1000 Friends, only the 2009 Marion County population forecast, which was adopted by ordinance, arguably meets the rule's definition of "law." The PSU and Employment Department forecasts are clearly "new evidence." OAR 660-025-0160(5) provides that the Commission shall hear appeals of Periodic Review work tasks "based on the record unless the commission requests new evidence or information **at its discretion** and allows the parties an opportunity to review and respond to the new evidence or information." (Emphasis added.)

Thus, it is entirely within the Commission's discretion whether to take notice of law or accept new evidence. There is no reason for the Commission to do so here. The Commission is reviewing Periodic Review Work Task 2, a decision adopted by the City of Woodburn in October 2005. Woodburn's decision was governed by the legal standards in effect in 2005, when it adopted its decision amending the Woodburn Comprehensive Plan and Development Ordinance. The Commission's review is based on evidence in the record submitted by the City or submitted during the DLCD review process which culminated in the November 30, 2006, Director's referral order. It would be entirely unfair to the parties for the Commission to accept evidence generated in 2009 or 2010 into a review process where the evidentiary phase concluded in 2006.

Office of the City Attorney

270 Montgomery Street • Woodburn, Oregon 97071

Ph. 503-982-5228 • Fax 503-982-5243

Richard Whitman, Director
Re: Woodburn Periodic Review
January 10, 2011
Page 2

1000 Friends real goal is in the letter's second request – that "LCDC must remand the underlying UGB [amendment] decision to the city to legally address the Court of Appeals decision." This is completely inaccurate. The Court of Appeals concluded that "LCDC's order is inadequate for judicial review with respect to its treatment of the [industrial land need issue], and, accordingly, [we] reverse and remand the order for reconsideration." *1000 Friends, supra*, 237 Or App at 216. Thus, the Court's decision was based solely on the inadequacy of the Commission's order. It did not make any decision regarding the merits of Woodburn Periodic Review Work Task 2, which was the subject of the Commission's review.

Basically, the Commission's review process has been dragged out for four years (and counting) because of the appeal filed by 1000 Friends. Now, rather than the Commission improving its order reviewing the City's 2005 decision, 1000 Friends wants LCDC to remand the City's decision so the City can start over on a process that initially began in the late 1990's and during which the City's 1999 Comprehensive Plan has remained in effect. Further, any UGB adopted by the City after considering the 2009 and 2010 population and employment forecasts would have to be reviewed by DLCD and could be appealed again, taking perhaps another 4-5 years, during which time more new forecasts could be adopted, creating an endless loop of planning.

Finally, what useful end would be achieved by sending the 2005 Plan back to the City? According to 1000 Friends the new Marion County forecast is for a 2020 population of 31,243 and a 2030 population of 41,718. Woodburn's 2005 Plan adopted a UGB based on a 2020 population forecast of 34,919. Under the new forecast, Woodburn's UGB is good for the population expected around 2025 – longer than Woodburn thought it was planning for, but well within a current 20-year planning horizon. In the meantime, Woodburn is still operating with a UGB originally adopted in the early 1980's, and which is clearly inadequate under any population forecast.

The Commission should deny 1000 Friends' request that it take official notice (or take new evidence) or remand the City's decision. Rather, respondents ask the Commission to adopt a revised order that better explains its responses to petitioners' objections, and is responsive to the remand by the Court of Appeals.

Sincerely,



N. Robert Shields
Woodburn City Attorney



Corinne C. Sherton
Attorney for Opus Northwest, LLC

cc: Steve Oulman
Mary Kyle McCurdy
Jane Ellen Stonecipher
Mark Shipman

Summary of Goals, Rules and Statutes Relative to Site Need

ORS 197.712 Economic Development

(2)(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.

Goal 14 Urbanization

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

Old Goal 9 Economic Development Administrative Rule OAR 660-009-0015(2)

The plan shall identify the approximate number and acreage of sites needed to accommodate industrial and commercial uses to implement plan policies. The need for sites should be specified in several broad "site categories," (e.g., light industrial, heavy industrial, commercial office, commercial retail, highway commercial, etc.) combining compatible uses with similar site requirements. It is not necessary to provide a different type of site for each industrial and commercial use which may locate in the planning area. Several broad categories will provide for industrial and commercial uses likely to occur in most planning areas.

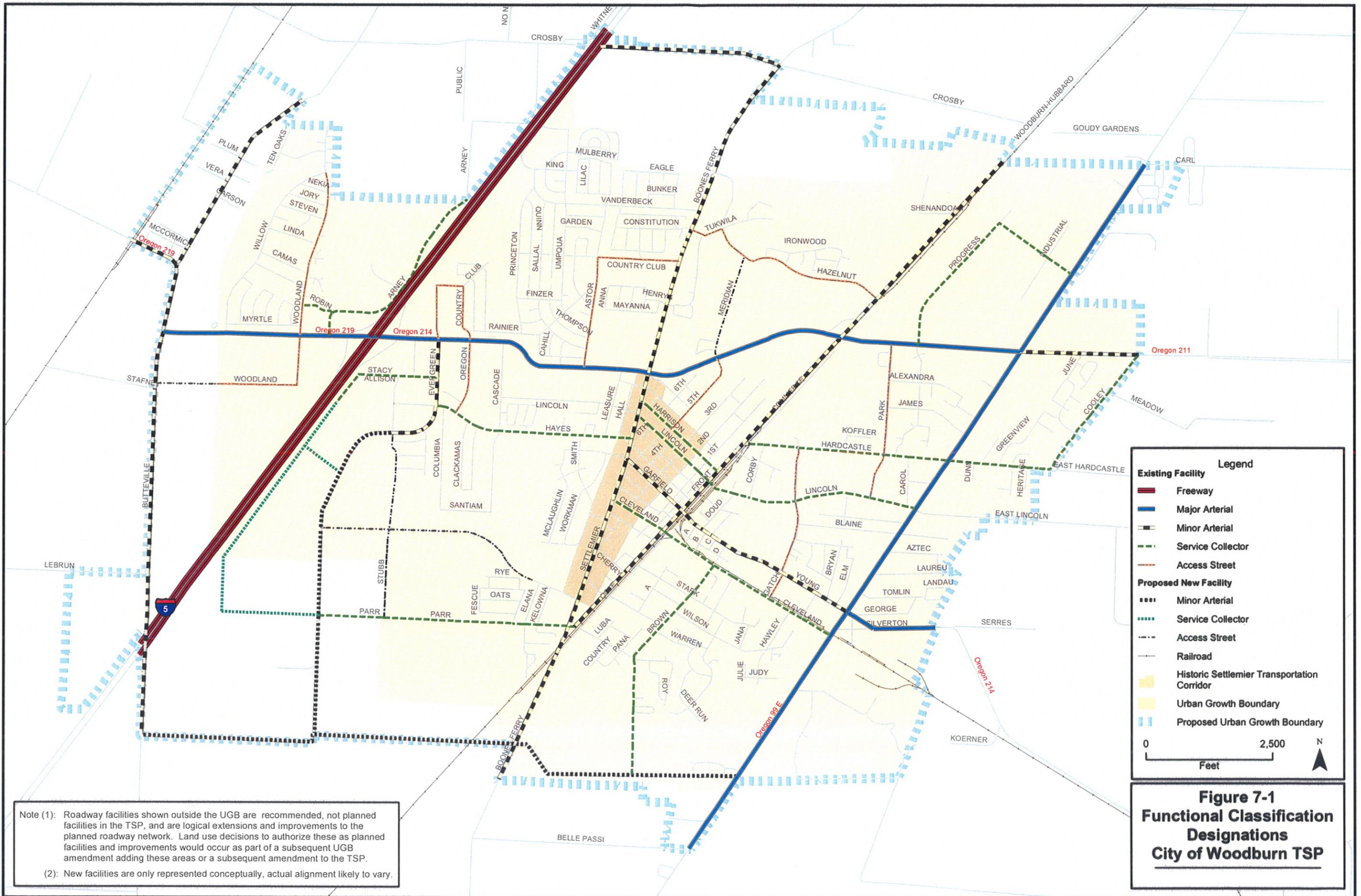
Applicable Exceptions to ORS 197.298 Priorities for urban growth boundary expansion

(3) Land of lower priority under subsection (1) of this section [in Woodburn areas with Class II soils] may be included in an urban growth boundary if land of higher priority [in Woodburn areas with Class III soils] 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;

*** * ***

(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.



Note (1): Roadway facilities shown outside the UGB are recommended, not planned facilities in the TSP, and are logical extensions and improvements to the planned roadway network. Land use decisions to authorize these as planned facilities and improvements would occur as part of a subsequent UGB amendment adding these areas or a subsequent amendment to the TSP.

(2): New facilities are only represented conceptually, actual alignment likely to vary.

Legend

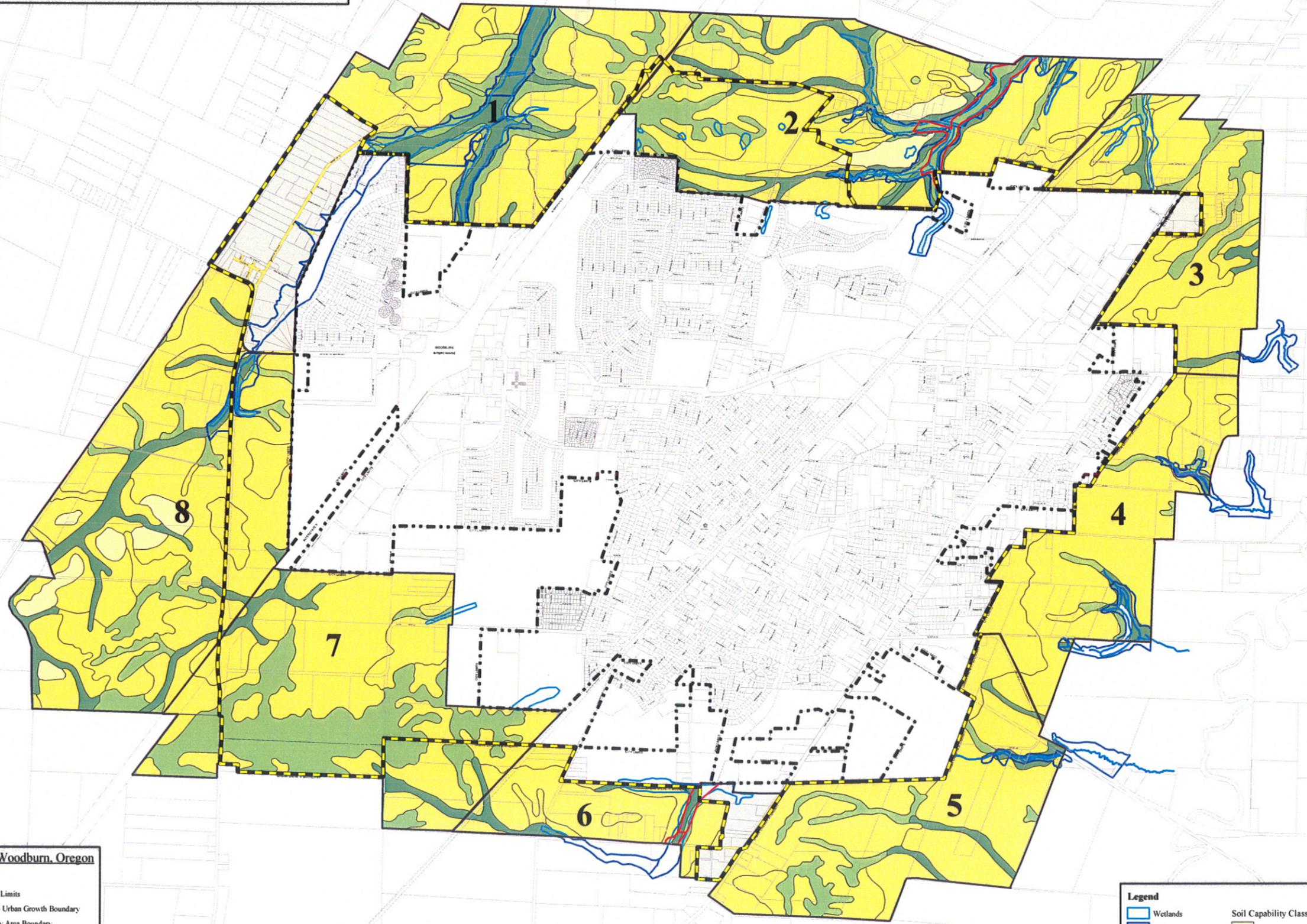
Existing Facility	
	Freeway
	Major Arterial
	Minor Arterial
	Service Collector
	Access Street
Proposed New Facility	
	Minor Arterial
	Service Collector
	Access Street
	Railroad
	Historic Settler Transportation Corridor
	Urban Growth Boundary
	Proposed Urban Growth Boundary

