

## UGB Expansion Analysis for Employment Land

### I. Introduction

This UGB Expansion Analysis for Employment Land sets out the standards and process by which the City of Eugene has identified the land to be added to Eugene’s urban growth boundary (“UGB”) for future industrial use. The additional urbanizable industrial land will complete the City’s buildable land inventory (“BLI”) to provide employment opportunities for Eugene’s growing population through 2032.

The City’s Employment Land Supply Study, adopted as an appendix to the Envision Eugene Comprehensive Plan, establishes the need to expand the UGB to add more industrial land. Part I of the Employment Land Supply Study identifies the supply of employment land within the UGB in 2012. Part II of that Study is the City’s Economic Opportunities Analysis (“EOA”), which concludes the City will need additional commercial and industrial employment land to meet the needs of the growing population through 2032. The EOA identifies the number of additional sites that are needed, and the characteristics those sites will need. Considering the additional land need that results from public and semi-public uses that occur on employment land (addressed in Part III of the Employment Land Supply Study), and the measures the City has taken since 2012 to increase the supply of employment land within the UGB (addressed in Part V of the Employment Land Supply Study), the City is still deficient in employment land as follows:

- 2 industrial sites of 75 acres or larger;
- 3 industrial sites of between 50 and 75 acres;
- 2 industrial sites of between 20 and 50 acres; and
- 4 industrial sites of between 10 and 20 acres.

This deficit must be addressed through an expansion of the City’s UGB.

### II. Overview of Legal Standards and Process for Selecting Land to Address an Industrial Land Deficit

State statutes, rules and court decisions set up a highly prescriptive set of standards that must be applied to the City’s selection of land to address its industrial land deficit.<sup>1</sup> The standards described in this Section II are set out in order of their application. In Section III, below, the City explains how the City applied the standards to determine which land to include in its UGB to address the deficit in industrial employment land.

The primary regulation that governs the procedure for evaluating land for any UGB expansion is set out at ORS 197.298. ORS 197.298 is implemented more specifically through Statewide Planning Goal 14, the Goal 14 administrative rules at OAR 660-024. For a UGB expansion to address a deficit of industrial land,

---

<sup>1</sup> Amendments to Statewide Planning Goal 14 and its administrative rules at OAR 660-024 took effect on January 1, 2016. The amended versions do not apply to the City of Eugene for purposes of this UGB work, pursuant to HB 4126 (2016) and OAR 660-024-0000(4) (“The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016.”)

Goal 9 rules at OAR 660-009 also apply. Terms of the statute and rules are referenced throughout this overview of the legal standards and procedure.

The primary directives for UGB expansions are set out in ORS 197.298:

- (1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:
  - (a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.
  - (b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or non-resource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.
  - (c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).
  - (d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.
- (2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.
- (3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:
  - (a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
  - (b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
  - (c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

### **a. Establish the Industrial Land Study Area / Candidate Land for Evaluation (ORS 197.298(1)(b) / OAR 660-024-0060(4))**

The initial step in determining where a City will expand its UGB is to establish an extraterritorial study area. The only legal standards for doing so are derived from ORS 197.298(1)(b), which refers to the City's consideration of "land adjacent to the UGB," and OAR 660-024-0060(4), which states:

In determining alternative land for evaluation under ORS 197.298, “land adjacent to the UGB” is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

The study area for the industrial land expansion, including all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency, is addressed under Section III.a., below.

## **b. Categorize Candidate Land into the Four Priority Categories of ORS 197.298(1)**

ORS 197.298(1) sets out the initial requirement for analyzing land in the study area by requiring the City to sort the study area land into four basic categories:

- a. Land that is designated urban reserve land;
- b. Land identified in Lane County’s rural comprehensive plan or the Metro Plan<sup>2</sup> as an exception area or non-resource land, including resource land that is completely surrounded by exception areas unless such resource land is high-value farmland;
- c. Land designated as marginal land; and
- d. Land designated in Lane County’s rural comprehensive plan or the Metro Plan for agriculture or forestry, or both.

This is addressed under Section III.b. of this study, below. ORS 197.298(1) and OAR 660-024-0060(1) below set out a “priority” system among the four land categories described above. The order of priority corresponds with the order in which the categories are listed above, highest (a) to lowest (d). This priority system begins with the general rule that cities will expand onto land in the highest-priority land category, expanding onto lower priority land only if the higher-priority land is “inadequate to accommodate the amount of land needed.”

## **c. Starting with Land in the Highest Priority Category, Apply State’s Factors for Dismissal of Candidate Land**

Under III.c.f., below, the land in each priority category is analyzed. For every subarea, the analysis applies the following factors, in order, as required by ORS 197.298, Statewide Planning Goals 14 and 9, OAR 660-024, OAR 660-009 and the Oregon Court of Appeals. The Court of Appeals’ decision in *1000 Friends of Oregon v. LCDC*, 244 Or App 239, 262 (2011) (often referred to as “the McMinnville decision”) is particularly noteworthy, as it provides the most specific direction regarding these steps and the application of ORS 197.298, Goal 14 and OAR 660-024, which apply to all UGB expansions.

### **(1) Dismiss Candidate Land with “Development Constraints” -- Factors that Temporarily or Permanently Limit or Prevent the Use of Land to Address the Identified Industrial Land Deficit (244 Or App 239 (2011))**

---

<sup>2</sup> For some areas, the land use designations of the Metro Plan are not parcel-specific as of the development of this document. As a result, portions of tax lots may fall into one priority while the majority of the tax lot is in a different priority.

This threshold factor, explained by the Court of Appeals in the McMinnville decision, is required to make sure that the supply of land included in a UGB expansion can actually be developed. The Court of Appeals stated that “any necessary UGB amendment process for purposes of land development begins with the identification of buildable land that is contiguous to the existing [urban growth] boundary.” *1000 Friends of Oregon v. LCDC*, 244 Or App 239, 262 (2011). In that case, the Court of Appeals explained that the determination as to whether candidate land is “inadequate,” as that term is used in ORS 197.298(1) and (3), cannot be made until unbuildable land has been dismissed from consideration.<sup>3</sup>

For purposes of a UGB amendment to add employment land, the City must dismiss land that is encumbered with “development constraints,” as that term is defined for potential industrial land at OAR 660-009-0005. OAR 660-009-005(2) provides that “development constraints” means:

*“factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.”*

The City’s EOA, located at Part II of its Employment Land Supply Study, identifies four development constraints that would limit or prevent the siting of a new industrial use of the type the City can reasonably expect to attract during the 20-year planning period.<sup>4</sup> Therefore, those constraints are the ones applied by Eugene. They are:

- Land that has a slope of 5 percent or greater based on the United States Geological Survey’s 10-meter digital elevation model<sup>5</sup>
- Land within the Special Flood Hazard Areas (SFHA) identified on the applicable Flood Insurance Rate Map (FIRM)<sup>6</sup>
- Land subject to Statewide Planning Goal 5 protections that are designated in an acknowledged comprehensive plan<sup>7</sup>

---

<sup>3</sup> The Court explained that this initial basis for dismissal of land, which is explicitly stated in the statutes that govern UGB expansions for residential land, is clearly required for employment land as well. *1000 Friends of Oregon v. LCDC*, 244 Or App 239, 262 (2011). See also, OAR 660-024-0060(1)(e), stating that the determination of suitable land to accommodate land needs must include consideration of any provisions of law applicable in determining whether land is buildable.

<sup>4</sup> While “parcel fragmentation” is listed in OAR 660-009-005(2) as a constraint, it is addressed in this analysis under (2), below, through the requirement that expansion “sites” must meet minimum size characteristics with a maximum number of tax lots.

<sup>5</sup> <http://nationalmap.gov/elevation.html>

<sup>6</sup> <https://www.eugene-or.gov/1945/Flood-Zones-and-Terms>

<sup>7</sup> Lane County’s Goal 5 program protects mineral and aggregate resources by designating land in the Metro Plan as “Sand and Gravel.” With that designation, the parcels do not fall into any of the ORS 197.298(1) priority categories. Even if Goal 5 Sand and Gravel land did fall into a priority category, it would be summarily removed from further consideration at this stage because the Goal 5 protections that apply to the entire site prevent its redevelopment for industrial uses. Only after such a site has been removed from the County’s Goal 5 inventory could it be considered for other uses.

- Tax lots committed to a use or development that is not reasonably likely to be discontinued during the planning period, making industrial redevelopment highly unlikely during planning period based on specific circumstances described on a lot by lot basis<sup>8</sup>

To provide some preliminary context, four high level “context” maps (one for each of the development constraints) are provided at the end of Section III.b., below. In Section III.c.-f., below, as each subarea is specifically analyzed in order of its ORS 197.298 priority, land with these constraints is identified and dismissed from further consideration. In some cases, this results in dismissal of a small area on a tax lot. In other cases, the constraint applies to an entire tax lot.

**(2) Dismiss Candidate Land that Cannot Reasonably Accommodate the Specific Types of land Needs / Cannot be Expected to Provide the Appropriate Site Characteristic for the Proposed Use (ORS 197.298(3)(a) / OAR 660-024-0060(1)(e), (5))**

ORS 197.298(3)(a) states:

- 3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:
  - a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

OAR 660-024-0060, implementing ORS 197.298, provides (with emphasis added):

- 1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:
  - a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.
  - b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.
  - c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.
  - d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

---

<sup>8</sup> One attribute of an area designated as an “urban reserve,” is that its further development is legally restricted until it is brought into the UGB. This is because such development, if allowed to occur before a UGB expansion, can impede efficient urbanization of the area. Eugene and Lane County have not adopted urban reserves and are an illustration of the problem described above. Lane County has allowed fairly extensive development in the areas surrounding Eugene’s UGB. In some areas, that development is so extensive or urban in nature that it makes the land unavailable for the uses needed by Eugene’s growing population.

- e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.

\* \* \*

- 5) If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

In determining whether land is suitable for industrial use, the Goal 9 rule's definition of "suitable" at OAR 660-009-0005(12) applies. That rule states that "'Suitable' means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use."<sup>9</sup>

OAR 660-009-005(11) defines "Site Characteristics" as "the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes."

Taken together, these statutes and rules allow the City to dismiss from further consideration land in its study area that lacks the site characteristics needed to accommodate the expected industries. The City's Employment Land Supply Study, adopted as an appendix to the Envision Eugene Comprehensive Plan, discusses numerous site characteristics that make land suitable for the new or expanding industries that are desired by, and likely to be attracted to, Eugene during the 20-year planning period. The EOA, Part II of the Employment Land Supply Study, addresses "Site Needs for Target Industries" in its section 6.2. For purposes of its evaluation of land, the City of Eugene chose to include only the most essential site characteristics identified through data and studies cited by ECONorthwest in the City's EOA: those focused on minimum acreage needs and proximity to a freight route. The EOA contains detailed information justifying these site characteristics for the different types of employment-generating development that Eugene is expecting to attract based on its economic development strategy. Specifically, the expansion sites needed in Eugene must:

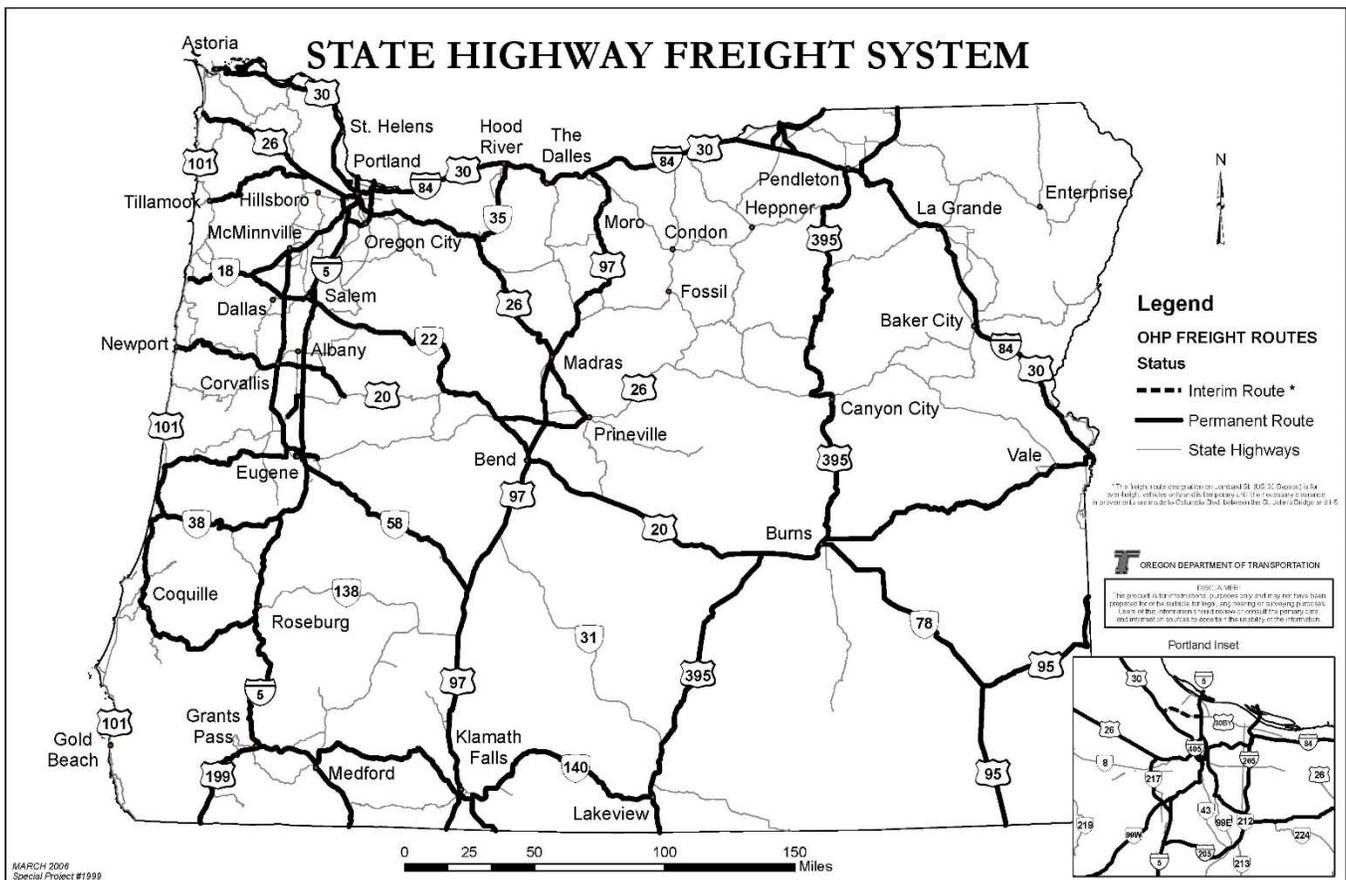
- Be a contiguous area comprised of one or two tax lots that could accommodate one of the following:<sup>10</sup>
  - an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)

---

<sup>9</sup> The Goal 14 rule at OAR 660-024-0010(8) states that "'Suitable vacant and developed land' describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (12) for 'suitable'."

