

The last step in the analysis is to add in public and semi-public land needs. Table 6-7 shows the reconciliation of land need and supply. The results show that Springfield has an overall surplus of residential land, but has deficits in the High-Density Residential and Parks and Open Space categories.

Table 6-7. Reconciliation of land need and supply, Springfield UGB, 2010

Plan Designation	Residential Land Surplus/Deficit (From Table 6-6)	Public/Semi- Public Land Need	Total Surplus/ Deficit
Low Density Residential	455	77	378
Medium Density Residential	93	17	76
High Density Residential	-21	7	-28
Parks and Open Space		300	-300
Government/Employment		62	Met through land need in EOA
Total	527	463	126

Source: ECONorthwest

The results lead to the following findings:

- The Low Density Residential designation has a *surplus* of approximately 378 gross acres.
- The Medium Density Residential designation has a *surplus* of approximately 76 gross acres.
- The High Density Residential designation has a *deficit* of approximately 28 gross acres. At a minimum, the City will meet the deficit of 411 dwellings (21 acres) through land its redevelopment strategies in Downtown and Glenwood. The additional seven acres of public/semi-public land is intended to provide public open space for the higher density development, as well as any needed public facilities. This need could potentially be met through a variety of approaches—from designating seven additional acres high-density residential to ensuring that land designated park and open space is provided adjacent to high density residential developments.
- The Parks and Open Space designation has a *deficit* of 300 acres. This need does not imply that the City should expand the UGB for parks and open space. The City has a surplus of buildable lands in the low and medium density residential plan designations that can provide land for future parks within those designations, consistent with the objectives of the adopted Park and Recreation Comprehensive Plan. A portion of the parks and open space need can also be met on residentially designated land that has constraints and therefore is not counted as buildable acres (e.g., ridgeline trail systems). Since no surplus of land designated for high density residential uses exists, the 21-acre high density residential plan

designation deficit has been increased by seven (7) acres to provide parkland immediately adjacent to the proposed high density residential district.

- Government and employment land needs will be met through existing lands or land needs identified in the Springfield Economic Opportunities Analysis.

Context for Assessing Housing Needs

Appendix A

WHAT IS AFFORDABLE HOUSING?

The terms “affordable” and “low-income” housing are often used interchangeably. These terms, however, have different meanings:

- *Affordable housing* refers to households’ ability to find housing within their financial means. Households that spend more than 30% of their income on housing and certain utilities are considered to experience *cost burden*.²⁸ As such, any household that pays more than 30% experiences cost burden and does not have *affordable* housing. Thus, affordable housing applies to all households in the community.
- *Low-income housing* refers to housing for “low-income” households. HUD considers a household low-income if it earns 80% or less of median family income. In short, low-income housing is targeted at households that earn 80% or less of median family income.

These definitions mean that any household can experience cost burden and that affordable housing applies to all households in an area. Low-income housing targets low-income households. In other words, a community can have a housing affordability problem that does not include only low-income households.

It is important to underscore the point that many households that experience cost burden have jobs and are otherwise productive members of society. A household earning 80% of median family income in Springfield earns about \$39,000 annually—or about \$18.50 per hour for a full-time employee. The maximum affordable purchase price for a household earning \$39,000 annually is about \$120,000. Depending on household size, many of these households are eligible for government housing assistance programs.

In summary, any household can face housing affordability problems. Because they have more limited financial means, the incidence of cost burden is higher among low-income households. Statewide planning Goal 10 requires cities to adopt policies that encourage housing at price ranges commensurate with incomes. In short, state land use policy does not distinguish between households of different income levels and requires cities to adopt policies that encourage housing for all households.

²⁸ Cost burden is a concept used by HUD. Utilities included with housing cost include electricity, gas, and water, but do not include telephone expenses.

WHAT OBJECTIVES DO HOUSING POLICIES TYPICALLY TRY TO ACHIEVE?

The *Practice of State and Local Planning*²⁹ classifies goals that most government housing programs address into four categories:

- *Community life.* From a community perspective, housing policy is intended to provide and maintain safe, sanitary, and satisfactory housing with efficiently and economically organized community facilities to service it. In other words, housing should be coordinated with other community and public services. Although local policies do not always articulate this, they are implicit in most local government operations. Comprehensive plans, zoning, subdivision ordinances, building codes, and capital improvement programs are techniques most cities use to manage housing and its development. Local public facilities such as schools, fire and police stations, parks, and roads are usually designed and coordinated to meet demands created by housing development.
- *Social and equity concerns.* The key objective of social goals is to reduce or eliminate housing inadequacies affecting the poor, those unable to find suitable housing, and those discriminated against. In other words, communities have an obligation to provide safe, satisfactory housing opportunities to all households, at costs they can afford, without regard to income, race, religion, national origin, family structure, or disability.
- *Design and environmental quality.* The location and design of housing affect the natural environment, residents' quality of life, and the nature of community life. The objectives of policies that address design and environmental quality include neighborhood and housing designs that meet: household needs, maintain quality of life, provide efficient use of land and resources, reduce environmental impacts, and allow for the establishment of social and civic life and institutions. Most communities address these issues through local building codes, comprehensive land use plans, and development codes.
- *Stability of production.* Housing is a factor in every community's economy. The cyclical nature of housing markets, however, creates uncertainties for investment, labor, and builders. The International City Manager's Association suggests that local government policies should address this issue—most do not. Moreover, external factors (e.g. interest rates, cost of building materials, etc.) that bear upon local housing markets tend to undermine the effectiveness of such policies.

Despite the various federal and state policies regulating housing, most housing in the U.S. is produced by private industry and is privately owned. While the land

²⁹ *The Practice of Local Government Planning, 2nd Edition*. International City Managers Association, 1988.

use powers of local government have been an important factor in the production of housing, the role of local government has largely focused on regulation for public health and safety and provision of infrastructure. More recently, awareness has grown regarding the impact policies and regulations have had on the other aspects of community life such as costs of transportation and other infrastructure, access of residents to services and employment, and social interactions.

DEMAND VERSUS NEED

The language of Goal 10 and ORS 197.296 refers to housing *need*: it requires communities to provide needed housing types for households at all income levels. Goal 10's broad definition of need covers all households—from those with no home to those with second homes. State policy, however, does not make a clear distinction between need and demand. Following is our definition, which we believe to be consistent with definitions in state policy:

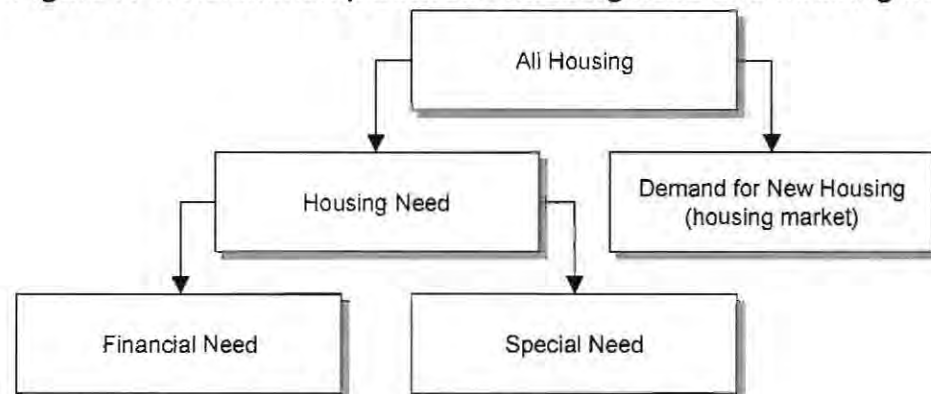
- *Housing need* can be defined broadly or narrowly. The broad definition is based on the mandate of Goal 10 that requires communities' plan for housing that meets the needs of households at all income levels. Thus, Goal 10 implies that everyone has a housing need because everyone needs housing. However, definition used by public agencies that provide housing assistance (primarily the Department of Housing and Urban Development – HUD, and the Oregon Housing and Community Services Department – HCS) is more narrow. It does not include most of the households that can purchase or rent housing consistent with the requirements of their household size for a price that is affordable. Households that cannot find and afford such housing have need: they are either unhoused, in housing of substandard condition, overcrowded, or paying more than their income and federal standards say they can afford.
- *Housing market demand* is what households demonstrate they are willing to purchase in the market place. Growth in population leads to a growth in households and implies an increase in demand for housing units that is usually met primarily by the construction of new housing units by the private sector based on developers' best judgments about the types of housing that will be absorbed by the market. ORS 197.296 includes a market demand component: buildable land needs analyses must consider the density and mix of housing developed over the previous five years or since their most recent periodic review, whichever is greater.

In short, a housing needs analysis should make a distinction between housing that people might need (housing needs) and what the market will produce (housing market demand).

Figure A-1 shows a schematic that distinguishes between housing needs that are unmet and those that are met via market transactions. All housing need is the total number of housing units required to shelter the population. In that sense, it is approximately the number of households: every household needs a dwelling place. But some of that need is met through market transactions without much

government intervention because households have the income to *demand* (purchase) housing services (as owners or renters). That demand is shown in the box on the right. Other households, however, have needs unmet, usually because they lack the resources to purchase housing services (financial need), but because of special needs as well (though, even here, the issue is still one of financial resources).

Figure A-1. Relationship between housing need and housing demand



Most housing market analyses and housing elements of comprehensive plans in Oregon make forecasts of new demand (what housing units will get built in response to market forces). Work by housing authorities is more likely address housing need for special classes, especially low-income. It is the role of cities under Goal 10 to adopt and implement land use policies that will encourage provision of housing units that meet the needs of all residents.

It is unlikely that housing markets in any metropolitan area in the US provide housing to meet the needs of every household. Even many upper-income households probably believe they "need" (want) more housing than their wealth and income allows them to afford. Goal 10 does not require communities address the housing "want" of residents.

More important, however, are more basic housing needs. At the extreme there is homelessness: some people do not have any shelter at all. Close behind follows substandard housing (with health and safety problems), space problems (the structure is adequate but overcrowded), and economic and social problems (the structure is adequate in quality and size, but a household has to devote so much of its income to housing payments that other aspects of its quality of life suffer). Location can also be a burden—households that live further from work and shopping opportunities will have to spend more money on transportation. Moreover, while some new housing is government-assisted housing, public agencies do not have the financial resources to meet but a small fraction of that need. New housing does not, and is not likely to, fully address all these needs because housing developers, like any other business, typically try to maximize their profits.

In fact, many of those needs are much more likely to be satisfied by existing housing: the older, used stock of structures that is usually less expensive per square foot than new housing. Thus, forecasting the type of new units that might be built in a region (by type, size, and price) is unlikely to bear any relationship to the type of housing to which most people with acute housing needs will turn to solve their housing problems. One key reason for this is the dynamics associated with housing construction. The cost of building new housing is largely prohibitive for building dwelling units affordable to low-income households. This “trickle-down” effect is well known among housing specialists. In most communities a quick comparison of new home prices with income distributions will underscore the fact that developers tend to focus on the move-up market and not on entry-level housing.

Viewed in the light of those definitions (e.g., housing demand and housing need), the requirements of Goal 10 need clarification. Goal 10 mandates that communities plan for housing that meets the needs of households at all income levels. Thus, Goal 10 implies that everyone has a housing need. As we have noted, however, it is hard to justify spending public resources on the needs of high-income households: they have the income to purchase (demand) adequate housing services in the housing market. The housing they can afford may not be everything they want, but most policymakers would agree that the difference does not classify as the same kind of need that burdens very-low-income households.

