



Willamette Valley Office • PO Box 51252 • Eugene, OR 97405 • (541) 520-3763 • fax (503) 223-0073  
Portland Office • 133 SW 2nd Ave, Suite 201 • 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  
Central Oregon Office • 155 NW Irving Ave • Bend OR 97703 • (541) 797-6761

April 20, 2017

Jim Rue, Director  
c/o Periodic Review Specialist  
Department of Land Conservation and Development  
635 Capitol Street NE, Suite 150  
Salem, OR 97301

via e-mail to: [DLCD.PR-UGB@state.or.us](mailto:DLCD.PR-UGB@state.or.us)

Re: Objections to City of Springfield submittal

Dear Mr. Rue:

On March 31, 2017, the City of Springfield mailed notice of adoption of Ordinance 6361, which included an economic opportunities analysis, buildable land inventory, related comprehensive plan and zoning code amendments, and the addition of 257 acres of employment lands to the city's urban growth boundary. Approximately half of the new employment lands are located north of Springfield in the Gateway area; the rest are south of downtown in the Millrace area.

The UGB amendment was co-adopted by Lane County. The relevant file numbers are RP2009-00014 (Springfield) and 509-PA13-05393 (Lane County). These amendments have been submitted to DLCD pursuant to 197.626 to 197.650.

1000 Friends of Oregon submitted written and oral testimony at the public hearings on these amendments (for example, R.3692-3720) and has standing to file objections. As explained below, we have four objections to the city's submittal. They are:

- a) There is no relevant evidence supporting the city's determination that its need for 20+ acre sites can only be met by sites that average 60+ acres in size.
- b) The city failed to demonstrate that its need for four additional 5-20 acre commercial sites cannot be met on surplus industrial sites, prior to expanding the UGB.
- c) Commercially-designated portions of two master planned sites were not inventoried.
- d) A 20+ acre vacant industrial parcel was miscategorized due to a problem with the city's Goal 5 mapping that erroneously classified uplands as jurisdictional wetland.

These four problems act in concert to significantly inflate the size of Springfield's apparent need for new employment land. Once the problems are corrected, it is likely that the need for new land will be reduced by as much as half.

We welcome and support the proposed Mill Race UGB expansion, which would provide 125 unconstrained buildable acres, including two sites that are 20+ acres in size. Most of the Mill Race area is out of the floodplain. In addition, it was determined to be the least expensive candidate expansion area to serve by a staff-prepared cost analysis which was presented to the Springfield City Council on April 28, 2014. The Mill Race would cost far less to serve than the Gateway area, yet would provide roughly the same amount of buildable land.

We cannot support any part of the 132-acre Gateway expansion. The entire area is within the floodplain, and much of it is environmentally sensitive. Springfield's own staff have cautioned that pending regulatory changes may make development of this area infeasible. Per the city's own cost analysis, extending services to this area would prohibitively expensive: over \$125 million. That seems an especially poor investment considering the additional floodplain regulations and subsequent reduction in the buildable area.

The tremendous cost of extending infrastructure to the urban fringe would have city-wide ramifications. It does not appear likely that landowners could pay their own way, since the cost of improvements would exceed the finished value of their land. Therefore, city-wide systems development charges would probably need to be substantially increased to service the new land. This would be a hidden subsidy, paid by every homebuilder and business creating new housing and employment anywhere in the city.

Beyond these cost concerns, a large supply of new urbanizable land outside the current UGB would harm Springfield's efforts to revitalize and redevelop downtown, Glenwood, and other areas like East Main Street. It would also undercut urban property owners who have already invested heavily in their land and buildings, and who may have spent decades faithfully paying taxes to the city.

The portions of the Gateway expansion area that are not wetland, riparian area or sloped are predominantly Class 2 farmland, and are currently making a valuable contribution to Lane County's rural economy. Given the substantial financial and regulatory barriers to development, farming is likely the highest and best long-term use for this area.

A more compact UGB would better support Springfield's existing stakeholders, 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: fairness, a higher quality of life, better affordability and a healthier environment.

### **OBJECTION 1: SITE CHARACTERISTICS**

**The decision violates OAR 660-009-0015(2), OAR 660-009-0005(11) and Goal 14 because the city erroneously concluded that its identified need for four 20+ acre sites could only be met by sites averaging 60+ acres in size, and consequently overestimated its land need and adopted an overly large UGB expansion.**

### **Legal framework**

Under Goal 9 and its implementing rules, cities may specify physical characteristics, including minimum sizes, that candidate employment sites must have. However, these determinations must be based on the site characteristics that are “typical” of expected uses and that are “necessary” for “particular” employment uses to operate:

OAR 660-009-0005(11):

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

OAR 660-009-0015(2):

Identification of Required Site Types. The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories.

OAR 660-009-0025(1):

Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories.

LUBA devised a two-pronged test to interpret these requirements. To be a valid site characteristic: (1) the attribute must be typical of the expected use and (2) the attribute must have some meaningful connection with the operation of the use. LUBA further held that “typical” attributes are those that are “typically required for a business to operate successfully.”<sup>1</sup> The Court of Appeals upheld LUBA’s test, noting that “‘necessary’ site characteristics are those attributes that are reasonably necessary to the successful operation of *particular* industrial or employment uses, in the sense that they bear some important relationship to that operation.” (Emphasis added) *Friends of Yamhill County v. City of Newberg*, 240 Or App 238 (2011).

In its later review of Newberg’s EOA, the Department concluded that OAR 660-009-0005(11)’s “particular industrial or other employment use” language mandates a certain level of specificity:<sup>2</sup>

“In its review of objections, the department interprets the administrative rules to require a city to demonstrate that site characteristics describe operational needs of particular

---

<sup>1</sup> *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010).

<sup>2</sup> See page 17 of the 1/23/14 memo from DLCDC director Jim Rue to LCDC that was posted as Agenda Item 4 to the February 13-14, 2014 LCDC Meeting.

employment uses or groups of uses with similar operational needs. The department finds that the term ‘particular’ should be interpreted in a way that allows a city a reasonable and practical path to compliance with the rules while addressing its economic development needs. At the same time, it cannot be construed so broadly that it renders the term ‘particular’ moot. For example, requiring a city to determine, with substantial evidence, precise operational and siting needs for semiconductor manufacturing, medical device manufacturing, and nano & micro technology manufacturing separately is not practical or reasonable. On the other hand, ‘manufacturing’ is so broad and encompasses so many different ‘particular uses’ that implementing site characteristics at this level would likely not establish an adequate basis for rule compliance, much less address the practical needs of the city. In this example, ‘high tech manufacturing’ could be the appropriate level of aggregation that is still specific enough to be a ‘particular use.’”

Thus, an EOA must determine what attributes are “typical” and “necessary” for each “particular” use. What is critical for one use may be unimportant to another use, or may even be detrimental. While compatible industries that have similar site needs may be grouped together into “broad site categories,” as provided by OAR 660-009-0015(2) and -0025(1), an EOA must still consider the site characteristics necessary for “particular” industries, and cannot lump them all together.

As explained in detail below, contrary to the rule’s directive to consider the needs of “particular” industrial uses, Springfield determined what is “typical” and “necessary” for its planned large-site employment uses by creating simple averages of *all* occupied industrial and commercial 20+ acre sites, regardless of the uses found thereon. Worse, the uses on these currently occupied sites are not representative of the uses the city plans to accommodate on 20+ acre sites in the future.

### **Springfield’s site characteristics**

The employment land portion of the UGB expansion is based on the August 2015 *Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis* (EOA). This document is part of Exhibit B to Springfield Ordinance 6361 and appears in the record at pages 48 through 272. As summarized by the “Site Needs” portion of the EOA’s Table 5-1 (R.145, reproduced below), Springfield determined that it needs four 20+ acre sites (3 industrial and 1 commercial). We accept this determination of the city’s need for 20+ acre sites.

**Table 5-1. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030**

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
<b>Buildable Land Inventory</b>					
<b>Vacant</b>					
Industrial	72	24	20	12	0
Commercial and Mixed Use	104	14	6	4	0
<b>Potentially Redevelopable</b>					
Industrial	122	28	31	6	1
Commercial and Mixed Use	305	20	15	0	0
<b>Total Buildable Sites</b>					
Industrial	194	52	51	18	1
Commercial and Mixed Use	409	34	21	4	0
<b>Site Needs</b>					
<b>Needed sites</b>					
Industrial	7	7	7	12	3
Commercial and Mixed Use	174	31	23	8	1
<b>Surplus (deficit) of sites</b>					
Industrial	<b>187</b>	<b>45</b>	<b>44</b>	<b>6</b>	<b>-2</b>
Commercial and Mixed Use	<b>235</b>	<b>3</b>	<b>-2</b>	<b>-4</b>	<b>-1</b>

Source: ECONorthwest.

Note: The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

Our concern lies with the EOA’s assertion that candidate sites in the “20 and Larger” category must average 60+ acres in size to meet that need. The following Table 5-2 from the EOA (R.145) states that “20 and Larger” sites must be, on average, 63 acres for industrial sites, and 60 acres for commercial sites:

**Table 5-2. Average size of needed sites based on average sizes of sites with employment in Springfield, Springfield UGB**

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
<b>Industrial</b>	0.5	1.4	3.0	10.0	63.0
<b>Commercial and Mixed Use</b>	0.4	1.4	3.2	9.3	60.0

Source: ECONorthwest based on QCEW data

Note: Average site size for sites 20 acres and larger is rounded to the nearest acre.

Table 5-2’s accompanying text provides this rationale:

“The average site sizes in Table 5-2 are based on empirical analysis of the size of Industrial and Commercial taxlots with employment in Springfield in 2006. This analysis involved relating covered employment data<sup>3</sup> (covered employment in Springfield is

<sup>3</sup> The city’s findings (R.885) discuss the use of covered employment data and imply that the use of “confidential” information to select sites for averaging somehow insulates the city’s determination from further scrutiny. However, the findings do not dispute the EOA’s explanation that the data were used solely to select sites with current employment, then sort those sites into the industrial or commercial category. There is nothing mysterious about this analysis; it not necessary to consider confidential employment details.

shown in Table C-1) to taxlots in Springfield. The taxlots were grouped into categories of site size (i.e., less than 1 acre, 1-2 acres, etc.) by type of land (i.e., industrial or commercial/mixed-use). For each group, the average site size was determined, as shown in Table 5-2. For example, there were 75 Industrial sites smaller than 1 acre in Springfield with employment, with an average of 0.5 acres per site.” (EOA, page 78)

When we initially raised this issue in our September 12, 2016 letter (R.3694-3698), we were unsure which sites were used to compute these averages, since Table 5-2’s footnote about its data source does not cite to any evidence in the record. In our letter, we recreated the analysis for 20+ acre sites using taxlot data from Lane County and the city’s buildable land inventory. As explained in our letter, these are the occupied 20+ acre industrial sites we found:

International Paper mill.....	175 acres
Sierrapine lumber mill .....	71 acres
Swanson lumber mill .....	36 acres
Rosboro lumber mill .....	70 acres
Jasper-Natron lumber mill #1 .....	47 acres
Jasper-Natron lumber mill #2 .....	29 acres
High Banks warehouse (site is mostly underwater) <sup>4</sup> .....	47 acres
<u>True Value regional distribution center .....</u>	<u>29 acres</u>
<b>AVERAGE ALL SITES.....</b>	<b>63 acres</b>

This 63-acre average exactly matches the EOA’s average 20+ acre occupied industrial site size. The city’s findings in response to our letter (R.881-886) do not dispute that these eight sites were averaged to produce the 63-acre industrial site characteristic.

Our letter also recreated the city’s commercial size analysis; we found only two 20+ acre sites:

Peace Health hospital complex .....	72 acres
<u>Gateway shopping center .....</u>	<u>48 acres</u>
<b>AVERAGE ALL SITES.....</b>	<b>60 acres</b>

Here, too, our average exactly matched the EOA’s determination, and the city’s findings do not dispute that the shopping mall and hospital sites were averaged to produce the 60-acre commercial site characteristic.

We can agree that the city’s research provides information on what is “typical” for paper mills, lumber mills, regional distribution centers, regional hospitals, and large shopping malls. The

---

<sup>4</sup> The entire High Banks warehouse site is 47 acres. However, as shown by the aerial photo that is Attachment 5 to our September 12, 2016 letter, most of it is underwater. The warehouse sits on a section of the shoreline that is considerably smaller than 20 acres. Therefore, the True Value site is the only example of a warehousing/distribution site larger than 20 acres.

problem is, these five “particular uses” are not the types of industries Springfield’s four additional 20+ acre sites are intended to serve. Therefore, this information is not relevant to the Goal 9 inquiry as to what characteristics these four large sites must have.

The EOA contains a detailed list of the future employment uses that could occupy the four 20+ acre sites.<sup>5</sup> For industrial sites:

“Springfield identified the following types of target industries in manufacturing (as part of the General Industrial employment category) that require sites 5 acres and larger: medical equipment, high-tech electronics and manufacturing, recreational equipment, furniture manufacturing, specialty food processing.” (EOA pg. 85, R.152, also see Table 5-5 on the following page of this letter, R.151)

For commercial sites:

“Springfield identified the following types of large office employers as target industries that require sites of five acres or larger: high tech, corporate headquarters, biotech, professional and technical services, back office, and medical services.” (EOA pg. 90, R.157, also see Table 5-5 on the following page of this letter, R.151)

Clearly, a paper mill, with its need for large sludge ponds, railcar accommodation, and wood storage yards, has little in common with Springfield’s targeted manufacturing industries: medical equipment, high-tech electronics and manufacturing, recreational equipment, furniture manufacturing, specialty food processing. Therefore, the fact that Springfield’s existing paper mill requires a 175-acre site is not relevant to the required Goal 9 analysis. The sizes of the city’s existing lumber mills and regional distribution centers are similarly irrelevant.

Regarding commercial needs, the Gateway mall and Peace Health hospital are regional-scale “one offs” that won’t be recreated over the next 20 years. In addition, retail is not a targeted industry. On the other hand, “medical services” *are* one of uses expected to occupy a future 20+ acre site. Even so, the size of the Peace Health site cannot inform those needs because the planned large sites are not intended for another regional-scale hospital. As the findings explain:

“While Springfield certainly aspires to create opportunities for more so-called ‘one off’ developments (such as the PeaceHealth RiverBend Campus) the 2015 Final CIBL/EOA land need determination, the 2030 Comprehensive Plan and UGB expansion amendments do not address such ‘one-offs.’ The CIBL/EOA clearly states that such ‘one off’ opportunities are *not* provided for in the land need determination and if aspiration to provide sites for ‘one-offs’ were to be included, the City would need a much larger UGB expansion than the modest expansion proposed.” (Findings, R.886)

---

<sup>5</sup> The city’s response to this issue does not acknowledge that the EOA contains a specific list of uses that require large sites, and that this list is narrower than other tallies of potential future industries found elsewhere in the EOA. Instead, the findings at R.883 refer to these other, broader lists and imply that *all* those industries mentioned are planned to locate on large sites. This ignores the plain language in the “Site Size and Other Characteristics” section of the EOA, which refers only to the narrower list of industries (R.150-161).