0 2,500 Feet

N

Figure 7-1
Functional Classification
Designations
City of Woodburn TSP

Agricultural Soils outside Woodburn 2002 Urban Growth Boundary



City of Woodburn, Oregon

Legend

- City Limits
- 2005 Urban Growth Boundary
- Study Area Boundary
- Assessor's Tax Lots

Map Not to Scale

WOODBURN
Natural Resources ANSI Email - Revised: 10-19-2005

Legend

- Wetlands
- Riparian Areas
- NWI Line Study Area
- Flood Plain
- F-MC

Soil Capability Class

- I
- II
- III
- IV
- Exception Areas



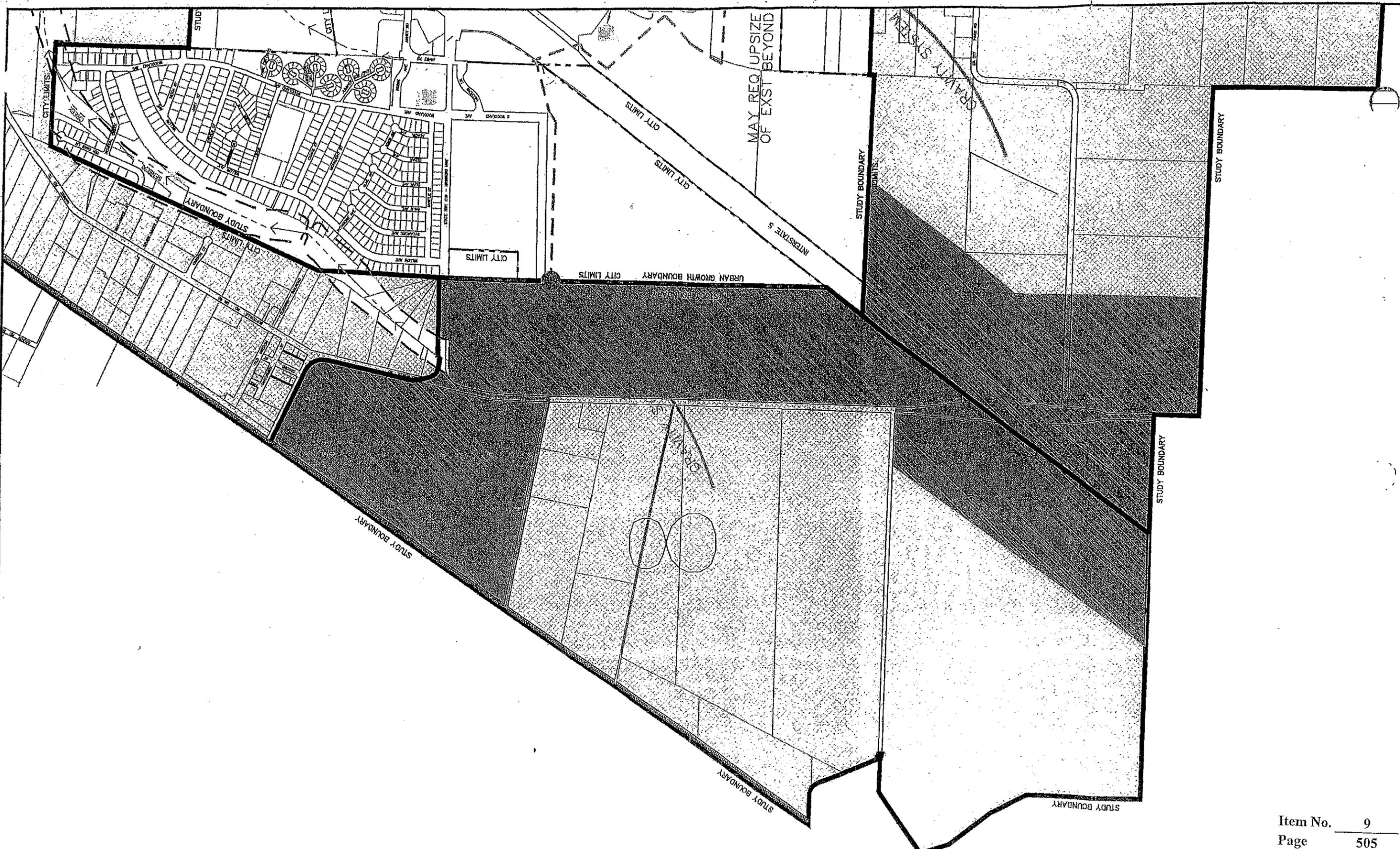
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-  Tax Lots
-  Overlay Zone
-  Roads



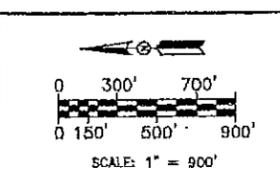
Figure 9-1
Interchange Management Area (IMA)
Overlay District





LEGEND

STUDY BOUNDARY	UNIMPROVED RIGHT-OF-WAY	CITY LIMITS	RAILROAD	PRIVATE STREET (NOT CITY RIGHT-OF-WAY)	RS/RM	UPGRADES
URBAN GROWTH BOUNDARY	CULVERT	CITY LIMITS	STREAM	REGION NUMBER	COM/IND	NEW TRUNK LINE
CITY LIMITS	F.E.M.A. 100 YEAR FLOOD PLANE	CITY LIMITS	GRAVITY SYSTEM FLOW DIRECTION	CFS	CUBIC FEET PER SECOND	POC-POINT OF CONNECTION
			NEW PUMP STATION			

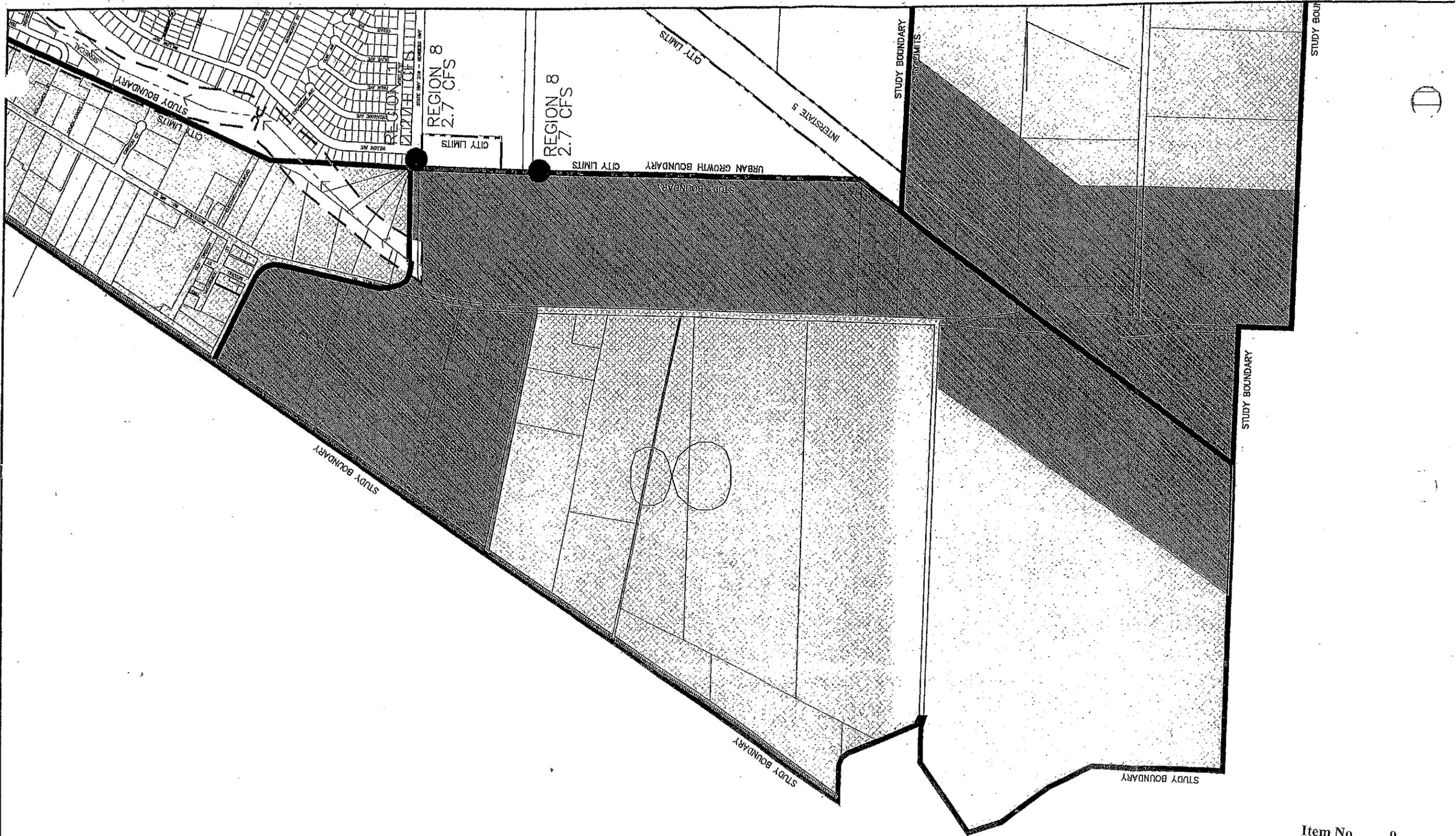


CITY OF WOODBURN
PUBLIC WORKS DEPARTMENT
ENGINEERING DIVISION

SAP SANITARY MAP
REGION 8

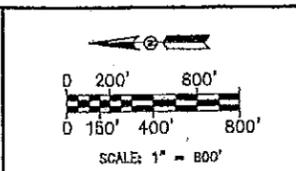
DISCLAIMER: THIS MAP IS A GRAPHIC REPRESENTATION, USING THE MOST CURRENT INFORMATION AVAILABLE. HOWEVER, IT SHOULD NOT BE CONSIDERED ACCURATE FOR SURVEY.