<sup>10</sup> In the City's analysis of each subarea of land, under III.c.-f. below, it does not dismiss an unconstrained higher priority site that is too small to meet any of the size requirements above if it is located within a mile of access to a State Designated Freight Route and could possibly be combined with an adjacent lower priority site to meet a size requirement. For such sites, the analysis below specifies that the site will be considered further along with adjacent lower priority sites, to determine whether the inclusion of it in combination with a lower-priority site can reduce the need to expand onto lower priority land.

- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)
- Have access via existing or planned roads, within 1 mile of the site, to a State Designated Freight Route (see State Highway Freight System map inset below).<sup>11</sup> State Designated Freight Routes within one mile of the study area are:
  - Interstate 5
  - Interstate 105 west of I-5
  - Randy Papé Beltline
  - Highway 99 north of Randy Papé Beltline
  - Highway 126 west of Randy Papé Beltline



**(3) Dismiss Candidate Land to which Future Urban Services Could not Reasonably be Provided Due to Topographical or other Physical Constraints (ORS 197.298(3)(b))**

ORS 197.298(3)(b) states:

- 3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

<sup>11</sup> Access is measured from along existing or planned roads to access points for the routes, such as an intersection, entrance or exit.

- b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints;

At this stage of the land evaluation – the dismissal of land that is not adequate to address the identified needs -- the Court of Appeals has instructed that cities may dismiss land based on the specific standard at OAR 197.298(3)(b). However, the City of Eugene’s analysis does not identify any higher priority land that could not be served in the planning period due to “topographical or other physical constraints” and, therefore, does not dismiss any land on this basis.

**(4) Dismiss Candidate Land if its Inclusion in the UGB would be Untenable Considering the Comparative Environmental, Energy, Economic and Social Consequences that would Result from its Inclusion in the UGB (Goal 14 Locational Factor 3)**

**(5) Dismiss Candidate Land if its Inclusion in the UGB to Address the Identified Industrial Land Deficit would be Incompatible with Nearby Agricultural and Forest Activities Occurring on Farm and Forest Land Outside the UGB (Goal 14 Locational Factor 4)**

The Oregon Court of Appeals has instructed that, at this stage of a city’s analysis, when the city applies ORS 197.298(3), it must also apply (only) two of the four “location factors” from Goal 14 (factors three and four).

**(6) Identify Lower Priority Land that is Needed in Order to Include or to Provide Services to the Remaining Land in this Priority (ORS 197.298(3)(c))**

The City of Eugene’s analysis does not identify any lower priority land that must be included in the UGB in order to include or serve higher priority land and, therefore, does not dismiss any land on this basis.

**(7) Add Remaining Candidate Land to the UGB and/ or Evaluate Land in the Next Highest Priority Category as follows:**

- (a) If there is no candidate land remaining in this priority category then apply steps (1) through (6) to the land in the next highest priority category**
- (b) If the amount of candidate land remaining in this priority category can accommodate some, but not all, of the industrial land deficit then:**
  - **Add the remaining land in this priority (including any land identified in step (6)) to the UGB; and**
  - **Apply steps (1) through (6) to the land in the next highest priority category**
- (c) If the amount of candidate land remaining in this priority category is more than is needed to accommodate the need for industrial land deficit, apply the boundary location factors of Goal 14 to select the land for inclusion in the UGB (within priority category four, give higher priority to poor soils (ORS 197.298(2))**

As stated in (7)(c), above, all four of the boundary location factors of Goal 14 are to be used when the amount of suitable land in a particular priority category is more than is needed to satisfy the identified need. OAR 660-024-0060(1)(b). The Goal 14 factors are applied to choose which land, within that priority, to include in the UGB. This process comes into play only for fourth priority land in Eugene’s industrial UGB analysis. When addressing fourth priority land, ORS 197.298(2) requires that “[h]igher

priority shall be given to lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”

The locational factors of Statewide Planning Goal 14 are:

- 1) Efficient accommodation of identified land needs;
- 2) Orderly and economic provision of public facilities and services;
- 3) Comparative environmental, energy, economic and social consequences; and
- 4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

To provide direction regarding the application of the Goal 14 locational factors, above, OAR 660-0024-0060 provides:

- 3) The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.

\* \* \*

- 7) For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities.
- 8) The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:
  - a. The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;
  - b. The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and
  - c. The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.

### **III. Analysis of Land for UGB Expansion**

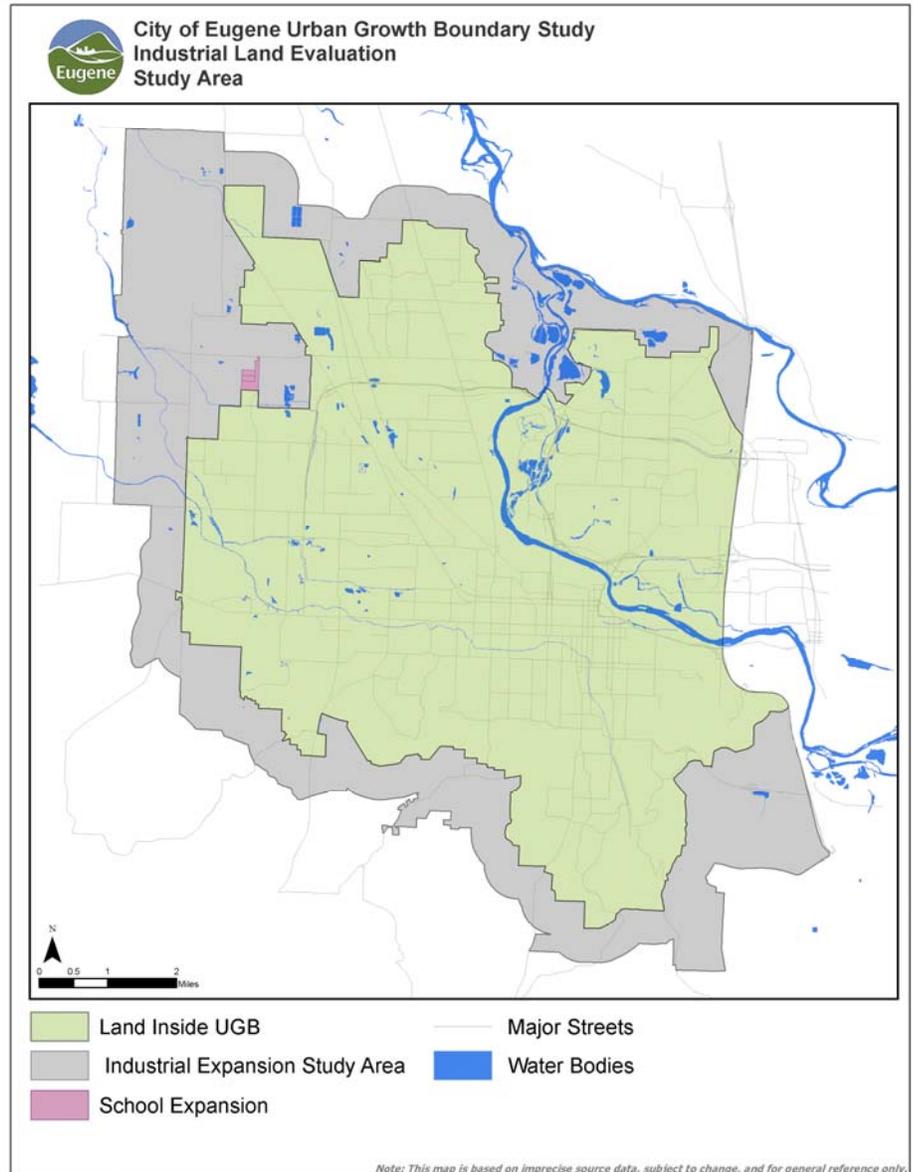
#### **a. Establish the Study Area / Candidate Land for Evaluation (ORS 197.298(1)(b) / 660-024-0060(4))**

For purposes of determining where the City of Eugene will expand its UGB to accommodate the industrial land needs that exceed the capacity of its existing UGB, an extraterritorial study area was

established. As explained under II.a, above, the study area established by the City must be “adjacent” to the UGB, including “land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.” ORS 197.298(1)(b); OAR 660-024-0060(4).

Specifically, Eugene’s study area for industrial land includes all land west of Interstate 5,<sup>12</sup> south of the McKenzie River, and within ½ mile of Eugene’s current UGB or within the Eugene-Springfield Metropolitan Area General Plan boundary (which extends beyond ½ mile in some areas). The study area includes some additional land to allow for analysis of exception areas or non-resource areas that abut the current UGB and extend beyond the boundary described above. Through a separate study (the UGB Expansion Analysis for School Land), a 54-acre portion of this study area has already been identified for an expansion to site a new school facility and will, therefore, not be considered in this UGB Expansion Analysis for Employment Land. The industrial land study area includes about 18,734 acres, more than enough land to ensure consideration of all land with a reasonable potential to satisfy the need.

The location of the study area is shown on the “Study Area” map.



<sup>12</sup> The acknowledged regional comprehensive plan (the Metro Plan) provides that “[t]he division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway.” ORS 197.304 requires Eugene and Springfield to establish separate UGBs “consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan.”

## **b. Categorize Candidate Land into the Four Priority Categories of ORS 197.298(1)**

As explained under II.b, above, ORS 197.298(1) requires the City to identify the land in its study area as follows:

- First Priority Land: land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan
- Second Priority Land: land identified in the Lane County Rural Comprehensive Plan or the Metro Plan as an exception area or non-resource land, including resource land that is completely surrounded by exception areas unless such resource land is high-value farmland
- Third Priority Land: land designated as marginal land in the Lane County Rural Comprehensive Plan
- Fourth Priority Land: land designated in the Lane County Rural Comprehensive Plan or the Metro Plan for agriculture or forestry, or both.

Because these priority categories are based on land use designations, the first map below, Land Use Designations, shows the designations of both the Metro Plan and the Lane County Rural Comprehensive Plan. For land use designations that are used by both plans (e.g. “Agriculture” in Metro Plan and “Agricultural” in the Lane County Rural Comprehensive Plan), the same mapping color and label is used for the purposes of this study. This map and following maps with candidate land also show the site identified in the UGB Expansion Analysis for School Land for an urban growth boundary expansion to accommodate a need for school land. The base designations shown on this map have been aggregated into priority categories, as shown on the subsequent map, Priority Categories of Candidate Land.

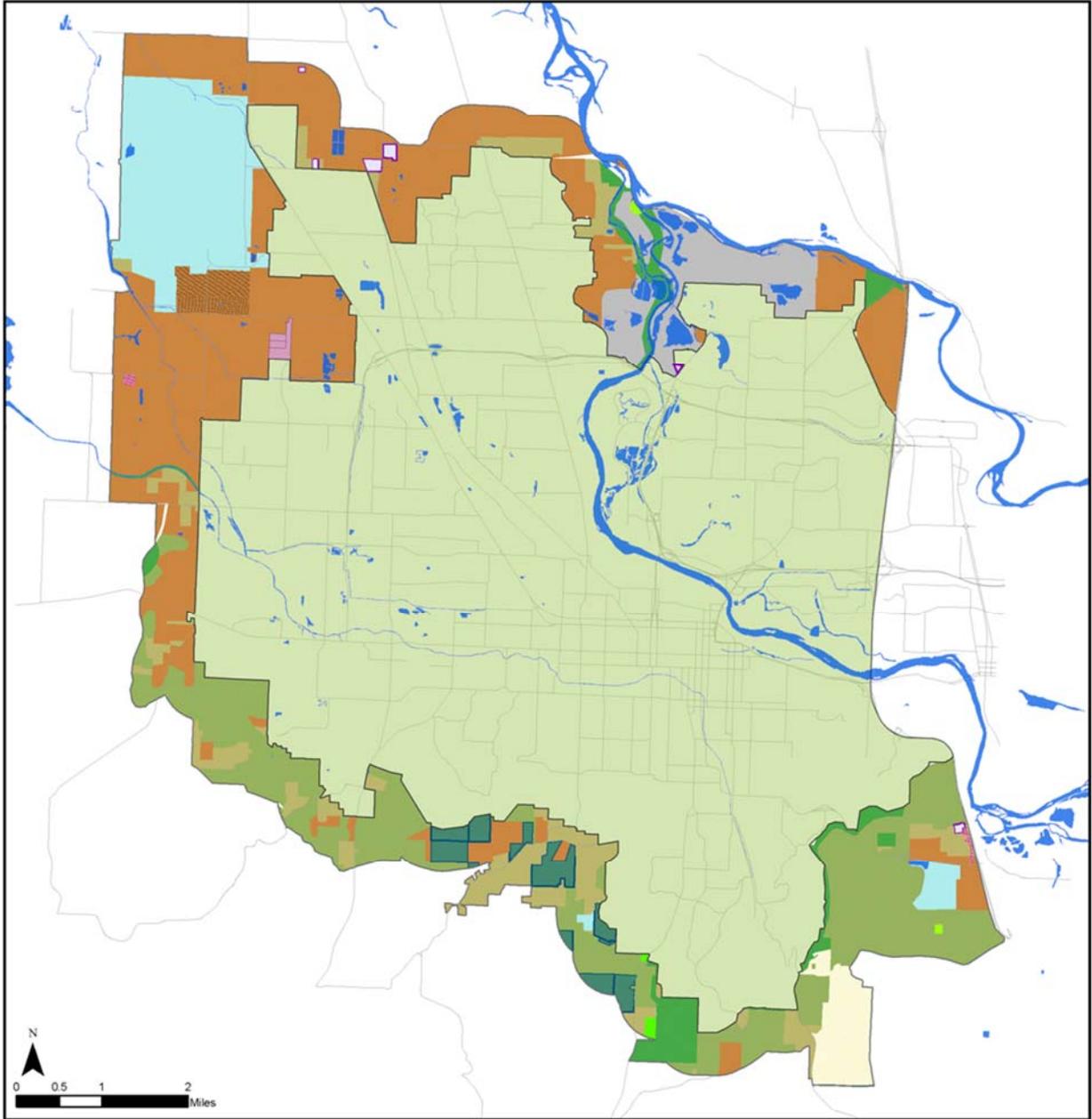
In Eugene’s study area, there are no lands designated as urban reserves (See ORS 197.298(1)(a), above); therefore there is no first priority land included on the map or in the analysis that follows. Land within the study area that does not fall into any of the four priority categories is identified on the “Priority Categories of Candidate Land” map as “Other Lands.”<sup>13</sup>

---

<sup>13</sup> These lands include those designated for Sand and Gravel, Airport Reserve, and Parks and Open Space, as well as a small portion of a tax lot designated Government and Education for which an exception was not required to be taken.



