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October 10, 2012

Linda Pauly
Principal Planner
City of Springfield
225 Fifth Street
Springfield, OR 97477

Re: Proposed UGB expansion

Dear Linda:

Following is our focused review of the September 2009 draft *Springfield Economic Opportunities Analysis (EOA)*, along with suggestions for how Springfield could move forward with a 50-100 acre industrial UGB expansion that 1000 Friends would support.

NEED DETERMINATION

The EOA's fundamental weakness is extremely low assumed job densities. For example:

Industrial on sites over 20 acres.....	0.8 jobs per acre
Industrial overall.....	1.5 jobs per acre
Retail overall.....	11.3 jobs per acre
Office overall.....	14.8 jobs per acre
Average for all new employment.....	7.9 jobs per acre

These job densities are plainly unreasonable. Springfield has already achieved job densities far in excess of these assumptions. For example, while the EOA proposes an overall job density of just 7.9 employees per acre, Springfield's current job density is *three times* higher, at 24 employees per acre.¹

The low employment densities lead to absurd results. For example, the EOA claims that 500 acres of large-lot industrial land are needed for just 375 workers. The EOA offers no explanation or facts to support these outcomes.

The authors of the EOA were aware of the difference between Springfield's historic job densities and what was ultimately proposed. Table C-10 on page 141 identifies the number of needed sites that would be needed based on "historic employment patterns." The final line, however, presents a range of needed sites that is far greater than Table C-10's tally, both for every specific site size and in aggregate. This overage is carried over into Table C-11. The following table summarizes

¹ See the attached Springfield EOA Job Density Analysis for details.

the substantial differences between the “historic employment pattern” and the EOA’s presumed future need.

	SITE SIZE					
	<1	1 to 2	2 to 5	5	20 to 50	>50
Table C-10 “Historic Pattern”	181	38	30	20	2	2
Table C-11 Assumed Future Need	225	60	48	30	5	3
Increase From “Historic”	124%	158%	160%	150%	250%	150%

The EOA offers no evidence in support of such a dramatic departure from the Table C-10 determination. We urge the city not to proceed with the Table C-11 proposal.

Instead, we recommend that the city pursue more the reasonable Table C-10 site needs determination. This would still be an aggressive departure from past trends, and would still result in a much higher land need determination than current trends indicate is necessary. Despite Table C-10’s “historic employment pattern” label, as the attached Springfield EOA Job Density Analysis shows, the job density that would result from Table C-10 is only 13 jobs per acre, much lower than Springfield’s current 24 jobs per acre.

While we do have concerns about Table C-10’s conclusions, in the interests of compromise, we are willing to support a site needs determination that is consistent with Table C-10.

SUPPLY DETERMINATION

There appears to be an error in Table 5-1. As shown below, this table claims there are five 5-20 acre parcels, one 20-50 acre redevelopable parcel, and nothing over 50 acres:

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

	Site Size (acres)					
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	Greater than 50
Buildable Land Inventory						
Vacant						
Industrial	72	24	20	12	0	0
Commercial and Mixed Use	104	14	6	4	0	0
Redevelopable						
Industrial	122	28	31	5	1	0
Commercial and Mixed Use	305	20	15	0	0	0
Total Buildable Sites						
Industrial	194	52	51	23	1	0
Commercial and Mixed Use	409	34	21	4	0	0

However, as shown below, Table 2-10’s tally of redevelopable land shows eleven 5-20 acre parcels, two 20-to-50 parcels, and one 50+ acre parcel:

Table 2-10. Buildable acres in potentially redevelopable tax lots by plan designation and parcel size, Springfield UGB, 2008