PLOT DATE: MARCH 11, 2004



Item No. 9
Page 513

LEGEND	
	STUDY BOUNDARY
	CITY LIMITS
	URBAN GROWTH BOUNDARY
	PRIVATE STREET (NOT CITY RIGHT-OF-WAY)
	UNIMPROVED RIGHT-OF-WAY
	RAILROAD
	CULVERT
	STREAM
	F.E.M.A. 100 YEAR FLOOD PLANE
	RS/RM
	COM/IND
	REGION NUMBER
	UPGRADES
	TRUNK MAN
	PCC-POINT OF CONNECTION
	CJRG- FEET PER SECOND



CITY OF WOODBURN
PUBLIC WORKS DEPARTMENT
ENGINEERING DIVISION
DISCLAIMER: THIS MAP IS A GRAPHIC REPRESENTATION, USING THE MOST CURRENT INFORMATION AVAILABLE, HOWEVER, IT SHOULD NOT BE CONSIDERED ACCURATE FOR SURVEY.

SAP WATER MAP
REGION 8
PLOT DATE: MARCH 11, 2004

Rec. Vol. 5, p. 417



- Marion County ranks #1 among Oregon counties in gross agricultural sales.
- Agriculture is the top industry in Marion County.
- 80% of Oregon's farm products are exported out of state; 40% are exported out of the country.

Rec. Item 6, p. 101, & Rec. Item 10, p. 1022, Table 2-3.

“[Farm businesses] have a substantial inventory in this county. Their businesses generate \$500 million for the county. They are not a targeted industry. They're here. We're here. We've been here. We're necessary to life.”

Tom Brawley, Marion County Farm Bureau
Testimony to LCDC, January 25, 2007
Supp. Rec. Item 2, p. 22

ORS 215.243

Agricultural Land Use Policy

The Legislative Assembly finds and declares that:

(1) Open land used for agricultural use is an efficient means of conserving natural resources that constitute an important physical, social, aesthetic and economic asset to all of the people of this state, whether living in rural, urban or metropolitan areas of the state.

(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.

Conflict of interest cited

7068
A consultant on land use advised a developer, a group says.

BY MICHAEL ROSE
Statesman Journal

WOODBURN — A consultant hired by the city of Woodburn had a conflict of interest when he recommended expanding the city's urban growth boundary, according to land-use group 1000 Friends of Oregon.

Portland-based consultant Gregory Winterowd of Winterbrook Planning advised the city of Woodburn and real estate developer Opus Northwest. Opus intends to develop a 130-acre site along Interstate 5, west of the WinCo Distribution Center.

The dispute is whether Winterowd — hired by the city to provide impartial advice — should have taken money from a developer whose project depends on getting agricultural land brought into the urban growth boundary and rezoned for industry.

"How can we possibly rely on the objectivity of his analysis?" said Sid Friedman, planning advocate for 1000 Friends of Oregon.

Woodburn officials should view Winterowd's recommendations with skepticism or fall back on an earlier land-use study done by McKeever-Morris that suggested there was no need to expand the urban growth boundary, Friedman said.

Winterowd described 1000 Friends' allegations that he acted improperly as "a below-the-belt hit." The consultant said he took pains to inform 1000 Friends and the city about his work with Opus.

"Clearly, I don't believe there was a conflict because the city was fully aware of it," he said.

The American Institute

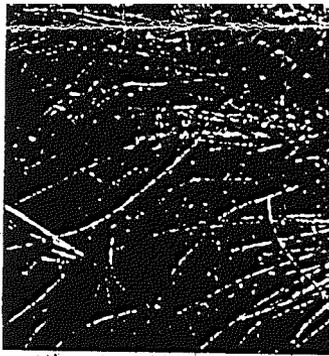
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EXPANSION: Land west of the WinCo Distribution Center in Woodburn is slated for development. A land-use group is concerned that a consultant to the city regarding the parcel also advised the developer.

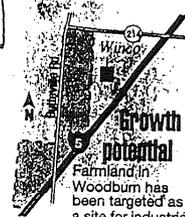


examined before core success. Winterowd verbally cordoned from 1000



ANDREA J. WRIGHT / Statesman Journal

EXPANSION: Land west of the WinCo Distribution Center in Woodburn is slated for development. A land-use group is concerned that a consultant to the city regarding the parcel also advised the developer.



KAY WORTHINGTON / Statesman Journal

of Certified Planners code of ethics states that a planner should fully disclose any "reasonably foreseeable conflict" to clients before performing work. A planner working for a real estate development client while also serving a public agency that may have a role in reviewing the client's projects is one

example of "reasonably foreseeable conflict," according to an advisory issued by the trade group.

Woodburn officials said Winterowd's work for Opus "was acknowledged verbally" by the city, according to a Dec. 11 letter from the city manager to 1000 Friends.

Winterowd said he assisted Opus with designing a master plan for its property, but that work came several months after the determination that the Opus site would, in all likelihood, be part of Woodburn's urban growth boundary.

Opus also paid for his participation in meetings with state agencies, the governor's office, Marion County and 1000 Friends. In all, the consultant said Opus paid him about \$8,000.

"I would never compro-

mise a planning process for a little bit of money, or a lot of money," said Winterowd, who used to be a member of 1000 Friends.

The complaints particularly sting, he said, because the master plan he prepared for Opus was intended to prevent the traffic congestion and sprawl detested by 1000 Friends.

Woodburn officials said that they have reviewed 1000 Friends' complaints about Winterowd and found them unfounded.

Winterowd "no longer works" for Opus on the Woodburn project, he said.

"I don't see this as a story, although the 1000 Friends are trying to make it one," said John Brown, city administrator for Woodburn. "This is a difficult enough process without having third parties coming in from the outside," he added.

The Opus site might become a focal point for contrasting views of Oregon's future: saving land for agriculture or rolling out the welcome mat for real estate developers. It recently was identified as one of 25 locations of "statewide significance for job creation" by state economic development officials.

Woodburn has discussed adding about 1,000 acres of land to its urban growth boundary, including the Opus parcel. The process, which has been ongoing since 1997, must be approved by the city, county and state agencies before any land is added to Woodburn. It could take months, or even years if appeals are filed, before the proposed expansion is approved.

1000 Friends' Friedman

SEE WOODBURN / 7B

“We said if we have all the employment we expect to have, we'll have 200 developed acres of the 400 acres we are developing.”

Greg Winterowd, City of Woodburn Consultant
Testimony at LCDC Hearing, January 25 2007
Supp. Rec. Item 2, p. 51

“As documented in the 2005 Revised Buildable Lands Inventory, the 2002 Woodburn UGB included 126 acres of vacant, partially vacant and potentially redevelopable industrial land .”

“The 126 acres was reduced to 47 acres because land owners said ‘their property was being held for future expansion’ or ‘was...being used for storage of equipment.’”

City of Woodburn UGB Expansion Justification Report

September 2005

Rec. Item 10, p. 1390

Table 4. Summary of estimated site needs by size, Woodburn 2000-2020

Site Size (acres)	Number of Sites	Average Site Size	Estimated Acres
100 or more	1	125.0	125.0
50-100	1	70.0	70.0
25-50	3	35.0	105.0
10-25	5	15.0	75.0
5-10	7	8.0	56.0
2-5	10	4.0	40.0
Less than 2	15	1.0	15.0
Total/Average	42	11.6	486.0

- Large lot target industries include Electronic and Electric Equipment manufacturing (i.e., silicon chip fabrication plants).

ECONorthwest, *Site Requirements for Woodburn Target Industries*

October 2003

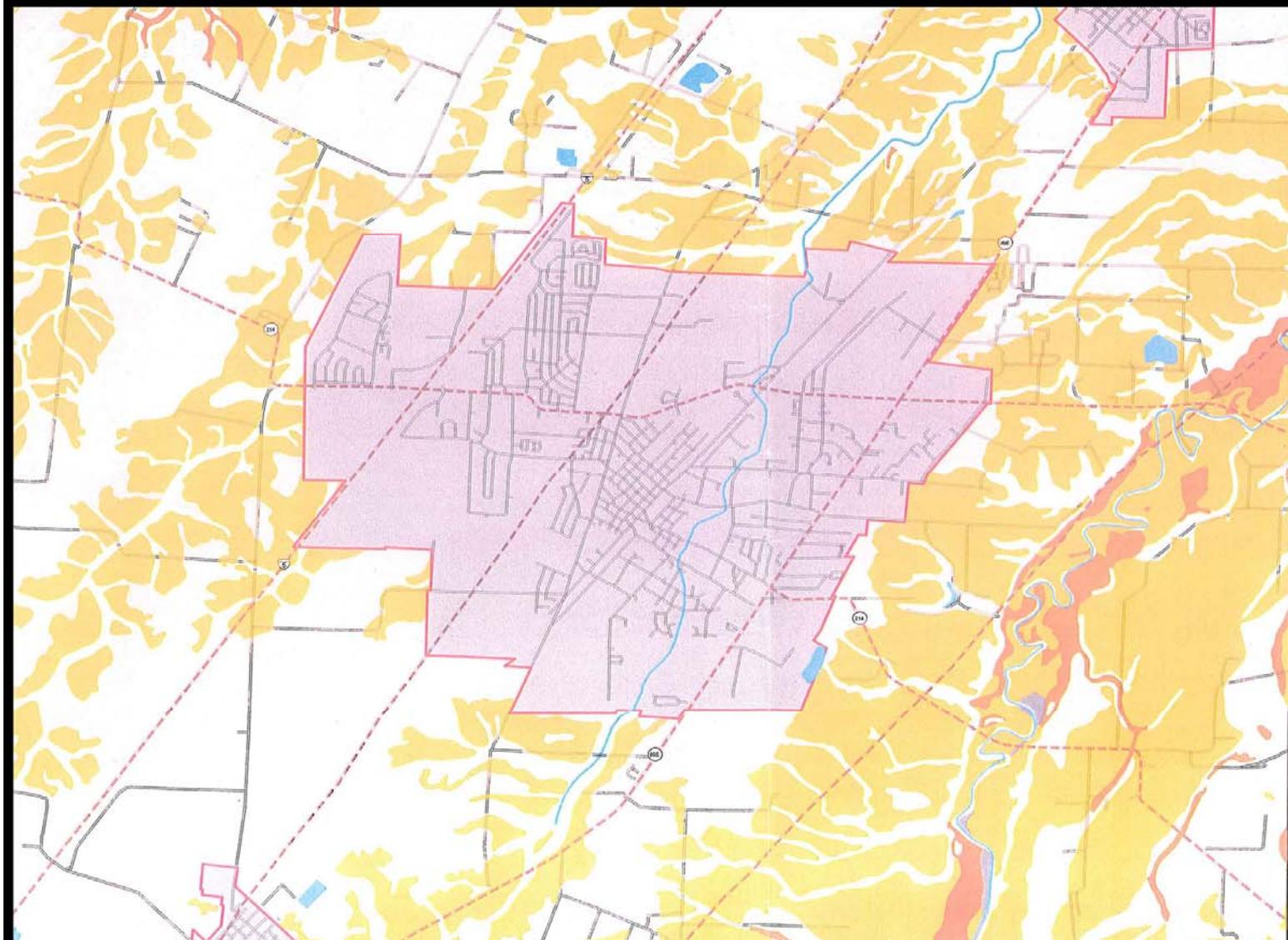
Rec. Item 10, p. 1287, Table 4

Statewide Planning Goal 9 (Economic Development)

“Comprehensive plans for urban areas shall... Include an analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends.”