**City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Land Use Designations**



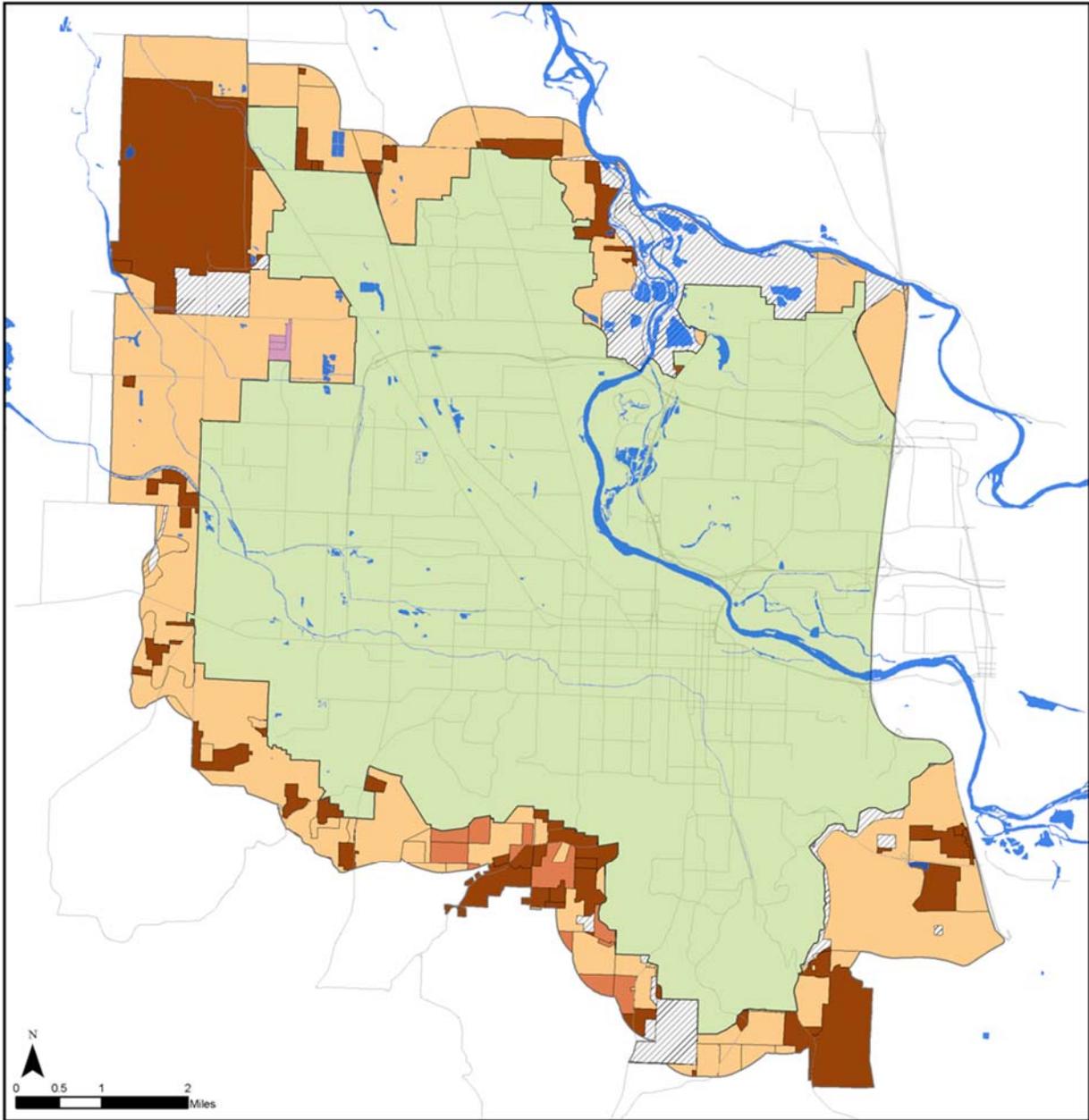
- |                  |  |                   |                  |
|------------------|--|-------------------|------------------|
| Land Inside UGB  | <b>Comprehensive Plan Designations</b> | Sand and Gravel   | Rural Commercial |
| School Expansion | Government & Education                 | Agriculture       | Rural Industrial |
| Major Streets    | Parks and Open Space                   | Forest Land       | Airport Reserve  |
| Water Bodies     | Natural Resource                       | Rural Residential | Marginal         |
|                  |  |                   | Non Resource     |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved: 8/24/2016



# City of Eugene Urban Growth Boundary Study Industrial Land Evaluation Priority Categories of Candidate Land



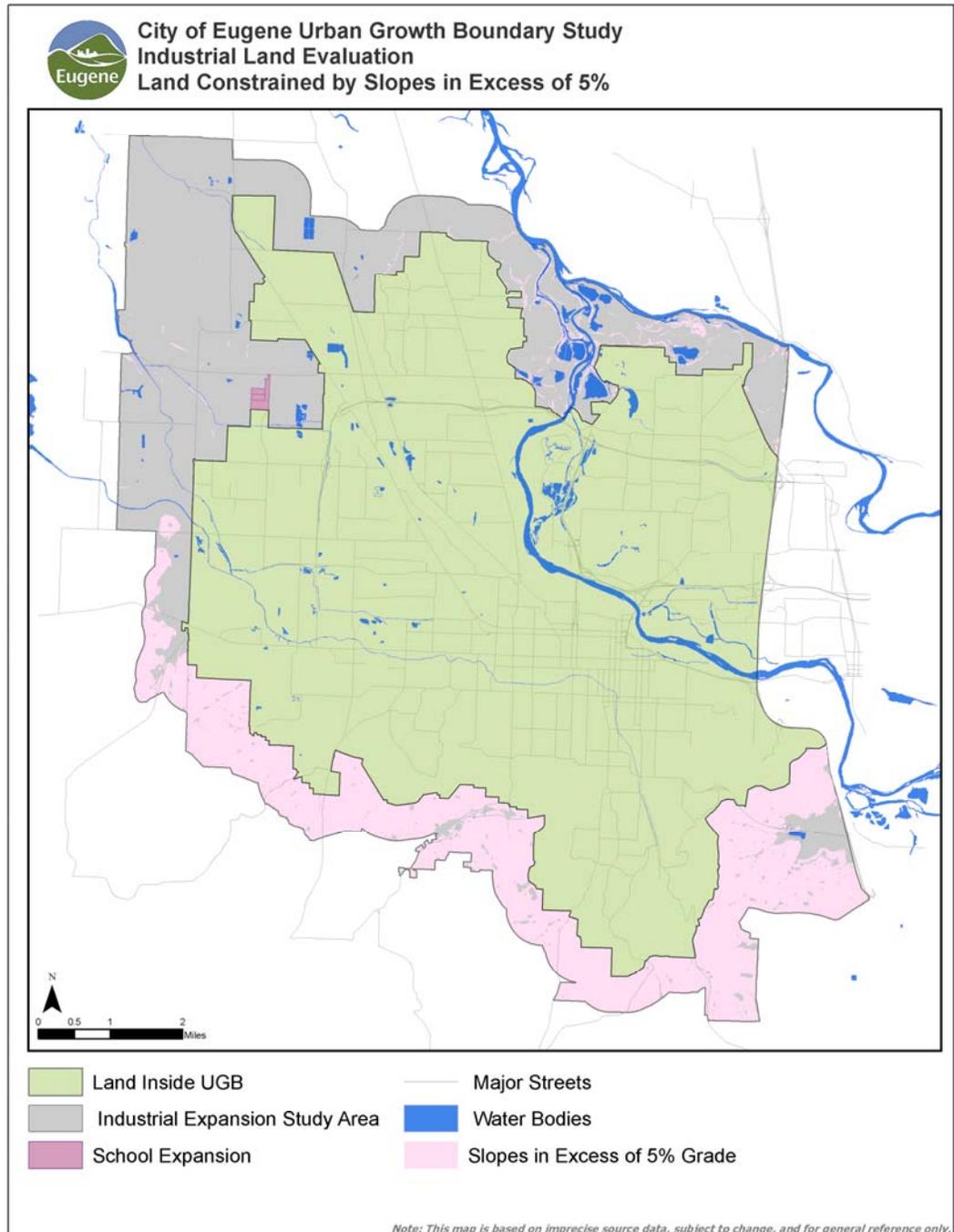
|                  |  |
|------------------|--|
| Land Inside UGB  | <b>Land Types</b>  |
| School Expansion | Priority 2   |
| Major Streets    | Priority 3   |
| Water Bodies     | Priority 4   |
|                  | Other Lands - land that does not fall within any priority category |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved 5/31/2018

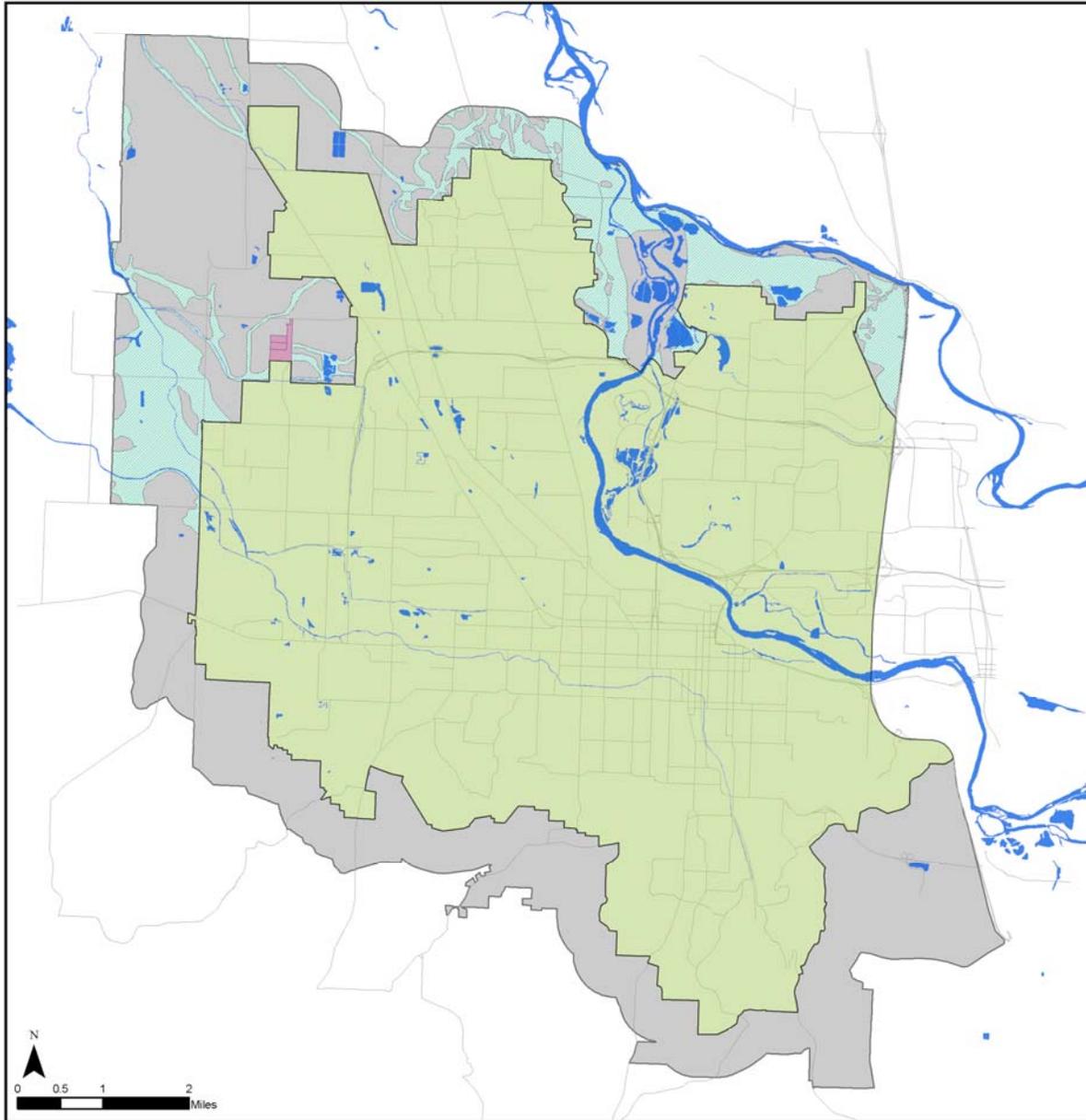
Due to the large extent of the study area and the level of detail used to conduct the analysis, each of the priority categories of land is addressed below by dividing it into smaller subareas. The purpose of these subareas is exclusively to provide a closer view of the characteristics of land in each priority category that are essential to meet the identified needs for industrial expansion. The analysis does not evaluate any subarea as a whole for suitability, but rather evaluates all of the land within each subarea for its ability to meet the City’s industrial land need.

Because maps of each subarea show a limited view of the relevant constraints, and because many constraints overlap, a series of contextual maps (“Land Constrained by Slopes in Excess of 5%,” “Land Constrained by the Special Flood Hazard Area,” “Land Constrained by Goal 5 Wetland or Mineral Aggregate Protections”, and “Land Constrained by Uses or Development”) are provided below to show the extent of each individual development constraint across the study area.