**Table 5-5. Summary of characteristics of sites needed by target industries, Springfield**

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p><b>Target Industries:</b>                      Medical Equipment                      High-tech Electronics and Manufacturing                      Recreational Equipment                      Furniture Manufacturing                      Specialty Food Processing  <b>Building Type:</b> General Industrial  <b>Site Needs for:</b> Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres.</p> <p>The size of sites needed by Springfield’s target industries will vary by the size of building:                      100,000 sq ft building will need a site of between 9-12 acres                      200,000 sq ft building will need a site of between 18-24 acres                      500,000 sq ft building will need a site of between 45- 60 acres</p> <p>The average size of existing sites with employment in Springfield (Table 5-2) is:                      5-20 acre site: 10 acres                      20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield’s municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p><b>Target Industries:</b>                      High Tech Services                      Corporate Headquarters                      Biotech                      Professional and Technical Services                      Back office                      Medical Services  <b>Building Type:</b> Commercial and Other  <b>Site Needs for:</b> Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres.</p> <p>The size of sites needed by Springfield’s target industries will vary by the size of building:                      50,000 sq ft building will need a site of between 4- 6 acres                      100,000 sq ft building will need a site of between 8-12 acres                      200,000 sq ft building will need a site of between 16-24 acres</p> <p>If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres.</p> <p>The average size of existing sites with employment in Springfield (Table 5-2) is:                      5-20 acre site: 9.3 acres                      20+ acre site: 60 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p> <p>Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield’s municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>



## **Conclusion**

Under OAR 660-009-0015(2), EOAs must estimate “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses.” OAR 660-009-0005(11) stipulates that site characteristics must be “necessary for a particular industrial or other employment use to operate.” Goal 14 requires the UGB to be based upon demonstrated need.

Contrary to the Goal 9 rule’s directive to collect and consider evidence regarding the needs of its “particular” planned large-site employment uses, Springfield instead determined what is “typical” and “necessary” for these large-site uses by creating a simple average of *all* currently-occupied industrial and commercial 20+ acre sites throughout the city. These existing uses are not representative of the types of future uses the city expects on its large sites, as plainly shown by the EOA’s Table 5-5, reproduced on the previous page.

Consequently, the city wrongly determined that its identified need for four 20+ acre sites could only be met by sites averaging 60+ acres in size. This caused the city to overestimate its land need and adopt an overly large UGB expansion, in violation of Goal 14.

**Proposed Remedy:** The Department should remand the decision, with instructions to either: a) provide additional evidence and rationale to support the current 60-acre and 63-acre site size averages; or b) revise the proposal so that sites containing at least 20 buildable acres are deemed suitable to meet the need for 20+ acre sites.

## **OBJECTION 2: COMMERCIAL SITE DEFICIT**

**The decision violates OAR 660-024-0050(4) and Goal 14 because the city failed to demonstrate that its need for four additional 5-20 acre commercial sites cannot be met on surplus industrial sites, prior to expanding the UGB.**

As illustrated by the EOA’s Table 5-1 (R.145, reproduced below), Springfield has 18 buildable industrial sites in the 5-20 acre range, but needs only 12 of these, leaving a surplus of 6 sites. Table 5-1 also shows that Springfield has 4 buildable commercial sites in the 5-20 acre range, but needs 8 of these, and so has a deficit of 4 sites.

**Table 5-1. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030**

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
<b>Buildable Land Inventory</b>					
<b>Vacant</b>					
Industrial	72	24	20	12	0
Commercial and Mixed Use	104	14	6	4	0
<b>Potentially Redevelopable</b>					
Industrial	122	28	31	6	1
Commercial and Mixed Use	305	20	15	0	0
<b>Total Buildable Sites</b>					
Industrial	194	52	51	18	1
Commercial and Mixed Use	409	34	21	4	0
<b>Site Needs</b>					
<b>Needed sites</b>					
Industrial	7	7	7	12	3
Commercial and Mixed Use	174	31	23	8	1
<b>Surplus (deficit) of sites</b>					
Industrial	<b>187</b>	<b>45</b>	<b>44</b>	<b>6</b>	<b>-2</b>
Commercial and Mixed Use	<b>235</b>	<b>3</b>	<b>-2</b>	<b>-4</b>	<b>-1</b>

Source: ECONorthwest.

Note: The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

There is nothing wrong with this initial determination. The problem is that the city jumped directly to a conclusion that the identified deficit of 4 commercial sites in the 5-20 acre range could only be remedied by expansion of the UGB.

There is another option: the identified deficit could be met by strategic re-designation of just 4 of the 18 inventoried industrial sites. Since there is currently a surplus of 6 such sites, re-designation of 4 industrial sites would still leave the city with a surplus of 2 industrial sites.

Goal 14 and its administrative rules require that each of the existing 18 buildable industrial sites in the 5-20 acre size class first be assessed to determine whether any could meet the commercial deficit:

“Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB.” (OAR 660-024-0050(4))

The city failed to fulfill this important requirement.

The city’s findings (R.887-888) are not responsive to this issue. The findings insist that the site characteristics for commercial and industrial sites are not the same, but fail to explain how they

are different. The findings ignore the EOA's Table 5-5 (reproduced on page 8 of this letter), which lists the site characteristics for large-lot industrial and commercial targeted industries.

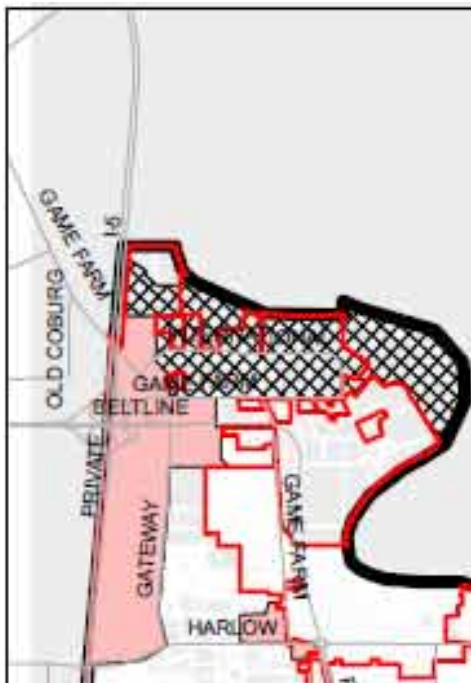
An inspection of Table 5-5 reveals that industrial and commercial site needs are *identical*, except for a provision that commercial sites "should have access to mass transit within one-half mile." This detail is important; it means that surplus industrial sites could only be deemed unsuitable for commercial use in the event the required mass transit services could not be provided.

The city's findings also imply that all 18 industrial sites in the 5-20 acre size class must be preserved to meet future industrial needs. This does not make sense; the city has already determined that 6 of these 18 industrial sites are *not* needed. The EOA's Table 5-1 states there are 6 "surplus" industrial sites in the 5-20 acre range.

A quick review of the 18 inventoried 5-20 acre industrial sites reveals that several are surrounded by commercially-zoned land and commercial uses, and would likely be ideal candidates for re-designation. For example, in the northwest corner of the city, near the Gateway shopping mall and Peace Health regional hospital, there are four vacant sites zoned for Campus Industrial uses. The entire area is served with EmX 10-minute bus rapid transit service.

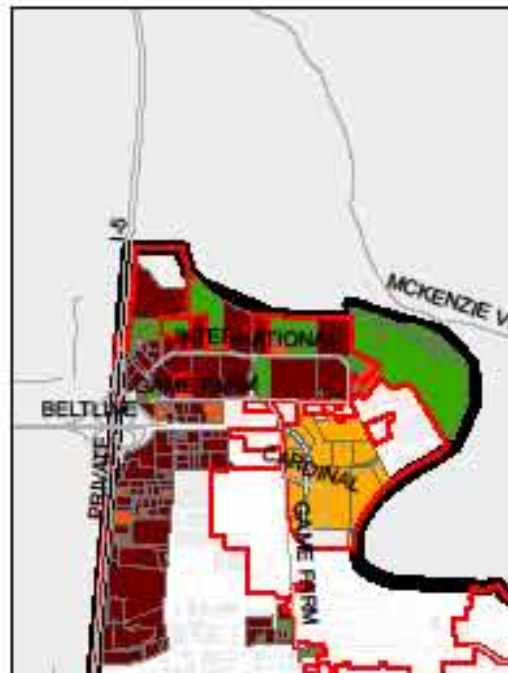
Map 2-1 denotes Campus Industrial zoning with black cross-hatching; Commercial zoning is pink. Map 2-2 denotes vacant sites with green shading.

**Map 2-1 Plan Designation**



EOA, R.80

**Map 2-2. Land by Classification.**



EOA, R.87

As examples, two of the four vacant 5-20 acre Campus Industrial sites in this area are illustrated below. The first is a 12-acre site immediately east of the Royal Caribbean call center and immediately south of the proposed UGB expansion area. The second is a 6-acre site

immediately west of the Peace Health regional hospital. It is owned by Peace Health. See pages 14 and 16 of the attachment to this letter for more information on these sites.<sup>6</sup>

Map & Taxlot # 17-03-15-00-05400



Map & Taxlot # 17-03-15-40-00800



Another option is to simply acknowledge that Springfield's Campus Industrial zone is a hybrid zone that already allows all but one (medical services) of the targeted commercial uses expected to located on 5+ acre sites.<sup>7</sup> In fact, the EOA *anticipates* that some of these commercial users will locate in the campus industrial zone:

“Large office employers are likely to locate in commercial or mixed-use zones, with some large office employers (e.g., high tech, biotech, professional or technical services, back office) locating in mixed-employment zones, such as campus industrial.” (R.157-158)

The EOA's Table 4-2 (R.136) compares the allowed uses in each plan designation with Springfield's targeted industries; an excerpt appears below. Note that the uses allowed in Campus Industrial match the city's targeted large-lot industries at least as well as those allowed in Commercial. For example, high-tech and back office functions are allowed in Campus Industrial, but are not allowed in Commercial.

<sup>6</sup> This document is in the record but was not part of the official submittal. It is discussed in meeting minutes at R.1887 and appears in the record index between submittal items 12 and 13.

<sup>7</sup> As previously noted, the targeted 5+ acre commercial uses are high tech, corporate headquarters, biotech, professional and technical services, back office, and medical services, per R.151 and R.157.

**Table 4-2. Target Industries and Plan Designations**

Target Industry	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial
Medical Services		✓	✓	?
Services for Seniors	?	✓?	✓?	?
Manufacturing	✓?	?	?	✓?
Specialty Food Processing	✓?	?	?	✓?
High-Tech	✓			?
Professional and Technical Services	✓	✓	✓	?
Call Centers	✓?	?	✓?	?
Back Office Functions	✓		✓	?
Tourism	?	✓?	✓?	?
Green Businesses	✓?	✓?	✓?	✓?
Corporate Headquarters	✓	✓	✓	?
Services for Residents	?	✓?	✓?	?
Government and Public Services	✓?	✓?	✓?	?

□

As previously noted, there are four 5-20 acre vacant Campus Industrial sites that could accommodate most of the large-lot targeted commercial uses (see also EOA Table 2-9, R.90). The city has not demonstrated why Commercial land is necessary to meet identified needs for large sites, so long as Campus Industrial property is available.

**Proposed Remedy:** The Department should remand the decision, with instructions to either: a) provide additional evidence and rationale demonstrating that the identified need for four additional 5-20 acre commercial sites cannot be met on any of the surplus 5-20 acre industrial sites; b) revise the proposal to acknowledge that the need for four 5-20 acre commercial sites can be met via re-designation of surplus industrial sites; or c) revise the proposal to acknowledge that nearly all large-lot commercial uses can be accommodated on Campus Industrial sites.

**OBJECTION 3: MASTER PLANNED VACANT SITES**

The decision violates Goal 2 (adequate factual base), OAR 660-009-0015(3), OAR 660-024-0050(4) and Goal 14 because the city improperly excluded the commercially-designated portions of two large, vacant, buildable master planned sites from inventory and thereby adopted an overly large UGB expansion.

## **Springfield's land inventory**

OAR 660-009-0015(3) requires an accurate inventory of all buildable employment land:

“(3) Inventory of Industrial and Other Employment Lands. Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

(B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and

(C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.

(b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.

(c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section 3(a) of this rule.”

The EOA explains that Chapter 2 is intended to meet the above requirements of OAR 660-009-0015(3):

“The Springfield Commercial and Industrial Buildable Lands (CIBL) inventory is intended to identify lands within the Springfield urban Growth Boundary (UGB) that are suitable for development and can accommodate employment growth. This chapter addresses the requirements of OAR 660-009-0015(3) to inventory vacant and developed lands that are designated for industrial or other employment uses.” (EOA, R.72)

An inspection of Chapter 2 reveals the following information regarding vacant sites: a summary presented in Table 2-9 (R.90); Map 2-3 (R.91), which shows the location of commercial and industrial vacant land; Map 2-4 (R.92), which shows the same vacant sites overlaid with constraints; and Map 2-5 (R.93), which shows which vacant sites have constrained areas.

Chapter 2's scant information makes it difficult to verify the status of individual vacant parcels within the inventory. Table 2-9 merely summarizes the overall number of sites and acres in each size class. Similarly, the three city-level maps are blurred when blown up to a site-level scale

and contain no numerical information or other site-specific data that would permit one to determine how individual sites were classified. However, it can at least be determined that Table 2-9 and its accompanying maps identify 4 commercial/mixed-use sites and 12 industrial sites in the 5-20 acre vacant land size class. No sites in the 20+ acre vacant land size class were found.

The situation with redevelopable property is much clearer. For these properties, the city prepared an individual list of sites; the information required by OAR 660-009-0015(3) is laid out for each site by Table 2-12 (R.101-102). Six redevelopable sites in the 5-20 acre size class and one site in the 20+ acre size class were identified.

The information in Table 2-9 and Table 2-12 matches Table 5-1 (R.145), which tallies Springfield’s total buildable land supply: 12 industrial and 4 commercial/mixed use vacant 5-20 acre sites; 6 redevelopable industrial 5-20 acre sites; and 1 redevelopable industrial 20+ acre site.

**Table 5-1. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030**

	2010	2015	2020	2030	2030
<b>Total Vacant Land Supply</b>					
Industrial	72	24	20	12	0
Commercial and Mixed Use	104	14	6	4	0
<b>Total Vacant Land Supply</b>					
Industrial	122	28	31	6	1
Commercial and Mixed Use	305	20	15	0	0
<b>Total Vacant Land Supply</b>					
Industrial	194	52	51	18	1
Commercial and Mixed Use	409	34	21	4	0
<b>Total Vacant Land Supply</b>					
Industrial	7	7	7	12	3
Commercial and Mixed Use	174	31	23	8	1
<b>Total Vacant Land Supply</b>					
Industrial					
Commercial and Mixed Use					

Source: ECONorthwest.