This study is not the place to resolve debates about definitions of housing need and the purposes of Goal 10. Here are our assumptions about the distinction between demand and need in the rest of this study:

- Our analysis of need addresses the Goal 10 requirements regarding financial need (ability to obtain housing) as they relate to future households and to those households whose circumstances suggest that they will have special problems in finding adequate and affordable housing services. That analysis occurs after, and largely independent of, the forecast of new housing that is likely to be built to supply effective demand.
- Our forecast includes a comparison of demand for new housing: what kind of housing of what type is likely to get built in the region over the next 20 years. The baseline forecast is the housing “demand” forecast, the alternative forecast is the housing “need” forecast.

In summary, Goal 10 intends that cities identify housing need and develop a land use policy framework that meets identified needs. One of the key issues that gets addressed in a housing needs analysis is to determine how much land is needed for different housing types, and therefore must be designated for different housing types. Providing sufficient land in the proper designations is one of the most fundamental land use tools local governments have to meet housing need.

National Housing Trends

The overview of national, state, and local housing trends builds from previous work by ECO and conclusions from *The State of the Nation's Housing, 2008* report from the Joint Center for Housing Studies of Harvard University. The Harvard report summarizes the national housing outlook for the next decade as follows:

“Housing markets contracted for a second straight year in 2007. The national median single-family home price fell in nominal terms for the first time in 40 years of recordkeeping, leaving several million homeowners with properties worth less than their mortgages. With the economy softening and many home loans resetting to higher rates, an increasing number of owners had difficulty keeping current on their payments. Mortgage performance—especially on subprime loans with adjustable rates—eroded badly. Lenders responded by tightening underwriting standards and demanding a higher risk premium, accelerating the ongoing slide in sales and starts.

“It is still uncertain how far, and for how long, the housing crisis will drive down household growth. Regardless, given the solid underpinnings of long-term demand—including the recent strength of immigration and the aging of the echo-boom generation into young adulthood—household growth will pick up again once the economy recovers. But if the nation suffers a prolonged economic downturn that results in lower immigration and more doubling up, household growth in 2010-2020 may fall short of the 14.4 million level currently projected.

This evaluation presents a bleak outlook for housing markets and for homeownership in the short-term brought on by the subprime mortgage crisis. However, the image painted of the future looks brighter, as the increase in housing demand is naturally induced by the growth of the population in the necessary age groups.

Long run trends in home ownership and demand

Last year (2007) was a continuation of the significant departure from the recent housing boom that had lasted for 13 consecutive years (1992-2005). While strength in early 2005 pushed most national housing indicators into record territory, the market began to soften and sales slowed in many areas in the latter half of 2005. By 2006, higher prices and rising interest rates had a negative impact on market demand. Investor demand, home sales and single-family starts dropped sharply. Growth in national sales prices also slowed. By 2007 and early 2008, housing market problems had reached the rest of the economy, resulting in a nationwide economic slowdown and fear of recession. After 12 successive years of increases, the national homeownership rate slipped in 2005, again in 2006 to 68.8%, and again in 2007 to 68.1%.

The Joint Center for Housing Studies concludes that the cooling housing market in 2006 had an immediate impact on homeownership. Increasing interest rates and decreasing housing affordability contributed to the recent market correction. Homebuilders could not react quickly enough to changing market conditions, resulting in an oversupply of housing and a rising inventory of unsold homes. The Joint Center for Housing Studies predicts that once the corrections made to work off the housing oversupply and prices start to recover, a return to traditional mortgage products and the strength of natural demand will invigorate the homeownership rate. The long-term market outlook shows that homeownership is still the preferred tenure. Over the next decade, 88% of net household growth is expected to come from gains in the number of homeowners. While further homeownership gains are likely during this decade, they are not assured. Additional increases depend, in part, on finding ways to ease the difficulties faced by low and moderate income households in purchasing a home. It also rests on whether the conditions that have led to homeownership growth can be sustained.

From 2000 to 2005 housing starts and manufactured home placements appeared to have been roughly in line with household demand. In 2005, with demand for homes falling but construction coming off record levels, the surplus of both new and existing homes was much higher than in recent years. In late 2007 and early 2008, the excess supply of new single-family homes retreated by about 12%, though the simultaneous drop in sales left the supply at 11 months, a figure not seen since the 1970s. This resulted in a strong buyer's market, leaving many homes lingering on the market and forcing many sellers to accept prices lower than what they were expecting. The Joint Center for Housing Studies predicts the oversupply will eventually balance as housing starts continue to fall, lower prices motivate unforeseen buyers, and the rest of the economy begins to recover.

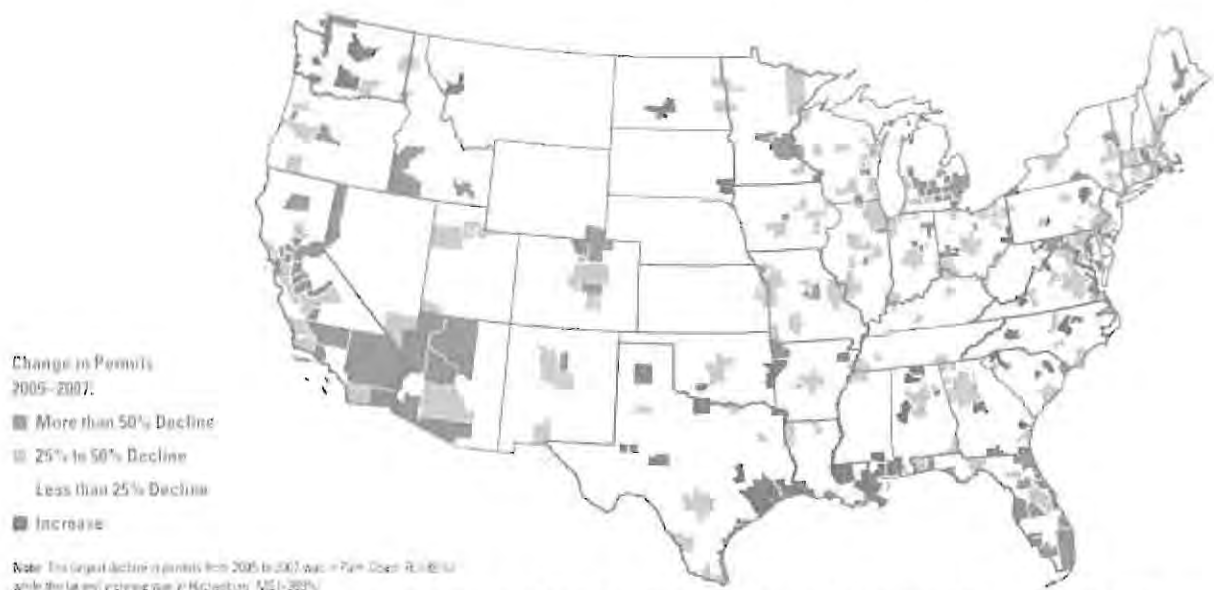
The Joint Center for Housing Studies indicates that demand for new homes could total as many as 14.4 million units nationally between 2010 and 2020. Nationally, the vast majority of these homes will be built in lower-density areas where cheaper land is in greater supply. People and jobs have been moving away from central business districts (CBDs) for more than a century: the number of the country's largest metropolitan areas with more than half of their households living at least 10 miles from the CBD has more than tripled from 13 in 1970 to 46 in 2000; in six metropolitan areas more than a fifth of households live at least 30 miles out. While people older than 45 years are generally continuing to move away from CBDs, younger people have begun to move nearer to CBDs.

The Joint Center for Housing Studies also indicates that demand for higher density housing types exists among certain demographics. They conclude that because of persistent income disparities, as well as the movement of the echo boomers into young adulthood, housing demand may shift away from single-family detached homes toward more affordable multifamily apartments, town homes, and manufactured homes. Supply-side considerations, however, outweigh these demographic forces.

Recent trends in home ownership and demand

Conditions that had previously bolstered the housing market and promoted homeownership weakened in 2005 and eroded further in 2006 and 2007. Increasing interest rates and weakening housing prices combined to slow the housing market. In 2007, new home sales were down 40% from the record 2005 level, and existing home sales were down 20%. Regionally, using housing permits issued as a proxy for new home ownership, Lane County's issued housing permits fell between 25% and 50% between 2005 and 2007.

Figure B-1. Change in housing permits issued by county, U.S., 2005-2007



Source: Census Bureau, Construction Statistics, Building Permits by County. As cited in The State of The Nation's Housing, 2008, The Joint Center for Housing Studies of Harvard University, p. 8

Figure B-2. Change in housing permits issued by county, Oregon, 2005-2007



Source: Census Bureau, Construction Statistics, Building Permits by County. As cited in *The State of The Nation's Housing, 2008*, The Joint Center for Housing Studies of Harvard University, p. 8

Demographic trends in home ownership

According to the Joint Center for Housing Studies, immigration will play a key role in accelerating household growth over the next 10 years. Between 2000 and 2006, immigrants contributed to over 60% of household growth. Minorities will account for 68% of the 14.6 million projected growth in households for the 2005 to 2015 period. Immigrants now comprise a growing share of young adults and children in the United States. Twenty percent of Americans ages 25-34 are foreign born, and an additional 9% are second generation Americans. Members of this generation will probably earn more than their parents becoming an even greater source of housing demand in the coming decades.

The Joint Center for Housing Studies suggests that an aging population, and of baby boomers in particular, will drive changes in the age distribution of households in all age groups over 55 years. A recent survey of baby boomers showed that more than a quarter plan to relocate into larger homes and 5% plan to move to smaller homes. Second home demand among upper-income homebuyers of all ages also continues to grow. Households aged 50 to 69 are expected to account for the purchase of nearly half a million second homes between 2005 and 2015.

People prefer to remain in their community as they age.³⁰ The challenges that seniors face as they age in continuing to live in their community include: changes in healthcare needs, loss of mobility, the difficulty of home maintenance, financial concerns, and increases in property taxes.³¹ Not all of these issues can be addressed through housing or land-use policies. Communities can address some of these issues through adopting policies that:

- Diversify housing stock to allow development of smaller, comparatively easily maintained houses in single-family zones, such as single story townhouses, condominiums, and apartments.
- Allow commercial uses in residential zones, such as neighborhood markets.
- Allow a mixture of housing densities and structure types in single-family zones, such as single-family detached, single-family attached, condominiums, and apartments.
- Promote the development of group housing for seniors that are unable or choose not to continue living in a private house. These facilities could include retirement communities for active seniors, assisted living facilities, or nursing homes.
- Design public facilities so that they can be used by seniors with limited mobility. For example, design and maintain sidewalks so that they can be used by people in wheel chairs or using walkers.

Home rental trends

Nationally, the rental market continues to experience growth, adding 2 million rental households from 2004 to 2007. Demand strengthened in every region except the Northeast. Vacancy rates in the West continue to decline, leading to strong increases in rental rates. Over the longer term, the Joint Center for Housing studies expects rental housing demand to grow by 1.8 million households over the next decade. Minorities will be responsible for nearly all of this increased demand. The minority share of renter households grew from 37% in 1995 to 43% in 2005. The minority share is forecast to exceed 50% of renter households in 2015. Demographics will also play a role. Growth in young adult households will increase demand for moderately priced rentals, in part because echo boomers will reach their mid-20s after 2010. Meanwhile growth among those between the ages of 45 and 64 will lift demand for higher-end rentals. Given current trends in home prices and interest rates, conditions will become increasingly favorable for rental markets in the coming years.