**City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Land Constrained by the Special Flood Hazard Area**



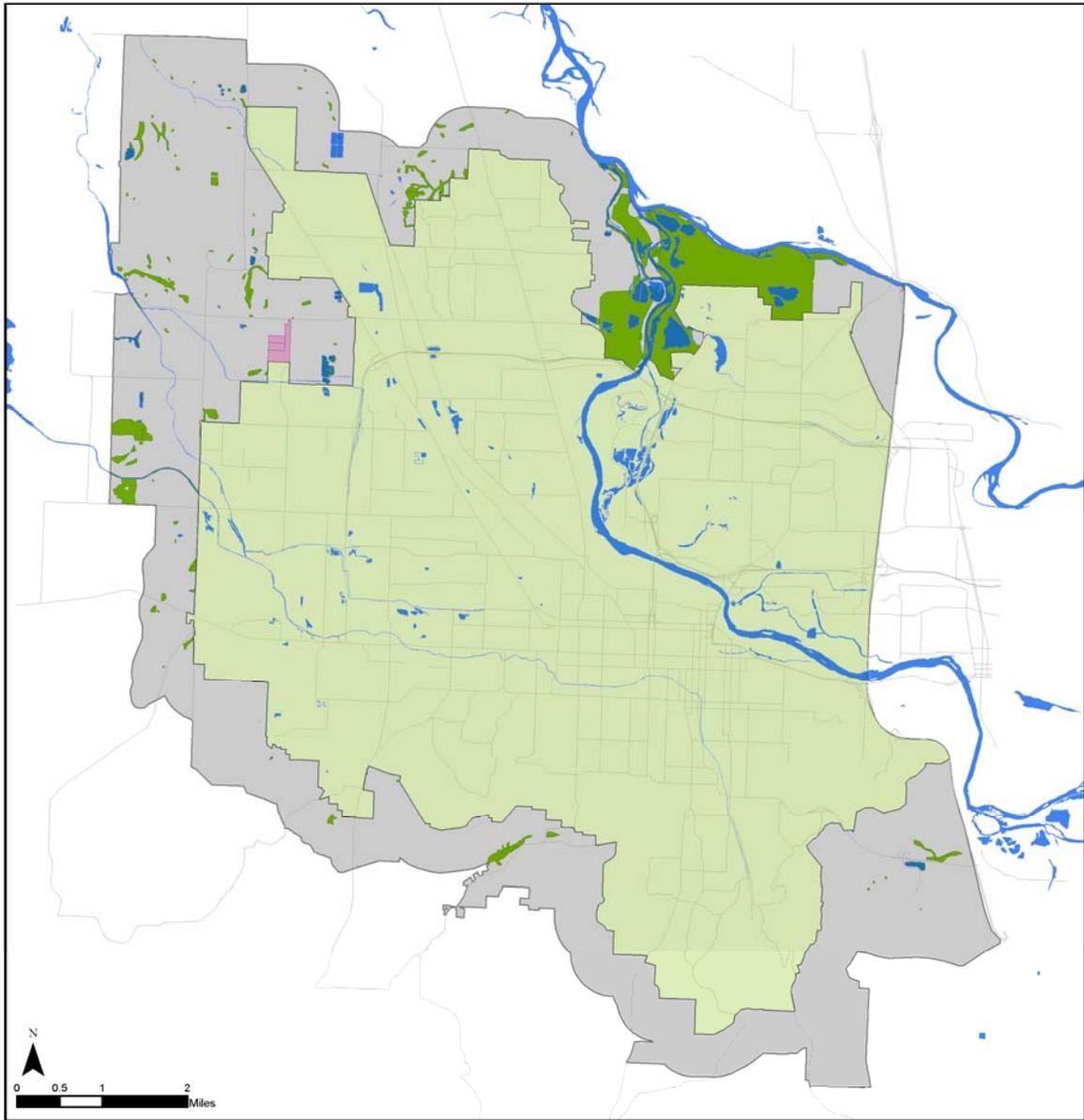
- |                                 |                           |
|---------------------------------|---------------------------|
| Land Inside UGB                 | Major Streets             |
| Industrial Expansion Study Area | Water Bodies              |
| School Expansion                | Special Flood Hazard Area |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Data PDF Saved: 5/27/2016



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Land Constrained by Goal 5 Wetlands or Mineral and Aggregate Protections



- |   |  |
|---|--|
|  Land Inside UGB                 |  Major Streets  |
|  Industrial Expansion Study Area |  Water Bodies   |
|  School Expansion                |  Goal 5 Protected Wetlands or Mineral and Aggregate Resources |

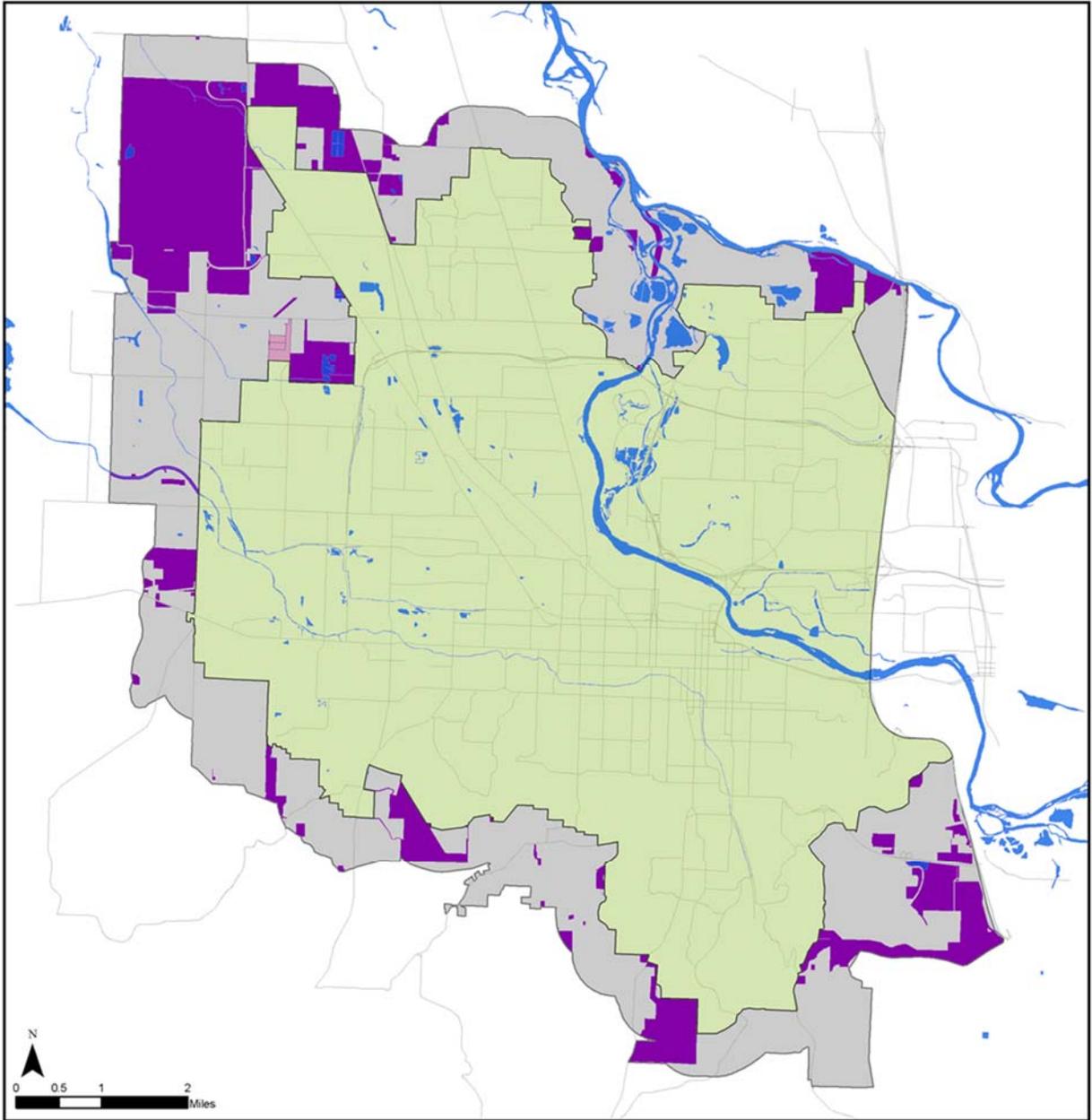
*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

14

<sup>14</sup> This map only notes wetland and mineral and aggregate Goal 5 protections. Additional Goal 5 protected areas may be identified upon detailed analysis.



# City of Eugene Urban Growth Boundary Study Industrial Land Evaluation Land Constrained by Uses or Development



- |                                 |  |
|---------------------------------|--|
| Land Inside UGB                 | Major Streets  |
| Industrial Expansion Study Area | Water Bodies   |
| School Expansion                | Constrained by Uses/Development Making<br>Redevelopment Highly Unlikely in the Planning Period |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

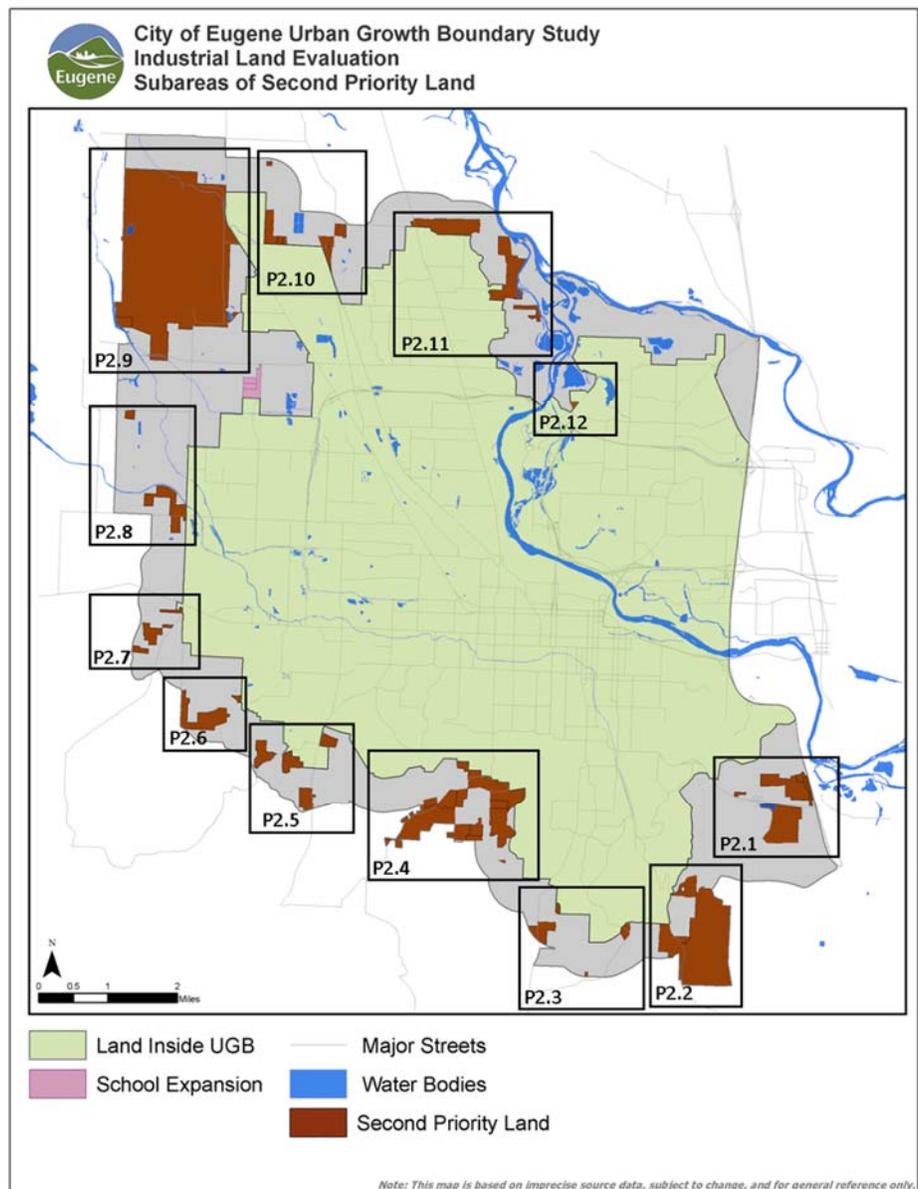
Date PDF saved: 5/17/2018

### c. First Priority Land – Apply State’s Factors for Dismissal of Candidate Land

There is no land designated for urban reserves around Eugene. Therefore, there is no first priority land to consider for the proposed UGB expansion.

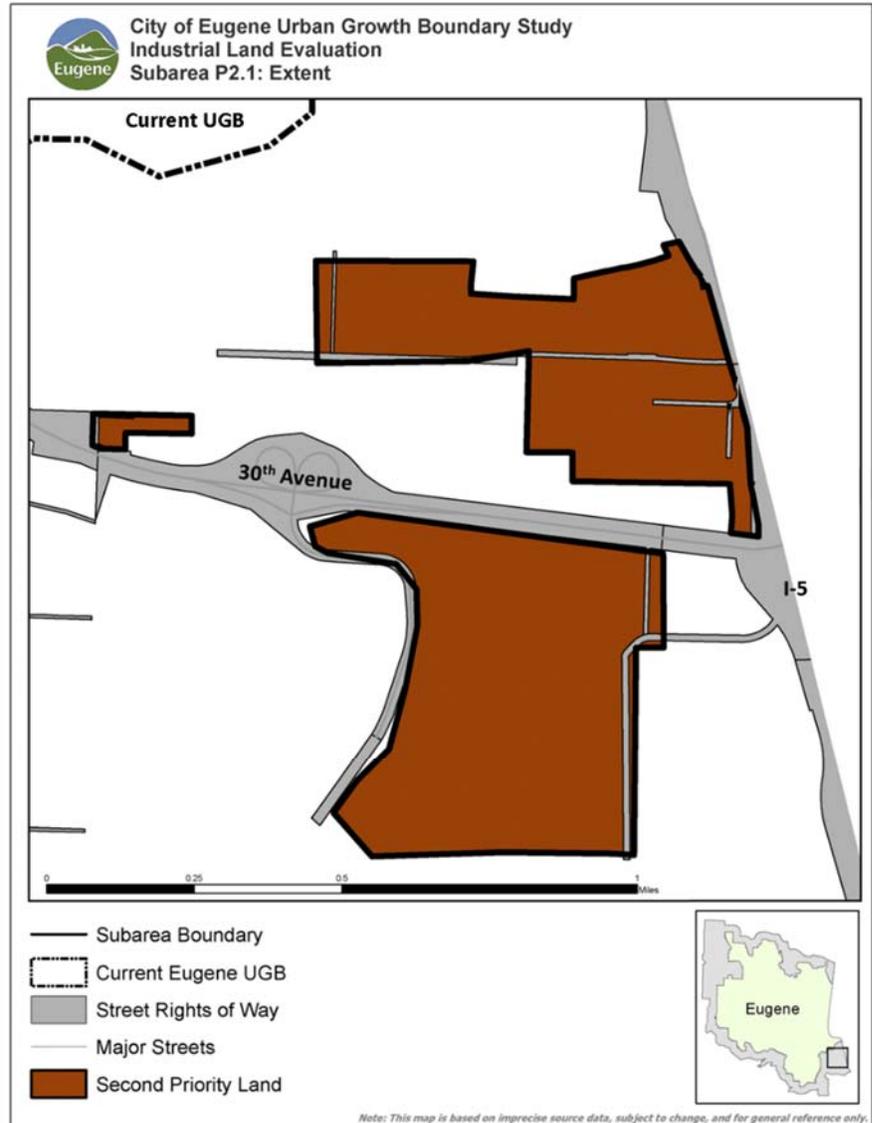
### d. Second Priority Land – Apply State’s Factors for Dismissal of Candidate Land

The second priority land in Eugene’s study area is divided into 12 subareas for evaluation. These Priority 2 (“P2”) subareas are shown below on the “Subareas of Second Priority Land” map. As noted above, these subareas allow for a more detailed view of the land within the study area. The analysis that follows evaluates all land in each subarea. It does not determine the suitability of subareas as a whole. Each of the twelve subareas of second priority land was evaluated using the standards and process set out in Section II.c, above. An analysis that walks through that evaluation follows.



## (1) Subarea P2.1

Subarea P2.1 is located to the southeast of the current UGB, near 30th Avenue and Interstate 5, as shown on the “Extent” map. It is composed of 272.8 acres of second priority land in three closely located areas separated from each other by fourth priority land. The land in this subarea is designated as either Rural Residential, Rural Commercial, Rural Industrial, or Government and Education.