Guideline 4: “Plans should emphasize the expansion of and increased productivity from established industries and firms as a means to strengthen local and regional economic development.”

Woodburn Soils - Prime



Legend

- Woodburn - UGB
- Major Lakes
- All areas are prime farmland
- Prime where drained
- Prime where irrigated
- Prime where drained and protected from flooding
- Major Highways
- Census Roads (1:100k)
- Major Rives/Streams

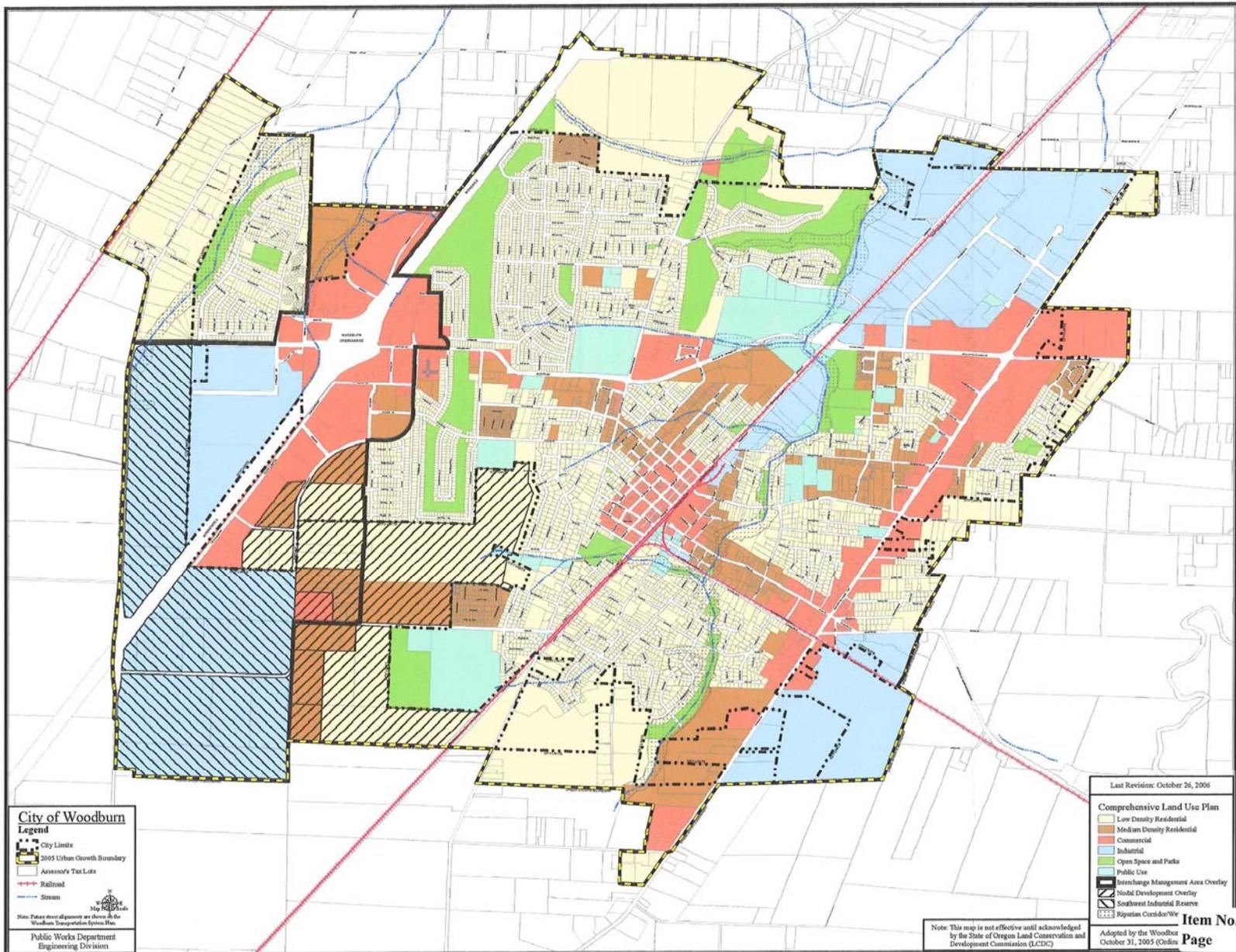


0.25 0 0.25 0.5 0.75 Miles

Source:
NRCS SSurgo Soil
Station High Value Farmland
Class 2 Not Irrigated
OAR 660-33-020(3)(a)(B)

Natural Resources Division
February 2, 2004
Request 640

This product is for informational purposes and may not have been prepared for, or be suitable for, legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.



City of Woodburn
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 - - - 2005 Urban Growth Boundary
 - - - Assessor's Tax Lots
 - - - Railroad
 - - - Stream
 Note: Future street alignments are shown in the Woodburn Transportation System Plan.
 Public Works Department
 Engineering Division

Last Revision: October 26, 2006
Comprehensive Land Use Plan
 - - - Low Density Residential
 - - - Medium Density Residential
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 - - - Industrial
 - - - Open Space and Parks
 - - - Public Use
 - - - Interchange Management Area Overlay
 - - - National Development Overlay
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 - - - Riparian Corridor/Waterway
 Item No. _____
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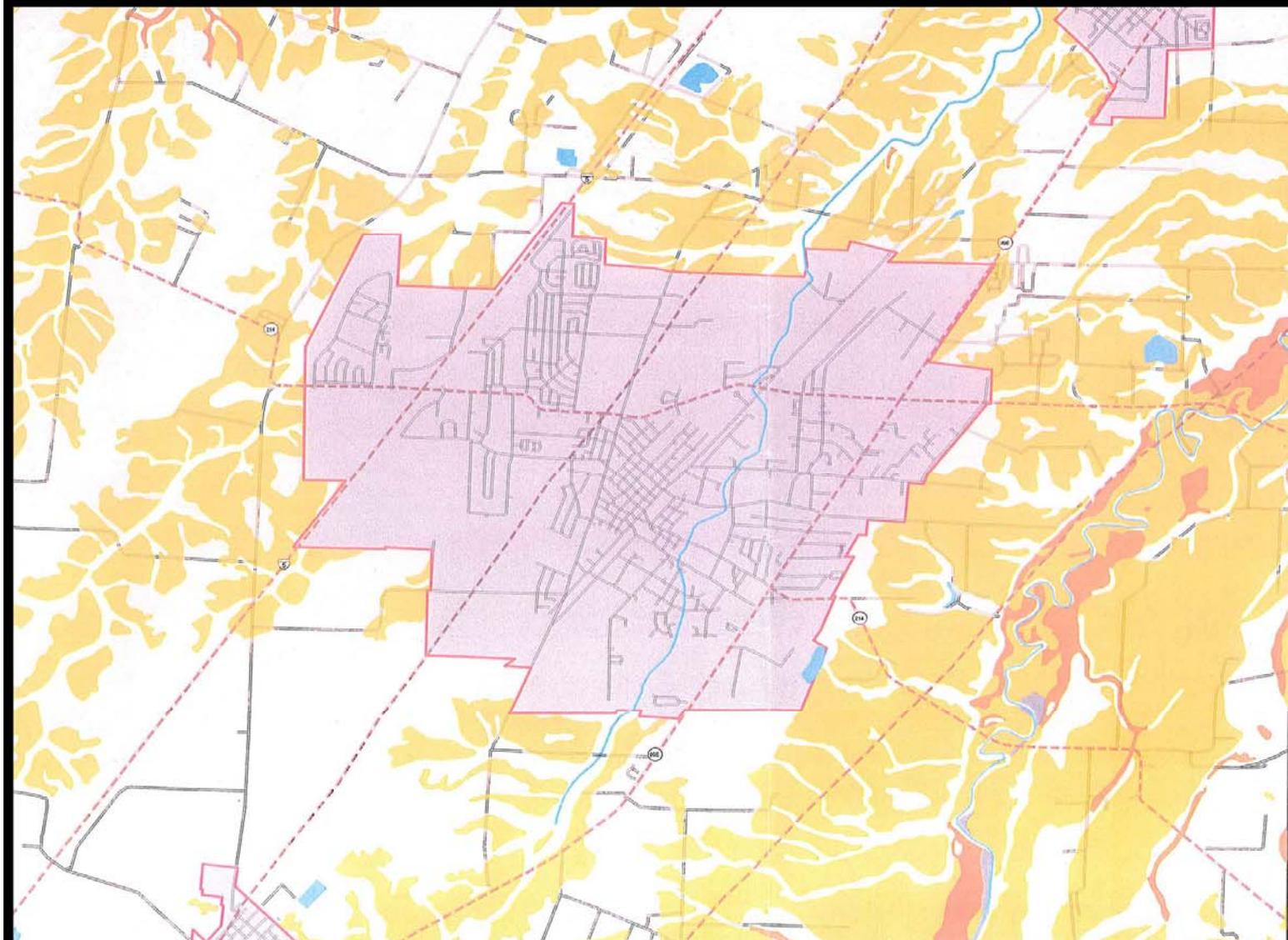
Note: This map is not effective until acknowledged by the State of Oregon Land Conservation and Development Commission (LCDC)