³⁰ A survey conducted by the AARP indicates that 90% of people 50 years and older want to stay in their current home and community as they age. See <http://www.aarp.org/research>.

³¹ "Aging in Place: A toolkit for Local Governments" by M. Scott Ball.

Despite only modest increases in rents in recent years, growing shares of low- and moderate-wage workers, as well as seniors with fixed incomes, can no longer afford to rent even a modest two-bedroom apartment anywhere in the country. In 2006, one in three American households spent more than 30% of income on housing, and more than one in seven spent upwards of 50%. The national trend towards increased rent to income ratios is mirrored regionally in that a salary of two to three times the 2007 Federal minimum wage of \$5.85 is needed to afford rents in Lane County (see Figure B-3).

According to the Joint Center for Housing Studies, these statistics understate the true magnitude of the affordability problem because they do not capture the tradeoffs people make to hold down their housing costs. For example, these figures exclude the 2.5 million households that live in crowded or structurally inadequate housing units. They also exclude the growing number of households that move to locations distant from work where they can afford to pay for housing, but must spend more for transportation to work. Among households in the lowest expenditure quartile, those living in affordable housing spend an average of \$100 more on transportation per month than those who are severely housing cost-burdened. With total average monthly outlays of only \$1,000, these extra travel costs amount to 10 percent of the entire household budget.

Figure B-3. Hourly wages needed to afford rent by county, U.S., 2008



Source: HUD's Fair Market Rents for 2008, based on methodology developed by the National Low Income Housing Coalition. As cited in *The State of The Nation's Housing, 2008*, The Joint Center for Housing Studies of Harvard University, p. 30

Note: Every county in Oregon had a housing wage between \$11.70 and \$17.54 in 2008.

Trends in housing affordability

Despite widespread falling house prices, affordability problems have not improved significantly. A median-priced single-family home under conventional terms in 2007 (10% downpayment and 30-year fixed rate loan) only costs \$76 per month and \$1,000 downpayment less than a house bought in 2006, the year in which the sales prices of single-family homes were at their highest real price in history. Only 17 of the 138 National Association of Realtors-covered metropolitan areas have lower costs in 2007 than they did in 2003 when interest rates were bottomed out.

With low-wage jobs increasing and wages for those jobs stagnating, affordability problems will persist even as strong fundamentals lift the trajectory of residential investment. The number of severely cost-burdened households (spending more than 50% of income on housing) increased by almost 4 million households from 2001 to 2006, to a total of nearly 18 million households in 2005. Nearly 40% of low-income households with one or more full-time workers are severely cost burdened, and nearly 60% of low-income households with one part-time worker are severely cost burdened. The Joint Center for Housing Studies points to widening income disparities and decreasing federal assistance as two factors exacerbating the lack of affordable housing. While the Harvard report presents a relatively optimistic long-run outlook for housing markets and for homeownership, it points to the significant difficulties low- and moderate-income households face in finding affordable housing, and preserving the affordable units that do exist.

Trends in Housing Characteristics

The U.S Bureau of Census Characteristics of New Housing Report presents data that show trends in the characteristics of new housing for the nation, state, and local areas. Several trends in the characteristics of housing are evident from the New Housing Report:

- Larger single-family units on smaller lots. Between 1997 and 2007 the median size of new single-family dwellings increased 15%, from 1,975 sq. ft. to 2,277 sq. ft. nationally and 18% in the western region from 1,930 sq. ft. to 2,286 sq. ft. Moreover, the percentage of units under 1,200 sq. ft. nationally decreased from 8% in 1997 to 4% in 2007. The percentage of units greater than 3,000 sq. ft. increased from 15% in 1997 to 26% of new one-family homes completed in 2007. In addition to larger homes, a move towards smaller lot sizes is seen nationally. Between 1994 and 2007 the percentage of lots under 7,000 sq. ft. increased by 13% from 29% of lots to 33% of lots. A corresponding 4% decrease in lots over 11,000 sq. ft. is seen.
- Larger multifamily units. Between 1999 and 2007, the median size of new multiple family dwelling units increased by 15%. The percentage of multifamily units with more than 1,200 sq. ft. increased from 26% to 47% in the western region and from 28% to 50% nationally. The

percentage of units with less than 600 sq. ft. stayed at 1% both regionally and nationally.

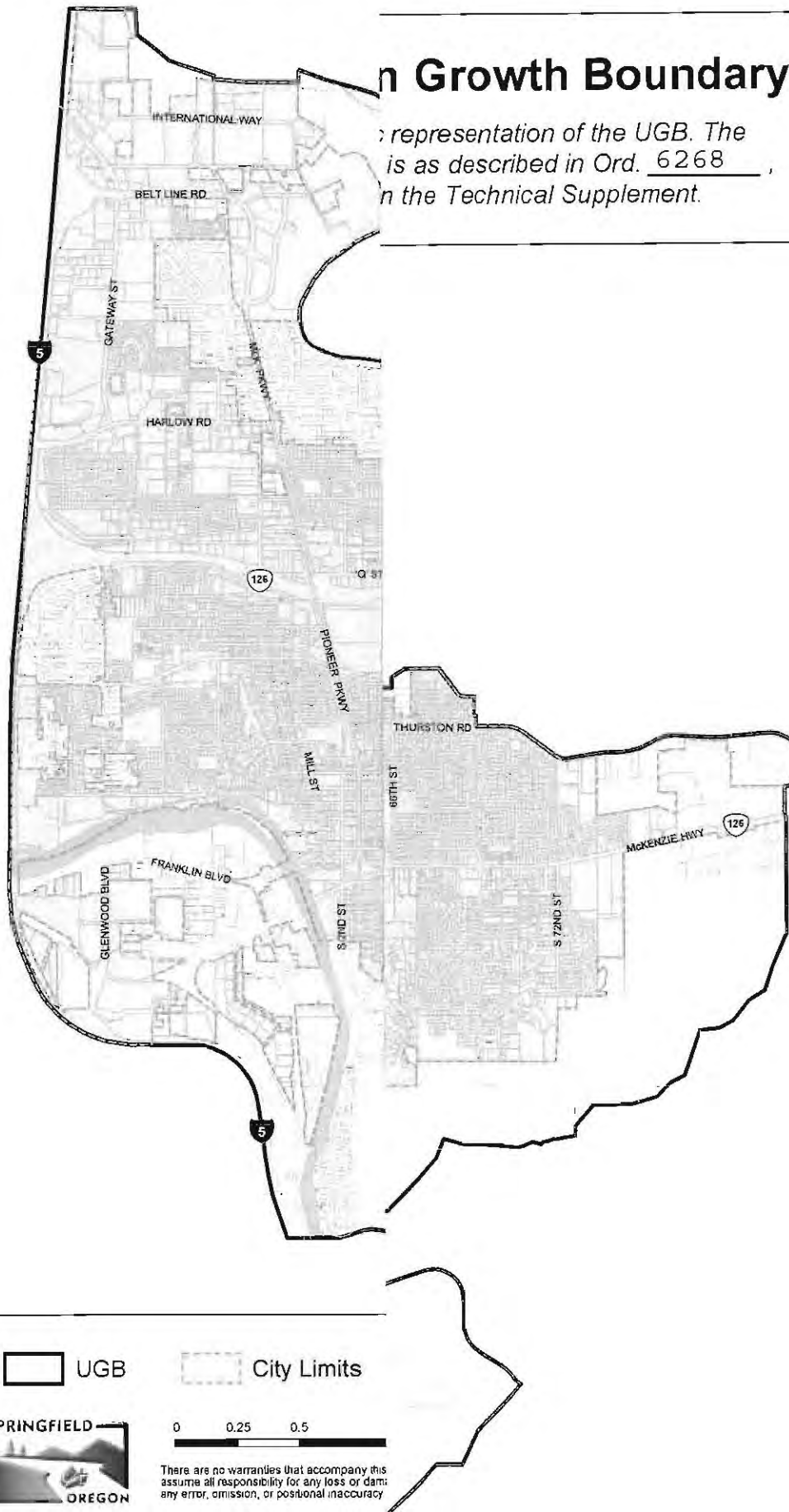
- More household amenities. Between 1994 and 2007 the percentage of single-family units built with amenities such as central air conditioning, fireplaces, 2 or more car garages, or 2 or more baths all increased. The same trend in increased amenities is seen in multiple family units.

A clear linkage exists between demographic characteristics and housing choice. This is more typically referred to as the linkage between life-cycle and housing choice and is documented in detail in several publications. Analysis of data from the Public Use Microsample (PUMS) in the 2000 Census to describe the relationship between selected demographic characteristics and housing choice. Key relationships identified through this data include:

- Homeownership rates increase as income increases;
- Homeownership rates increase as age increases;
- Choice of single-family detached housing types increases as income increases;
- Renters are much more likely to choose multiple family housing types than single-family; and
- Income is a stronger determinate of tenure and housing type choice for all age categories.

in Growth Boundary

representation of the UGB. The
is as described in Ord. 6268 ,
in the Technical Supplement.



☐ UGB

☐ City Limits



0 0.25 0.5

There are no warranties that accompany this assume all responsibility for any loss or damage any error, omission, or positional inaccuracy

List of tax lots that are adjacent to and inside, or split by the UGB

April 5, 2011

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
17-02-19	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision
1702190000101	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #94-02-32; plat #94-P0555; CS #32200
1702190000203	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000300	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000400	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000500	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000501	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000601	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000699	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000701	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	SUB2003-00014; Plat #2004- PO1787
1702190000800	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000900	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #87-03-20; CS #28405
1702190001000	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001100	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001200	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702194100101	in			
1702194100102	in			
1702194100200	in			
1702194100300	in			
1702194100800	in			
1702194100900	in			
1702194100901	in			
1702194100902	in			
1702194102900	in			
17-02-20				
1702200000500	in	tax lot line, city limits and UGB are coincident		
1702200000600	in	tax lot line, city limits and UGB are coincident		
1702200000700	in	tax lot line, city limits and UGB are coincident		
1702200000800	in	tax lot line, city limits and UGB are coincident		
1702200001301	in	tax lot line, city limits and UGB are coincident		