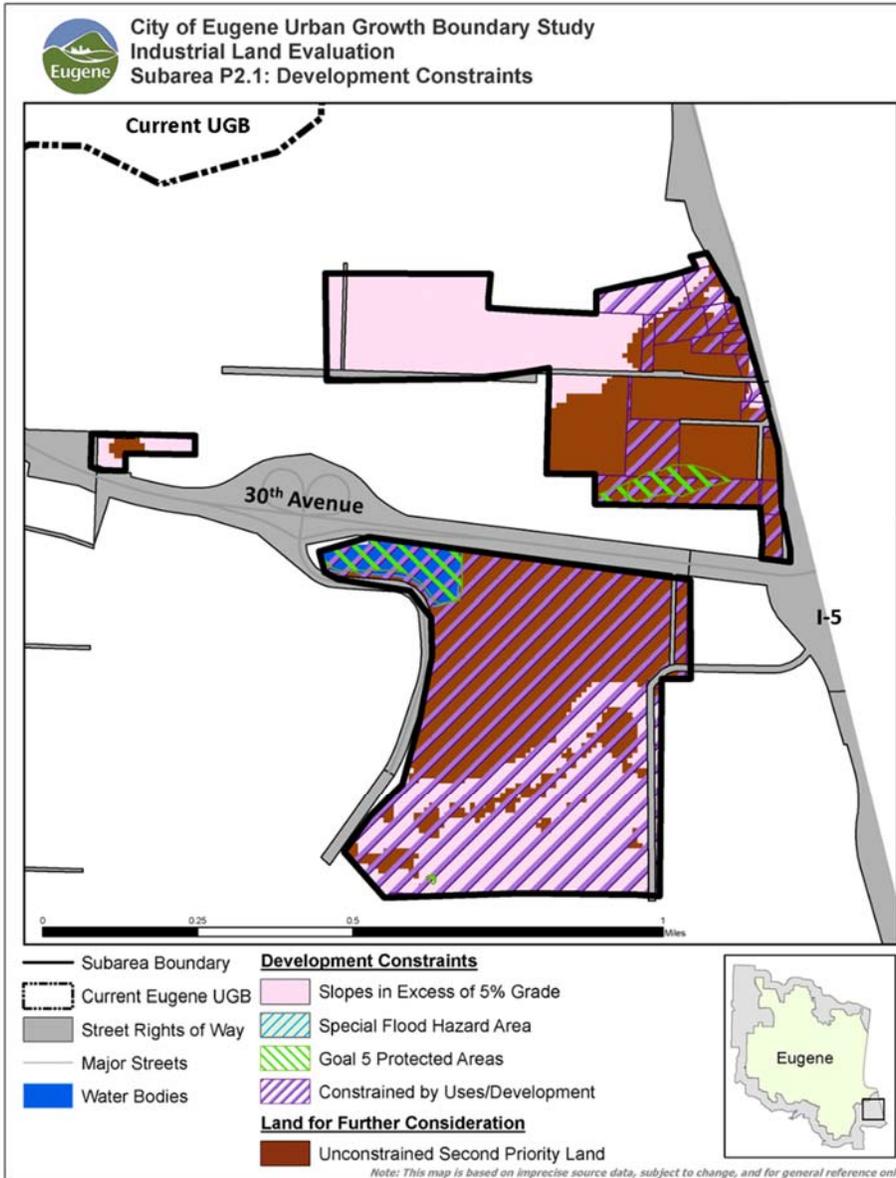


### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit

The map “Subarea P2.1: Development Constraints” shows the development constraints present in Subarea P2.1. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.1 subarea has more than one type of development constraint. The map “Subarea P2.1: Development Constraints” is a visual representation of the following information:

#### *Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 120.6 acres of the land in Subarea P2.1 (44 percent) are constrained by slopes greater than 5%.



*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.1 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

13 acres of the land in Subarea P2.1 (5 percent) are constrained by Lane County Goal 5 protections.<sup>15</sup>

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Nineteen (19) tax lots totaling 186.7 acres of the land in Subarea P2.1 (68 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.

The majority of this land is in 6 tax lots adjacent to 30<sup>th</sup> Avenue that are owned by Lane Community College. The largest lot contains the main campus of the college, while other lots are committed to future development as the college expands. The remaining 13 tax lots are developed by businesses along McVay Highway (Big Foot Beverages, Doug’s Place Restaurant and Catering, Over the Top Services, Mid-State Industrial Service, Inc., Emerald Valley Gardens, JDD LCC, and the SeQuential Biofuels Station).<sup>16</sup> These businesses already contribute to the employment of the region, and so adding these lots with the intent of converting them to large-

<sup>15</sup> Lane County Goal 5 resources in this study are: mineral and aggregate resources designated as Sand and Gravel in the Metro Plan, wetlands identified in the State/National Wetland Inventory based on data from 1982, 1989, and 1990; riparian corridors identified by the Oregon Department of Forestry in 2000 as fish-bearing streams; or wildlife habitat identified by the Oregon Natural Heritage Program or the Oregon Department of Fish and Wildlife.

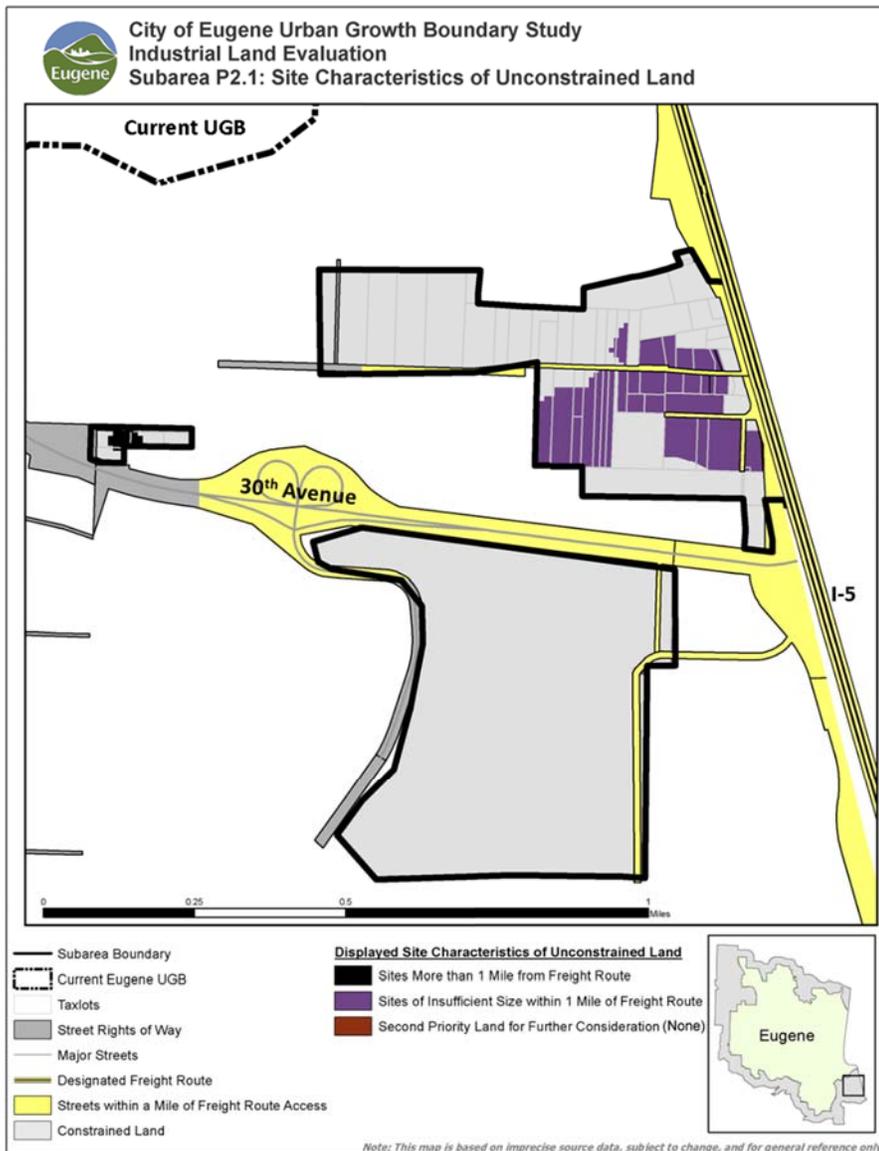
<sup>16</sup> Except for the site owned by Lane Community College, all P2.1 sites dismissed due to existing uses would need to be dismissed below under (b) due to insufficient size.

lot industrial properties would fail to meet the City’s economic development needs, resulting in either the same number of jobs or a net loss, depending on employment density.

Summary of Development Constraints

In all, 241.3 acres of the land in Subarea P2.1 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 31.5 acres of land in Subarea P2.1 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.1: Site Characteristics of Unconstrained Land”, above, shows the remaining / unconstrained land in Subarea P2.1 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.1 is Interstate 5. All remaining land under consideration in this subarea is within one mile of an access point to I-5 except the western-most site.<sup>17</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

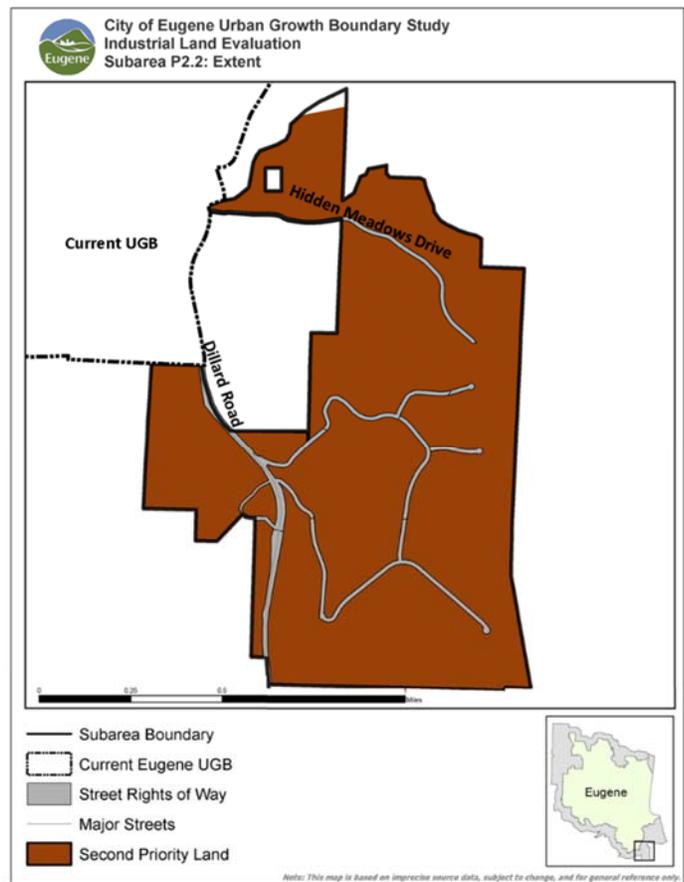
- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

Subarea P2.1 is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites. Further, none of the remaining sites are adjacent to lower priority land that has potential, when combined with the second priority land, to create sites large enough to accommodate a needed industrial site.

**Subarea P2.1 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.1 is suitable for industrial expansion.

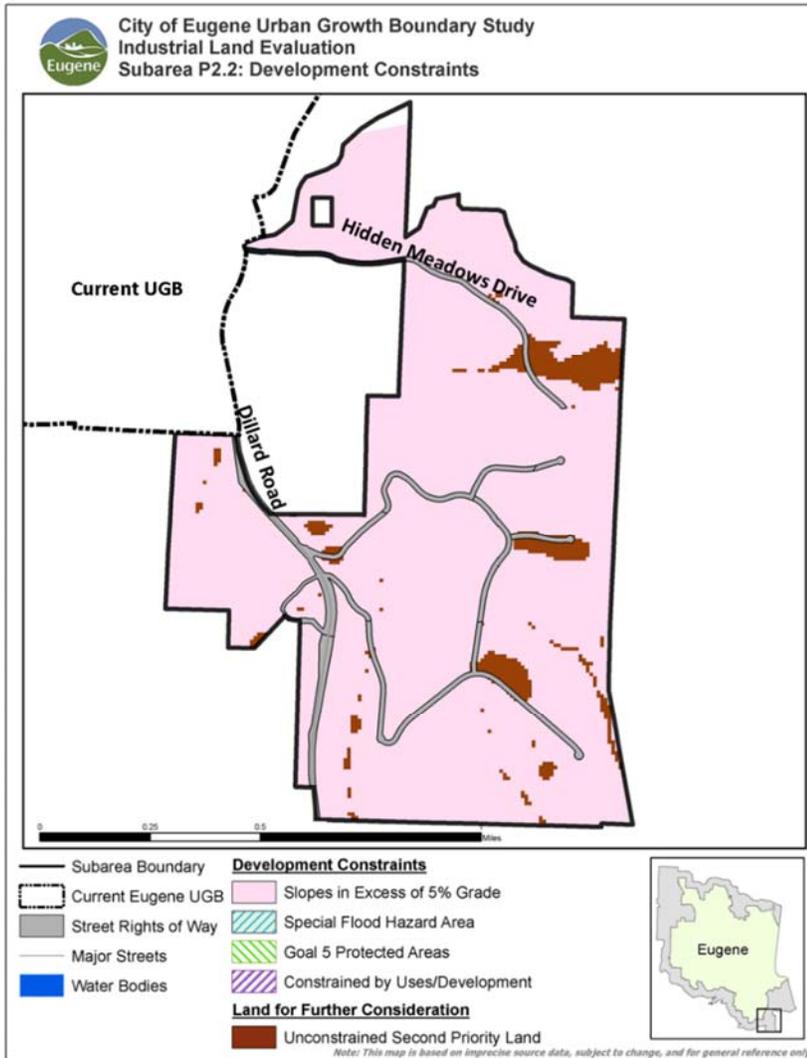
## (2) Subarea P2.2

Subarea P2.2 is located to the southeast of the current UGB, near Dillard Road and Hidden Meadows Drive, as shown on the “Extent” map. This subarea is composed of 633.1 acres of highly parcelized and developed second priority land designated Rural Residential.



<sup>17</sup> Were it not discarded for distance from a Freight Route, the western-most site would be discarded for insufficient size to meet the identified site characteristics.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



The map “Subarea P2.2: Development Constraints” shows the development constraints present in Subarea P2.2. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. The map “Subarea P2.2: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 599.7 acres of the land in Subarea P2.2 (95 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.2 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

None of the land in Subarea P2.2 is

constrained by Lane County Goal 5 protections.