Note: The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

**Our CIBL recap submittal**

We accept the city’s findings as to redevelopable sites. However, we believe the vacant land inventory is incomplete. At the local level, we struggled to verify the sparse data in Table 2-9 using the information in Chapter 2 and were unable to do so. We therefore asked city staff for the supporting information that was used to create Table 2-9 and the accompanying maps. We received a Microsoft Access data file titled “CIBL\_FINAL\_LANDBASE.MDB.” This file contained the information we were looking for: the map and taxlot number of each site, the plan

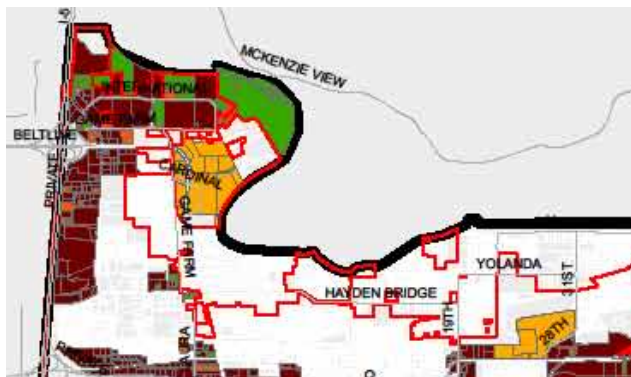
designation, the status (vacant, developed, etc), the total acres in each site, and the number of constrained acres in each site. We do not know if city staff entered this file into the record.

Using the city's Microsoft Access data, we successfully identified each 5-20 acre site listed in Table 2-9 and extracted the relevant data into a summary table. We assigned each site a number: C-1, C-2, C-3 and C-4 for the 4 commercial and mixed use sites, and I-1, I-2, I-3, etc for the 12 industrial sites. Using county tax records, we looked up the tax file for each of these 16 sites and printed it out, then labeled each printout with the appropriate site number. We next located each site on a blown-up portion of the EOA's Map 2-4 and labeled the 16 sites with their assigned numbers. We submitted all this information to the city; our submittal is attached to this letter.

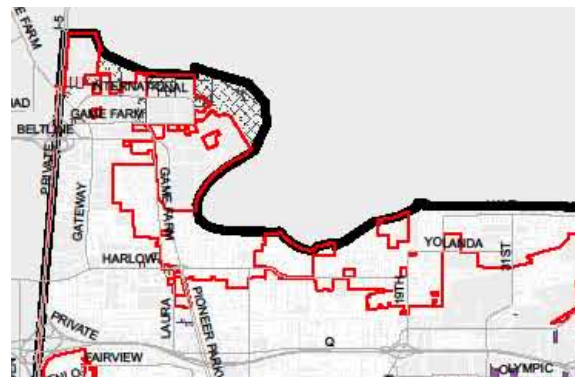
We prepared this CIBL recap to serve as an accurate accounting of every 5+ acre vacant, buildable site in the city's inventory, for use in determining whether every known site had been properly accounted for. Since our CIBL recap includes *all* vacant, buildable sites listed in Tables 2-9, 2-12 and 5-1, it follows that if other vacant sites exist, they are not included in the inventory.

### Master planned vacant sites

We did find two large, vacant, master planned sites that were not included in the EOA's inventory: the commercially-designated portions of the Marcola Meadows and Riverbend sites. These sites appear on the EOA's Map 2-2 in gold color; a portion of Map 2-2 is shown below on the left. However, they are absent from Map 2-3, which is shown on the right. Map 2-3 is titled "Vacant Industrial and Commercial Land."



Map 2-2, R.87



Map 2-3, R.91

As discussed above, we definitively identified *all* vacant and redevelopable sites in the 5+ acre size classes; these master planned sites were not among them. To review, and as shown in the above Table 5-1, the inventory contains only 4 commercial sites in the 5+ acre size classes. These 4 commercial sites are illustrated on our attached CIBL recap: see sites C-1, C-2, C-3 and C-4 on the annotated EOA Table 2-4 excerpts on pages 2,4 and 5. See also the tax printouts for each site on pages 6 through 9.

Despite their clear absence from the inventory, the EOA states that the employment portions of the Marcola Meadows and Riverbend sites *were* included:



“The inventory also includes two sites with approved master plans: Riverbend and Marcola Meadows. These sites have master plans that approve a specific amount of employment. The CIBL only inventoried the portion of these sites that are approved for employment uses.” (EOA, R.86)

“Marcola Meadows is a master-planned proposed mixed use project located on a vacant 100-acre parcel in Springfield. The project is expected to include about 190 single unit detached homes, about 120 townhouses, about 120 homes in apartments, and 54 homes for senior living. The total proposed land requirement of the residential village would be 39 acres. The Marcola Meadows Master Plan includes a commercial anchor development, professional offices and retail. The planned commercial component will occupy about 44 acres. The remaining land in the development will be used for common open space and streets.” (EOA, R.141)

Similarly, the city’s findings insist that these master planned sites were included:

“Marcola Meadows. For the purposes of the Commercial and Industrial lands inventory, the CIBL/EOA classified the 44 total commercial acres in the inventory as ‘master planned,’ based on the approved Marcola Meadows Master Plan (CIBL/EOA, pp. 19, 74). The CIBL/EOA concluded that this site does not provide a site in the 20-acre and larger category to meet identified site needs in the 2010-2030 planning period. Nothing in the approved Master Plan<sup>12</sup> requires a 20-acre site to be reserved. Instead, the Master Plan provides ‘Commercial Villages’ sites as follows:

*“Area 3 ‘Alder Plaza Professional Office’ 4.47 gross acres  
Area 4 ‘Marcola Meadows Neighborhood Retail’ 14.87 gross acres  
Area 5 ‘Marcola Meadows Main Street Retail’ 6.66 gross acres  
Area 6 ‘Marcola Meadows Community Retail’ 5.83 gross acres  
Area 7 ‘Marcola Meadows General Retail’ 13.77 gross acres*

*Total commercial villages 45.6 gross acres, 42.28 net acres.”*

\* \* \*

“CIBL/EOA Table 2-6 p. 19 shows that 161 unconstrained acres (18 tax lots) were classified as “Master Plan” in the inventory. The CIBL inventoried only the portion of the master planned sites that area approved for employment uses. Both Master Plans — Marcola Meadows and PeaceHealth River Bend — also include residential land. Master plan areas are shown in CIBL/EOA Map 2-2.” (R.889-890, emphasis in original)

It does appear that the city *intended* to include these sites. We extracted the following data from the city’s above-described Microsoft Access data file, and it does include the relevant taxlots. The below table illustrates some of the information from the Microsoft Access file, and is taken from page 1 of the our attached CIBL recap:

	Map & Taxlot	Classification	Total Acres	Constrained Acres
Riverbend	1703220000100	Master Plan	11.30	0.00
Riverbend	1703220000300	Master Plan	10.33	0.00
Riverbend	17032200003401	Master Plan	5.12	0.00
Marcola Meadows	1702300001800	Master Plan	47.69	1.54
Marcola Meadows	1703251102300	Master Plan	12.22	0.35

However, for whatever reason, the commercially-designated portions of these sites did not make it onto the Table 2-9 summary table, Maps 2-3, 2-4 and 2-5, or Table 5-1. The city does not appear to realize this.

Instead, the findings focus on trying to explain why the Marcola Meadows site, which contains well over 20 acres of contiguous, unconstrained, commercially-designated land, was counted as multiple 5-20 acre sites instead of as a 20+ acre site. That question is premature. First, the city must correct its error of failing to inventory the two master planned sites *at all*. The Microsoft Access database information presented above shows 26 acres of buildable, unconstrained commercial land at the Riverbend site, and over 40 acres at the Marcola Meadows site, but neither were credited with providing *any* 5+ acre sites in the inventory.

Once these sites are properly accounted for on remand, the city can consider how to assign site size classifications. The findings reference deed restrictions on the Marcola Meadows site, but do not explain how these restrictions could compromise the viability of a 20+ acre site:

“Although the site remains vacant at present, the approved Master Plan is still valid and deed restrictions have been recorded to ensure implementation of the Master Plan including but not limited to: Condition 13 restricting permitted uses to the uses permitted in the Mixed Use Commercial District; Condition 16 restricting limit of commercial buildings to 30 feet when located within 50 feet of LDR District west of Martin Drive; Condition 18 restricting permitted uses to those uses permitted in the Nodal Development Overlay District (SDC 3.3-1010B applicable to the Mixed Use Commercial District). The property abuts low density residential neighborhoods on 3 sides.” (Findings, R.889)

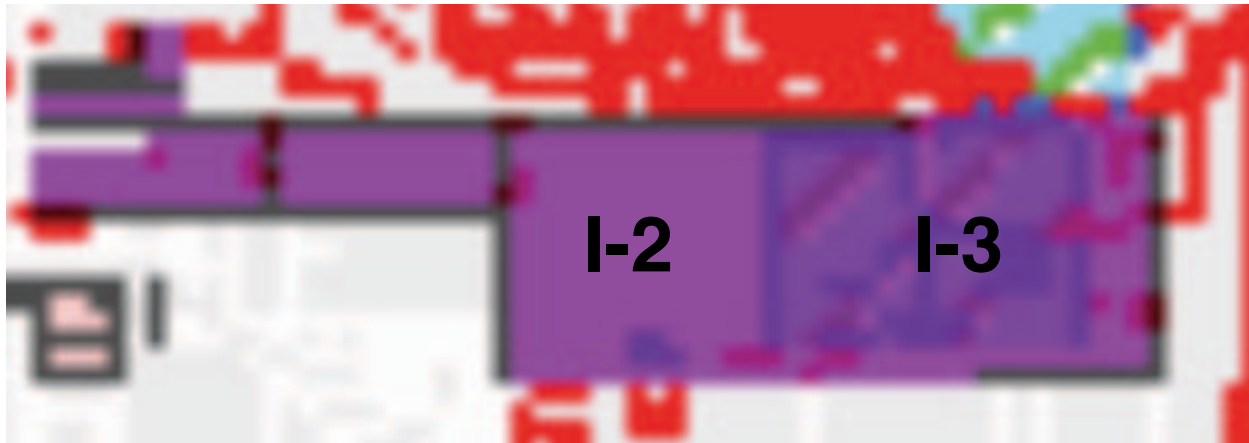
**Proposed Remedy:** The Department should remand the decision, with instructions to: a) revise the proposal to include in inventory the vacant, commercially-designated portions of the Marcola Meadows and Riverbend sites; and b) assign site size classification for these master planned sites based on consideration of the deed restrictions already placed on the property by the master planning process, along with any other relevant evidence.

#### **OBJECTION 4: INTERNATIONAL PAPER SITE**

**The decision violates Goal 2 (adequate factual base), OAR 660-009-0010(5), OAR 660-009-0015(3), OAR 660-024-0050(4) and Goal 14 because the city relied on a flawed GIS map layer that incorrectly classified uplands as jurisdictional wetland, and thereby improperly misclassified a vacant, buildable 20+ acre site and adopted an overly large UGB expansion.**

## The International Paper site

The International Paper site is hundreds of acres in size and spans several adjacent lots. Along the site's southern boundary are three contiguous vacant lots. Two of these lots are larger than 5 acres and are included in the EOA's inventory of 5+ acre vacant sites. These lots can be seen in the central portion of the EOA's Map 2-4, excerpted below and annotated with the "I-2" and "I-3" labels that we created for these two sites in our attached CIBL recap. Taxlot printouts for sites I-2 and I-3 are found on pages 11 and 12 of the recap.



Map 2-4, annotated (R.92)

Note that these lots are purple, while the improved lots located to the north are not. Map 2-4's legend states that purple denotes *vacant* Heavy Industrial land. The EOA's Table 2-9 lists four vacant Heavy Industrial sites in the inventory. The following information was retrieved from the previously discussed Microsoft Access file provided by city staff; it is taken from page 1 of our attached CIBL recap and accurately depicts all four of these inventoried Heavy Industrial sites:<sup>8</sup>

Site	Map & Taxlot	Plan Designation	Classification	Total Acres	Constrained Acres
I-1	1702310005300	Heavy Industrial	Vacant	9.88	0.34
I-2	1702320000401	Heavy Industrial	Vacant	9.66	0.17
I-3	1702320000501	Heavy Industrial	Vacant	25.07	13.58
I-10	1803010000701	Heavy Industrial	Vacant	21.02	6.73

## GIS wetland mapping error

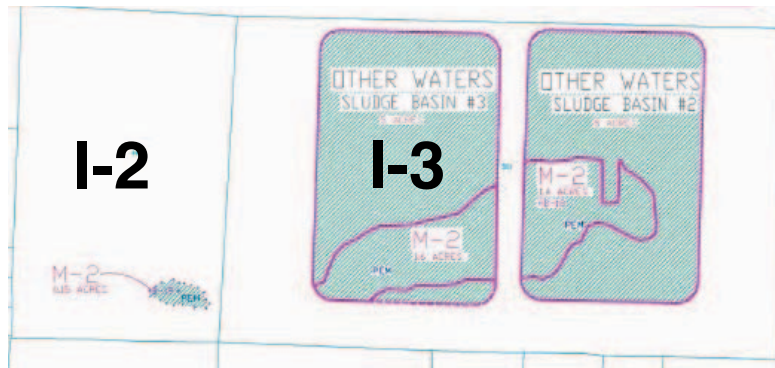
<sup>8</sup> We are reasonably certain we understand the EOA's inventory because the information presented in our CIBL recap exactly matches the EOA's. For example, Site I-1 has 9.88 total acres, less 0.34 constrained acres, equals 9.54 buildable acres. Site I-2 has 9.66 total acres, less 0.17 constrained acres, equals 9.49 buildable acres. Together, these two sites comprise 19.0 acres. That total matches Table 2-9's entry for 19.0 buildable Heavy Industrial acres in the 5.00-9.99 acre size class.

Similarly, Site I-3 has 25.07 total acres, less 13.58 constrained acres, equals 11.49 buildable acres. Site I-10 has 21.02 total acres, less 6.73 constrained acres, equals 14.29 buildable acres. Together, these two sites comprise 25.8 acres. This total matches Table 2-9's entry for 25.8 buildable Heavy Industrial acres in the 10.00-19.99 acre size class.

We concur that site I-2 has just under 10 acres of buildable land. The problem is that 13.58 of site I-3's 25.07 total acres are wrongly assumed to be constrained by wetlands, leaving only 11.49 buildable acres. In fact, there are *no* jurisdictional wetlands on site I-3; it therefore has 25.07 acres of buildable land and belongs in the 20+ acre size class, not the 5-20 acre size class. This is important because the city already has a surplus of industrial sites in the 5-20 acre size class, but a shortage of 20+ acre sites.