Plan Designation	Lot Size (Buildable Acres)								Total	
	<0.25	0.25-0.49	0.50-0.99	1.00-1.99	2.00-4.99	5.00-9.99	10.00-19.99	20.00-50.00		50+
Total Acres										
Industrial										
Campus Industrial	0.2	0.5	1.9	3.4	5.0	0.0	0.0	0.0	0.0	11.0
Light Medium Industrial	3.9	10.0	10.6	12.4	36.3	19.4	0.0	0.0	0.0	92.7
Heavy Industrial	1.4	2.8	9.7	24.5	53.7	32.7	22.4	0.0	89.5	236.7
Special Heavy Industrial	0.0	0.0	0.0	1.7	0.0	0.0	12.4	63.2	0.0	77.4
Subtotal	5.5	13.3	22.2	42.0	95.0	52.1	34.9	63.2	89.5	417.7
Commercial										
Commercial	7.6	13.7	21.8	12.7	22.6	0.0	0.0	0.0	0.0	78.4
Community Commercial	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Major Retail Center	1.5	1.8	0.9	0.0	0.0	0.0	0.0	0.0	0.0	4.3
Subtotal	9.1	15.5	22.8	12.7	22.6	0.0	0.0	0.0	0.0	82.7
Mixed Use										
Commercial Mixed Use	9.6	7.8	14.3	10.0	8.9	0.0	0.0	0.0	0.0	50.6
Light Medium Industrial Mixed Use	0.1	0.3	0.7	0.0	0.0	0.0	0.0	0.0	0.0	1.1
Medium Density Res Mixed	0.4	0.3	2.5	1.2	9.2	0.0	0.0	0.0	0.0	13.5
Mixed Use	1.5	2.2	2.8	3.8	12.4	0.0	0.0	0.0	0.0	22.7
Subtotal	11.6	10.5	20.2	15.0	30.5	0.0	0.0	0.0	0.0	87.9
Total	26.2	39.4	65.2	69.7	148.1	52.1	34.9	63.2	89.5	588.2
Number of Tax Lots										
Industrial										
Campus Industrial	1	1	2	2	2	0	0	0	0	8
Light Medium Industrial	38	26	14	9	13	3	0	0	0	103
Heavy Industrial	22	6	12	16	16	5	2	0	1	80
Special Heavy Industrial	0	0	0	1	0	0	1	2	0	4
Subtotal	61	33	28	28	31	8	3	2	1	195
Commercial										
Commercial	70	37	31	9	6	0	0	0	0	153
Community Commercial										
Major Retail Center	17	6	1	0	0	0	0	0	0	24
Subtotal	87	43	32	9	6	0	0	0	0	177
Mixed Use										
Commercial Mixed Use	69	22	21	7	3	0	0	0	0	122
Light Medium Industrial Mixed Use	1	1	1	0	0	0	0	0	0	3
Medium Density Res Mixed	2	1	3	1	2	0	0	0	0	9
Mixed Use	11	7	4	3	4	0	0	0	0	29
Subtotal	83	31	29	11	9	0	0	0	0	163
Total	231	107	89	48	46	8	3	2	1	535

Source: City of Springfield GIS data; analysis by ECONorthwest
 Note: Buildable acres includes "constrained" acres and "unconstrained" acres
 Note: Acres may not sum to tenths due to rounding errors.

Below is a comparison of the corrected Table 5-1 land supply determination and the Table C-10 "Historic" site needs. There is a surplus in every category except the >50-acre size range.

	SITE SIZE					
	<1	1 to 2	2 to 5	5	20 to 50	>50
Table C-10 "Historic Pattern"	181	38	30	20	2	2
Corrected Table 5-1 Supply	603	86	72	27	2	1

If the city determines that the needed >50-acre site cannot be created via assembly of smaller sites, then we would support expansion of the UGB to provide that site, up to a maximum of 100 acres.

ADDITIONAL CONSIDERTIONS

First, the city should focus its planning and funding efforts on the industrial site that can be most easily served with infrastructure. Public facilities must be provided to the new site in a timely

manner, in order for this expansion to be genuinely helpful to Springfield's land supply. Our experience has been that industrial sites without available services are not attractive in the market. Failure to serve industrial land also sets the stage for conversion to other uses. After many years without an industrial buyer, frustrated property owners may subsequently request redesignation to a more marketable use, such as residential.