Woodburn Comprehensive Land Use Map - Rec. Item 7, p. 243

Rec. Vol. 5, p. 417



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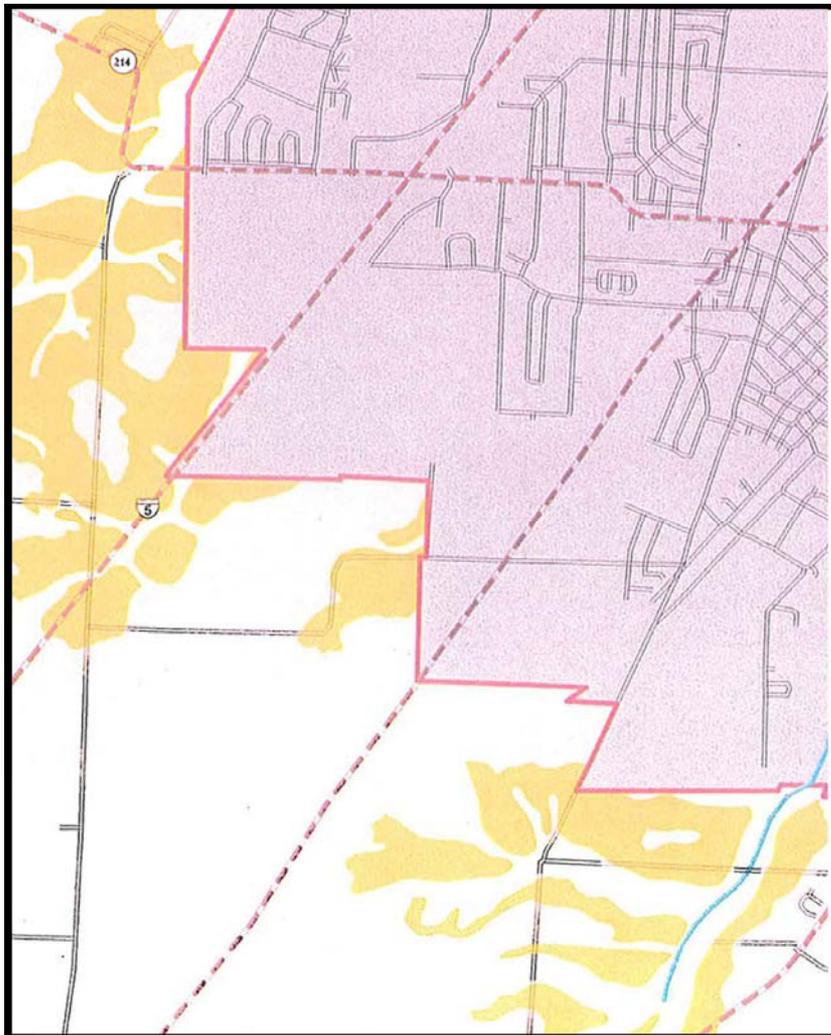


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“The department is concerned especially with the proposed expansions located west of Interstate 5 and north of the existing UGB. Both of these areas include prime farmland and Class II soils. **Based on the soils priority established by both Goal 14 and the statute, the best place for any justified expansion onto agricultural land would be south of the existing UGB between I-5 and Boones Ferry Road.** This area includes large tracts of ‘poorer’ Class III soils.”

Oregon Department of Agriculture
Letter to Jim Mulder, Woodburn Community Planning Director
March 19, 2004
Rec. Vol. 5, p. 843

“Woodburn has about 7% of Marion County’s population and just under 8% of Marion County’s jobs. Between 1990 and 2000, 11.2% of all job growth in Marion County occurred in Woodburn...This new higher forecast would account for 23% of all future Marion County job growth. This is unrealistic.”

1000 Friends of Oregon

Letter to City of Woodburn Planning Commission

February 10, 2005

Rec. Vol. 5, pp. 372-373

“Available employment and economic information indicate that the Base Case growth rate for Woodburn will diminish, **and the amount of industrial need identified by the Committee is unrealistic....**The consulting team recommendation does not include any land outside of the existing UGB because **the data does not indicate a need in the foreseeable future.**”

McKeever/Morris

Woodburn Buildable Lands and Urbanization Project—Final Report

February 7, 2000

Rec. Vol. 2, pp. 949-950

“The County supports an expansion [of the UGB] to the west and southwest but sees the inclusion of approximately **430 acres of existing farmland in these areas as being more than is needed to meet the economic development objectives of the city** and provide for the site needs of targeted industries.”

Marion County Public Works
Comments on Periodic Review Amendments
March 21, 2005
Rec. Vol. 5, p. 152

“The amount of employment expected is overly ambitious, but more importantly, **much of the net growth in employment will probably be absorbed by underutilized industrial and commercial space and vacant lands.**”

Kevin Cronin, Metro Area Field Rep, DLCDC
Letter to Jim Mulder, City of Woodburn
April 21, 2004
Rec. Vol. 3, p. 656



Woodburn Industrial Land For Sale - Rec. Vol. 5, p. 751-752



Woodburn Industrial Land For Sale
Rec. Item 9, p. 284



Woodburn Industrial Land For Sale
Rec. Vol. 5, p. 750



Woodburn Industrial Land For Sale
Rec. Item 9, p. 281



Woodburn Industrial Land For Sale
Rec. Vol. 5, p. 753

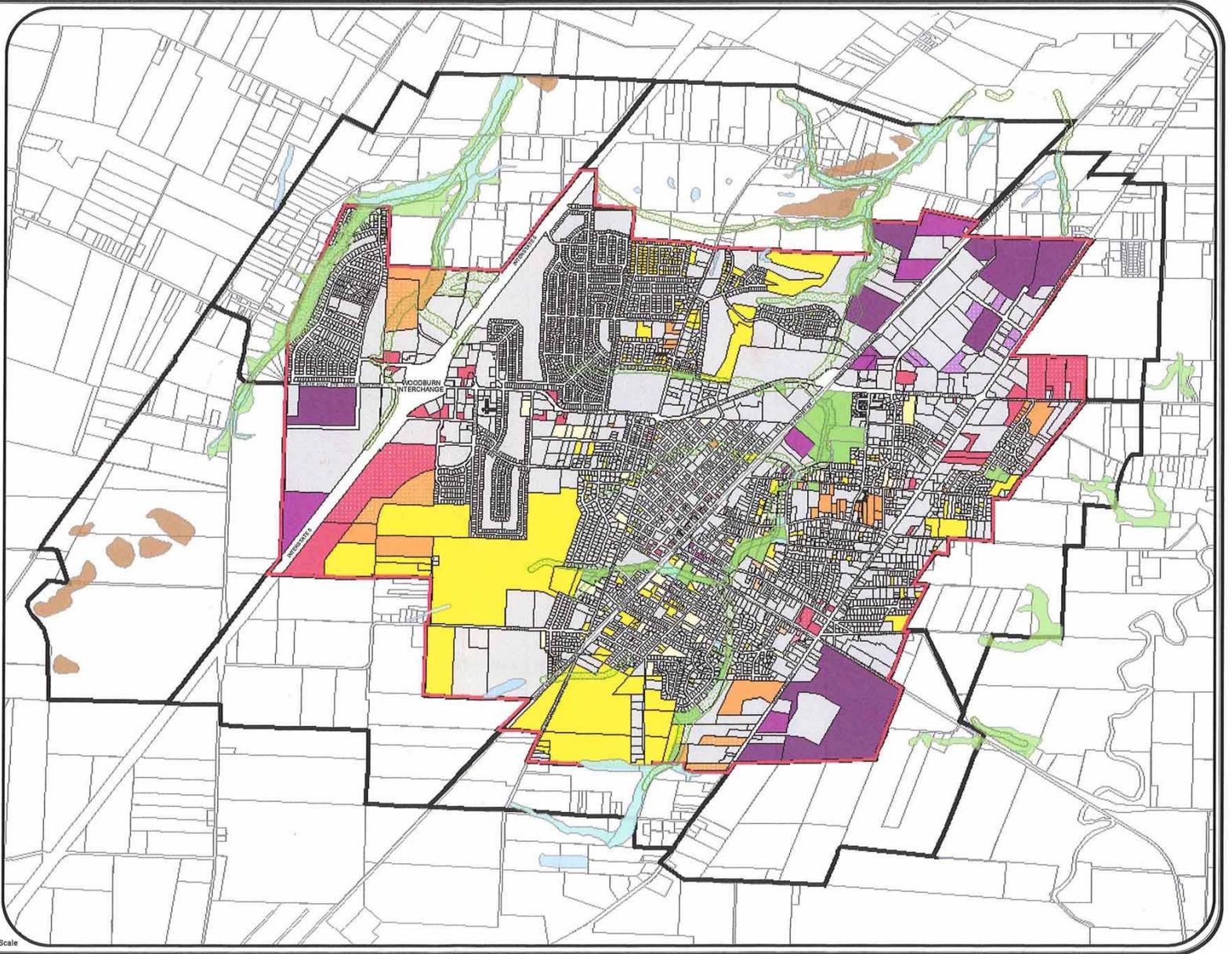
Buildable Lands Inventory

City of Woodburn



Legend

- Urban Growth Boundary
- Study Area Boundary
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- Soil Capability Class I**
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Note: Map not to Scale

Table 16: Industrial Vacant – Existing UGB

TAXLOT	OWNER_NAME	ACRES	Dev	IND Net Ac
051W05C 01100	MARY CO - A PARTNERSHIP	8.77	Vac	7.45
051W05D 01000	HANAUSKA,VICTOR J	13.32	Vac	11.32
051W07DA00100	DON BURLINGHAM FAMILY CORP	6.04	Vac	5.13
051W07DD00900	CITY OF WOODBURN	0.19	Vac	0.10
051W07DD01800	MIKE CAMPBELL DEVELOPMENT INC	0.32	Vac	0.20
051W08B 01500	MERCER INDUSTRIES INC	2.53	Vac	2.15
051W08BC00500	MERCER INDUSTRIES INC	3.03	Vac	2.58
051W17C 00900	CAM,IVAN &	6.26	Vac	5.32
051W18AB11100	WILLAMETTE VALLEY LAW PROJECT	0.12	Vac	0.10
051W18AB11500	CITY OF WOODBURN	0.09	Vac	0.08
051W18AB11800	ENGLEMAN,TODD	0.26	Vac	0.22
051W18AB12300	CITY OF WOODBURN	0.22	Vac	0.19
051W18AB12400	CITY OF WOODBURN	0.22	Vac	0.19
051W18AB13000	UNION PACIFIC RAILROAD CO	0.11	Vac	0.09
051W18AB13200	CITY OF WOODBURN	0.09	Vac	0.08
052W11-00400	WINCO FOODS INC	19.13	Vac	16.26
052W11 00105	HILLYER,LEO M & REYNE M	0.42	Vac	0.36

Table 20: Industrial Partially Vacant – Existing UGB

TAXLOT	ACRES	OWNER_NAME	Dev	IND Net Ac
051W05C 01000	13.60	KER CONTRACTORS INC	Pvac	5.54
051W05D 01800	7.05	FAR WEST FIR SALES COMPANY	Pvac	3.61
051W05D 03500	30.09	FLEETWOOD HOMES OF OREGON INC	Pvac	4.54
051W08A 02300	10.49	CREDO TOOL CO	Pvac	6.52
051W08B 00400	18.20	PELTIER REAL ESTATE CO	Pvac	7.03
051W17C 00700	92.59	COBANK,ACB	Pvac	19.20
051W19A 00300	9.60	CAM,RIRFIL G	Pvac	4.76
052W11-00101	28.18	HARDWARE WHOLESALERS INC	Pvac	6.95

Table 24: Industrial Potential Redevelopment – Existing UGB

TAXLOT	OWNER_NAME	ACRES	Dev	IND Net Ac
051W08A 00300	BARRETT PROPERTIES	1.85	Redev	1.57
051W08A 00800	CARVER,DANIEL L DBA	1.39	Redev	1.18
051W08A 01200	CARVER,DANIEL L DBA	1.33	Redev	1.13
051W08A 02400	BARRETT PROPERTIES	2.86	Redev	2.43
051W08A 03600	MORGAN DRIVE AWAY INC	3.83	Redev	3.26
051W08B 02000	MORGAN DRIVE AWAY INC	1.91	Redev	1.62
051W08B 02100	MORGAN DRIVE AWAY INC	1.35	Redev	1.15
051W18AB12500	WILLAMETTE VALLEY LAW PROJECT	0.11	Redev	0.09