This problem occurred because the city used a GIS data layer that erroneously identified *every* mapped area in the city's adopted Local Wetlands Inventory (LWI) as jurisdictional wetland, even though only *some* of those mapped areas were actually identified as wetland.

In the case of site I-3, two abandoned paper mill sludge basins were mapped in the acknowledged 1998 LWI as "Other Waters" with a code of "M-2." The findings at R.892 explain that the M-2 code indicates the areas are *not* jurisdictional wetland. This is the LWI map for that area:



Findings, R.892, excerpted and annotated with I-2 and I-3 labels

The city's findings concede the GIS layer was erroneous, but then argue that the error should be excused because the inventory "was based on the best available GIS data":

"Staff reviewed the materials submitted and agrees that the City's constraints data for this parcel counted ponds shown in the Local Wetland Inventory (LWI) GIS data layer on the site as wetlands. The 2008 CIBL was based on the best available GIS data at the time, and these ponds were depicted in the LWI GIS data layer used in the inventory."  
(Findings, R.891)

However, the city's GIS wetlands layer is not an original data source; it is merely an electronic representation of the *true* data: the city's acknowledged LWI. The city's admittedly faulty GIS effort is clearly not the "best available or readily collectible information."<sup>9</sup> The paper-based LWI was and is the fundamentally correct information; if the city preferred to use GIS, it should have used more care when translating that data to electronic form.

<sup>9</sup> The city may be trying to invoke OAR 660-009-0010(5): "A jurisdiction's planning effort is adequate if it uses the best available or readily collectible information to respond to the requirements of this division."

## The city's backup arguments

After conceding the GIS mapping error, the findings put forward multiple alternate arguments, covering 10 pages, explaining that the error doesn't matter because the EOA didn't count this as a buildable site anyway (R.893-902). However, as with the Objection #3 issue of the omitted master planned lands, again the city does not seem to understand the contents of its own EOA.

As a threshold matter, we have already established that sites I-2 and I-3 were separately inventoried by the EOA as two vacant 5-20 acre sites. They are depicted on the EOA's Map 2-3 and 2-4 as vacant industrial sites. As explained in footnote 8, their buildable acreage precisely correlates with the buildable acreages shown in the EOA's Table 2-9. The city may not rely on an 11<sup>th</sup> hour re-characterization that conflicts with the facts and analysis contained in the EOA and its supporting data.

The city says it didn't treat these sites as vacant because in 2006, they had "City sewer running between 42nd and 48th Streets, rail spurs, rail cars, tanks, roads, paved areas, sawdust/wood chip stockpiles, outdoor storage, ponds/remains of ponds, and stormwater management system outfall and monitoring points." (Findings, R.894)

Not only does this assertion ignore the sites' obvious "vacant" designation on the EOA's Map 2-3 and 2-4, it also conflicts with how the EOA said it classified land:

*"Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000 are considered vacant (not including lands that are identified as having mobile homes)." (EOA, R.77)

Furthermore, the Department's interpretation of the Goal 9 rule is that things like pavement, fencing and landscaping are not "permanent buildings or improvements," and that lands containing only these types of improvements must be classified as "vacant" under OAR 660-009-0005(14).<sup>10</sup>

The city also claims it inventoried these sites *together* with the much larger taxlot to the north that contains the paper mill:

"The City assumed the Weyerhaeuser/IP site as one large industrial complex site. Adjacent tax lots or portions of tax lots that were being used in conjunction with the primary use of this industrial complex (outdoor storage, log yards, ponds, etc.) were inventoried together because they were assumed to be needed for the operations of the primary use and thus were not assumed as available inventory to meet Springfield's identified land needs." (Findings, R.893)

---

<sup>10</sup> See pages 38 and 39 of the 1/23/14 memo from DLCD director Jim Rue to LCDC that was posted as Agenda Item 4 to the February 13-14, 2014 LCDC Meeting, regarding a 13-acre paved lot that was in current use as part of a garbage hauling business.

This simply isn't true. As previously discussed, these sites are classified as "vacant" on the EOA's Map 2-3 and 2-4, and are fully accounted for as inventoried sites in Tables 2-9 and 5-1.

Also, what the city suggests would not comply with the Goal 9 rule's mandate to inventory "vacant land." OAR 660-009-0005(14)'s definition reads as follows:

"(14) 'Vacant Land' means a lot or parcel:

(a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or

(b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."

This definition is specific to each "lot or parcel," and does not permit cities to change the status of vacant sites and/or zero out their capacity by combining them with adjacent developed lands.

Finally, the city claims these sites were withheld from the inventory to "preserve" them for "expansion at the Weyerhaeuser complex heavy industrial uses." (Findings, R.897) This does not make sense. As far as the EOA's employment forecast and future land supply are concerned, it is immaterial whether new jobs are created as part of an expansion of an existing business or by a new business. Either way, the sites are used and new jobs are created. It is not necessary, or possible, to withdraw buildable vacant sites from inventory to "preserve" them for use by an adjacent business.

Despite the extensive and complicated explanations in the city's findings, this is a simple issue: a GIS mapping mistake led to the misclassification of a 20+ acre vacant sites as 5-20 acre site. This is important because the city already has a surplus of industrial sites in the 5-20 acre size class, but a shortage of 20+ acre sites.

**Proposed Remedy:** The Department should remand the decision, with instructions to revise the proposal to move site I-3 from the 5-20 acre size class to the 20+ acre size class.

## **CONCLUSION**

To recap, Springfield's decision is flawed because:

- a) There is no relevant evidence supporting the city's determination that its need for 20+ acre sites can only be met by sites that average 60+ acres in size.
- b) The city failed to demonstrate that its need for four additional 5-20 acre commercial sites cannot be met on surplus industrial sites, prior to expanding the UGB.
- c) Commercially-designated portions of two master planned sites were not inventoried.

d) A 20+ acre vacant industrial parcel was miscategorized due to a problem with the city's Goal 5 mapping that erroneously classified uplands as jurisdictional wetland.

For all these reasons, we urge the Department to remand the decision with instructions to make appropriate corrections, as noted above.

Sincerely,



Mia Nelson  
Urban Specialist  
1000 Friends of Oregon  
P.O. Box 51252  
Eugene, OR 97405  
541.520.3763

Attachment: CIBL recap, shown on record index between submitted items 12 & 13

cc:

Ed Moore, Regional Representative  
Dept. Land Conservation and Development  
via email to: [ed.w.moore@state.or.us](mailto:ed.w.moore@state.or.us)

Linda Pauly, Principal Planner  
City of Springfield Development and Public Works  
via email to: [lpaul@springfield-or.gov](mailto:lpaul@springfield-or.gov)

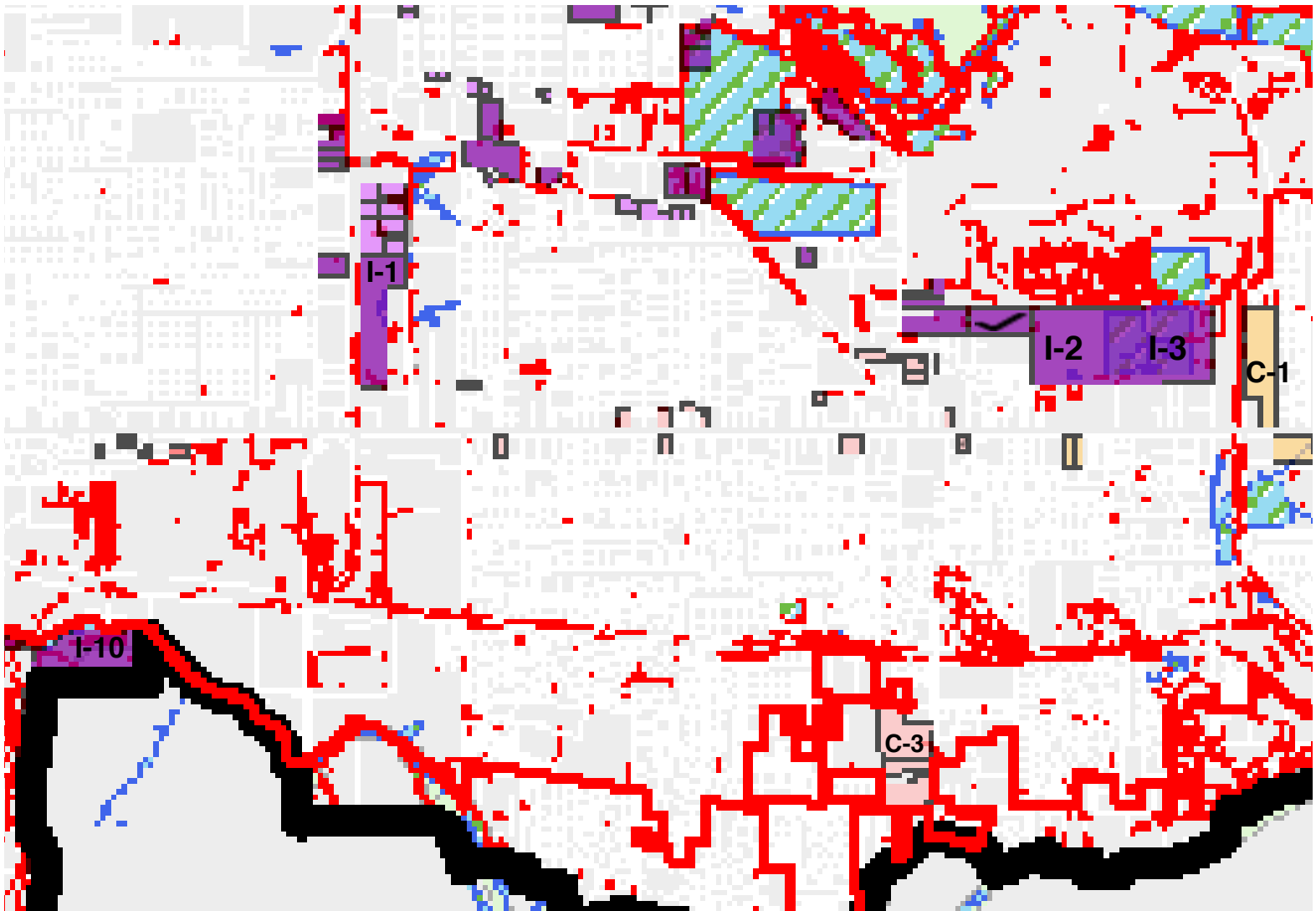
Keir Miller, Planning Supervisor  
Lane County Land Management  
via email to: [keir.miller@co.lane.or.us](mailto:keir.miller@co.lane.or.us)

**DATA TAKEN FROM MICROSOFT ACCESS FILE PROVIDED BY SPRINGFIELD STAFF  
 "CIBL\_FINAL\_LANDBASE.MDB"  
 VACANT & MASTER PLANNED LAND IN THE 6,7 & 8 SIZE CLASS**

SITE LABEL	MAPLOT	p_plandes	NEWCLASS	SIZE_CLASS	CIBL_ACRES	absolute_constraint _acres
C-1	1702324100400	Commercial Mixed Use	Vacant	6	8.48	0.00
C-2	1703344100100	LIGHT MED IND MIXED USE	Vacant	6	6.40	1.23
C-3	1802052300100	Commercial	Vacant	6	5.15	0.00
C-4	1802100001300	Commercial	Vacant	6	9.27	1.45
I-1	1702310005300	Heavy Industrial	Vacant	6	9.88	0.34
I-2	1702320000401	Heavy Industrial	Vacant	6	9.66	0.17
I-3	1702320000501	Heavy Industrial	Vacant	7	25.07	13.58
I-4	1703140001100	Campus Industrial	Vacant	6	68.35	60.81
I-5	17031500 05400	Campus Industrial	Vacant	7	12.08	1.29
I-6	1703153000400	Campus Industrial	Vacant	6	5.89	0.12
I-7	1703154000800	Campus Industrial	Vacant	6	6.40	0.05
I-8	18021000 01104	Light Medium Industrial	Vacant	7	25.23	6.23
I-9	1802100000100	Light Medium Industrial	Vacant	6	48.11	39.03
I-10	1803010000701	Heavy Industrial	Vacant	7	21.02	6.73
I-11	1803022003200	Light Medium Industrial	Vacant	7	18.59	7.61
I-12	18030313 00101	Light Medium Industrial	Vacant	6	6.45	0.33
Riverbend	1703220000100	STAFF ADDITION	Master Plan	7	11.30	0.00
Riverbend	1703220000300	STAFF ADDITION	Master Plan	7	10.33	0.00
Riverbend	1703220003401	STAFF ADDITION	Master Plan	6	5.12	0.00
Marcola Meadows	1702300001800	Campus Industrial	Master Plan	8	47.69	1.54
Marcola Meadows	1703251102300	Campus Industrial	Master Plan	7	12.22	0.35