EXHIBIT D-1

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
17-02-27				
1702270000901	split	City limits and UGB are coincident	Highbanks	
1702270000902	split	City limits and UGB are coincident	Highbanks	
1702270001002	split	connect the most northerly NE corner of tax lot 1702342200100 to NW corner of tax lot 1702342100400.	Highbanks	
1702270001004	in			
1702270001101	split	UGB and city limits are coincident	Thurston	
1702270001102	in			
1702270002002	in			
1702270002100	in			
17-02-28				
1702280000101	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000102	in			
1702280000300	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000301	in			
1702280000302	in			
1702280000401	in	UGB, city limits and tax lot lines are coincident		
1702280000402	in			
1702280000405	in			
1702280000406	in	UGB, city limits and tax lot lines are coincident		
1702280000500	split	450' N of the N edge of Highbanks ROW, then coincident with city limits east of tax lot 1702280000600	Highbanks	
1702280000600	in	UGB, city limits and tax lot lines are coincident		
1702284300200	in			
1702284300202	in	UGB, city limits and tax lot lines are coincident		
1702284300203	in			
1702284301308	in	UGB, city limits and tax lot lines are coincident		
1702284301309	in	UGB, city limits and tax lot lines are coincident		
17-02-29				
1702290002800	split	450' N of Highbanks ROW on the eastern lot line; connect to NE corner of tax lot 1702290002900	Highbanks	
1702290002900	split	Multi-part tax lot. Extend the UGB from tax lot 2800 to the W, coincident with tax lot line 2900 until it intersects the N edge of the ROW of I-105	Highbanks	
1702290003100	split	UGB and city limits are coincident	Highbanks	
17-02-30				
1702300000100	in	UGB, city limits and tax lot lines are coincident		
1702300000101	in	UGB, city limits and tax lot lines are coincident		
1702300000200	in	UGB, city limits and tax lot lines are coincident		
1702300002500	in	UGB, city limits and tax lot lines are coincident		

EXHIBIT D-2

Tax lot #	Status	Description	Area	Note
17-02-34				
1702341107900	in	UGB, city limits and tax lot lines are coincident		
1702341108000	in	UGB, city limits and tax lot lines are coincident		
1702341108100	in	UGB, city limits and tax lot lines are coincident		
1702341108200	in	UGB, city limits and tax lot lines are coincident		
1702341108300	in	UGB, city limits and tax lot lines are coincident		
1702341109000	in	UGB, city limits and tax lot lines are coincident		
1702341109100	in	UGB, city limits and tax lot lines are coincident		
1702341114900	in	UGB, city limits and tax lot lines are coincident		
1702341115000	in	UGB, city limits and tax lot lines are coincident		
1702341115100	in	UGB, city limits and tax lot lines are coincident		
1702341115200	in	UGB, city limits and tax lot lines are coincident		
1702341115300	in	UGB, city limits and tax lot lines are coincident		
1702341115400	in	UGB, city limits and tax lot lines are coincident		
1702341115500	split	split by city limits. Only "leg" portion is inside	Hayden Bridge	UGB formally interpreted in Levi Landing (#97-06-142); refer to plats of Levi Landing
1702341200100	in	UGB, city limits and tax lot lines are coincident		
1702341200500	split	Split by section line 170227 & 170234	Thurston	city limits outside UGB, Thurston Middle School
1702342100400	in	UGB, city limits and tax lot lines are coincident	Thurston	
1702342200100	in			
17-02-35				
1702352204801	in			
1702352204900	split	split by city limits	Thurston	
17-02-36				
1702362000403	in	UGB, city limits and tax lot lines are coincident on most easterly tax lot line		
1702362400102	in			
1702362400200	in			
1702363000100	in			
1702363002900	in			
1702363003200	in			
1702363003300	in			
1702363003400	in			
1702363003402	in			
17-03-14				
1703140000900	in			
1703140001100	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)
1703140001900	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)

EXHIBIT D-5

Tax lot #	Status	Description	Area	Note
17-03-15				
170315	in	maple island slough, unknown lot #	Gateway	tax lot contains public drainage facility
1703150000801	split	City limits and UGB are coincident	Gateway	
1703150001000	in	UGB, city limits and tax lot lines are coincident		
1703154000100	in	UGB, city limits and tax lot lines are coincident		
1703154000200	in	UGB, city limits and tax lot lines are coincident		
1703154000400	split	split by city limits; mostly outside the UGB, only the "leg" portion is inside	Gateway	
17-03-22				
1703220003700	in	UGB, city limits and tax lot lines are coincident		
1703220004102	in	Adjacent to McKenzie River. Refer to plat.		Riverbend Phase 2 (survey)
17-03-23				
1703233200100	in			
1703233200200	in			
1703233200300	in			
1703233200400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202600	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233203200	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203300	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203900	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233400100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400300	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233405400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405500	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405600	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405700	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition

EXHIBIT D-4

Tax lot #	Status	Description	Area	Note
1703233410800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233410900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703234200100	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200200	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200300	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200400	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200500	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200600	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200700	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234300100	in			
1703234300200	in	UGB, city limits and tax lot lines are coincident		
1703234305500	in	UGB, city limits and tax lot lines are coincident		
1703234305600	in	UGB, city limits and tax lot lines are coincident		
1703234305700	in	UGB, city limits and tax lot lines are coincident		
1703234305800	in	UGB, city limits and tax lot lines are coincident		
1703234305900	in	UGB, city limits and tax lot lines are coincident		
1703234306000	in	UGB, city limits and tax lot lines are coincident		
1703234306100	in	UGB, city limits and tax lot lines are coincident		
1703234306200	in	UGB, city limits and tax lot lines are coincident		
1703234306300	in	UGB, city limits and tax lot lines are coincident		
1703234406000	in	UGB, city limits and tax lot lines are coincident		
1703234406100	in	UGB, city limits and tax lot lines are coincident		
1703234406200	in	UGB, city limits and tax lot lines are coincident		
1703234406300	in	UGB, city limits and tax lot lines are coincident		
1703234407900	in			PLA #94-11-222; CS #32540
1703234409300	in	UGB, city limits and tax lot lines are coincident		
1703234409400	in	UGB, city limits and tax lot lines are coincident		
1703234409500	in	UGB, city limits and tax lot lines are coincident		
1703234409600	in	UGB, city limits and tax lot lines are coincident		
1703234409700	in	UGB, city limits and tax lot lines are coincident		
1703234409800	in	UGB, city limits and tax lot lines are coincident		
1703234409900	in	UGB, city limits and tax lot lines are coincident		
1703234410000	in	UGB, city limits and tax lot lines are coincident		
1703234410100	in	UGB, city limits and tax lot lines are coincident		
1703234410200	in	UGB, city limits and tax lot lines are coincident		
17-03-24				
1703240000101	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261

EXHIBIT D-5

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
1703240000102	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000103	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000104	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000300	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000301	in			
1703240000401	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000503	in			
1703240000507	in			
1703240000603	split	from the NE corner of the city limits on tax lot 1703243102000, then to a point 285' N of the N edge of Hayden Bridge ROW, on the east tax lot line of 1703240000603	Hayden Bridge	Journal #92-10-202 O'Niell; CS #33470 & 31021; Plat #92-P0306.
1703243100100	split	From NE corner of tax lot 1703243200301, to city limits on tax lot 1703243104000.	Hayden Bridge	
1703243100200	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100300	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100600	in			
1703243100701	in			
1703243100702	in			
1703243100704	in			
1703243100900	split	split by city limits	Hayden Bridge	
1703243102000	split	split by city limits, UGB and city limits are coincident	Hayden Bridge	
1703243104000	in	UGB, city limits and tax lot lines are coincident		
1703243104100	in	UGB, city limits and tax lot lines are coincident		
1703243104200	in	UGB, city limits and tax lot lines are coincident		
1703243200200	in			
1703243200301	in			
1703243200302	in			
1703243200303	in			
1703243200304	in			
1703243200305	in			
1703243200306	in			
1703243200307	in			
1703243200500	in			
1703243200600	in			
1703243200700	in			
1703243200800	in			

EXHIBIT D-6

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
1703243200900	in			
18-02-01				
1802010000100	split	follow ridgeline	SE Hills	
18-02-02				
1802020000100	split	follow ridgeline	SE Hills	
1802020000200	split	follow ridgeline	SE Hills	
1802020000300	split	follow ridgeline	SE Hills	
1802020000400	split	follow ridgeline	SE Hills	WEB
1802020000401	in		SE Hills	WEB
18-02-03				
1802030000600	in	follow ridgeline	SE Hills	
18-02-04				
1802040003000	split	approximately 450' S of Jasper Rd to a property corner, then W to a point on the W property line that is approximately 450' S of the Jasper Rd ROW. A drainage ditch on the W property line crosses the driveway at that point. The house and barn at 5119 Jasper Rd are inside the UGB.	Clearwater	
18-02-05				
1802050002600	split	Panhandle; 400' S of the S edge of the Jasper Rd. ROW	Clearwater	
1802050002800	split	E leg is split 450' S of the S edge of Jasper Rd ROW. W leg is split 220' S of the S edge of Jasper Rd ROW.	Clearwater	
1802050002801	split	On the E tax lot line, approximately 450' S of the S edge of Jasper Rd. ROW, then to the NW corner of the tax lot. The house (4855 Jasper Rd) is outside.	Clearwater	
1802051303501	in			
1802051303600	in			
1802051303700	in			
1802051303800	in			
1802051304100	in			
1802051304101	in			
1802051304200	in			
1802052300300	in			
1802052300400	in			
1802052300403	in			
1802052300500	in			
1802052300600	in			
1802052400100	in			Journal #1998-11-0255; Redwood Village plat

EXHIBIT D-7

Tax lot #	Status	Description	Area	Note
1802052400200	in			Journal #1998-11-0255; Redwood Village plat
1802052401000	in			Journal #1998-11-0255; Redwood Village plat
1802052401100	in			Journal #1998-11-0255; Redwood Village plat
1802052401200	in			Journal #1998-11-0255; Redwood Village plat
1802052407900	in			Journal #1998-11-0255; Redwood Village plat
1802052408000	in			Journal #1998-11-0255; Redwood Village plat
1802052408100	in			Journal #1998-11-0255; Redwood Village plat
1802052408201	in			
1802052409400	in			Journal #1998-11-0255; Redwood Village plat
1802052409600	in			Journal #1998-11-0255; Redwood Village plat
1802052409700	in			Journal #1998-11-0255; Redwood Village plat
1802052409800	in			Journal #1998-11-0255; Redwood Village plat
1802052409900	in			Journal #1998-11-0255; Redwood Village plat
1802052410000	in			Journal #1998-11-0255; Redwood Village plat
1802052411000	in			Journal #1998-11-0255; Redwood Village plat
1802052412000	in			Journal #1998-11-0255; Redwood Village plat
1802052413000	in			Journal #1998-11-0255; Redwood Village plat
18-02-06				
1802060001006	in			
1802060001007	in			
1802060004600	in			
1802062403500	in			
1802062403501	in			
1802062403600	in			
1802064104902	in			

EXHIBIT D-8

Tax lot #	Status	Description	Area	Note
1802064105700	in			
1802064105800	in			
1802064105900	in			
1802064106000	in			
1802064106100	in			
1802064106200	in			
1802064106300	in			
1802064114500	in			
1802064115900	in	UGB, city limits and tax lot lines are coincident; N bank of Jasper slough		filbert meadows, LRP2005-00010; SUB2005-00062
1802064200118	in			
1802064200119	in			
1802064200120	in			
1802064200121	in			
1802064200301	in			
1802064200500	in			
1802064200501	in			
1802064200503	split	connect SW corner of tax lot 1802064200800 to SE corner of tax lot 180206420600		
1802064200600	in			
1802064200800	in			
1802064200900	in			
18-02-09				
1802090000100	split	follow ridgeline from the most southerly NE corner of tax lot, to a point along Jasper Rd, 815' from the SW corner of the tax lot	SE Hills	WEB
1802090000600	split	panhandle; approximately 450' S of the S edge of Jasper Rd. ROW	Clearwater	
18-02-10				
1802100001600	in	UGB and tax lot lines are coincident	SE Hills	Weyerhauser Rd.
1802100000100	split	follow ridgeline to a point where the western tax lot line intersects north section line of 180210	SE Hills	WEB
18-02-11				
1802110000300	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110000400	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110001600	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110001700	split	interpretation with legal description	SE Hills	Weyerhauser Rd. Journal #1998-11- 0256 contains legal description (attachment D)