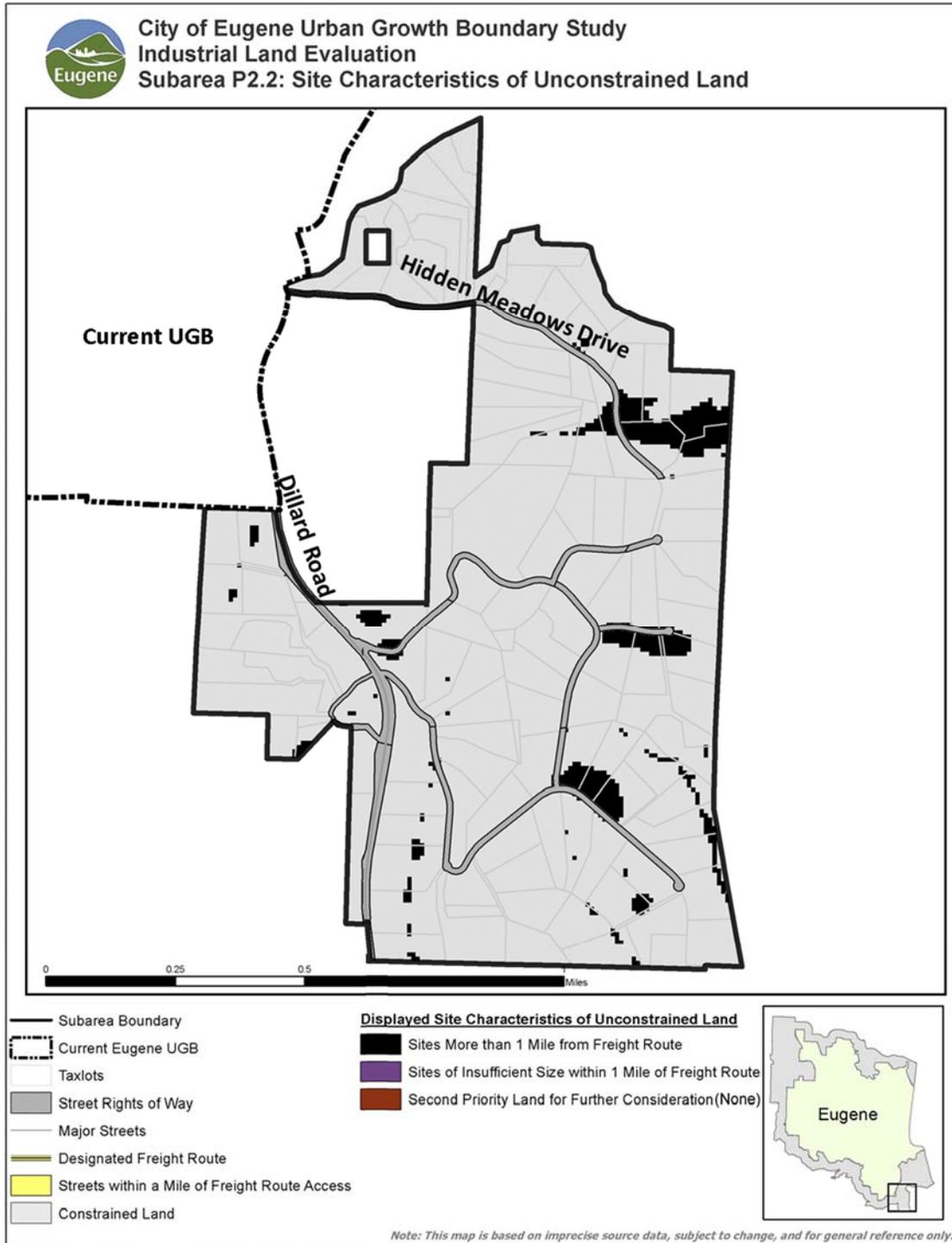
*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

None of the land in Subarea P2.2 is constrained by existing uses or development.

Summary of Development Constraints

In all, 599.7 acres of the land in Subarea P2.2 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 33.4 acres of land in Subarea P2.2 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.2: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.2 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.2 is Interstate 5. No remaining land under consideration in this Subarea P2.3 is within one mile of I-5.<sup>18</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

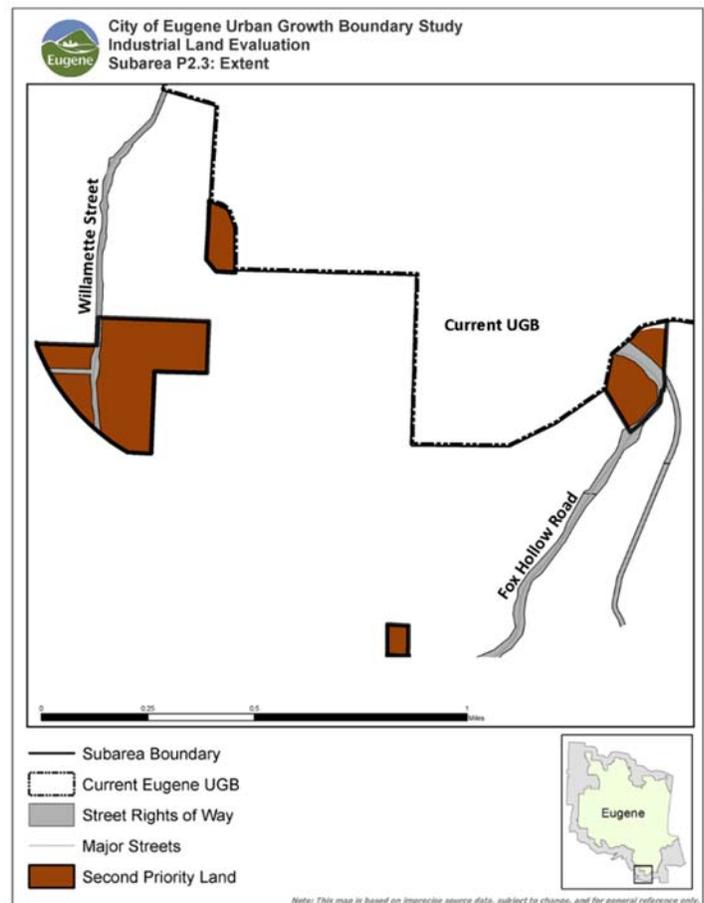
As explained above, no sites in Subarea P2.2 remain for consideration under this criterion.

**Subarea P2.2 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.2 is suitable for industrial expansion.

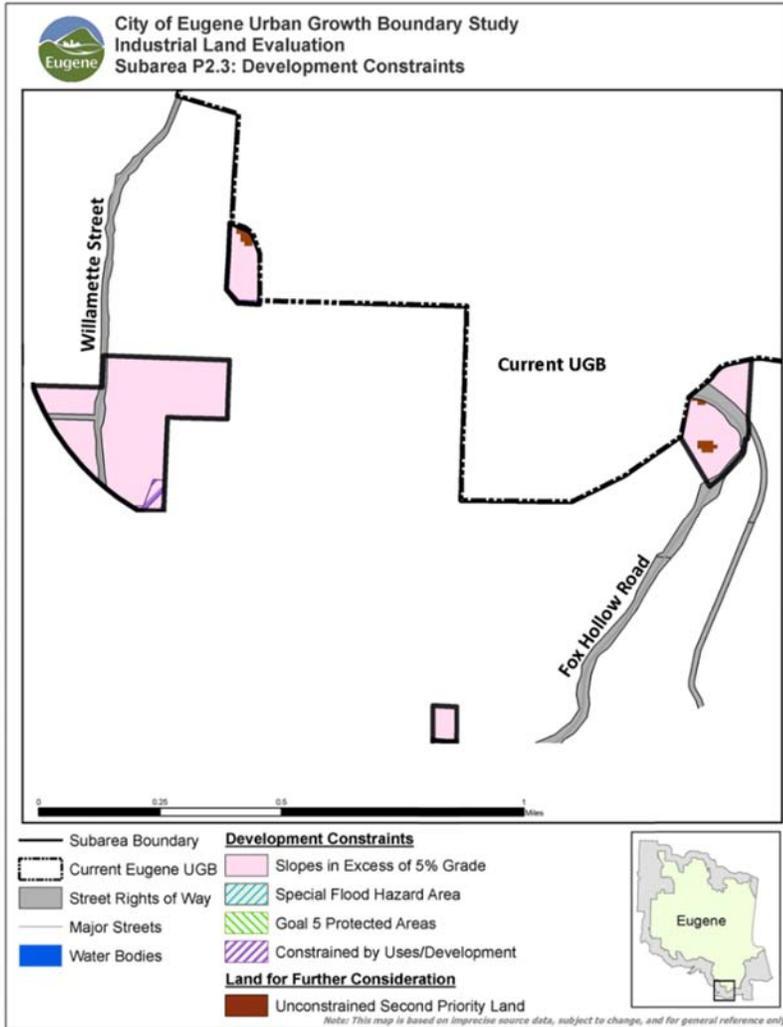
### (3) Subarea P2.3

Subarea P2.3 is located to the south of the current UGB, near Fox Hollow Road and Willamette Street, as shown on the “Extent” map. This subarea is composed of 70.2 acres of second priority land designated Rural Residential.

#### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit



<sup>18</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P2.3: Development Constraints” shows the development constraints present in Subarea P2.3. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.3 subarea has more than one type of development constraint. The map “Subarea P2.3: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 68.5 acres of the land in Subarea P2.3 (98 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.3 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5*

*Protections (natural resources)*

None of the land in Subarea P2.3 is constrained by Lane County Goal 5 protections.

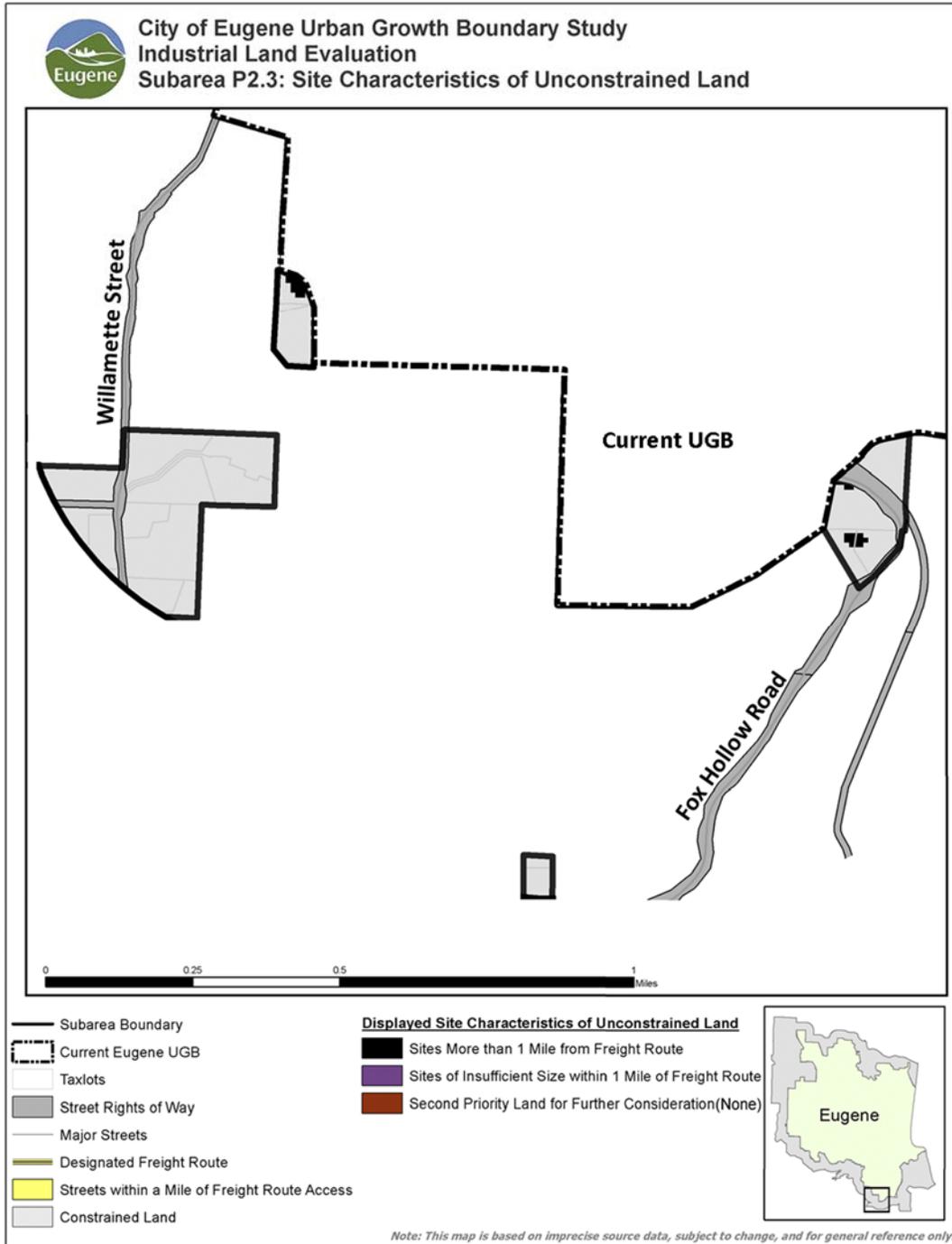
*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

One (1) tax lot totaling 1.7 acres of the land in Subarea P2.3 (2 percent) has existing uses or development that makes it highly unlikely that, if added to the UGB, it would be redeveloped for industrial uses. This tax lot is a part of the trailhead for Spencer Butte Park (one of an interconnected series of parks that make up the Ridgeline Trail System with over 12 miles of trails).

Summary of Development Constraints

In all, 68.5 acres of the land in Subarea P2.3 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 1.7 acres of land in Subarea P2.3 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.3: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.3 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.3 is Interstate 5. No remaining land under consideration in this subarea is within one mile of I-5.<sup>19</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

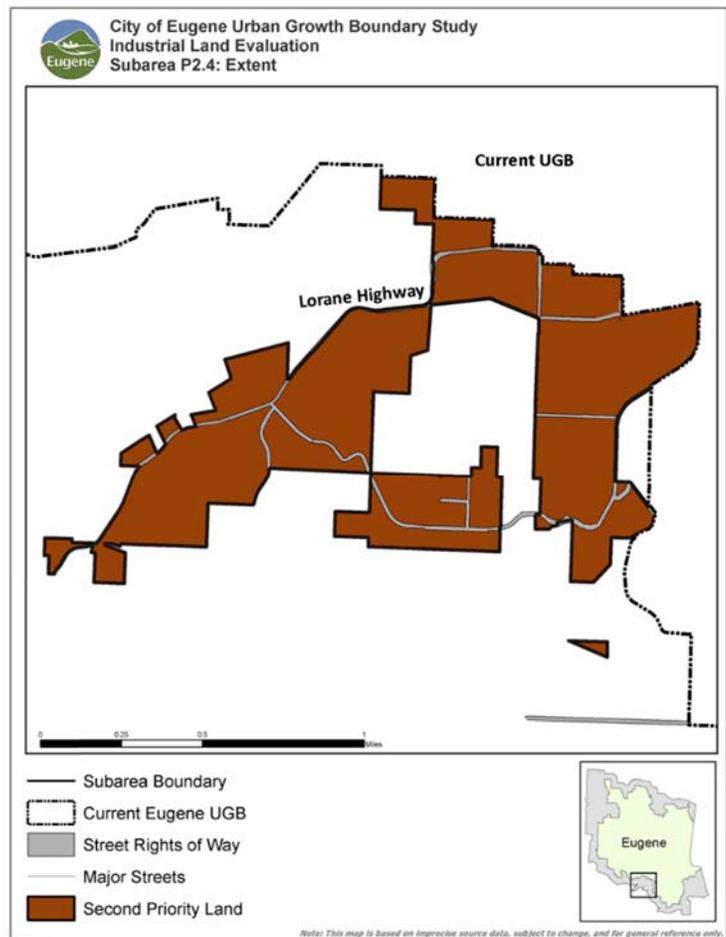
As explained above, no sites in Subarea P2.3 remain for consideration under this criterion.