Buildable Lands Inventory

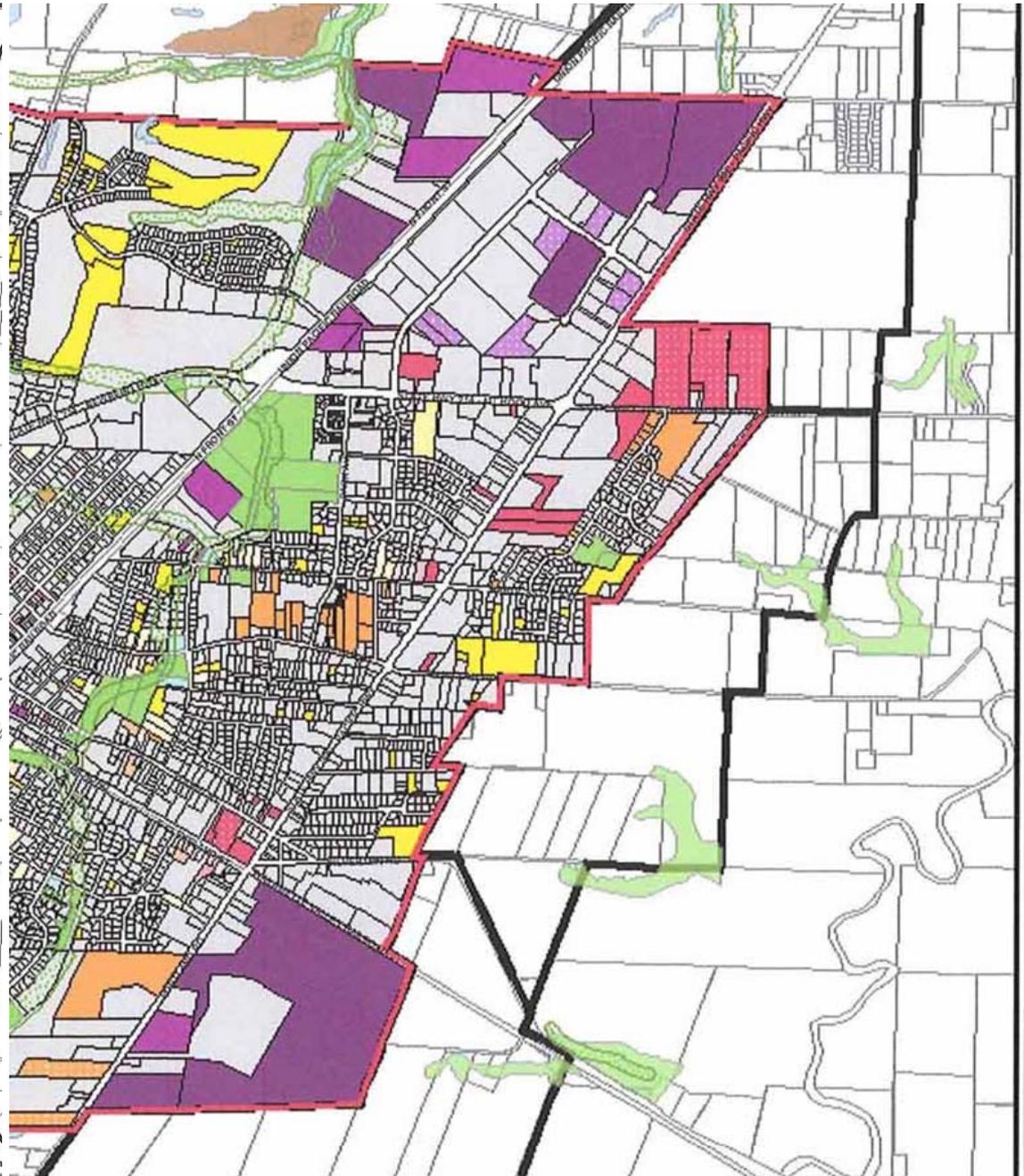
City of Woodburn

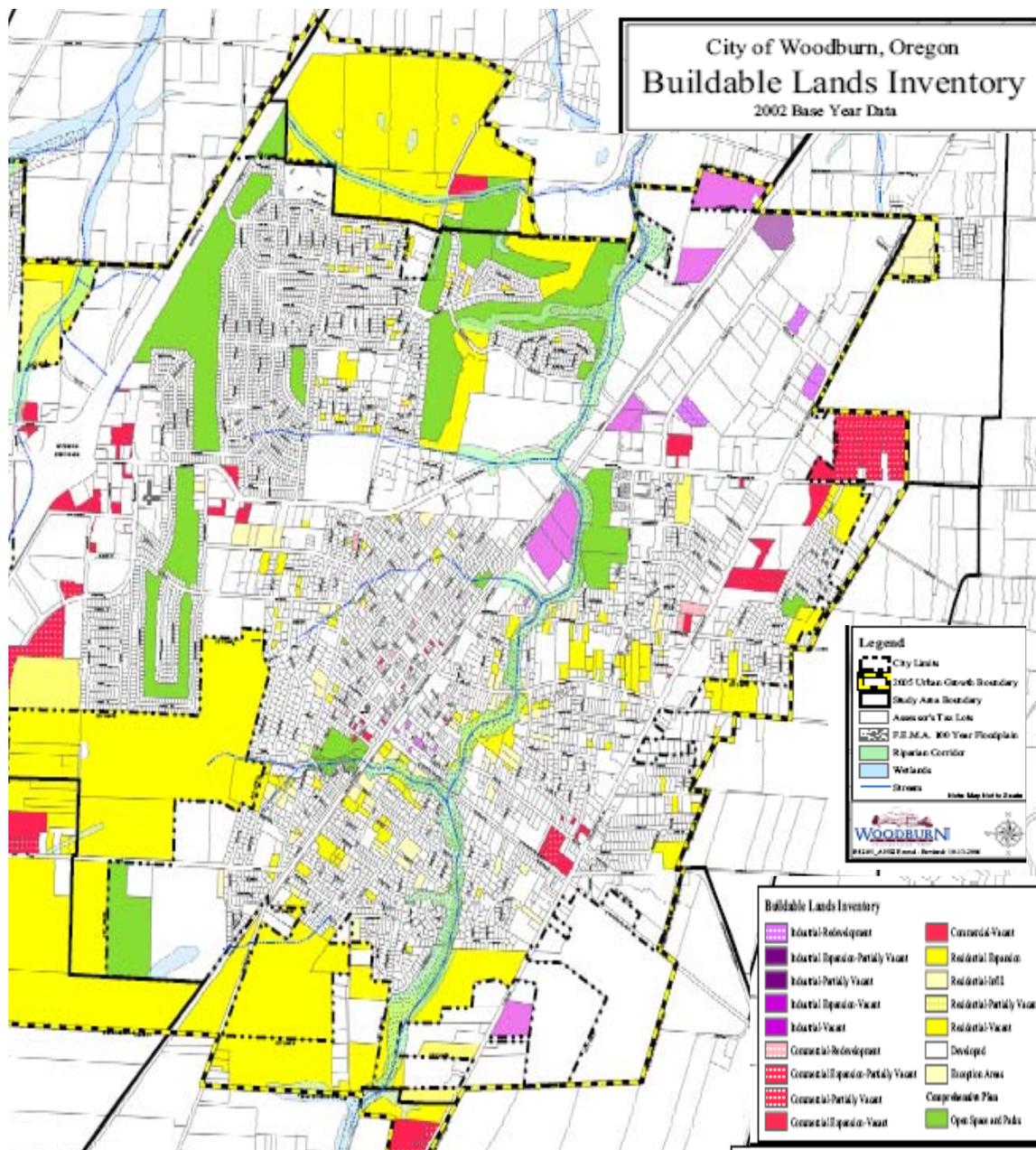


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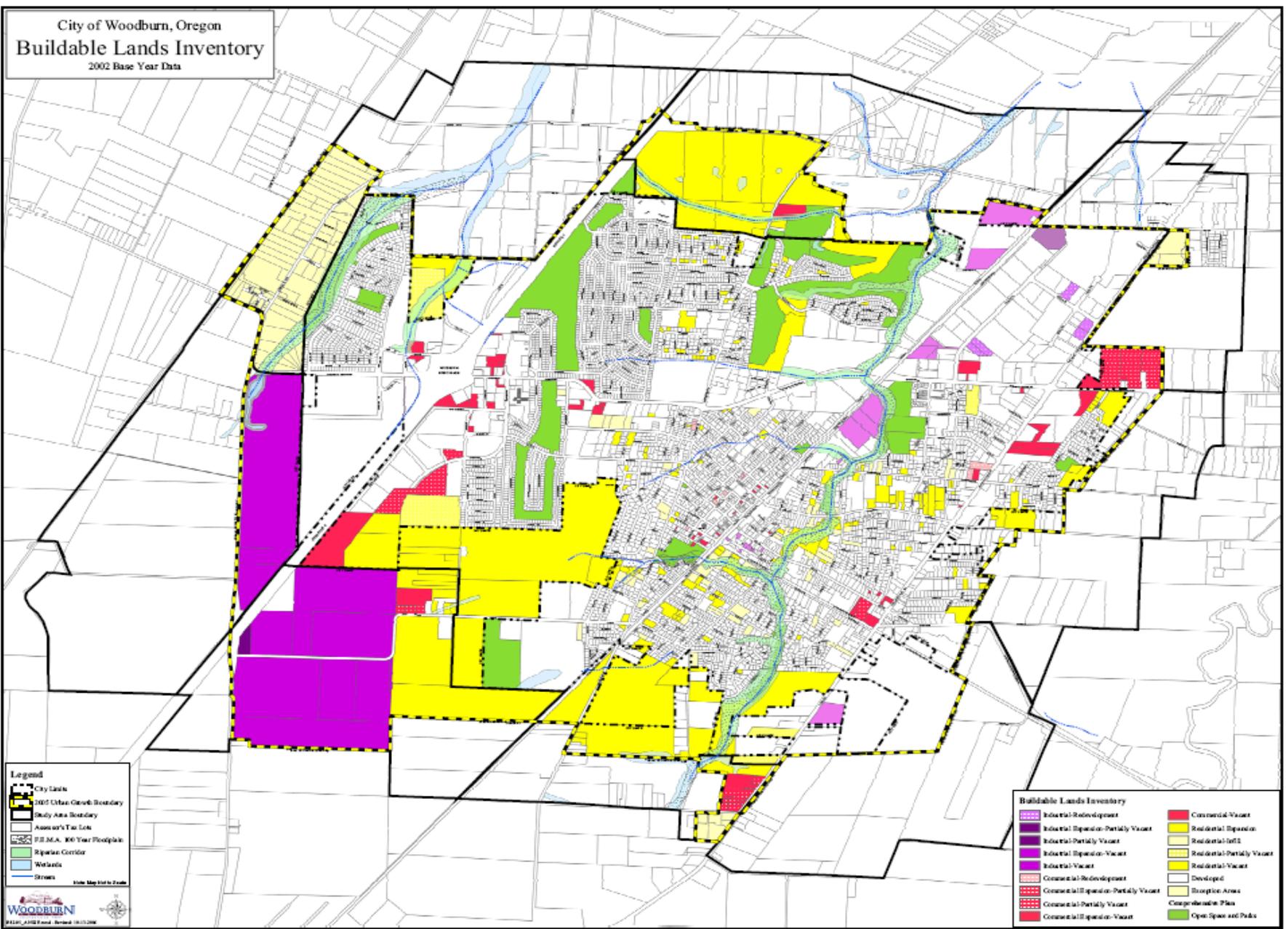
Note: Map not to Scale