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
1802110002000	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
18-02-15				
1802150000100	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
18-03-01				
1803010000701	in			
1803010001100	in			
1803010001301	in			
1803010003100	in			
1803010003200	in		willamette	
1803010003600	in			
18-03-02				
1803020000600	in			
18-03-11				
1803110000600	split	refer to description of UGB within I5 corridor	willamette	
1803110000700	split	refer to description of UGB within I5 corridor	willamette	
1803110001800	in			
18-03-12				
1803120000500	in			
ROW/other				
Jasper Rd.	in	UGB is the S edge of the Jasper Rd ROW, include entire ROW		
Mill Race	in	the Mill Race within 18-03-01 is entirely within the UGB, UGB is top of S bank		
I-105	in	I-105 within 17-02-29 and 17-02-30 is within the UGB		
17-02-35	in	UGB is the N edge of the Thurston Rd ROW, E of 69th Street to the E lot line of 1702362400200		
18-02-06-24	in	The ROW for Garden Ave and Kintzley Ave are within the UGB		
17-02-36	in	UGB is the N edge of the Thurston Rd ROW		
I5 description		refer to methodology in adopted ordinance		

Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary

Purpose of this action

1. To establish a tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5, in accordance with OAR 660-024-0020(2).
2. To establish a separate Urban Growth Boundary for the city of Springfield, as required by ORS 197.304.

Background & Findings

1. The Urban Growth Boundary (UGB) was originally acknowledged by the Land Conservation and Development Commission on August 19, 1982.
2. The existing map of the UGB was adopted by the Springfield City Council on May 17, 2004, by Ordinance No. 6087.
3. The tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5 establishes a more precise location of the UGB.
4. The methodology used to determine the precise location of the acknowledged UGB is based on the adopted policies contained in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan).
5. As adopted, the UGB is only tax lot-specific where it is coterminous with city limits, where it has been determined through the annexation process, and where it falls on the outside edge of existing or planned rights-of-way. (Page II-G-14 of the Metro Plan).
6. Where it is not tax lot-specific, the UGB is approximately 200' wide. This is in accordance with the adopted policies in the Metro Plan as well as decisions by the Lane County Hearings Official.
 - a. Levi Landing (Journal #1997-06-142 & #1999-06-144) is the only area where a more precise location of the UGB east of I5 has been determined by the Lane County Hearings Official.
 - b. Letter from Steve Gordon, dated June 29, 1999.
 - c. The best evidence that identifies the location of the UGB in the SE Hills is:
 - i. The city attorney and city staff endorsed the location of the ridgeline separating the drainage basins, as proposed in Journal #2000-06-128, Dilbeck, and
 - ii. The Springfield Planning Commission found the legal description contained in Journal #1998-11-256, Smejkal, accurately describes a portion of the UGB in the southeast hills.

Methodology

1. OAR 660-024-0020(2): "The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location."
 - a. This OAR requires the UGB to be shown at a scale that identifies which particular tax lots are included in the UGB. If a tax lot is split by the UGB, there must be sufficient information to determine the precise UGB location.
 - b. Where the UGB does not follow tax lot lines, a written description shall provide sufficient information to determine the precise UGB location. This information is contained in the table called: "Tax lots Adjacent and Split by the UGB"
2. The UGB is coincident with tax lot lines unless the tax lot line is outside the 200' wide area.
3. The UGB is coincident with tax lot lines when they are coterminous with the outside edge of rights-of-way, so the full width of the right-of-way is inside the UGB.
4. Roads and Rights of Way. The UGB shall lie along the outside edge of existing and planned rights-of-way that form a portion of the UGB so that the full right-of-way is within the UGB. Refer to Policy #2, Page II-C-4 of the Metro Plan.
5. The location of the UGB in relation to the Interstate 5 corridor is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan:

"The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and Metro Plan Plan Boundary (Plan Boundary); and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and UGB east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction."

- a. **General description.** The northbound lane is inside the Springfield UGB. The southbound lane is outside the Springfield UGB. For the area underneath the Willamette River Bridge, the UGB and the city limits are coincident.
- b. **Northern terminus.** Extend the northern tax lot line of 1703150000100 to the west until it intersects the centerline of the Interstate 5 right-of-way.
- c. **Southern terminus.** Extend the southernmost point of tax lot 180311001800 that is south of and adjacent to the Filbert Grove 5th Addition, to the W, to the intersection of the Interstate 5 centerline and the common section line of TRS 180311 and 180310. This point is approximately 275' south of the northbound Interstate 5 on-ramp.
- d. **Centerline.** For the purposes of the UGB location, the centerline is located within the area between the northbound and southbound travel lanes as they are currently located. A more precise location of the current centerline is included in the following metes and bounds description. If the travel lanes are shifted and

the metes and bounds description conflicts with the new travel lanes, the general description shall apply.

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South 83°17'27" East 1025.05 feet to the centerline of Pacific highway Interstate 5; thence North 6°38'21" East 1636.35 feet along said centerline to Engineers centerline station 402+01.88 being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South 6°42'32" West 13,695.08 feet to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South 4°17'57" West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South 1°53'22" West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South 9°18'13" East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South 20°29'48" East 15.13 feet to Engineers centerline station 603+34.93 POT BK = 202+88.88 POT AH; thence South 20°29'48" East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South 54°29'18" East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South 88°28'48" East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South 47°03'03" East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South 5°37'18" East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South 9°31'54" East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

6. Split Tax Lots. When the UGB is not coincident with tax lot lines, the criteria from the Metro Plan shall apply. The following criteria are from Page II-G-14 of the Metro Plan. The UGB shall follow the most appropriate feature:
 - a. Protection of Agricultural Lands
 - b. Protection of Forest Lands
 - c. Ridgeline (Drainage Basin)
 - d. Orderly and Economic Public Services
 - e. Floodway Fringe
 - f. Protection of Wetlands
 - g. Protection of Sand and Gravel Resources
 - h. Airport Protection
 - i. Existing Development and Services (City Limits)
 - j. Meet Economic Goals

7. The following areas contain tax lots that are split by the UGB. Refer to the detail maps in the technical supplement for further clarification.
- a. **Hayden Bridge Area Split Tax Lots:** The location of the UGB is a fixed distance (300') that is measured from the northern edge of the Hayden Bridge right-of-way, unless it has been previously determined as a result of a land use decision or annexation. The location of 300' north of the right of way was chosen since it included most of the existing dwellings and was within the 200' area. In addition, the land use decisions indicated the UGB was not intended to follow the Hayden Bridge right of way.
 - b. **High Banks Area Split Tax Lots.** The location of the UGB is either:
 - A fixed distance (450') that is measured from the northern edge of the High Banks right-of-way, or
 - Coincident with the city limits.
 - c. **North Gateway Area Split Tax Lots.** The UGB is coincident with the unnumbered tax lot that contains the public drainage facility. The tax lot is entirely within the UGB.
 - d. **Thurston Area Split Tax Lots.** The city limits extend outside the UGB on the tax lot that contains the Thurston Middle School. On that tax lot, the UGB is coincident with the section line.
 - e. **Southeast Hills Area Split Tax Lots.** The adopted policies indicate the UGB should follow the ridgeline (refer to the table "Metro Plan Urban Growth Boundary Map Key" from Page II-G-21 of the Metro plan). The line was originally drawn in 1982 and generally follows the ridgeline. The city's current mapping technology is able to more accurately follow the ridgeline. The letter from Steve Gordon, dated June 29, 1999, provides evidence of the intent to follow the ridgeline. Journal #1998-11-0256 is a land use decision that provided a legal description for a portion of this area.
 - f. **Clearwater Area Split Tax Lots:** When the UGB does not follow tax lot lines in this area, its location is based on aerial photo interpretation and proximity to the Jasper Rd. right of way. This effort also included a site visit and discussions with the landowner of 5119 Jasper Rd.
 - g. **Willamette Area Split Tax Lots:** Refer to the description of the UGB within the I5 corridor. The location is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan.

**ORDINANCE NO. PA 1274
FINDINGS AND CONCLUSIONS**

IN SUPPORT OF AN ORDINANCE AMENDING THE *EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (METRO PLAN)* TO ADOPT THE *SPRINGFIELD 2030 REFINEMENT PLAN RESIDENTIAL LAND USE AND HOUSING ELEMENT* AND TO ESTABLISH A SEPARATE SPRINGFIELD URBAN GROWTH BOUNDARY PURSUANT TO ORS 197.304.

In 2007 the Oregon Legislature passed and the Governor signed into law Chapter 650, Oregon Laws 2007, codified as ORS 197.304 and commonly known as “House Bill 3337” mandating separate residential lands studies and resulting urban growth boundaries for the cities of Eugene and Springfield consistent with each city jurisdictional responsibility. In addition, the *Metro Plan* contains provisions for adoption or amendment of refinement plans as further described in Lane Code Chapters 12 & 16. These findings address the new law and other applicable criteria sufficient to support adoption by the Lane County Board of Commissioners of the proposed Springfield refinement plan residential land use and housing element, related residential land needs analysis, Springfield urban growth boundary technical supplement and map amendment for a separate Springfield UGB for the area east of I-5. Additionally, the City of Springfield prepared and adopted findings, Exhibit F to its adopted Ordinance No. 1, in support of implementation of ORS 197.304 to establish a separate Springfield Urban Growth Boundary. Those findings are incorporated by reference herein.

1. ORS 197.304 Lane County accommodation of needed housing.

(1) Notwithstanding an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions to the contrary, a city within Lane County that has a population of 50,000 or more within its boundaries shall meet its obligation under ORS 197.295 to 197.314 separately from any other city within Lane County. The city shall, separately from any other city:

- (a) Establish an urban growth boundary, consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan; and
- (b) Demonstrate, as required by ORS 197.296, that its comprehensive plan provides sufficient buildable lands within an urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years.

(2) Except as provided in subsection (1) of this section, this section does not alter or affect an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions adopted by Lane County or local governments in Lane County. [2007 c.650 §2]; and

2. ORS 197.304 Springfield evaluation of the sufficiency of its residential buildable land supply. Local housing policies must meet the requirements of Oregon Statewide Planning Goal 10 (ORS 197.295 to 197.314, ORS 197.475 to 197.490, and OAR 600-008) and ORS 197.296 defines factors to establish sufficiency of buildable lands within an urban growth boundary and requires analysis and determination of residential housing patterns. Springfield Development Services Department and ECO Northwest, under contract, begin an inventory and analysis of Springfield’s residential land on December 5, 2005. Springfield completed its evaluation and reports results and conclusions of the

residential land supply and need as summarized in the *Springfield Residential Land and Housing Needs Analysis*. February, 2011.

Criteria for adoption of a Metro Plan Amendment is found in Lane Code Chapter 12, Section 12.225 (2) (a) & (b). It states that in reaching a decision, the Board of County Commissioners must adopt findings which demonstrate that the proposal meets applicable approval criteria and state and local laws. The Applicable Statewide Planning Goals are addressed in these findings.