**Subarea P2.3 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.3 is suitable for industrial expansion.

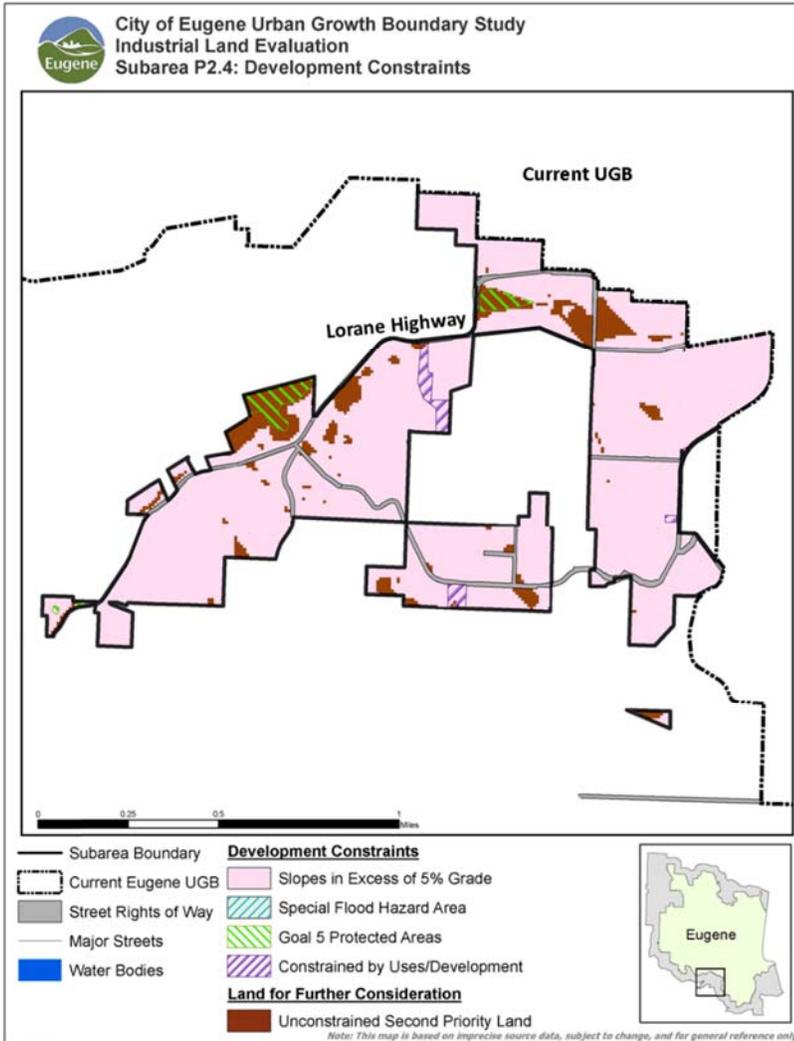
**(4) Subarea P2.4**

Subarea P2.4 is located to the south of the current UGB, near Lorane Highway, as shown on the “Extent” map. This subarea is composed of 552.6 acres of second priority land designated Rural Residential.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



<sup>19</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P2.4: Development Constraints” shows the development constraints present in Subarea P2.4. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.4 subarea has more than one type of development constraint. The map “Subarea P2.4: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 501.8 acres of the land in Subarea P2.4 (91 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.4 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

11.3 acres of the land in Subarea P2.4 (2 percent) is constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Two (2) tax lots totaling 7.5 acres of the land in Subarea P2.4 (1 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. These tax lots are owned by Eugene Parks and Open Space.<sup>20</sup>

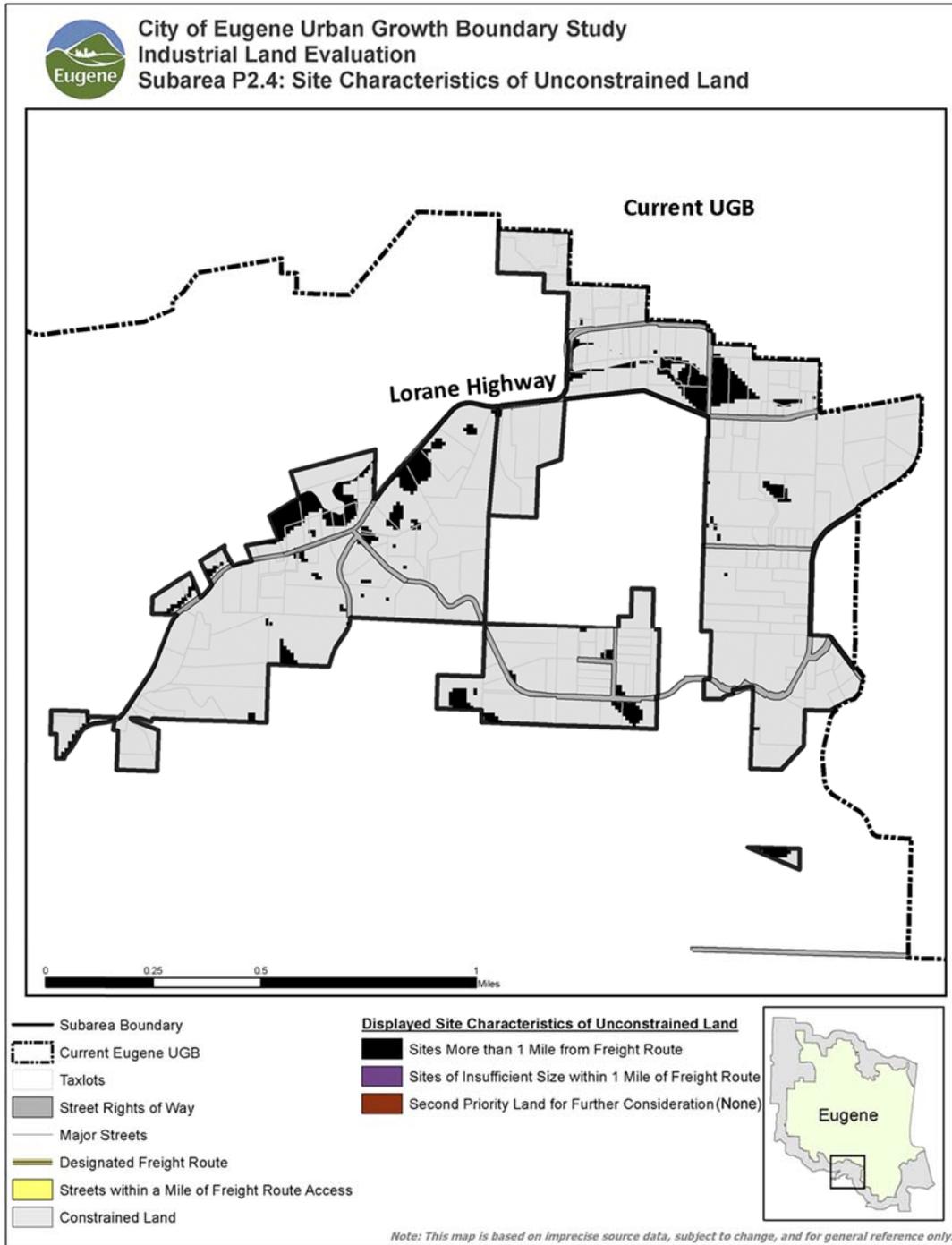
Summary of Development Constraints

In all, 513.1 acres of the land in Subarea P2.4 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic

<sup>20</sup> Were these tax lots not discarded for uses/development that make industrial redevelopment highly unlikely, they would be discarded for slope in excess of 5% grade.

development” per OAR 660-009-005(2)). The remaining 39.5 acres of land in Subarea P2.4 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.4: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.4 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Routes to Subarea P2.4 are Interstate 105 and Highway 126. No remaining land under consideration in this subarea is within one mile of these Freight Routes.<sup>21</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

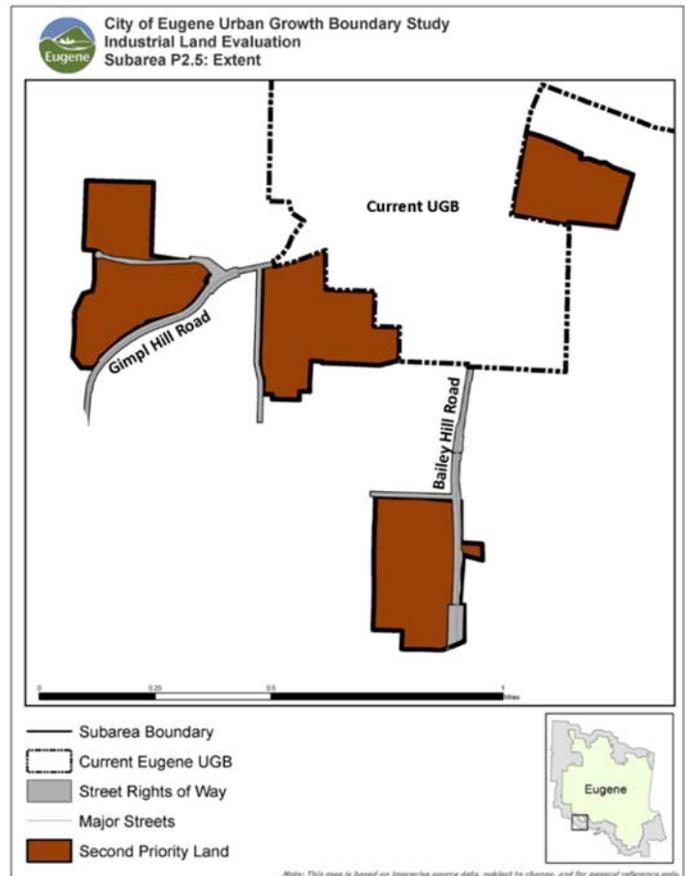
As explained above, no sites in Subarea P2.4 remain for consideration under this criterion.

**Subarea P2.4 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.4 is suitable for industrial expansion.

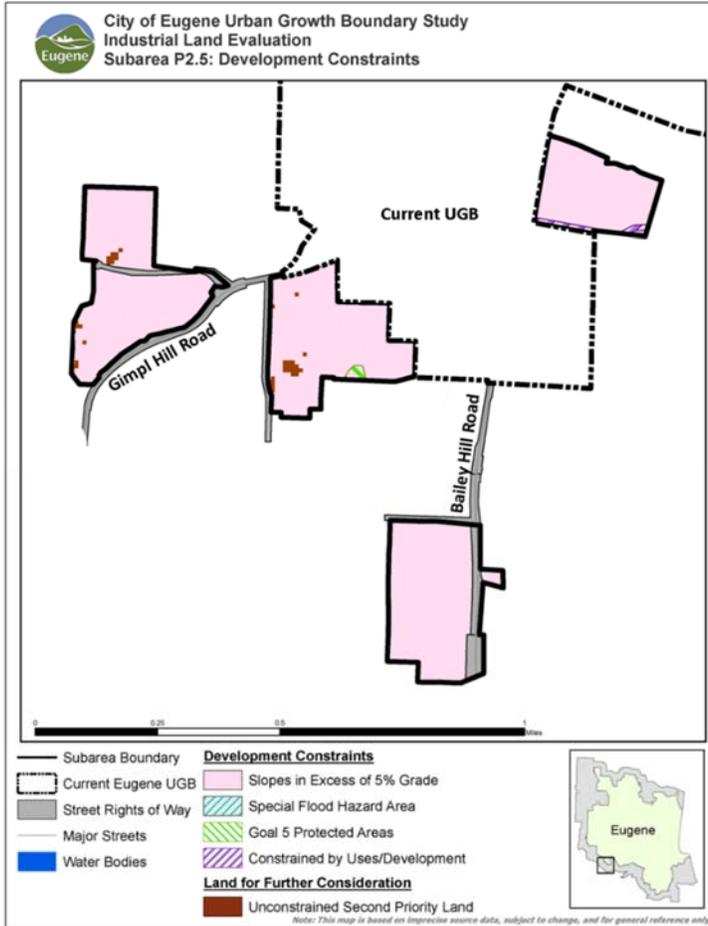
**(5) Subarea P2.5**

Subarea P2.5 is located to the south of the current UGB, near Gimpl Hill Road and Bailey Hill Road, as shown on the “Extent” map. This subarea is composed of 142.1 acres of second priority land designated Rural Residential.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



<sup>21</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P2.5: Development Constraints” shows the development constraints present in Subarea P2.5. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.5 subarea has more than one type of development constraint. The map “Subarea P2.5: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 140.4 acres of the land in Subarea P2.5 (99 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.5 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

0.6 acres of the land in Subarea P2.5 (less than 1 percent) is constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

One (1) partial tax lot totaling 1.2 acres of the land in Subarea P2.5 (less than 1 percent) has existing uses or development that makes it highly unlikely that, if added to the UGB, these sites would be redeveloped for industrial uses. This tax lot serves as an access point to the parkland, Wild Iris Ridge.<sup>22</sup>