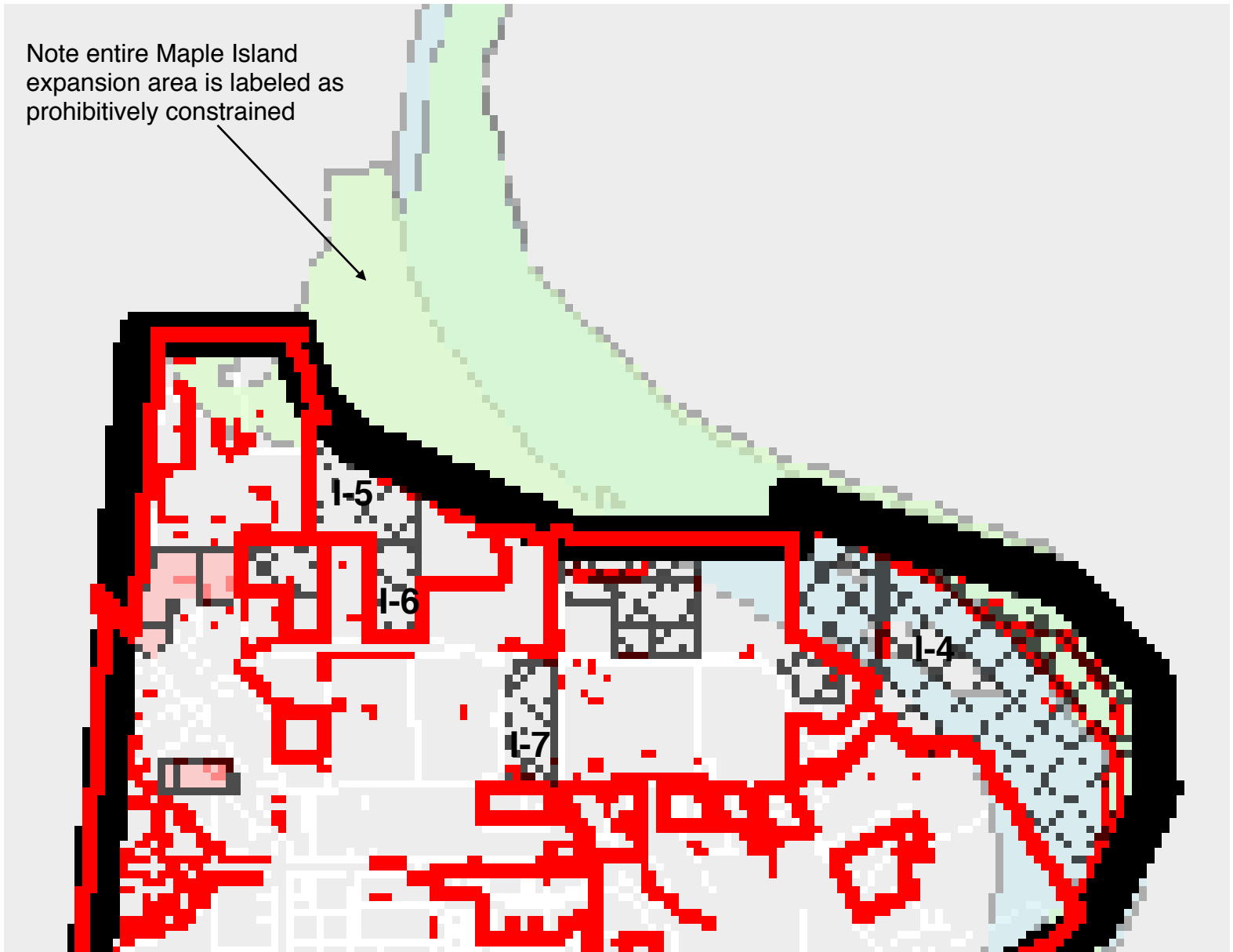


# Map 2-4 Vacant Land - Central Springfield

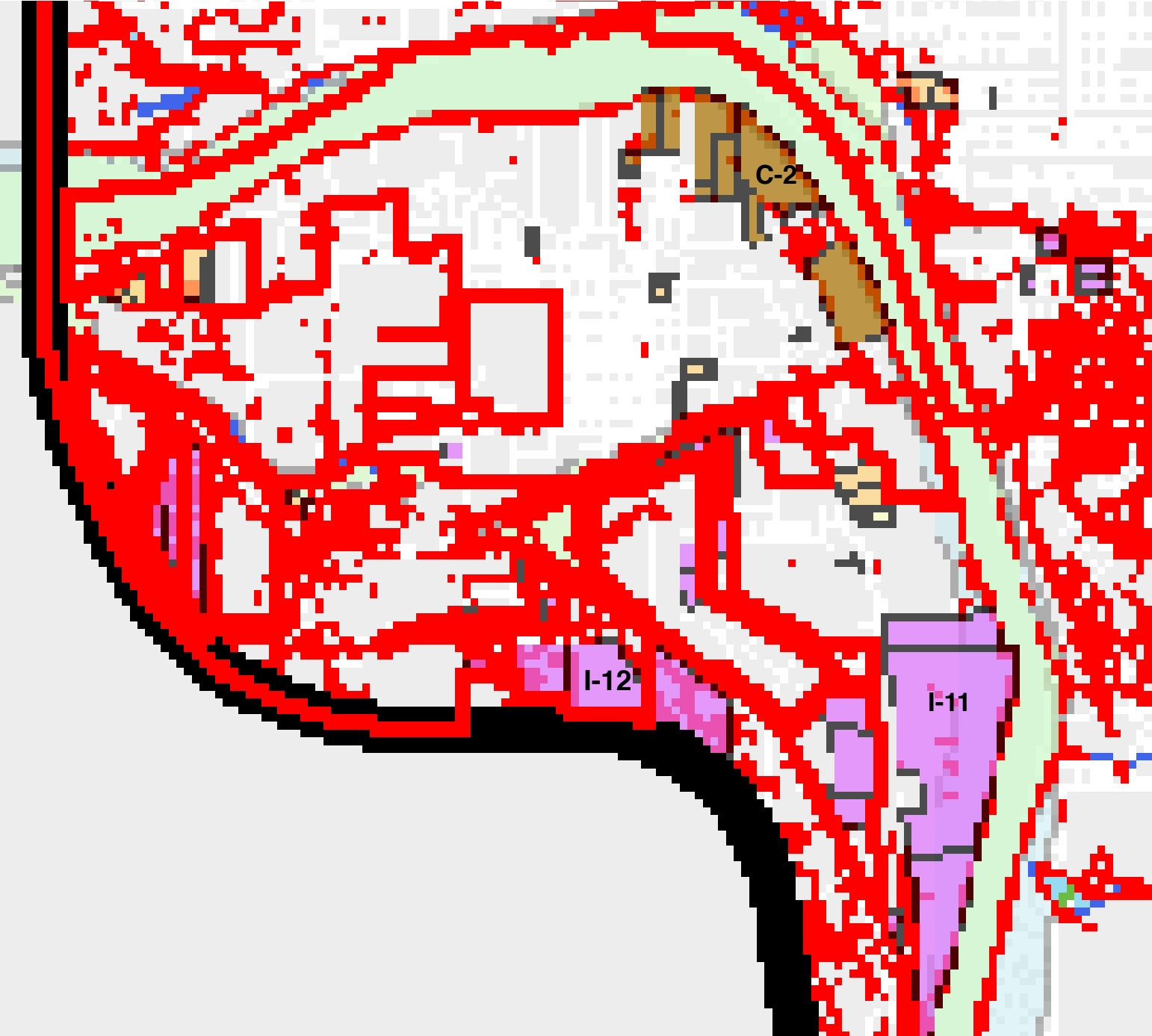


## Map 2-4 Vacant Land - Gateway Area (NW corner of map)

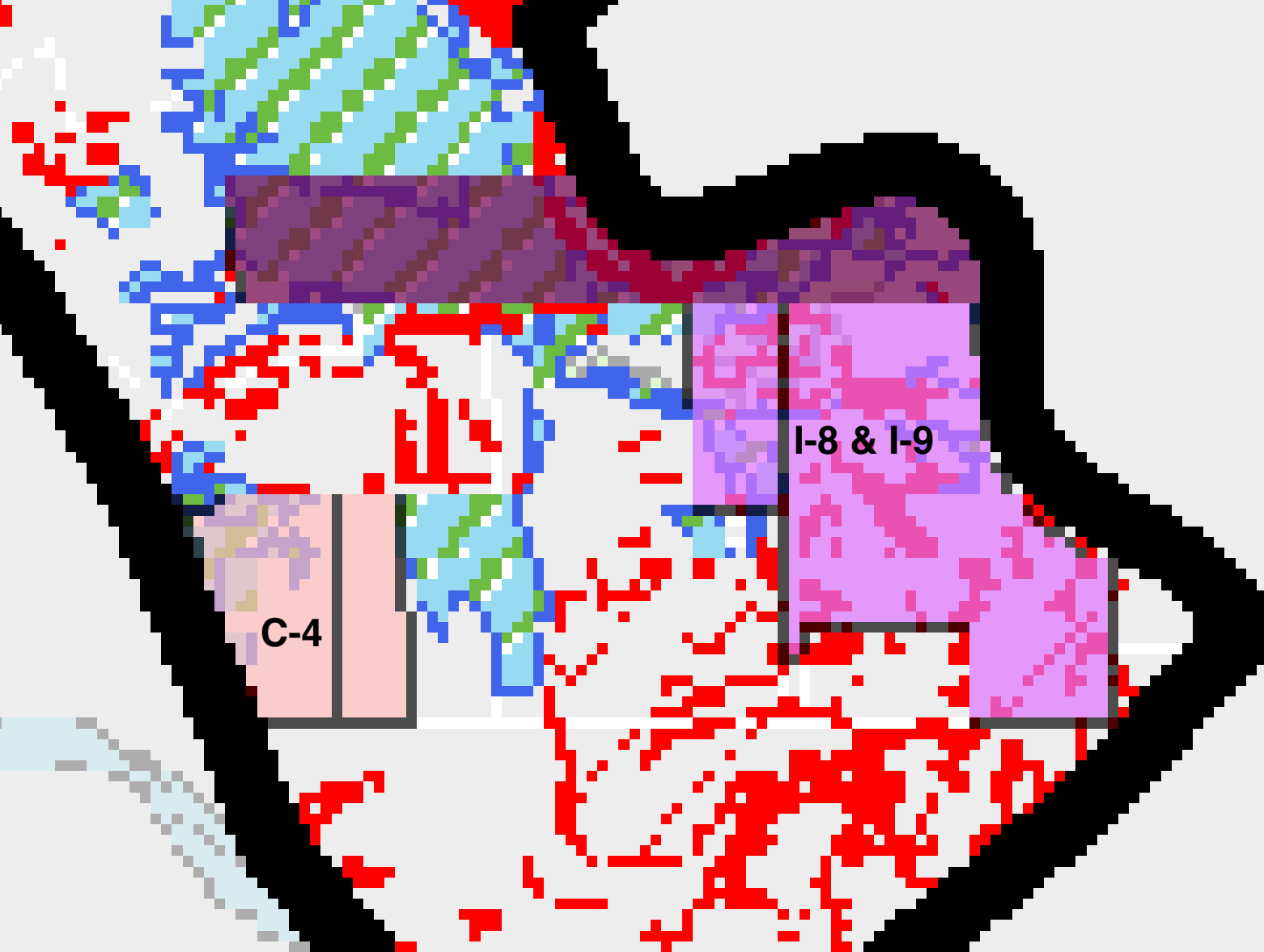
Note entire Maple Island expansion area is labeled as prohibitively constrained



Map 2-4 Vacant Land - Glenwood Area (SW corner of map)



Map 2-4 Vacant Land - Natron Area (SE corner of map)



## Detailed Property Report

**Site Address** N/A  
**Map & Taxlot#** 17-02-32-41-00400  
**SIC** N/A  
**Tax Account#** 0129161

**Property Owner 1**  
 HOUSING AUTH & COMM SRVCS AG  
 177 DAY ISLAND RD  
 EUGENE, OR 97401  
 Tax account acreage 8.51  
 Mapped taxlot acreage<sup>†</sup> 8.53

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

### Map & Taxlot # 17-02-32-41-00400



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total Assessed Value	Tax
	Land	Improvement	Total		
2016	\$851,258	\$0	\$851,258	\$209,392	\$ 0.00
2015	\$868,631	\$0	\$868,631	\$203,293	\$ 0.00
2014	\$843,332	\$0	\$843,332	\$197,372	\$ 0.00
2013	\$826,797	\$0	\$826,797	\$191,623	\$ 0.00
2012	\$826,797	\$0	\$826,797	\$186,042	\$ 0.00
2011	\$826,797	\$0	\$826,797	\$180,623	\$ 0.00
2010	\$810,586	\$0	\$810,586	\$175,362	\$ 0.00
2009	\$900,652	\$0	\$900,652	\$170,254	\$ 0.00
2008	\$874,420	\$0	\$874,420	\$165,295	\$ 0.00
2007	\$741,034	\$0	\$741,034	\$160,481	\$ 0.00
2006	\$540,901	\$0	\$540,901	\$155,807	\$ 0.00
2005	\$503,164	\$0	\$503,164	\$151,269	\$ 0.00
2004	\$453,301	\$0	\$453,301	\$146,863	\$ 0.00
2003	\$453,301	\$0	\$453,301	\$142,585	\$ 0.00
2002	\$431,716	\$0	\$431,716	\$138,432	\$ 0.00
2001	\$431,716	\$0	\$431,716	\$134,400	\$ 0.00
2000	\$407,280	\$0	\$407,280	\$130,485	\$ 0.00
1999	\$415,590	\$0	\$415,590	\$126,684	\$ 0.00
1998	\$388,400	\$0	\$388,400	\$122,994	\$ 0.00
1997	\$380,780	\$0	\$380,780	\$119,412	\$ 0.00
1996	\$355,870	\$0	\$355,870	\$355,870	\$ 0.00
1995	\$132,680	\$0	\$132,680	\$132,680	\$ 0.00

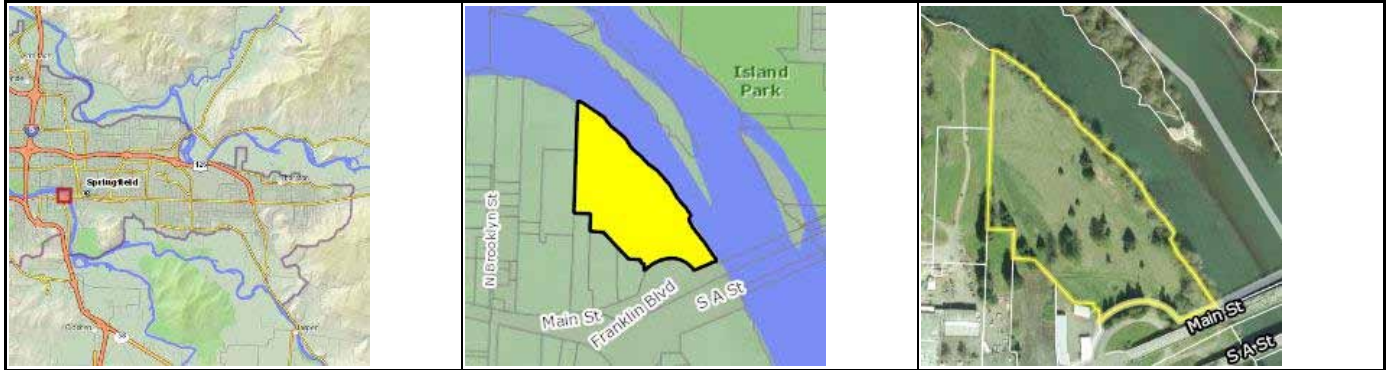
**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-03-34-41-00100  
**SIC** N/A  
**Tax Account#** 0299667

**Property Owner 1**  
 TOO BLUE LLC  
 PO BOX 2055  
 EUGENE, OR 97402  
 Tax account acreage 6.99  
 Mapped taxlot acreage† 6.41

† Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 17-03-34-41-00100**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$1,175,453	\$0		\$1,175,453	\$360,912	\$6,169.50
2015	\$1,199,442	\$0		\$1,199,442	\$350,400	\$6,013.70
2014	\$1,199,442	\$0		\$1,199,442	\$340,194	\$5,906.48
2013	\$1,153,310	\$0		\$1,153,310	\$330,285	\$5,768.69
2012	\$1,153,310	\$0		\$1,153,310	\$320,665	\$5,132.66
2011	\$1,153,310	\$0		\$1,153,310	\$311,325	\$5,037.43
2010	\$1,119,719	\$0		\$1,119,719	\$302,257	\$4,889.01
2009	\$1,166,374	\$0		\$1,166,374	\$293,453	\$4,773.01
2008	\$1,132,402	\$0		\$1,132,402	\$284,906	\$4,675.25
2007	\$984,698	\$0		\$984,698	\$276,608	\$4,517.81
2006	\$729,406	\$0		\$729,406	\$268,551	\$4,471.64
2005	\$639,830	\$0		\$639,830	\$260,729	\$4,334.78
2004	\$520,929	\$0		\$520,929	\$253,135	\$4,119.52
2003	\$505,757	\$0		\$505,757	\$245,762	\$3,772.00
2002	\$510,866	\$0		\$510,866	\$238,604	\$3,481.21
2001	\$526,666	\$0		\$526,666	\$231,654	\$3,711.17
2000	\$506,410	\$0		\$506,410	\$224,907	\$3,422.12
1999	\$429,160	\$0		\$429,160	\$218,356	\$3,306.94
1998	\$360,640	\$0		\$360,640	\$211,996	\$3,148.02
1997	\$327,850	\$0		\$327,850	\$205,821	\$3,145.87
1996	\$256,130	\$0		\$256,130	\$256,130	\$3,250.00
1995	\$228,690	\$0		\$228,690	\$228,690	\$2,966.07

**Detailed Property Report**

**Site Address** 4164 JASPER RD Springfield, OR 97478-6548  
**Map & Taxlot#** 18-02-05-23-00100  
**SIC** N/A  
**Tax Account#** 0562791<sup>a</sup>  
<sup>a</sup> Additional site address(es) are associated with this tax account

**Property Owner 1**  
 JASPER JUNCTION LLC  
 85831 PARKLANE CIR  
 PLEASANT HILL, OR 97455  
 Tax account acreage 5.28  
 Mapped taxlot acreage<sup>†</sup> 5.23

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 18-02-05-23-00100**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$855,815	\$593		\$856,408	\$189,002	\$3,381.04
2015	\$873,281	\$606		\$873,887	\$183,497	\$3,284.65
2014	\$873,281	\$606		\$873,887	\$178,152	\$3,235.06
2013	\$873,281	\$606		\$873,887	\$172,963	\$3,172.00
2012	\$873,281	\$606		\$873,887	\$167,925	\$2,878.72
2011	\$873,281	\$659		\$873,940	\$163,034	\$2,801.48
2010	\$847,846	\$640		\$848,486	\$158,285	\$2,722.12
2009	\$883,173	\$670		\$883,843	\$153,675	\$2,654.04
2008	\$857,450	\$650		\$858,100	\$149,199	\$2,609.95
2007	\$779,500	\$500		\$780,000	\$144,853	\$2,362.34
2006	\$281,850	\$151,070		\$432,920	\$150,480	\$2,456.35
2005	\$245,046	\$130,230		\$375,276	\$146,902	\$2,415.47
2004	\$199,225	\$105,880		\$305,105	\$142,623	\$2,369.14
2003	\$199,225	\$105,880		\$305,105	\$138,469	\$2,301.13
2002	\$197,253	\$104,830		\$302,083	\$134,436	\$2,102.38
2001	\$187,860	\$112,720		\$300,580	\$130,520	\$2,062.44
2000	\$187,860	\$112,720		\$300,580	\$126,718	\$2,012.60
1999	\$153,980	\$92,390		\$246,370	\$123,027	\$2,034.61
1998	\$148,060	\$93,320		\$241,380	\$119,444	\$1,387.63
1997	\$143,750	\$90,600		\$234,350	\$115,965	\$1,360.07
1996	\$136,900	\$78,100		\$215,000	\$215,000	\$2,246.13
1995	\$83,620	\$45,230		\$128,850	\$128,850	\$1,330.30

**Detailed Property Report**

**Site Address** 36400 BRAND S RD Springfield, OR 97478-9502  
**Map & Taxlot#** 18-02-10-00-01300  
**SIC** N/A  
**Tax Account#** 0567535

**Property Owner 1**  
 CORNELIUS FAMILY TRUST  
 36400 BRAND S RD  
 SPRINGFIELD, OR 97478  
 Tax account acreage 16.32  
 Mapped taxlot acreage<sup>†</sup> 17.19

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 18-02-10-00-01300**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$585,586	\$142,670		\$728,256	\$188,085	\$1,957.76
2015	\$545,264	\$107,111		\$652,375	\$182,607	\$1,906.36
2014	\$539,537	\$110,226		\$649,763	\$177,288	\$1,850.25
2013	\$539,537	\$85,296		\$624,833	\$172,124	\$1,789.09
2012	\$556,788	\$93,360		\$650,148	\$167,111	\$1,647.68
2011	\$213,454	\$103,969		\$317,423	\$162,244	\$1,616.06
2010	\$242,935	\$101,600		\$344,535	\$157,518	\$1,622.10
2009	\$301,949	\$105,230		\$407,179	\$152,930	\$1,652.62
2008	\$304,898	\$140,400		\$445,298	\$148,476	\$1,557.65
2007	\$255,660	\$129,830		\$385,490	\$144,151	\$1,528.63
2006	\$193,682	\$115,920		\$309,602	\$139,952	\$1,537.76
2005	\$160,732	\$107,330		\$268,062	\$135,876	\$1,504.20
2004	\$136,214	\$100,310		\$236,524	\$131,918	\$1,438.50
2003	\$134,866	\$95,530		\$230,396	\$128,076	\$1,344.20
2002	\$124,876	\$95,530		\$220,406	\$124,346	\$1,298.26
2001	\$123,640	\$52,200		\$175,840	\$120,724	\$1,261.05
2000	\$110,390	\$56,130		\$166,520	\$117,208	\$1,233.67
1999	\$116,200	\$56,700		\$172,900	\$113,794	\$1,173.02
1998	\$96,830	\$47,250		\$144,080	\$110,480	\$1,109.11
1997	\$96,830	\$46,320		\$143,150	\$107,262	\$1,185.01
1996	\$91,350	\$40,630		\$131,980	\$131,980	\$1,027.05
1995	\$81,560	\$37,620		\$119,180	\$119,180	\$ 931.58



## Detailed Property Report

**Site Address** N/A  
**Map & Taxlot#** 17-02-31-00-05300  
**SIC** N/A  
**Tax Account#** 1761079

**Property Owner 1**  
 ARCLIN USA LLC  
 1000 HOLCOMB WOODS PKWY STE 342  
 ROSWELL, GA 30076  
 Tax account acreage 10.01  
 Mapped taxlot acreage† 10.01

† Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

### Map & Taxlot # 17-02-31-00-05300



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total Assessed Value	Tax
	Land	Improvement	Total		
2016	\$1,240,489	\$0	\$1,240,489	\$1,240,489	\$21,514.28
2015	\$1,240,489	\$0	\$1,240,489	\$1,240,489	\$21,336.20
2014	\$1,240,489	\$0	\$1,240,489	\$1,240,489	\$21,645.33
2013	\$1,204,359	\$0	\$1,204,359	\$1,204,359	\$21,230.81
2012	\$1,204,359	\$0	\$1,204,359	\$1,204,359	\$20,095.70
2011	\$1,204,359	\$0	\$1,204,359	\$1,204,359	\$20,140.61
2010	\$1,216,525	\$0	\$1,216,525	\$1,216,525	\$20,362.93
2009	\$1,539,906	\$0	\$1,539,906	\$1,429,407	\$24,591.40
2008	\$1,412,758	\$0	\$1,412,758	\$1,387,774	\$23,761.63
2007	\$1,412,758	\$0	\$1,412,758	\$1,347,353	\$21,656.56
2006	\$1,308,110	\$0	\$1,308,110	\$1,308,110	\$20,724.91
2005	\$0	\$0	\$0	\$0	\$ 0.00

Detailed Property Report

Site Address N/A  
 Map & Taxlot# 17-02-32-00-00401  
 SIC N/A  
 Tax Account# 0126142

Property Owner 1  
 IP EAT THREE LLC  
 PO BOX 2118  
 MEMPHIS, TN 38101  
 Tax account acreage 9.48  
 Mapped taxlot acreage† 9.67

† Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

Map & Taxlot # 17-02-32-00-00401



Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$456,027	\$0		\$456,027	\$165,000	\$2,951.67
2015	\$456,027	\$0		\$456,027	\$160,194	\$2,867.52
2014	\$456,027	\$0		\$456,027	\$155,528	\$2,824.23
2013	\$442,745	\$0		\$442,745	\$150,998	\$2,769.18
2012	\$442,745	\$0		\$442,745	\$146,600	\$2,513.15
2011	\$442,745	\$0		\$442,745	\$142,330	\$2,445.71
2010	\$447,218	\$0		\$447,218	\$138,184	\$2,376.43
2009	\$566,099	\$0		\$566,099	\$134,159	\$2,316.99
2008	\$519,357	\$0		\$519,357	\$130,251	\$2,278.49
2007	\$519,357	\$0		\$519,357	\$126,457	\$2,062.32
2006	\$480,887	\$0		\$480,887	\$122,774	\$2,004.09
2005	\$429,364	\$0		\$429,364	\$119,198	\$1,959.94
2004	\$373,360	\$0		\$373,360	\$115,726	\$1,922.35
2003	\$345,704	\$0		\$345,704	\$112,355	\$1,867.16
2002	\$345,704	\$0		\$345,704	\$109,083	\$1,705.89
2001	\$342,282	\$0		\$342,282	\$105,906	\$1,673.49
2000	\$269,240	\$0		\$269,240	\$102,821	\$1,633.05
1999	\$220,690	\$0		\$220,690	\$99,826	\$1,650.91
1998	\$185,450	\$0		\$185,450	\$96,918	\$1,604.87
1997	\$180,050	\$0		\$180,050	\$94,095	\$1,598.87
1996	\$165,180	\$0		\$165,180	\$165,180	\$2,575.15
1995	\$104,550	\$0		\$104,550	\$104,550	\$1,641.07

**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-02-32-00-00501  
**SIC** N/A  
**Tax Account#** 0126167

**Property Owner 1**  
 IP EAT THREE LLC  
 PO BOX 2118  
 MEMPHIS, TN 38101  
 Tax account acreage 26.51  
 Mapped taxlot acreage<sup>†</sup> 25.07

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 17-02-32-00-00501**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$469,592	\$0		\$469,592	\$461,345	\$8,095.16
2015	\$469,592	\$0		\$469,592	\$447,908	\$7,931.31
2014	\$469,592	\$0		\$469,592	\$434,862	\$7,883.46
2013	\$455,916	\$0		\$455,916	\$422,196	\$7,723.67
2012	\$455,916	\$0		\$455,916	\$409,899	\$7,026.86
2011	\$455,916	\$0		\$455,916	\$397,960	\$6,838.31
2010	\$460,522	\$0		\$460,522	\$386,369	\$6,644.62
2009	\$582,940	\$0		\$582,940	\$375,116	\$6,478.44
2008	\$534,808	\$0		\$534,808	\$364,190	\$6,370.81
2007	\$534,808	\$0		\$534,808	\$353,583	\$5,766.41
2006	\$495,193	\$0		\$495,193	\$343,284	\$5,603.56
2005	\$442,138	\$0		\$442,138	\$333,285	\$5,480.11
2004	\$384,468	\$0		\$384,468	\$323,578	\$5,375.02
2003	\$355,990	\$0		\$355,990	\$314,153	\$5,220.72
2002	\$355,990	\$0		\$355,990	\$305,003	\$4,769.79
2001	\$352,466	\$0		\$352,466	\$296,119	\$4,679.18
2000	\$752,860	\$0		\$752,860	\$287,494	\$4,566.12
1999	\$617,100	\$0		\$617,100	\$279,120	\$4,616.06
1998	\$518,570	\$0		\$518,570	\$270,990	\$4,487.31
1997	\$503,470	\$0		\$503,470	\$263,097	\$4,470.58
1996	\$461,900	\$0		\$461,900	\$461,900	\$7,201.02
1995	\$292,330	\$0		\$292,330	\$292,330	\$4,588.55

**SITE I-4**

**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-03-14-00-01100  
**SIC** N/A  
**Tax Account#** 4137384

**Property Owner 1**  
 BRABHAM LARRY RAY  
 131 DEADMOND FERRY RD  
 SPRINGFIELD, OR 97477

See [Owner/Taxpayer section](#) for additional owners

Tax account acreage data not available  
 Mapped taxlot acreage<sup>†</sup> 70.68

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

Related Accts 149904

**Map & Taxlot # 17-03-14-00-01100**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$0	\$19,872		\$19,872	\$19,872	\$ 179.15
2015	\$0	\$18,148		\$18,148	\$18,148	\$ 161.90
2014	\$0	\$17,347		\$17,347	\$17,347	\$ 157.95
2013	\$0	\$16,300		\$16,300	\$16,300	\$ 149.08
2012	\$0	\$16,635		\$16,635	\$16,635	\$ 135.18
2011	\$0	\$17,697		\$17,697	\$17,697	\$ 146.51
2010	\$0	\$18,050		\$18,050	\$18,050	\$ 149.22
2009	\$0	\$18,590		\$18,590	\$18,590	\$ 155.18
2008	\$0	\$41,210		\$41,210	\$26,688	\$ 276.05
2007	\$0	\$40,800		\$40,800	\$25,911	\$ 266.27
2006	\$0	\$41,210		\$41,210	\$25,156	\$ 265.73
2005	\$0	\$27,940		\$27,940	\$24,423	\$ 220.61
2004	\$0	\$19,270		\$19,270	\$19,270	\$ 154.50
2003	\$0	\$18,530		\$18,530	\$18,530	\$ 149.11
2002	\$0	\$19,510		\$19,510	\$19,510	\$ 165.60
2001	\$0	\$23,510		\$23,510	\$23,510	\$ 180.24
2000	\$0	\$27,660		\$27,660	\$23,712	\$ 211.03
1999	\$0	\$26,340		\$26,340	\$23,021	\$ 199.22
1998	\$0	\$26,340		\$26,340	\$22,350	\$ 191.91
1997	\$0	\$25,820		\$25,820	\$21,699	\$ 194.53
1996	\$0	\$24,830		\$24,830	\$24,830	\$ 196.96
1995	\$0	\$24,110		\$24,110	\$24,110	\$ 195.66