LC12.225 (2) (a) Criterion #1 "The amendment must be consistent with the relevant statewide planning goals adopted by the Land Conservation and Development Commission."

Goal 1 – Citizen Involvement. Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process."

3. The Springfield Planning Commission conducted public hearings for review/adoption of draft Residential Land & Housing Needs Analysis on October 20, 2009.

The Springfield City Council conducted public hearings for review/adoption of the draft Residential Land & Housing Needs Analysis on November 16, 2009 and continued the hearing on December 7, 2009 to allow additional time for consideration of refinements to constraints data and adopted the draft *Springfield Residential Land & Housing Needs Analysis* by resolution: A RESOLUTION OF THE COMMON COUNCIL OF THE CITY OF SPRINGFIELD ADOPTING THE 2009 PRELIMINARY SPRINGFIELD RESIDENTIAL LAND AND HOUSING NEEDS ANALYSIS, FULFILLING ITS STATUTORY OBLIGATION TO "COMPLETE" THE PRELIMINARY INVENTORY, ANALYSIS AND DETERMINATION BEFORE JANUARY 1, 2010.

Springfield Development Services Department conducted public open houses on the Draft Springfield 2030 Refinement Plan including *Springfield Residential Land & Housing Needs Analysis*, *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* policies and Springfield Urban Growth Boundary tax lot specific map on February 3 and 4, 2010 and on March 16, 2011 to explain the proposed amendments and to receive public comment.

The Springfield and Lane County Planning Commissions conducted a joint public hearing on the Draft Springfield 2030 Refinement Plan including the draft *Springfield Residential Land & Housing Needs Analysis*, *Springfield 2030 Refinement Plan Residential Land and Housing Element* policies and Springfield UGB tax lot specific map on February 17, 2010, and continued on March 16, 2010.

On May 4, 2010 the Springfield and Lane County Planning Commissions voted to recommend approval of the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element*, incorporating the *Springfield Residential Land & Housing Needs Analysis* and a parcel specific separate urban growth boundary around the City of Springfield, based on the evidence and testimony in the record.

On April 4, 2011, the City of Springfield City Council and the Lane County Board of Commissioners held a public hearing on the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element*; and the Development Services staff report, the oral testimony, letters and emails received, written submittals of the persons testifying at the hearing, and the public records for file # LRP 00014 (Springfield 2030 Refinement Plan), file # LRP 2007-00030 (Springfield Residential Land Study), and the *Springfield Urban Growth Boundary Technical Supplement* have been considered and hereby are incorporated into the record for this proceeding;

Goal 2 – Land Use Planning. Goal 2 outlines the basic procedures of Oregon's statewide planning program. It says that land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted.

4. The Eugene-Springfield Metropolitan Area Urban Growth Boundary (UGB) was originally acknowledged by the Land Conservation and Development Commission on August 19, 1982; and upon completion of periodic review the city, by ordinance 6087 on May 17, 2004 adopted the current and now acknowledged Metro Plan diagram including the UGB on an 11 X 17" map; and Springfield's jurisdictional area of responsibility as specified in the acknowledged comprehensive plan is the Metro Area UGB east of Interstate 5.

Springfield has completed its evaluation of the residential land supply and has adopted a housing needs determination (the *Springfield Residential Land and Housing Needs Analysis, January 2011*) and residential land use policies (the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element*) that together demonstrate, as required by ORS 197.296, that the existing acknowledged comprehensive plan for the Metro Area UGB east of Interstate 5 contains sufficient buildable lands within an urban growth boundary established pursuant to statewide planning goals to accommodate estimated Springfield's housing needs for the plan period 2010-2030.

Goal 10 – Housing. This goal specifies that incorporated cities must plan for and accommodate needed housing types and have an inventory of buildable residential lands and housing types, such as multifamily and manufactured housing.

5. Housing in a variety of price and rent ranges commensurate with the financial capabilities of its households is important to Springfield. The definition of needed housing types as "housing types determined to meet the need shown for housing within an urban growth boundary at particular price ranges and rent levels," and ORS 197.303 defines needed housing types as:
 - (a) Housing that includes, but is not limited to, attached and detached single family housing and multiple family housing for both owner and renter occupancy;
 - (b) Government assisted housing;
 - (c) Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490; and

(d) Manufactured homes on individual lots planned and zoned for single family residential use that are in addition to lots within designated manufactured dwelling subdivisions.

The *Springfield Residential Land and Housing Needs Analysis, February, 20* is the technical supplement to the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* that incorporates input from citizens, stakeholder groups, commissions and elected officials received throughout a multi-year citizen involvement process that included a Residential Lands citizen advisory committee, online public surveys, community workshops, work sessions, open houses and public hearings.

6. The residential land use policies included in the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* together with the technical analysis included in the *Springfield Residential Land and Housing Needs Analysis, February 2011* are found to address Statewide Planning Goal 10: Housing, “To provide for the housing needs of the citizens of the state,” including goals, objectives, policies and implementation actions that supplement the *Eugene-Springfield Metropolitan Plan Residential Land Use and Housing Element* (Chapter III-A), while demonstrating the City’s ongoing commitment to increasing housing choice and residential densities within Springfield’s separate Urban Growth Boundary.
7. The *Springfield Residential Land and Housing Needs Analysis* demonstrates that Springfield has sufficient land designated for Low Density Residential and Medium Density Residential uses for the 2010-2030 plan period; and the *Springfield Residential Land and Housing Needs Analysis* identified a deficit of approximately 28 gross acres of land designated for high density residential (HDR) use and addresses the deficiency through Policy H.2:

“To meet identified high-density, multiple-family housing needs, the City shall re-designate at least 28 additional gross buildable acres in Glenwood Refinement Plan Subarea 8 and the eastern portion of Subarea 6 to Residential Mixed Use by December 31, 2012. This residential mixed use district shall accommodate a minimum of 411 dwelling units in the high density category and shall increase the required net minimum density to at least 28 dwelling units per acre.

Establishment of higher minimum and maximum densities is encouraged to support the neighborhood commercial uses and employment uses envisioned in the Glenwood Refinement Plan. District boundaries and density ranges shall be established through the Glenwood Refinement Plan amendment process by December 31, 2012. The Glenwood Refinement Plan includes a multi-year planning process for updates and an Urban Renewal District in Glenwood to support preparation and implementation of the plan.
8. ORS 197.296 (9) recognizes rezoning or redesignation of nonresidential land and redevelopment strategies as actions and measures that demonstrably increase the likelihood of higher density residential development.

Goal 14 – Urbanization. This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs for the 20 year planning period. Oregon Administrative Rules Division 24 Urban Growth Boundaries clarifies

procedures and requirements of Goal 14 regarding a local government adoption or amendment of an urban growth boundary (UGB); and

OAR 660-024-0020(2) provides as follows:

“The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location;”.

9. Springfield has prepared a tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5 that establishes a more precise location of the UGB based on GIS map files and documentation that establish Springfield’s UGB at a scale sufficient to determine which particular lots or parcels are included in the precise UGB location. Where the UGB does not follow tax lot lines, Springfield has prepared a written description of the location and documentation to provide sufficient information to determine the precise UGB location in those areas as described in the *Springfield Urban Growth Boundary Technical Supplement*.
10. The factors used to determine the precise location of the acknowledged UGB are based on the adopted policies contained in the *Eugene-Springfield Metropolitan Area General Plan* (Metro Plan) as clarified in previous land use decisions by the Lane County Hearings Official, as further described in Exhibit D and Exhibit E and as more fully documented in the *Springfield Urban Growth Boundary Technical Supplement*.

Conclusion

The above findings, including the City of Springfield findings for Implementation of ORS 197.304 Adoption of a Separate Springfield Urban Growth Boundary, Exhibit F to its enacted Ordinance No. 1 incorporated by reference herein, support the Board of Commissioners adopting this Ordinance to establish a separate Urban Growth Boundary for the city of Springfield, as required by ORS 197.304 and a Springfield specific map of the UGB in accordance with OAR 660-024-0020(2).

Implementation of ORS 197.304 Adoption of a Separate Springfield Urban Growth Boundary Findings