Revised Woodburn Buildable Lands Inventory (Detail) - Rec. Vol. 6, p. 1237

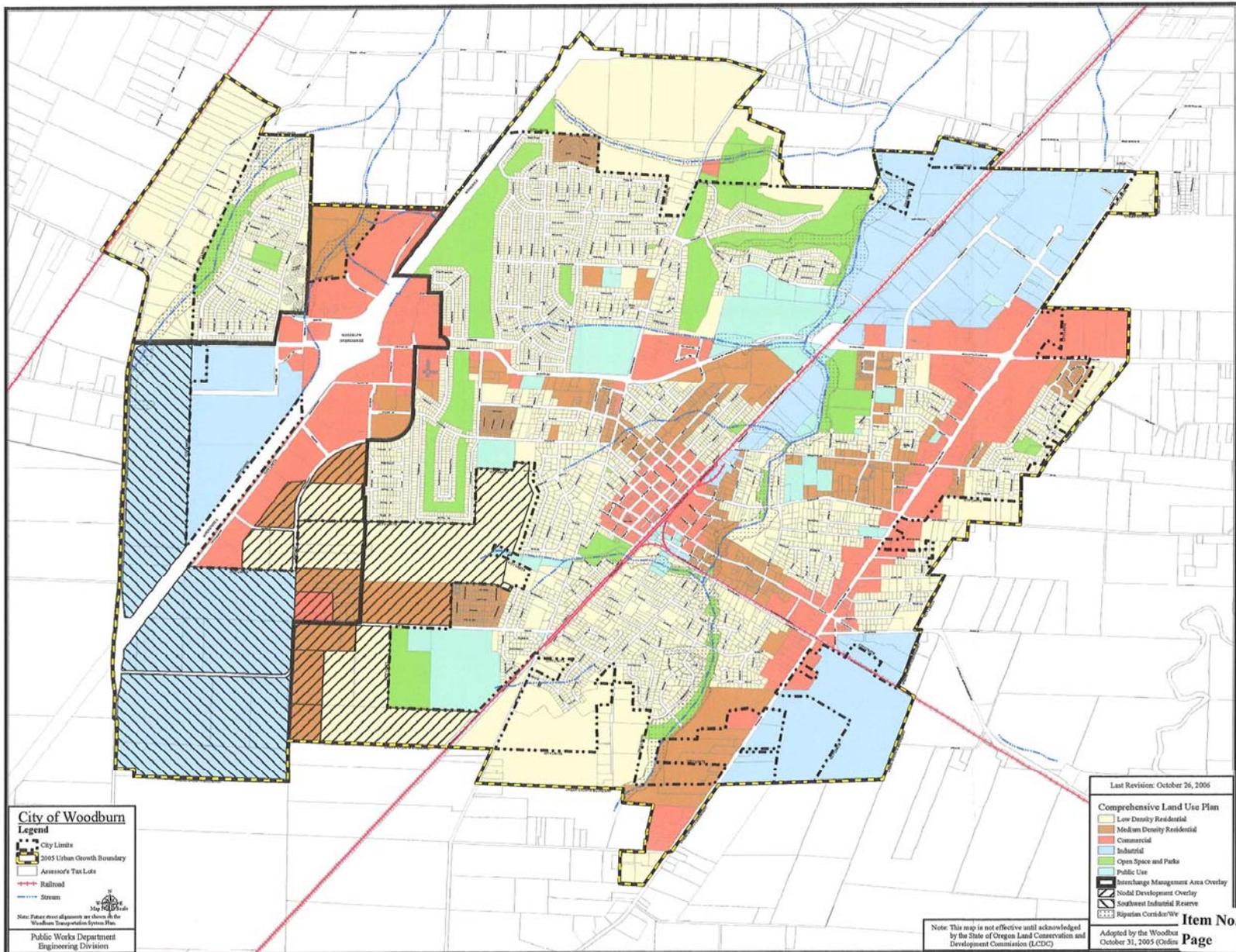
City of Woodburn, Oregon
Buildable Lands Inventory
 2002 Base Year Data



- Legend**
- City Limits
 - 2007 Urban Growth Boundary
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 - Assessor's Tax Lot
 - F.S.M.A. 100 Year Floodplain
 - Riparian Corridor
 - Wetlands
 - Streets

WOODBURN
 2010-2011 Forest Street 10-11-2008

- Buildable Lands Inventory**
- | | |
|---------------------------------------|------------------------------|
| Industrial-Redevelopment | Commercial-Vacant |
| Industrial-Expansion-Partially Vacant | Residential-Expansion |
| Industrial-Partially Vacant | Residential-Infill |
| Industrial-Expansion-Vacant | Residential-Partially Vacant |
| Industrial-Vacant | Residential-Vacant |
| Commercial-Redevelopment | Developed |
| Commercial-Expansion-Partially Vacant | Riparian Areas |
| Commercial-Partially Vacant | Conservation Plans |
| Commercial-Expansion-Vacant | Open Space and Parks |



City of Woodburn
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 Note: Future street alignments are shown in the Woodburn Transportation System Plan.
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Last Revision: October 26, 2006
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Woodburn Comprehensive Land Use Map - Rec. Item 7, p. 243