**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-03-15-00-05400  
**SIC** N/A  
**Tax Account#** 1709482

**Property Owner 1**  
 CAS INVESTMENTS RICE FARMS LLC  
 PO BOX 1593  
 LAKE OSWEGO, OR 97035

See [Owner/Taxpayer section](#) for additional owners

Tax account acreage 12.07  
 Mapped taxlot acreage<sup>†</sup> 12.10

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 17-03-15-00-05400**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$2,157,614	\$0		\$2,157,614	\$10,255	\$ 108.73
2015	\$2,197,082	\$0		\$2,197,082	\$9,956	\$ 106.34
2014	\$2,197,082	\$0		\$2,197,082	\$9,666	\$ 104.87
2013	\$2,131,300	\$0		\$2,131,300	\$9,384	\$ 101.99
2012	\$2,131,300	\$0		\$2,131,300	\$9,286	\$ 91.53
2011	\$2,131,300	\$0		\$2,131,300	\$8,845	\$ 88.72
2010	\$2,157,611	\$0		\$2,157,611	\$8,588	\$ 86.10
2009	\$2,723,326	\$0		\$2,723,326	\$8,337	\$ 84.33
2008	\$2,499,671	\$0		\$2,499,671	\$8,095	\$ 81.91
2007	\$2,197,079	\$0		\$2,197,079	\$7,859	\$ 78.94
2006	\$2,026,049	\$0		\$2,026,049	\$7,630	\$ 76.14
2005	\$1,776,082	\$0		\$1,776,082	\$7,408	\$ 71.14
2004	\$1,552,428	\$0		\$1,552,428	\$7,191	\$ 65.98
2003	\$1,434,022	\$0		\$1,434,022	\$6,982	\$ 64.15

# SITE I-6

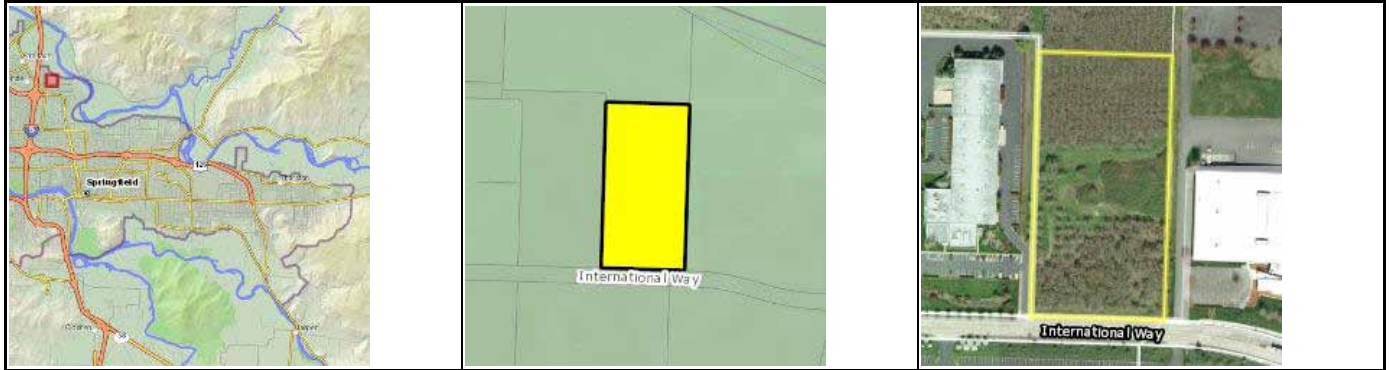
## Detailed Property Report

**Site Address** N/A  
**Map & Taxlot#** 17-03-15-30-00400  
**SIC** N/A  
**Tax Account#** 1518669

**Property Owner 1**  
 STATE INVESTMENTS LLC  
 PO BOX 1593  
 LAKE OSWEGO, OR 97035  
 Tax account acreage 5.88  
 Mapped taxlot acreage<sup>†</sup> 5.89

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

### Map & Taxlot # 17-03-15-30-00400



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total Assessed Value	Tax
	Land	Improvement	Total		
2016	\$1,619,192	\$0	\$1,619,192	\$5,108	\$ 54.16
2015	\$1,648,814	\$0	\$1,648,814	\$4,959	\$ 52.97
2014	\$1,648,811	\$0	\$1,648,811	\$4,815	\$ 52.24
2013	\$1,599,445	\$0	\$1,599,445	\$4,674	\$ 50.80
2012	\$1,599,445	\$0	\$1,599,445	\$4,627	\$ 45.61
2011	\$1,599,445	\$0	\$1,599,445	\$4,406	\$ 44.20
2010	\$1,619,185	\$0	\$1,619,185	\$4,277	\$ 42.88
2009	\$2,043,728	\$0	\$2,043,728	\$4,153	\$ 42.01
2008	\$1,875,886	\$0	\$1,875,886	\$4,031	\$ 40.79
2007	\$1,648,804	\$0	\$1,648,804	\$3,914	\$ 39.31
2006	\$1,520,453	\$0	\$1,520,453	\$3,800	\$ 39.23
2005	\$1,332,866	\$0	\$1,332,866	\$3,689	\$ 37.47
2004	\$1,165,022	\$0	\$1,165,022	\$3,581	\$ 35.08
2003	\$1,076,165	\$0	\$1,076,165	\$3,477	\$ 34.12
2002	\$1,076,165	\$0	\$1,076,165	\$3,375	\$ 34.67
2001	\$987,309	\$0	\$987,309	\$3,277	\$ 31.14
2000	\$645,761	\$0	\$645,761	\$3,181	\$ 53.85
1999	\$548,900	\$0	\$548,900	\$3,098	\$ 4.07
1998	\$461,260	\$0	\$461,260	\$3,057	\$ 25.84
1997	\$419,330	\$0	\$419,330	\$2,968	\$ 26.19
1996	\$327,600	\$0	\$327,600	\$3,550	\$ 27.72
1995	\$292,500	\$0	\$292,500	\$3,310	\$ 26.45

**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-03-15-40-00800  
**SIC** N/A  
**Tax Account#** 1518784

**Property Owner 1**  
 PEACEHEALTH  
 1115 SE 164TH AVE  
 VANCOUVER, WA 98683  
 Tax account acreage 6.31  
 Mapped taxlot acreage† 6.40

† Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 17-03-15-40-00800**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$1,655,706	\$0		\$1,655,706	\$608,027	\$12,059.91
2015	\$1,655,706	\$0		\$1,655,706	\$590,317	\$11,743.00
2014	\$1,655,706	\$0		\$1,655,706	\$573,123	\$11,658.12
2013	\$1,607,482	\$0		\$1,607,482	\$556,430	\$11,432.91
2012	\$1,607,482	\$0		\$1,607,482	\$540,223	\$10,196.22
2011	\$1,607,482	\$0		\$1,607,482	\$524,488	\$9,999.68
2010	\$1,623,720	\$0		\$1,623,720	\$509,212	\$9,739.85
2009	\$2,855,758	\$920		\$2,856,678	\$494,381	\$9,541.21
2008	\$2,619,962	\$880		\$2,620,842	\$479,982	\$9,358.74
2007	\$2,298,213	\$870		\$2,299,083	\$466,002	\$8,551.98
2006	\$2,127,975	\$720		\$2,128,695	\$452,429	\$8,437.26
2005	\$1,866,645	\$630		\$1,867,275	\$439,251	\$5,808.87
2004	\$1,623,170	\$550		\$1,623,720	\$426,457	\$5,485.94
2003	\$1,651,448	\$510		\$1,651,958	\$456,016	\$5,873.71
2002	\$1,651,448	\$450		\$1,651,898	\$442,734	\$5,379.62
2001	\$1,515,090	\$500		\$1,515,590	\$429,839	\$5,304.82
2000	\$878,820	\$610		\$879,430	\$417,319	\$4,853.21
1999	\$744,760	\$520		\$745,280	\$405,164	\$4,149.37
1998	\$625,850	\$500		\$626,350	\$393,363	\$4,531.11
1997	\$607,620	\$500		\$608,120	\$381,906	\$4,542.28
1996	\$474,700	\$500		\$475,200	\$475,200	\$4,895.52
1995	\$423,840	\$500		\$424,340	\$424,340	\$4,312.82

# SITE I-8 & I-9

## Detailed Property Report

**Site Address** N/A  
**Map & Taxlot#** 18-02-10-00-01104  
**SIC** N/A  
**Tax Account#** 1578580

**Property Owner 1**  
 DEBRA SMEJKAL WOLF REVOCABLE TRUST  
 PO BOX 2114  
 JASPER, OR 97438

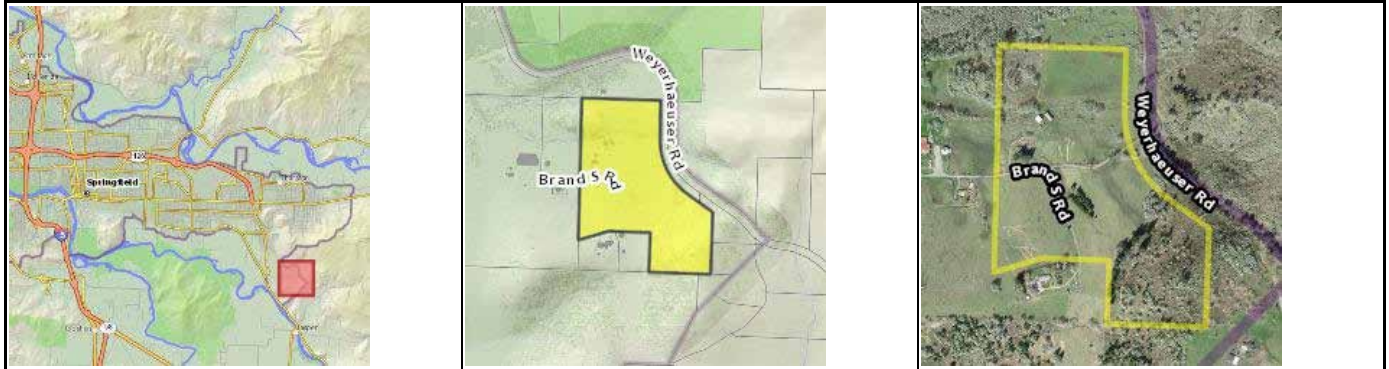
See [Owner/Taxpayer section](#) for additional owners

Tax account acreage 55.72  
 Mapped taxlot acreage<sup>†</sup> 60.46

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

Code Split - Other land tax account(s) associated with this taxlot 1342128

### Map & Taxlot # 18-02-10-00-01104



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$748,643	\$0		\$748,643	\$9,708	\$ 220.52
2015	\$744,612	\$0		\$744,612	\$9,488	\$ 210.19
2014	\$744,612	\$0		\$744,612	\$9,212	\$ 210.09
2013	\$721,341	\$0		\$721,341	\$8,941	\$ 213.52
2012	\$721,341	\$0		\$721,341	\$8,682	\$ 203.74
2011	\$721,341	\$0		\$721,341	\$8,428	\$ 194.28
2010	\$730,645	\$0		\$730,645	\$8,182	\$ 184.79
2009	\$926,103	\$0		\$926,103	\$7,946	\$ 196.09
2008	\$846,990	\$0		\$846,990	\$7,713	\$ 217.62
2007	\$721,336	\$0		\$721,336	\$9,449	\$ 192.71
2006	\$665,491	\$0		\$665,491	\$9,173	\$ 189.71
2005	\$493,300	\$0		\$493,300	\$8,907	\$ 183.09
2004	\$435,144	\$0		\$435,144	\$8,667	\$ 167.53
2003	\$467,897	\$0		\$467,897	\$6,623	\$ 144.43
2002	\$62,904	\$0		\$62,904	\$6,431	\$ 144.41
2001	\$47,591	\$0		\$47,591	\$6,250	\$ 140.17
2000	\$47,177	\$0		\$47,177	\$6,067	\$ 96.76
1999	\$49,650	\$0		\$49,650	\$5,900	\$ 135.13
1998	\$41,400	\$0		\$41,400	\$5,872	\$ 130.50
1997	\$41,400	\$0		\$41,400	\$5,701	\$ 138.85



# SITE I-10

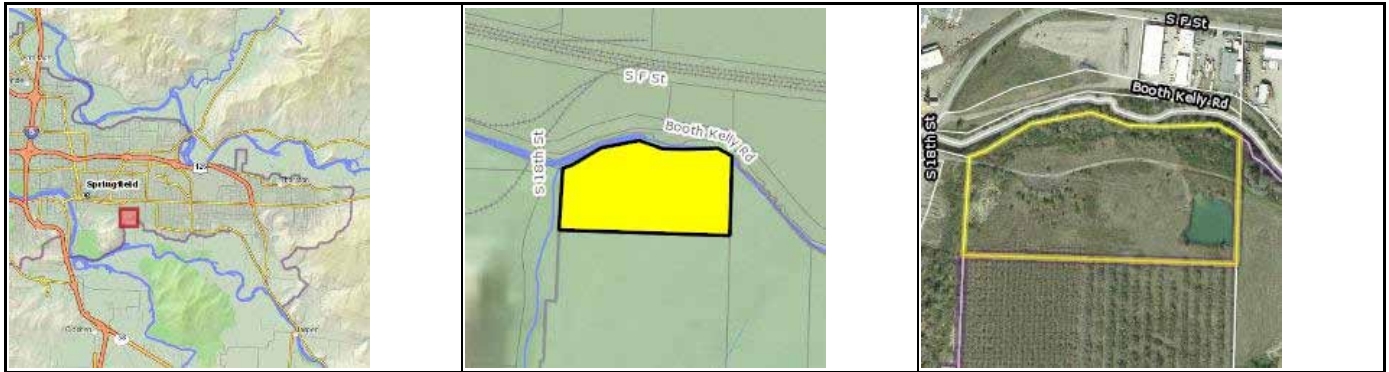
## Detailed Property Report

**Site Address** N/A  
**Map & Taxlot#** 18-03-01-00-00701  
**SIC** N/A  
**Tax Account#** 0578037

**Property Owner 1**  
 CITY OF SPRINGFIELD  
 PO BOX 300  
 SPRINGFIELD, OR 97477  
 Tax account acreage 15.99  
 Mapped taxlot acreage<sup>†</sup> 13.98

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

### Map & Taxlot # 18-03-01-00-00701



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$358,575	\$0		\$358,575	\$185,511	\$ 0.00
2015	\$358,575	\$0		\$358,575	\$180,108	\$ 0.00
2014	\$358,575	\$0		\$358,575	\$174,862	\$ 0.00
2013	\$501,840	\$0		\$501,840	\$244,726	\$2,720.28
2012	\$501,840	\$0		\$501,840	\$237,598	\$2,407.49
2011	\$501,840	\$0		\$501,840	\$230,678	\$2,342.74
2010	\$506,910	\$0		\$506,910	\$223,959	\$2,262.61
2009	\$641,659	\$0		\$641,659	\$217,436	\$2,194.73
2008	\$588,678	\$0		\$588,678	\$211,103	\$2,166.40
2007	\$588,678	\$0		\$588,678	\$204,954	\$2,079.69
2006	\$545,073	\$0		\$545,073	\$198,984	\$2,026.27
2005	\$486,673	\$0		\$486,673	\$193,188	\$1,996.58
2004	\$423,194	\$0		\$423,194	\$187,561	\$1,962.62
2003	\$391,847	\$0		\$391,847	\$182,098	\$1,901.85
2002	\$391,847	\$0		\$391,847	\$176,794	\$1,854.06
2001	\$387,968	\$0		\$387,968	\$171,645	\$1,816.93
2000	\$339,830	\$0		\$339,830	\$166,646	\$1,775.20
1999	\$257,450	\$0		\$257,450	\$161,792	\$1,755.01
1998	\$216,340	\$0		\$216,340	\$157,080	\$1,697.32
1997	\$210,040	\$0		\$210,040	\$152,505	\$1,672.98
1996	\$192,700	\$0		\$192,700	\$192,700	\$1,951.94
1995	\$169,450	\$0		\$169,450	\$169,450	\$1,777.05