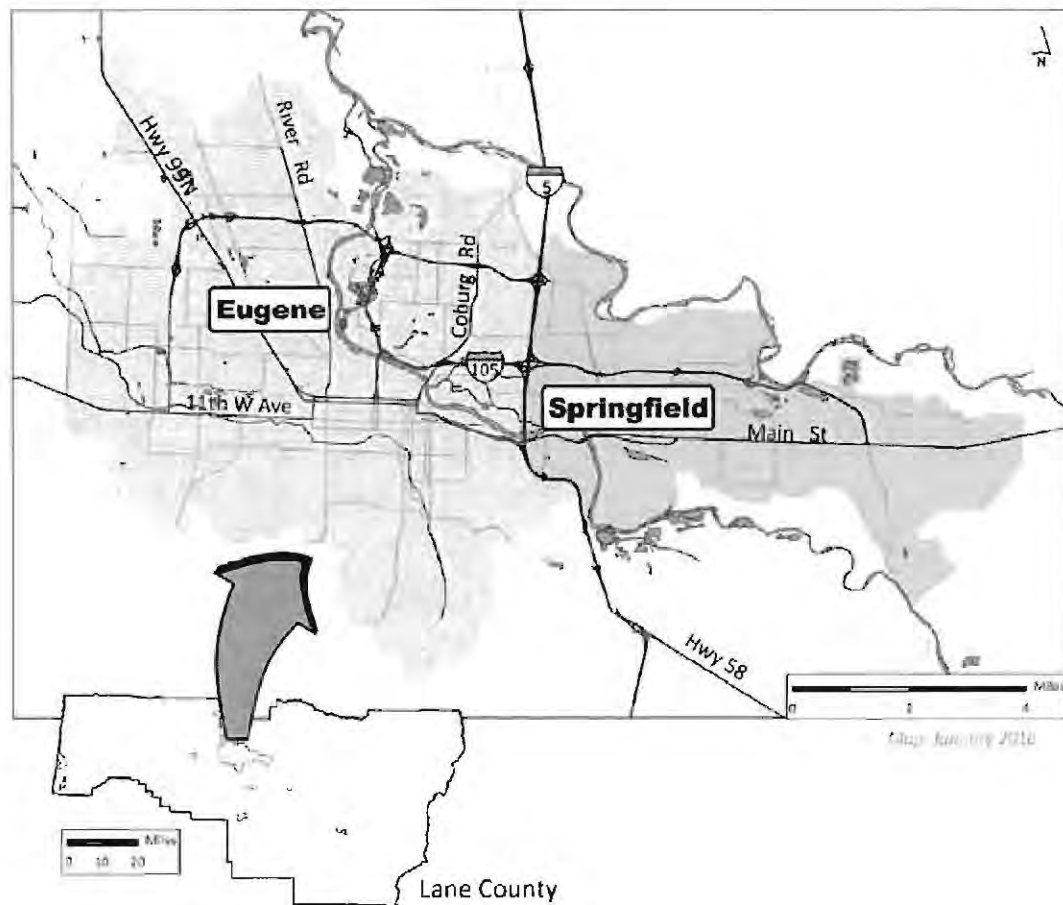


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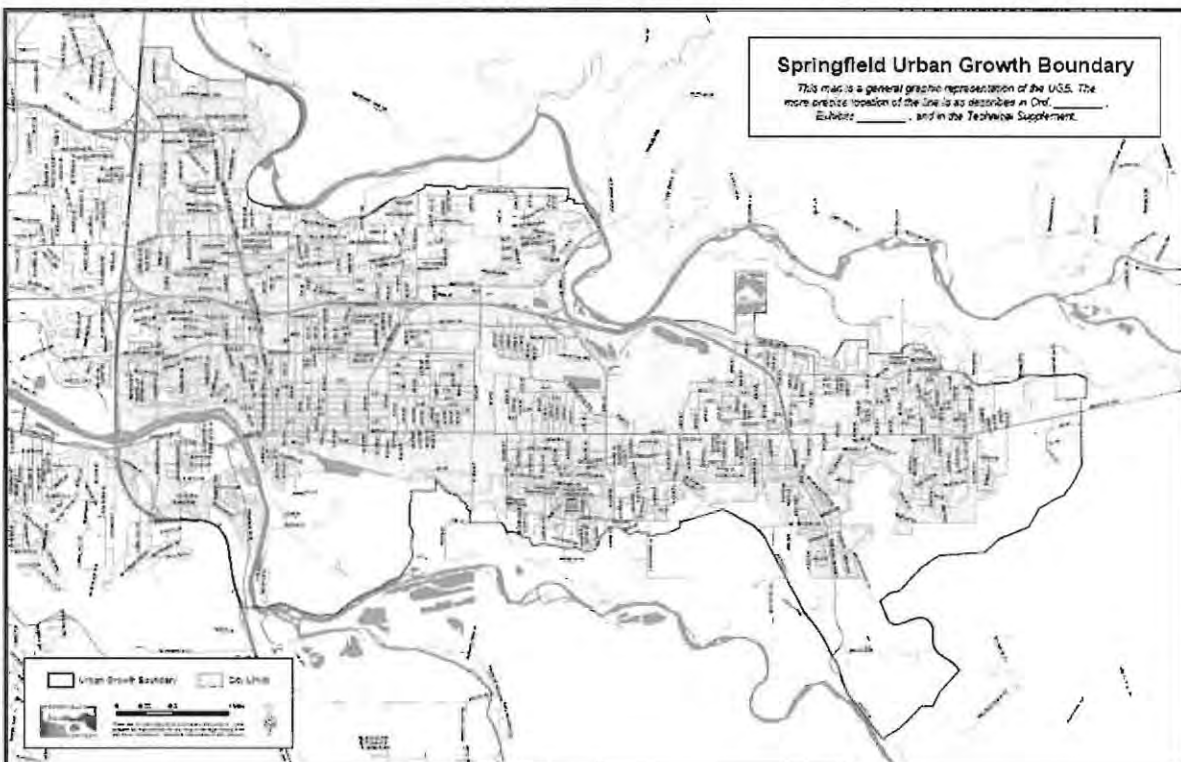
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I. Proposed Post-Acknowledgment Plan Amendment Package

This post-acknowledgement plan amendment (PAPA) package includes three changes to the *Eugene-Springfield Metropolitan Area General Plan* (Metro Plan):

1. Adoption of an amendment to the Eugene-Springfield Urban Growth Boundary (Metro UGB) to establish a separate UGB for the city of Springfield pursuant to ORS 197.304.
 - a. The area encompassed by the Springfield UGB is the same as the City's acknowledged "jurisdictional area" described in the Metro Plan.
 - b. As a result of this amendment, there will be no increase in the combined urban areas of the cities within the acknowledged Metro UGB.
 - c. To comply with OAR 660-024-0020(2), the City has determined the precise location of the Metro UGB (now the Springfield UGB) east of Interstate Highway 5. (Map A, Ordinance No. 6268 Exhibits C, D and E)

Map A: Springfield Separate Urban Growth Boundary (ORS 197.304)



2. Adoption of the *Springfield Residential Land and Housing Needs Analysis; April 2011* (RLHNA) to demonstrate that Springfield has a 20-year supply of buildable land within its separate Springfield UGB. The RLHNA (Ordinance 6268, Exhibit B) and these findings (Exhibit F) demonstrate compliance with:
 - a. ORS 197.296 Factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns;
 - b. Related "Needed Housing" statutes (ORS 197.295 through 197.314); and
 - c. Statewide Planning Goal 10 (Housing) and its administrative rule (OAR Chapter 660, Division 008).

3. Adoption of the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* (Springfield Housing Element) (Ordinance 6268 Exhibit A) to implement the Metro Plan and the results of the RLHNA, by increasing the supply of land designated for High Density Residential (HDR) uses by approximately 28 gross buildable acres. The adopted Housing Element includes the following policy and implementation "measure": Policy H .2. To meet identified high-density, multiple-family housing needs, the City shall redesignate at least 28 gross buildable acres in Glenwood Refinement Plan Subarea 8 and the eastern portion of Subarea 6 to Residential Mixed Use by December 31, 2012. This residential mixed use district shall accommodate a minimum of 411 dwelling units in the high density category and shall increase the required net minimum density to at least 28 dwelling units per acre. Establishment of higher minimum and maximum densities is encouraged to support the neighborhood commercial uses and employment uses envisioned in the Glenwood Refinement Plan. District boundaries and density ranges shall be established through the Glenwood Refinement Plan amendment process by December 31, 2012.

These amendments are necessary to comply with ORS 197.304 (*see* Section II) and ORS 197.296 (*see* Section III), notwithstanding any Metro Plan policy or intergovernmental agreement to the contrary.

II. Compliance with ORS 197.304

Background

ORS 197.304 is one of several “needed housing” statutes found in ORS 197.295 through ORS 197.314. This particular “needed housing” statute applies only to cities of over 50,000 in Lane County. ORS 197.304 requires that the city of Springfield adopt a separate UGB and demonstrate that there is sufficient buildable land within this separate UGB to meet identified housing needs over the next 20 years (as required by ORS 197.296).

ORS 197.304 is quoted in its entirety below in ***bold italic***, followed by the City’s findings demonstrating compliance with this statute:

197.304 Lane County accommodation of needed housing.

(1) Notwithstanding an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions to the contrary, a city within Lane County that has a population of 50,000 or more within its boundaries shall meet its obligation under ORS 197.295 to 197.314 separately from any other city within Lane County. The city shall, separately from any other city:

(a) Establish an urban growth boundary, consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan; and

(b) Demonstrate, as required by ORS 197.296, that its comprehensive plan provides sufficient buildable lands within an urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years.

(2) Except as provided in subsection (1) of this section, this section does not alter or affect an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions adopted by Lane County or local governments in Lane County.

Establishment of a Separate Springfield UGB

City Findings: The cities of Springfield and Eugene are located in Lane County and (according to the US Census American Communities Survey, 2009) have populations of 58,085 and 157,100 within their respective city limits. Springfield and Eugene are the only cities in Lane County that have a population greater than 50,000 and which share common comprehensive plan housing policies and a common urban growth boundary (UGB). Therefore, the application of ORS 197.304 is limited to these two Lane County cities.

ORS 197.304(1) requires each city to “meet its obligation” under the “needed housing” statutes (ORS 197.295 – 197.314) *separately* from the other. The cities of Eugene and Springfield currently meet their housing obligation under the needed housing statutes jointly: (a) through the acknowledged Metro Plan Residential Land Use and Housing Element, and (b) within a common (Metro) urban growth boundary. The Metro Plan, including the Residential Land Use and Housing Element, was adopted by Eugene, Springfield and Lane County in 2004,¹ and was subsequently acknowledged by the Land Conservation & Development Commission through the periodic review process.²

ORS 197.304 requires Springfield to “separately meet” its statutory housing obligations within a UGB “established” consistent with the Statewide Planning Goals. The UGB amendment necessary to “establish” a separate Springfield UGB will not result in a UGB expansion. Since there will be no increase in urban land area as a result of this amendment package, Goal 14 has limited applicability and thus the DLCDD Director shall determine whether this decision is subject to review by the Land Conservation and Development Commission “in the manner of periodic review.”³ In this case, amending the Metro Plan to “establish” a separate UGB does not have the technical meaning of “establish” as used in Statewide Planning Goal 14; rather, it means an amendment to the regional Metro UGB to adopt separate UGBs for each city, as required by ORS 197.304.⁴

¹ See Eugene Ordinance No. 20319 (adopted 4/21/04), Springfield Ordinance No. 6087 (adopted 4/17/04), and Lane County Ordinance No. PA 1197 (adopted 6/2/04).

² DLCDD Order 001635 Periodic Review Task #18, October 20, 2004

³ ORS 197.626 reads in relevant part: **“197.626 Expanding urban growth boundary or designating urban or rural reserves subject to periodic review. * * * a city with a population of 2,500 or more within its urban growth boundary that amends the urban growth boundary to include more than 50 acres * * * shall submit the amendment or designation to the Land Conservation and Development Commission in the manner provided for periodic review under ORS 197.628 to 197.650.”**

⁴ See Attachment 1, Memo by Corinne C. Sherton re “Legislative History of ORS 197.304,” dated December 28, 2010, which is incorporated into these findings by reference. As noted in attorney Sherton’s memorandum:

“There is no reference in the legislative history of HB 3337A to any intent that ‘establish an urban growth boundary,’ as used in ORS 197.304(1)(a), incorporate the technical meaning of ‘establish’ used in Goal 14. Rather, the frequent usage in written and oral testimony of the descriptions ‘splitting,’ ‘dividing,’ and ‘separating’ the existing Metro Plan UGB, to describe the HB 3337-mandated adoption of separate UGB’s by Springfield and Eugene, is more consistent with adoption of those separate UGB’s as amendments to the current Metro Plan UGB. Further, there is no doubt that the remainder of the Metro Plan (other than the current Metro UGB) will remain in effect when the HB 3337A process is concluded. Therefore, the demonstration required by ORS 197.304(1)(b), that a city’s comprehensive plan provides a 20-year supply of buildable land, as required by ORS 197.296, means that the necessary BLI and HNA must be adopted as amendments to the Metro Plan. If Springfield carries out the HB 3337A-mandated process of establishing its UGB and demonstrating compliance with ORS 197.296, as amendments to the acknowledged Metro Plan, then its UGB and housing analysis will become part of the Metro Plan, and in the future Springfield will be able to make decisions consistently

To accomplish this statutory requirement, Springfield has amended the acknowledged Eugene-Springfield Metro UGB to create a separate Springfield UGB for Springfield's "jurisdictional area[s] of responsibility" as described in the Metro Plan. The Metro Plan (Chapter II-D Jurisdictional Responsibility, p. II-D-1) states:

*"The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and Metro Plan Boundary; and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and the UGB east of the Interstate 5 Highway. * * * Refer to Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction."*

Since Interstate 5 separates Springfield's "jurisdictional area of responsibility" from that of the city of Eugene, Interstate Highway 5 will serve as the western portion of Springfield's UGB, as further described in Ordinance # 6268 Exhibits C, D and E. The Metro UGB will continue to serve as Springfield's UGB to the north, east and south. Thus, the external Metro UGB (the UGB that "separates urban from rural land," as opposed to the Springfield/Eugene intercity UGB which separates the cities' urban areas) will remain unchanged, *subject to the site specific interpretations of this boundary required by OAR 660-024-0020(2).*⁵

No changes to existing intergovernmental agreements among Lane County, Eugene and Springfield are proposed or necessary to implement ORS 197.304.