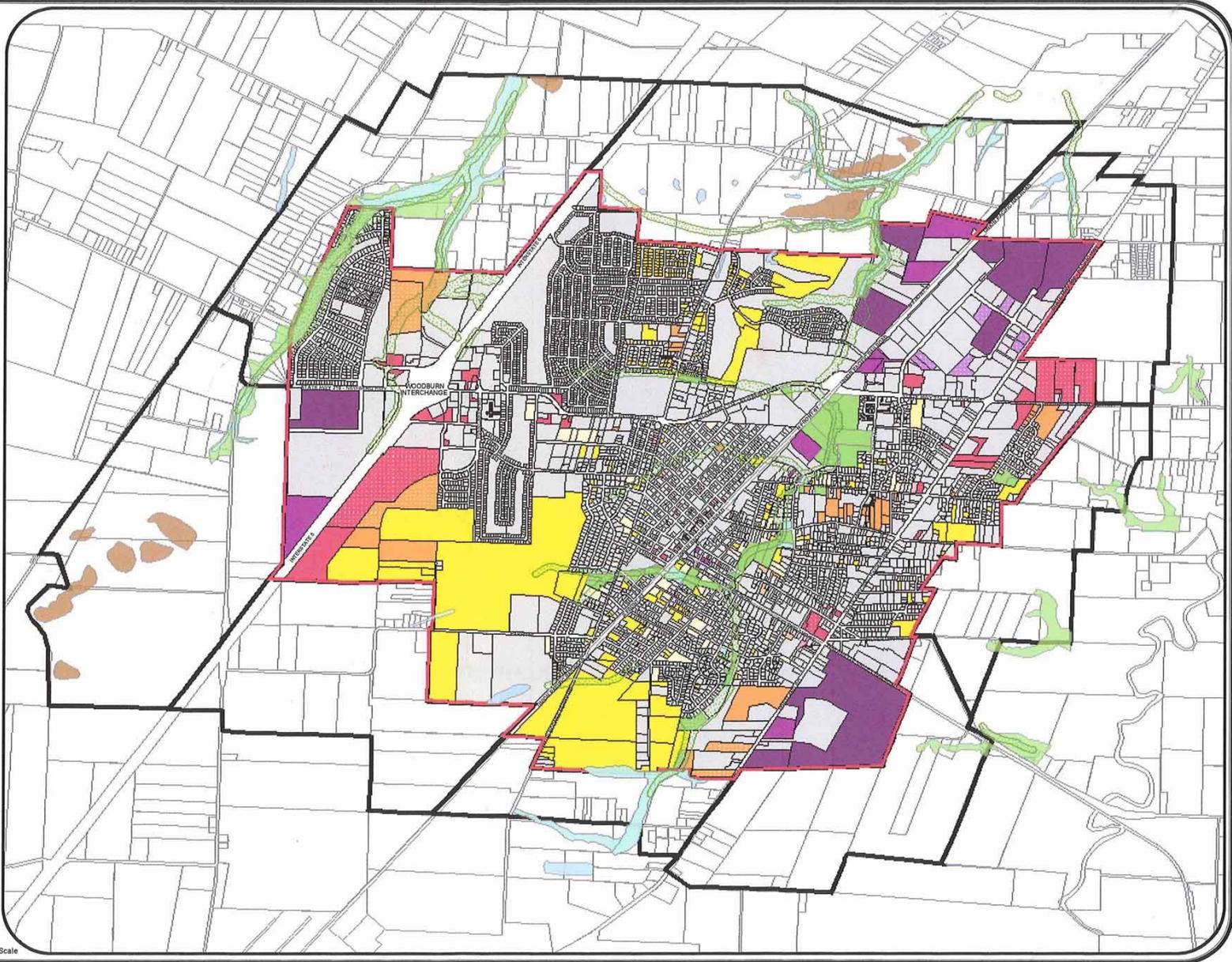
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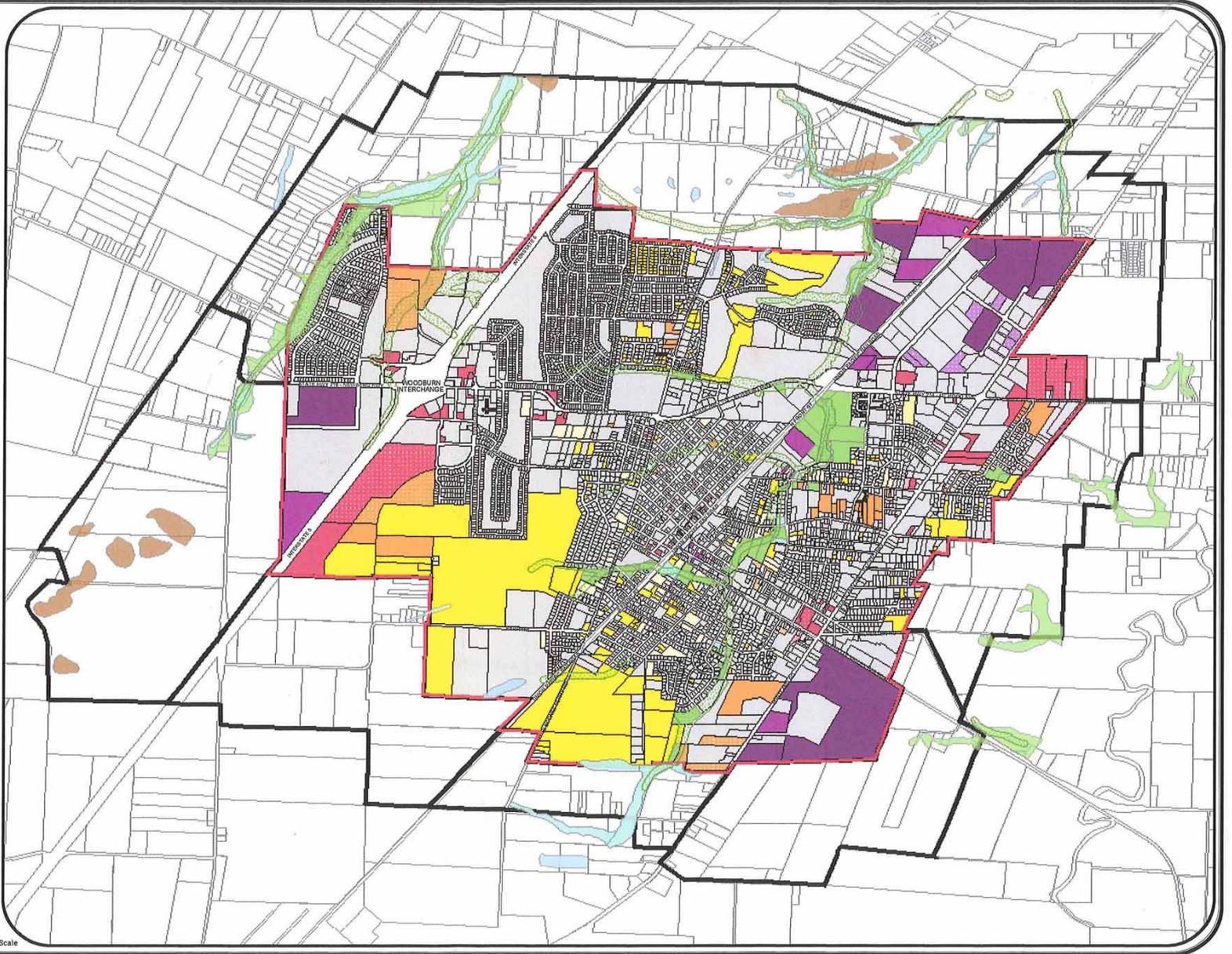
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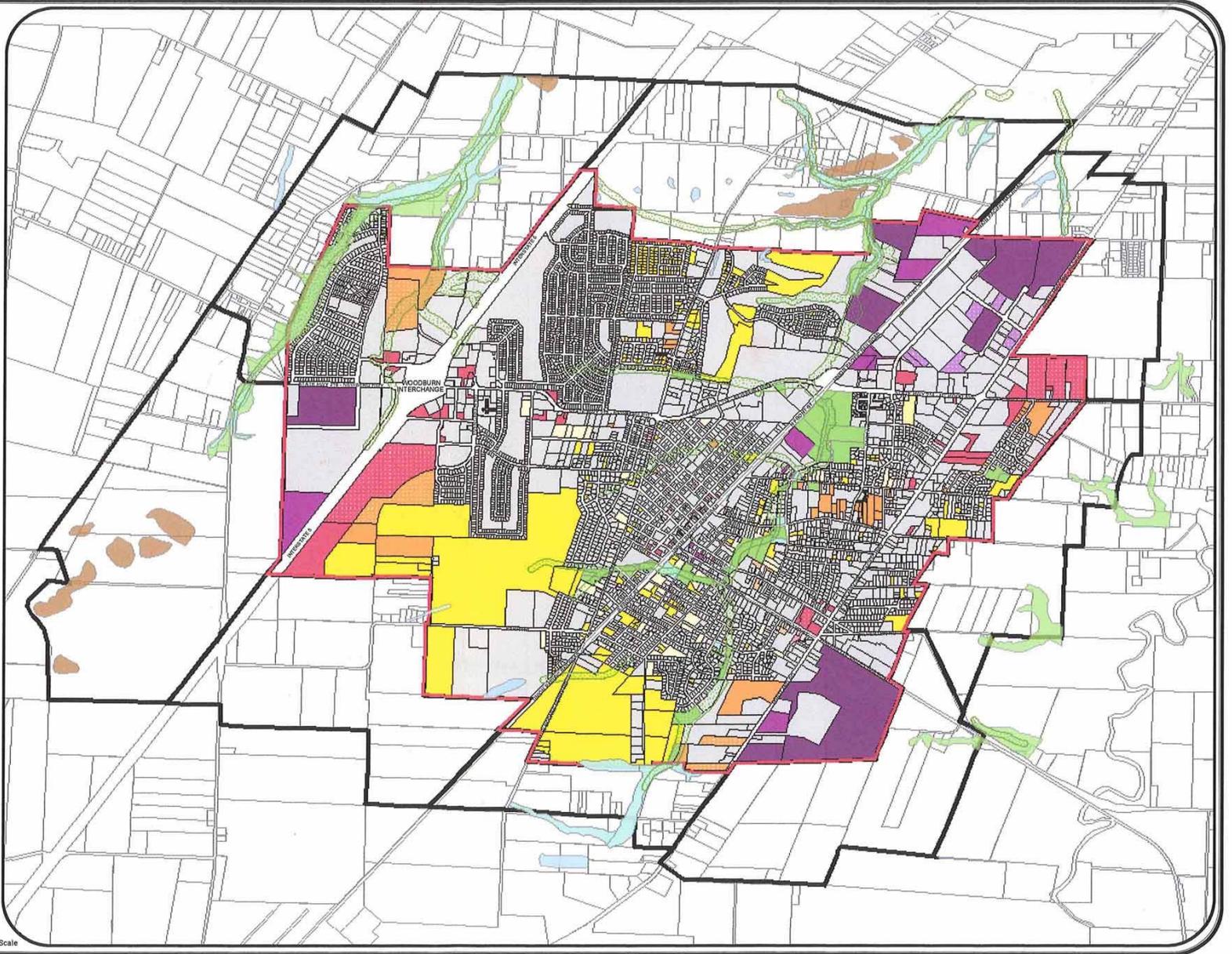
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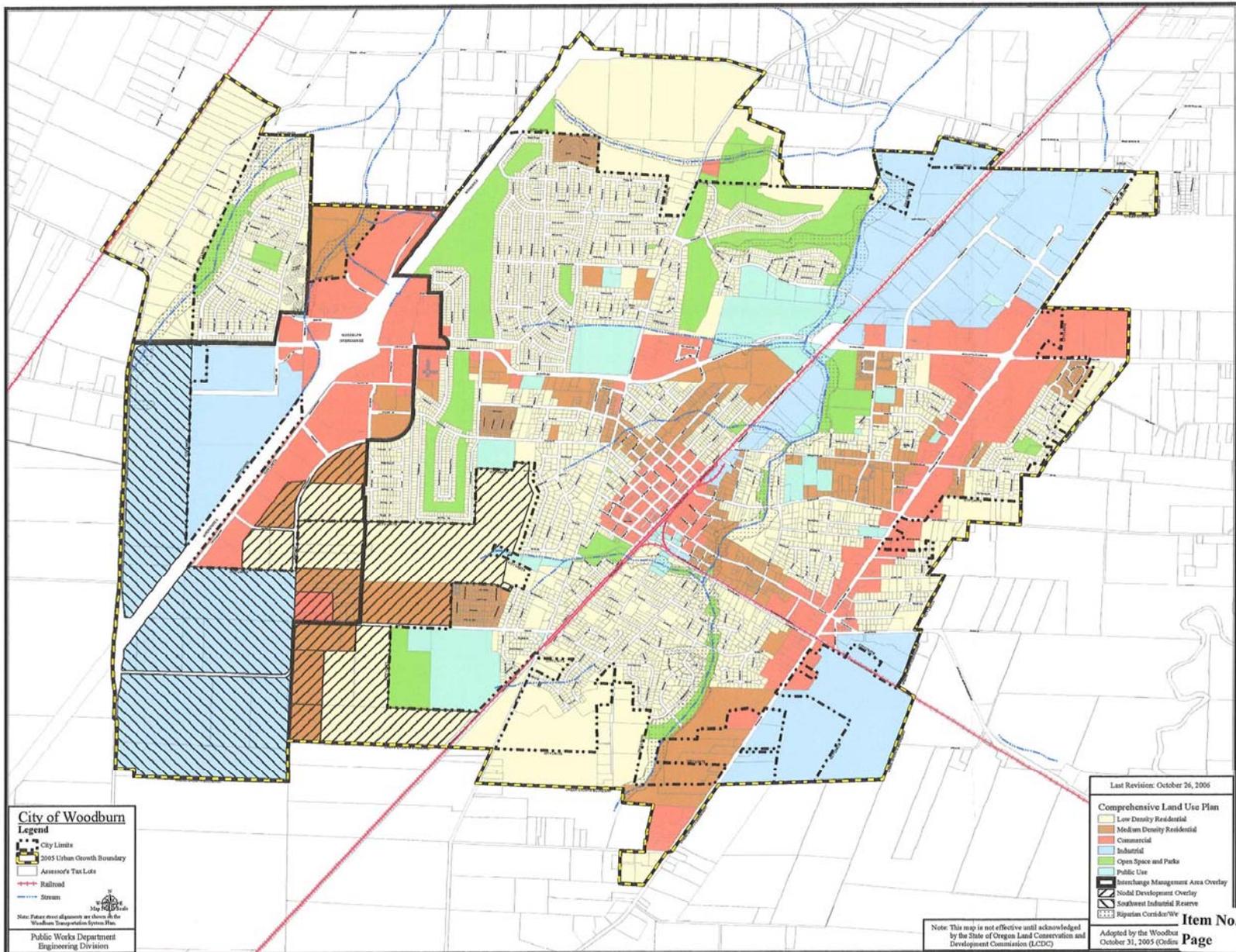
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ECONorthwest, *Site Requirements for Woodburn Target Industries*

October 2003

Rec. Item 10, p. 1287, Table 4



Woodburn Comprehensive Land Use Map - Rec. Item 7, p. 243

Rec. Vol. 5, p. 417



Table 11. Employment growth in Woodburn’s UGB by land use category, 2000 –2020

Land Use Category	Employment Growth 2000–2020		
	Low	Medium	High
Commercial	2,310	2,703	3,123
Office	1,147	1,332	1,530
Industrial	1,778	2,228	2,710
Public	747	876	1,011
Total	5,982	7,139	8,374

Source: ECONorthwest.

ECONorthwest, *Woodburn Population and Employment Projections, 2000-2020*, p. 18

April 2002

Rec. Item 10, p. 1096

“Commercial and office needs will be met largely through infill and redevelopment, and public uses will be largely met on residential land.”

ECONorthwest, *Site Requirements for Woodburn Target Industries*, p. 9

October 2003

Rec. Item 10, p. 1287