Springfield should also ensure that the large site is protected from future divisions. Springfield already has enough employment land in terms of acreage. Since the purpose of the UGB expansion would be solely to provide a large site, the site must be preserved for that use. It could take decades for this large site to develop; the city should not allow an impatient landowner to split the site in the interim. This protection is especially critical in light of Springfield's constrained future land supply. There will not be a lot of options for replacing large industrial sites that are lost to poorly planned development.

Finally, the city should remember that if the new industrial site develops quickly, that use would be important substantive evidence that can be used to justify another expansion to replace the site. In addition, work is underway now to reform UGB expansion rules to make it easier to create and maintain a perpetual regional supply of large industrial sites. Pursuing a more modest – but defensible – UGB expansion now does not tie the city's hands regarding future expansions. The city may revisit its *EOA* at any time.

Thank you for the opportunity to provide these comments.

Sincerely,



Mia Nelson
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1000 Friends of Oregon
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Eugene, OR 97452
541.520.3763

Attachment: Springfield EOA Job Density Analysis

Cc: Ed Moore, DLCD

SPRINGFIELD EOA JOB DENSITY ANALYSIS

FORECASTED JOBS, Table C-9	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50	TOTAL
Warehousing/Distribution	46	21	9	221	41	12	
General Industrial	141	161	167	168	20	302	
Office	1024	448	400	645	338	632	
Retail	143	65	116	76	535	576	
Other Services	817	451	460	869	520	752	
TOTAL FORECASTED JOBS	2171	1146	1152	1979	1454	2274	10176

SITES NEEDED, Table C-11	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50
Warehousing/Distribution			3	5	1	
General Industrial	5	7	10	11	3	3
Office	100	20	20	5	1	
Retail	70	15	10	4		
Other Services	50	18	5	5		
TOTAL SITES NEEDED	225	60	48	30	5	3

AVERAGE SITE SIZE, Table S-3	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50
Warehousing/Distribution	0.5	1.5	3	15	50	100
General Industrial	0.5	1.5	3	15	50	100
Office	0.3	1.5	3	15	40	50
Retail	0.3	1.5	3	15	40	50
Other Services	0.3	1.5	3	15	40	50

ACREAGE NEEDED (computed)	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50	TOTAL
Warehousing/Distribution	0	0	9	75	50	0	
General Industrial	3	11	30	165	150	300	
Office	30	30	60	75	40	0	
Retail	21	23	30	60	0	0	
Other Services	15	27	15	75	0	0	
TOTAL ACREAGE NEEDED	69	90	144	450	240	300	1293

JOBS PER ACRE (computed)	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50	OVERALL
Warehousing/Distribution	**	**	1.0	2.9	0.8	**	2.6
General Industrial	56.4	15.3	5.6	1.0	0.1	1.0	1.5
Office							14.8
Retail							11.3
Other Services							29.3
AVERAGE JOBS PER ACRE	31.7	12.7	8.0	4.4	6.1	7.6	7.9

2008 SPRINGFIELD EMPLOYMENT, Table C-2	41133						^
2008 DEVELOPED EMPLOYMENT LAND, Table 2-5	1710						
2008 JOBS PER ACRE (computed)	24						←-----COMPARE

USING CLAIMED "HISTORICAL" SITE NEEDS	<1	1 to 2	2 to 5	5 to 20	20 to 50	>50	TOTAL
AVERAGE SITE SIZE							
Average of industrial/commercial	0.4	1.5	3	15	45	75	
Need per historical, Table C-10	181	38	30	20	2	2	
TOTAL ACRES NEEDED	72	57	90	300	90	150	759
Resulting OVERALL EPA	30	20	13	7	16	15	13

Still much lower than existing 24 EPA ^