Process Considerations

City Findings: Under the provisions of ORS 197.304 and Goal 14, Lane County must co-adopt Springfield's separate UGB. No changes are proposed to existing Metro Plan land use designations or to the City's urban growth management agreement with Lane County.

Importantly, there will be no change in Eugene's and Springfield's combined urban land area as a result of this amendment. Therefore, the DLCD Director shall determine whether this post-

with the (new) acknowledged Metro Plan, as it is required to do under existing law."

⁵ "660-024-0020 Adoption or Amendment of a UGB * * * (2) The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location."

acknowledgment plan amendment proposal is subject to review by the Land Conservation and Development Commission "in the manner of periodic review (ORS 197.626).⁶

Statewide Planning Goal Findings

City Findings: Section III of these findings addresses Goal 10 (Housing) and its administrative rule (OAR Chapter 660, Division 008). Section IV of these findings addresses the remainder of the Statewide Planning Goals.

III. Compliance with ORS 197.296, Goal 10 and OAR Chapter 660, Division 008

The following findings show how the City has met each relevant provision of ORS 197.296 (Factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns). ORS 197.296 is divided into sections; each section is quoted below in ***bold italic*** followed by the City's findings demonstrating compliance with the quoted section.

ORS 197.296 and OAR Chapter 660, Division 008 (Interpretation of Goal 10 Housing) have corresponding or related provisions. Compliance with these Division 008 provisions is addressed in footnotes under the corresponding or related ORS 197.296 section.

Applicability

197.296 Factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns.

(1)(a) The provisions of this section apply to * * * local government comprehensive plans for lands within the urban growth boundary of a city that is located outside of a metropolitan service district and has a population of 25,000 or more.

City Findings: ORS 197.296 applies to the City of Springfield because the City's 2010 urban area population of 67,031 exceeds 25,000. The population within the Eugene-Springfield Metropolitan UGB (over 200,000) is much greater.

⁶ ORS 197.626 reads in relevant part: "**197.626 Expanding urban growth boundary or designating urban or rural reserves subject to periodic review.** * * * a city with a population of 2,500 or more within its urban growth boundary that amends the urban growth boundary to include more than 50 acres * * * shall submit the amendment or designation to the Land Conservation and Development Commission in the manner provided for periodic review under ORS 197.628 to 197.650."

20-Year Buildable Land Supply

(2) At periodic review pursuant to ORS 197.628 to 197.650 or at any other legislative review of the comprehensive plan or regional plan that concerns the urban growth boundary and requires the application of a statewide planning goal relating to buildable lands for residential use, a local government shall demonstrate that its comprehensive plan or regional plan provides sufficient buildable lands within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years. The 20-year period shall commence on the date initially scheduled for completion of the periodic or legislative review.

City Findings: The City has conducted a legislative review that relates to Goal 10 (Housing) and the supply of buildable land needed for residential use. This review was undertaken, in part, in response to ORS 197.304 requirements. Springfield's initially scheduled date for completion of this legislative review process was December 31, 2009. Therefore, the 20-year planning period runs from 2010 through 2030.

The April 2011 *Springfield Residential Land and Housing Needs Analysis* (RLHNA) (Ordinance Exhibit B) is the final product of that legislative review and serves as the City's "housing needs analysis" and "buildable lands inventory" under Goal 10, Division 008, and ORS 197.296. As discussed in more detail below, the April 2011 RLHNA demonstrates that there is sufficient buildable residential land within Springfield's jurisdictional area (*i.e.*, the area within the City's separate UGB) to meet identified residential, public and semi-public land needs during the 20-year planning period.

Comments and Revisions to the Draft RLHNA

During the City's legislative review process, 1000 Friends of Oregon (1000 Friends) and the Department of Land Conservation and Development (DLCD) expressed concerns regarding the draft RLHNA. Where these concerns raised valid issues, they have been considered in the revised RLHNA or in these findings.

- 1000 Friends (letters dated October 9, 2009 from Mia Nelson⁷ and November 11, 2009 from Sid Friedman) argued that the August 2009 draft of the RLHNA over-estimated land need and under-estimated land supply, resulting in a recommendation to add more land to the UGB than can be justified under Goal 14. 1000 Friends' comments focused on the relationship between public and semi-public and residential land needs and the buildable land for each within Springfield's jurisdictional area. 1000 Friends also noted

⁷ Ms. Nelson submitted this letter on behalf of herself and LandWatch Lane County, but was soon after hired by 1000 Friends.

that projected growth in higher-density group quarters was inconsistent with past trends.

- DLCD (October 10, 2009 letter) also had concerns regarding the relationship between housing, public and semi-public land needs and Springfield's buildable land supply. DLCD suggested that the draft RLHNA "overstates the need for additional land to accommodate these uses." DLCD also questioned the basis for the assumption in the RLHNA that 5% of projected housing need would be met through redevelopment of developed residential land, and asked for documentation regarding consistency of the RLHNA with Metro Plan assumptions.

The impetus for many of these objections appears to have been the conclusion reached in the 2007 version of the RLHNA that a UGB expansion of 344 gross buildable acres *may* be necessary to meet identified residential, public and semi-public land needs.⁸

However, in December 2009, a mapping error was discovered that had the effect of increasing the supply of vacant and partially vacant buildable residential land within Springfield's jurisdictional area from 935 to 1,447 acres.⁹ This finding resulted in substantial revisions to the 2007 RLHNA: **the December 2009 RLHNA concluded that a UGB amendment was no longer needed to meet 20-year housing, public and semi-public land needs.**

- In January 2011, ECONorthwest revised the draft RLHNA to address comments from 1000 Friends, DLCD and others, and to ensure internal data consistency.¹⁰ The April 2011 RLHNA (Ordinance Exhibit B), at pp. 65-70, better explains how public and semi-public land needs are allocated to residential, public and employment lands.
- The revised 2011 RLHNA also increased the estimated percentage of group home residents from 1% to 2% of projected population growth, as suggested by 1000 Friends. Modifying the future persons in group quarters assumption from 1% of new population to 2% of new population better reflects historical trends and the anticipated future demographic characteristics of Springfield.

⁸ The City of Springfield responded to concerns raised by 1000 Friends and DLCD in two documents:

1. Council Briefing Memorandum from Gregory Mott, dated November 16, 2009.
2. Letter from Allen Johnson, Johnson & Sherton, PC, dated October 20, 2009.

⁹ The Goal 10 rule defines land with slopes of 25% or greater as "generally unbuildable." (OAR 660-008-0005(2)) The GIS maps mistakenly showed land with slopes of 15% or greater as unbuildable and were based on outdated information. The City used newer "LIDAR" mapping techniques to correctly map slopes of 25% or greater. By including land with 15-25% slopes in the "buildable lands" category, the residential buildable land supply increased from 935 to 1,447 acres – to the point where a UGB amendment was no longer necessary to meet identified residential, public and semi-public land needs. (ECONorthwest December 1, 2009 Memorandum entitled "Revisions to the Residential Lands Study")

¹⁰ See Attachment 2, memo by ECONorthwest titled "Revisions to the Springfield Residential Land and Housing Needs Analysis," dated January 18, 2011, which is incorporated into these findings by reference.

The April 2011 RLHNA

The April 2011 RLHNA provides the factual and analytical basis for the City's determination that the separate Springfield UGB has sufficient buildable land to meet identified housing needs (including public and semi-public uses that typically locate on residential lands) for the 20-year planning period.

As shown in the 2011 RLHNA's Executive Summary (pp. i-iii), to meet the housing needs for Springfield's coordinated Year 2030 population of 81,608 (an increase of 14,577 people):

"Springfield will need to provide about 5,920 new dwelling units to accommodate growth between 2010 and 2030 plus 291 group quarter dwellings for a total 6,211 dwelling units. For non-group quarter dwellings, about 3,552 dwelling units (60%) will be single-family types, which include single-family detached, manufactured dwellings, and single-family attached housing. About 2,368 units (40%) will be multi-family housing."

Based on an analysis of demographic, household income, and economic trends, the 2011 RLHNA (p. Chapter 5) *projects* the number of needed housing units and the needed density range for each plan designation. Springfield's average needed density for all housing types/plan designations is 7.9 dwelling units per net acre.

"The forecast indicates that Springfield will need about 745 net residential acres, or about 918 gross residential acres to accommodate new housing between 2010 and 2030. The forecast results in an average residential density of 7.9 dwelling units per net residential acre and of 6.5 dwelling units per gross residential acre. This represents a 20% increase in density over the historical average of 6.6 dwelling units per net acre."

The RLHNA shows the effect of this projected density increase of 20% over recent *actual* residential densities in Table S-4 (p. iv):

- LDR land is projected to develop at 4.5 units per gross buildable acre;
- MDR land is projected to develop at 12.5 units per gross buildable acre; and
- HDR land is projected to develop at 20 units per gross buildable acre.

Notably, these projections are at the low end of the densities authorized by the Metro Plan and the *Springfield Development Code*.

The Metro Plan (p. III-A-7) establishes density ranges for the LDR, MDR and HDR plan designations as follows:

- LDR: through 10 units per gross acre;
- MDR: 10-20 units per gross acre; and

- HDR: over 20 units per gross acre.

The *Springfield Development Code* (Section 3.2-205) implements Metro Plan High, Medium and Low Density Residential designations with its HDR, MDR and LDR zoning districts:

A. Low Density Residential District (LDR). *The LDR District establishes sites for residential development where the maximum dwelling units per developable acre permitted is 10, consistent with the provisions of this Code. Fractions will be rounded down to the next whole number.*

B. Medium Density Residential District (MDR). *The MDR District establishes sites for residential development where single-family or multiple family dwellings are permitted with a minimum density of more than 10 units per developable acre and a maximum density of 20 units per developable acre, consistent with the provisions of this Code. Fractions will be rounded down to the next whole number. Land divisions shall not be used to diminish the minimum density standard.*

C. High Density Residential District (HDR). *The HDR District establishes sites for residential development where single-family or multiple family dwellings are permitted with a minimum density of more than 20 units per developable acre and a maximum density of 30 units per developable acre, consistent with the provisions of this Code. Fractions will be rounded down to the next whole number. Land divisions shall not be used to diminish the minimum density standard.*

However, as noted in both the Metro Plan and the RLHNA, *actual* residential development densities have been considerably lower than the maximums allowed by the Metro Plan and City zoning. Thus, *if* the housing market responds to the densities allowed by the Metro Plan and Springfield's zoning districts, there is flexibility for housing densities to exceed those projected in the RLHNA. For example, there is no maximum density in Springfield's Downtown and Glenwood Mixed-use Nodal areas. Based on examples of high density housing types built recently in the Eugene-Springfield Metro area, it is anticipated that residential density in the City's mixed-use nodal areas is likely to achieve higher densities over the plan period.¹¹

This is consistent with Goal 10:

Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.

¹¹ See staff report for the April 4, 2011 City Council meeting - Attachment 1: Briefing Memo "Housing Types Correlated with Springfield Residential Plan Designations/Densities." The report provides examples of recently built multi-family housing in the Eugene-Springfield area.