# SITE I-11

## Detailed Property Report

**Site Address** 5001 FRANKLIN BLVD 1 Eugene, OR 97403-2709  
**Map & Taxlot#** 18-03-02-20-03200  
**SIC** N/A  
**Tax Account#** 0579449 <sup>a</sup>  
<sup>a</sup> Additional site address(es) are associated with this tax account

**Property Owner 1**  
 WILDISH LAND CO  
 PO BOX 40310  
 EUGENE, OR 97404  
 Tax account acreage 32.46  
 Mapped taxlot acreage<sup>†</sup> 31.27

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

### Map & Taxlot # 18-03-02-20-03200



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total Assessed Value	Tax
	Land	Improvement	Total		
2016	\$1,060,468	\$457,174	\$1,517,642	\$1,205,732	\$23,752.86
2015	\$1,611,925	\$298,419	\$1,910,344	\$1,044,387	\$19,300.61
2014	\$1,611,925	\$298,419	\$1,910,344	\$1,013,968	\$20,625.53
2013	\$1,564,976	\$289,728	\$1,854,704	\$984,435	\$20,227.09
2012	\$1,564,976	\$289,728	\$1,854,704	\$955,762	\$18,039.15
2011	\$1,564,976	\$275,932	\$1,840,908	\$927,924	\$17,691.43
2010	\$1,580,784	\$278,720	\$1,859,504	\$900,897	\$17,231.73
2009	\$2,000,993	\$352,810	\$2,353,803	\$874,657	\$14,226.30
2008	\$1,835,774	\$336,010	\$2,171,784	\$849,182	\$13,934.91
2007	\$1,835,774	\$320,010	\$2,155,784	\$824,449	\$13,465.64
2006	\$1,699,791	\$264,470	\$1,964,261	\$800,436	\$13,328.06
2005	\$1,517,671	\$236,130	\$1,753,801	\$777,122	\$12,920.12
2004	\$1,319,714	\$205,330	\$1,525,044	\$754,487	\$12,278.52
2003	\$1,221,958	\$190,120	\$1,412,078	\$732,512	\$11,242.74
2002	\$1,221,958	\$166,770	\$1,388,728	\$711,177	\$10,376.00
2001	\$1,209,860	\$183,260	\$1,393,120	\$690,463	\$11,061.42
2000	\$1,098,830	\$176,210	\$1,275,040	\$670,352	\$10,199.87
1999	\$931,210	\$149,330	\$1,080,540	\$650,827	\$9,856.58
1998	\$782,530	\$149,330	\$931,860	\$631,871	\$9,382.91
1997	\$711,390	\$158,860	\$870,250	\$613,467	\$9,376.48
1996	\$555,770	\$172,670	\$728,440	\$728,440	\$9,243.11
1995	\$496,220	\$185,410	\$681,630	\$681,630	\$8,840.61

# SITE I-12

## Detailed Property Report

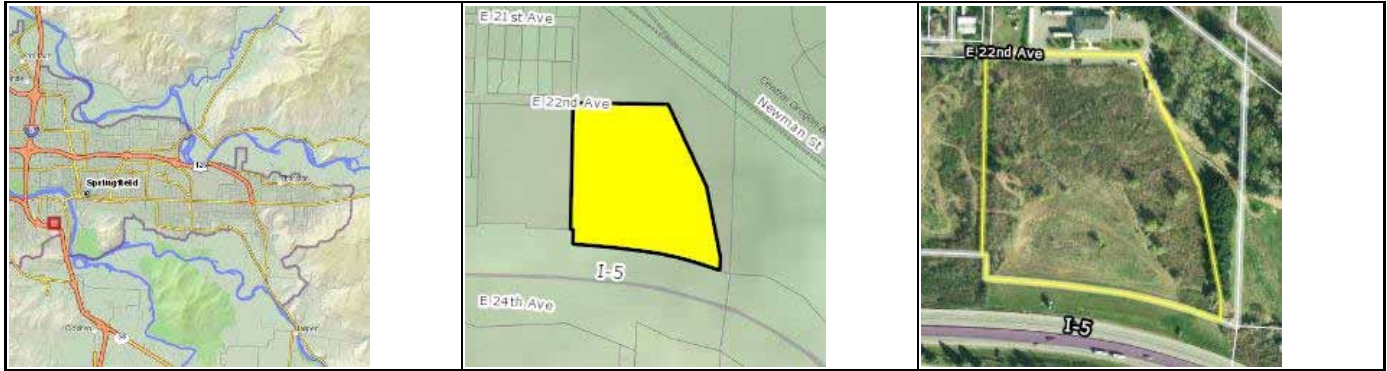
**Site Address** N/A  
**Map & Taxlot#** 18-03-03-13-00101  
**SIC** N/A  
**Tax Account#** 0582021

**Property Owner 1**  
 CITY OF SPRINGFIELD  
 PO BOX 300  
 SPRINGFIELD, OR 97477  
 Tax account acreage 6.48  
 Mapped taxlot acreage† 6.44

† Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

Related Accts 1508223 1508231

### Map & Taxlot # 18-03-03-13-00101



### Property Values & Taxes

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$903,258	\$0		\$903,258	\$341,387	\$ 0.00
2015	\$643,026	\$0		\$643,026	\$331,444	\$ 0.00
2014	\$643,026	\$0		\$643,026	\$321,790	\$6,545.66
2013	\$624,298	\$0		\$624,298	\$312,417	\$6,419.20
2012	\$624,298	\$0		\$624,298	\$303,317	\$5,724.84
2011	\$624,298	\$0		\$624,298	\$294,483	\$5,614.50
2010	\$630,605	\$0		\$630,605	\$285,906	\$5,468.61
2009	\$798,235	\$0		\$798,235	\$277,579	\$5,357.08
2008	\$732,326	\$0		\$732,326	\$269,494	\$5,254.62
2007	\$732,326	\$0		\$732,326	\$261,645	\$4,801.66
2006	\$678,080	\$0		\$678,080	\$254,024	\$4,737.24
2005	\$605,429	\$0		\$605,429	\$246,625	\$4,584.98
2004	\$526,460	\$0		\$526,460	\$239,442	\$4,376.71
2003	\$487,463	\$0		\$487,463	\$232,468	\$4,262.77
2002	\$487,463	\$0		\$487,463	\$225,697	\$4,027.11
2001	\$482,637	\$0		\$482,637	\$219,123	\$3,745.71
2000	\$479,020	\$0		\$479,020	\$212,741	\$3,739.86
1999	\$405,950	\$0		\$405,950	\$206,545	\$3,447.81
1998	\$341,130	\$0		\$341,130	\$200,529	\$3,248.85
1997	\$310,120	\$0		\$310,120	\$194,688	\$3,302.38
1996	\$242,280	\$0		\$242,280	\$242,280	\$3,721.13
1995	\$216,320	\$0		\$216,320	\$216,320	\$3,391.28

# MARCOLA MEADOWS

**EASY MAP**

Explore Create

Pan Zoom In Zoom Out Full Extent Previous Extent Next Extent

Navigation

Enable Map Tips

Display for...

Map Tips

Search For Taxlot/Address Search

Select By Point Select By Freehand Select By Line Select By Polygon Select By Rectangle

Taxlot Selection

Get T From Ac

★ Selected Results (2)

<< View History View Selected >>

Refine Results | Table View | Select All | Select None

★ **1702300001800**

**Taxlot**

Map & Taxlot Number: 1702300001800

Site Address 1 of 0:

Tax Account Number 1: 113785

Property Owner 1: MIDFIRST BANK

Approximate Taxlot Acreage: 46.68

RLID Reports: Other Links:

★ **1703251102300**

**Taxlot**

Map & Taxlot Number: 1703251102300

Site Address 1 of 0:

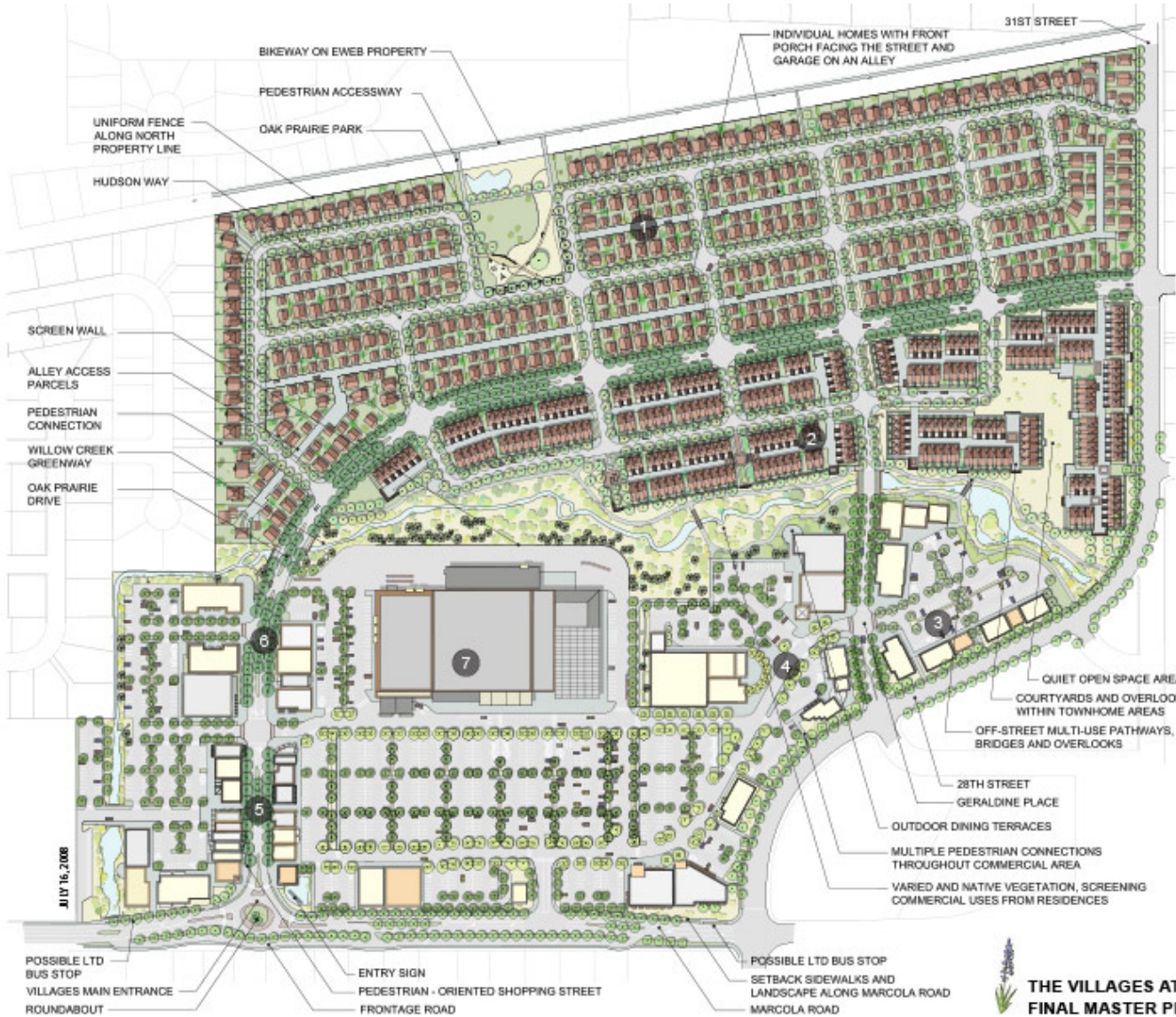
Tax Account Number 1: 1517653

Property Owner 1: MIDFIRST BANK

Approximate Taxlot Acreage: 53.89

RLID Reports: Other Links:

I want to...



**RESIDENTIAL VILLAGES**

- ① OAK PRAIRIE HOMES
- ② WILLOW CREEK TOWN HOMES

**COMMERCIAL VILLAGES**

- ③ ALDER PLAZA PROFESSIONAL OFFICE
- ④ MARCOLA MEADOWS NEIGHBORHOOD RETAIL
- ⑤ MARCOLA MEADOWS MAIN STREET RETAIL
- ⑥ MARCOLA MEADOWS COMMUNITY RETAIL
- ⑦ MARCOLA MEADOWS GENERAL RETAIL



**THE VILLAGES AT MARCOLA MEADOWS  
FINAL MASTER PLAN**



**Detailed Property Report**

**Site Address** N/A  
**Map & Taxlot#** 17-03-22-00-03401  
**SIC** N/A  
**Tax Account#** 1773272

**Property Owner 1**  
 PEACEHEALTH  
 1115 SE 164TH AVE  
 VANCOUVER, WA 98683  
 Tax account acreage 5.12  
 Mapped taxlot acreage<sup>†</sup> 5.12

<sup>†</sup> Mapped Taxlot Acreage is the estimated size of a taxlot as derived from the county GIS taxlot layer, and is not to be used for legal purposes.

**Map & Taxlot # 17-03-22-00-03401**



**Property Values & Taxes**

The values shown are the values certified in October unless a value change has been processed on the property. Value changes typically occur as a result of appeals, clerical errors and omitted property. The tax shown is the amount certified in October. This is the full amount of tax for the year indicated and does not include any discounts offered, payments made, interest owing or previous years owing. It also does not reflect any value changes.

Year	Real Market Value (RMV)			Total	Total Assessed Value	Tax
	Land	Improvement				
2016	\$3,236,487	\$0		\$3,236,487	\$1,785,303	\$35,410.59
2015	\$3,204,443	\$0		\$3,204,443	\$1,733,304	\$34,480.10
2014	\$3,204,443	\$0		\$3,204,443	\$1,682,819	\$34,230.89
2013	\$3,204,443	\$0		\$3,204,443	\$1,633,805	\$33,569.63
2012	\$3,204,443	\$0		\$3,204,443	\$1,586,218	\$29,938.44
2011	\$3,204,443	\$0		\$3,204,443	\$1,540,017	\$29,361.35
2010	\$3,111,110	\$0		\$3,111,110	\$1,495,162	\$28,598.41
2009	\$3,111,110	\$0		\$3,111,110	\$1,451,614	\$28,015.13
2008	\$3,020,496	\$0		\$3,020,496	\$1,409,334	\$27,479.34
2007	\$2,745,906	\$0		\$2,745,906	\$1,368,285	\$25,110.49
2006	\$0	\$0		\$0	\$0	\$ 0.00