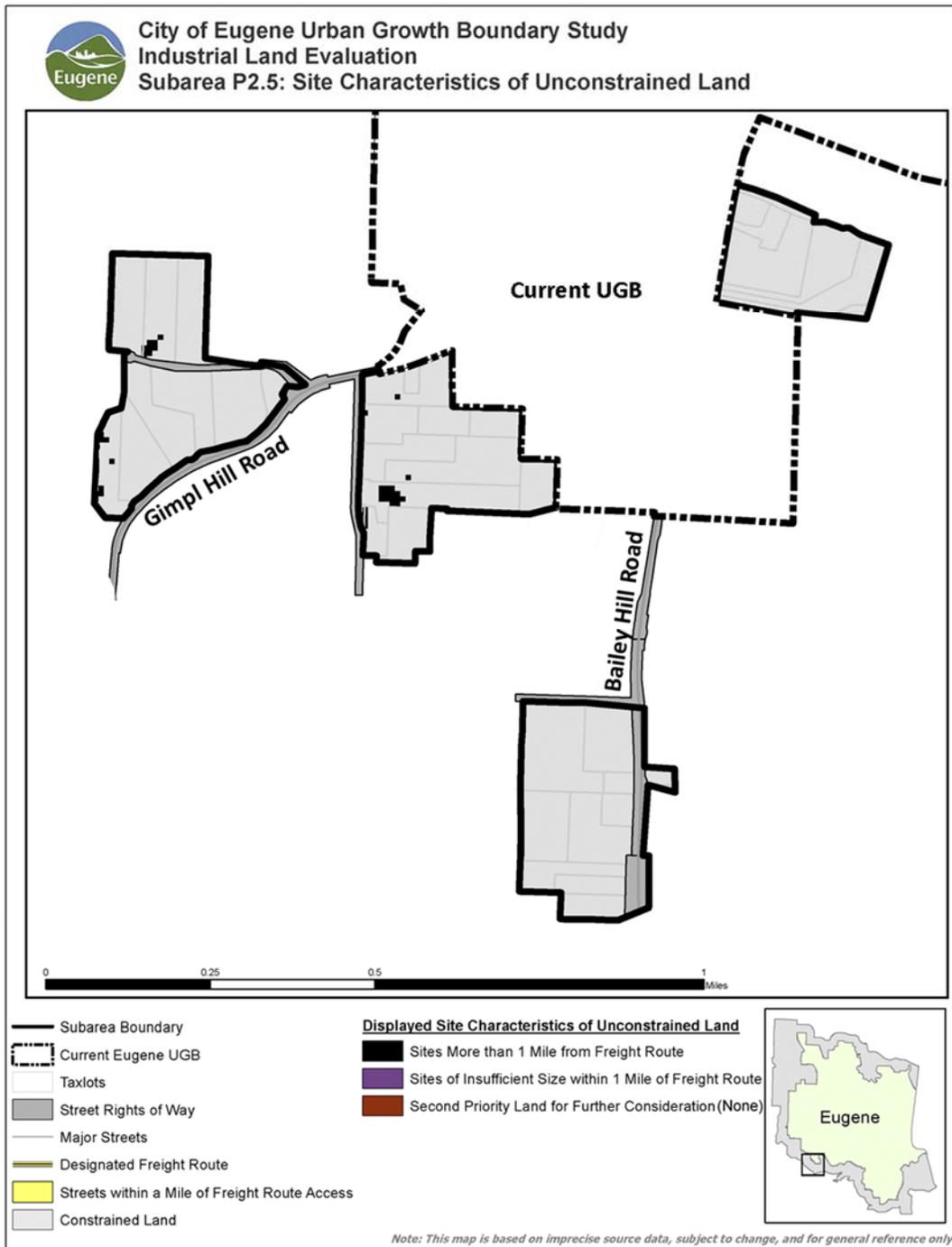
Summary of Development Constraints

In all, 140.4 acres of the land in Subarea P2.5 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic

<sup>22</sup> Were these tax lots not discarded for uses/development that make industrial redevelopment highly unlikely, they would be discarded for slope in excess of 5% grade.

development” per OAR 660-009-005(2)). The remaining 1.7 acres of land in Subarea P2.5 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.5: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.5 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.5 is Highway 126. No remaining land under consideration in this subarea is within one mile of Highway 126.<sup>23</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

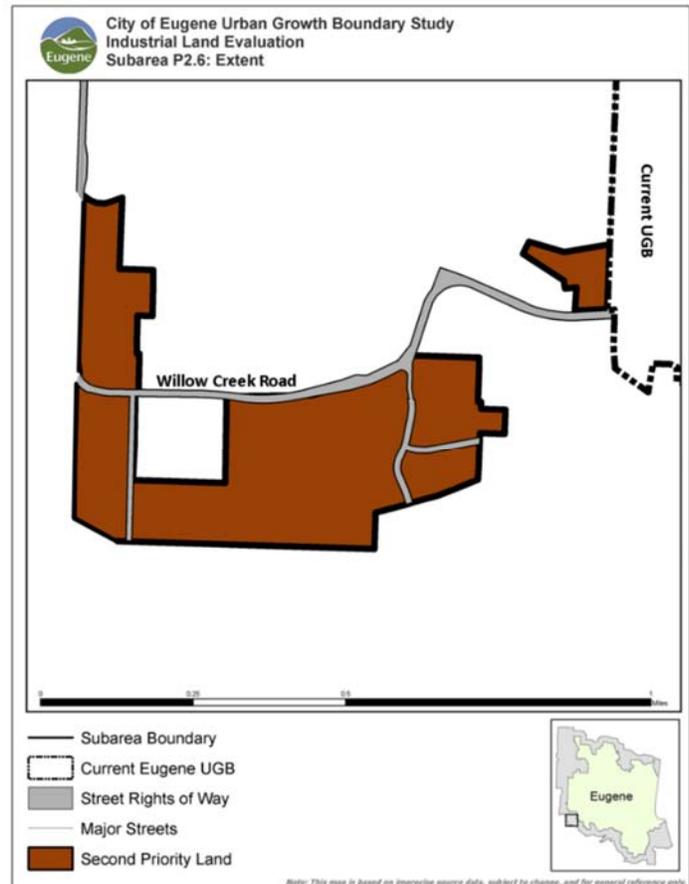
As explained above, no sites in Subarea P2.5 remain for consideration under this criterion.

**Subarea P2.5 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.5 is suitable for industrial expansion.

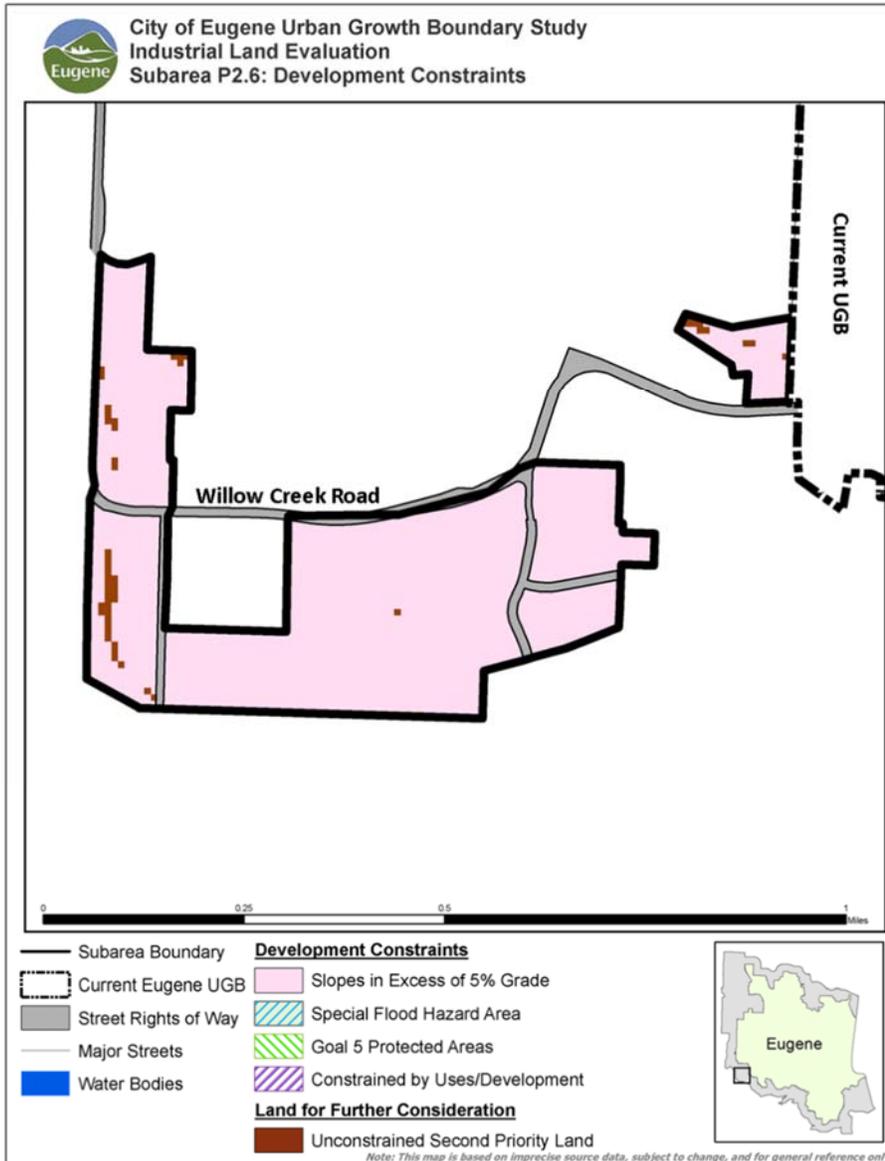
**(6) Subarea P2.6**

Subarea P2.6 is located to the south of the current UGB, near Willow Creek Road, as shown on the “Extent” map. This subarea is composed of 113.8 acres of second priority land designated Rural Residential.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



<sup>23</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P2.6: Development Constraints” shows the development constraints present in Subarea P2.6. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. The map “Subarea P2.6: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 112.6 acres of the land in Subarea P2.6 (99 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.6 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

None of the land in Subarea P2.6 is constrained by Lane County Goal 5 protections.

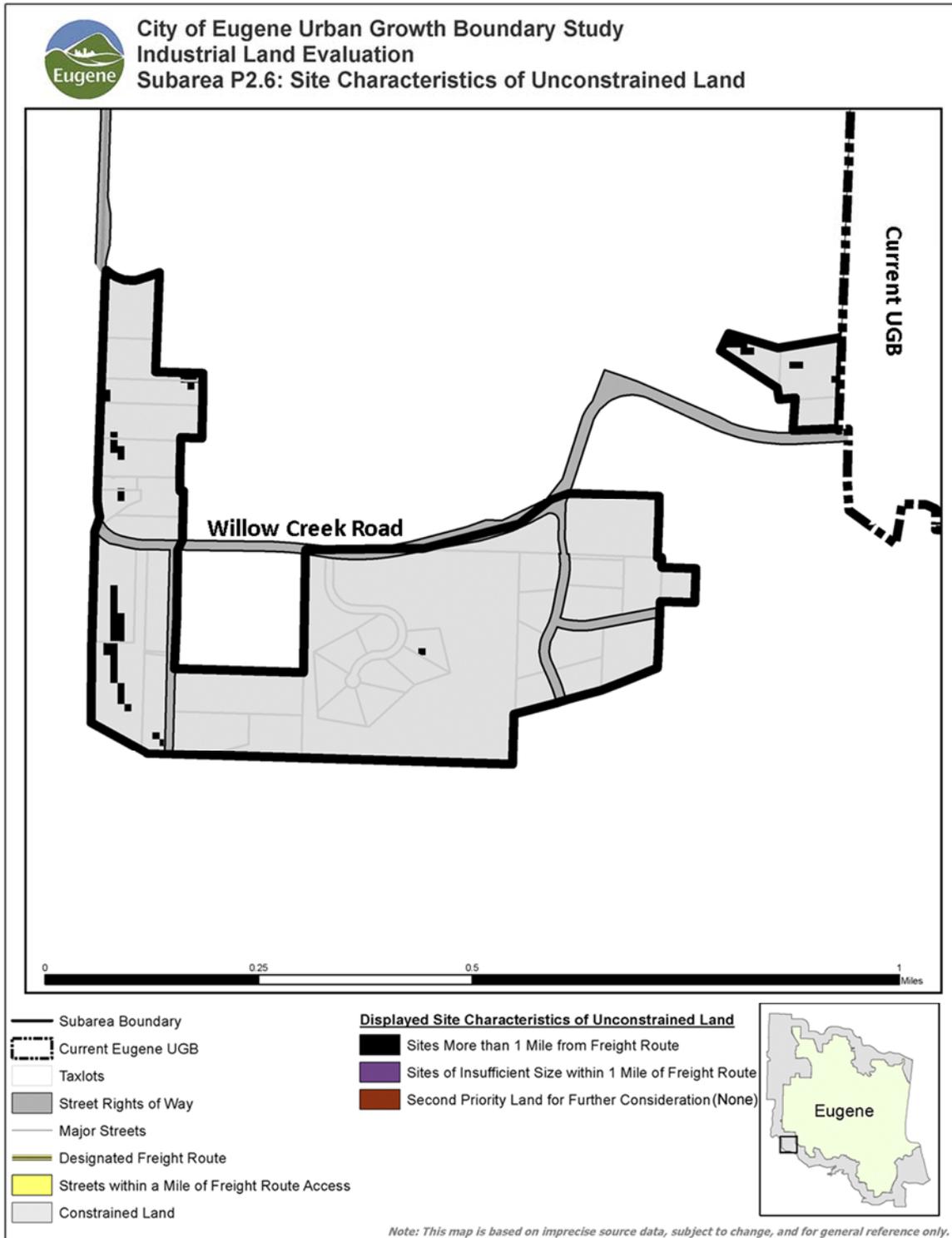
*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

None of the land in Subarea P2.6 is constrained by existing uses or development.

Summary of Development Constraints

In all, 112.6 acres of the land in Subarea P2.6 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 1.2 acres of land in Subarea P2.6 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.6: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.6 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.6 is Highway 126. No remaining land under consideration in this subarea is within one mile of Highway 126.<sup>24</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

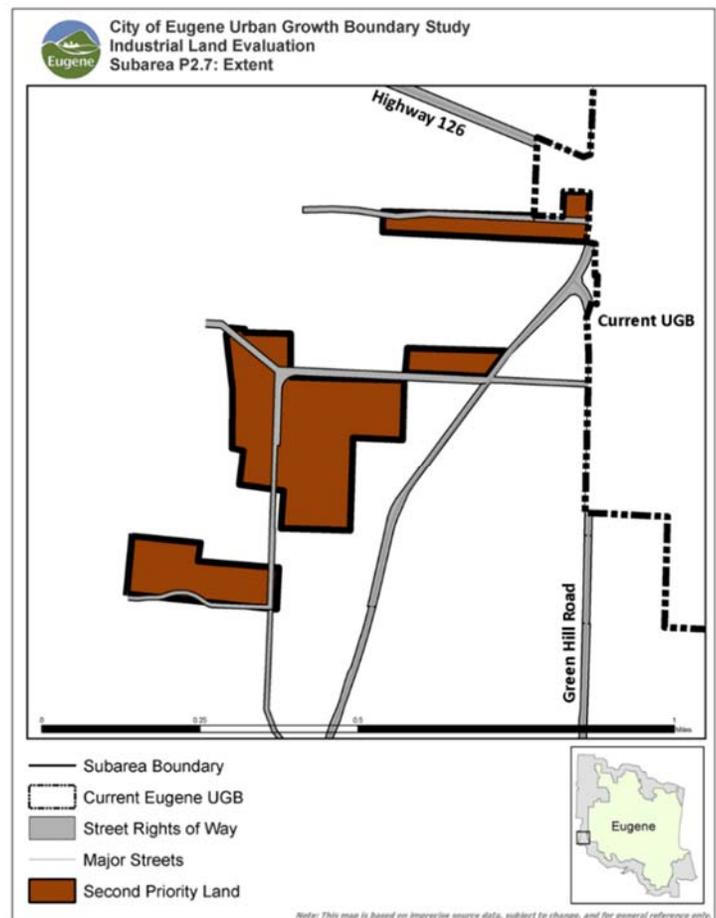
As explained above, no sites in Subarea P2.6 remain for consideration under this criterion.

**Subarea P2.6 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.6 is suitable for industrial expansion.

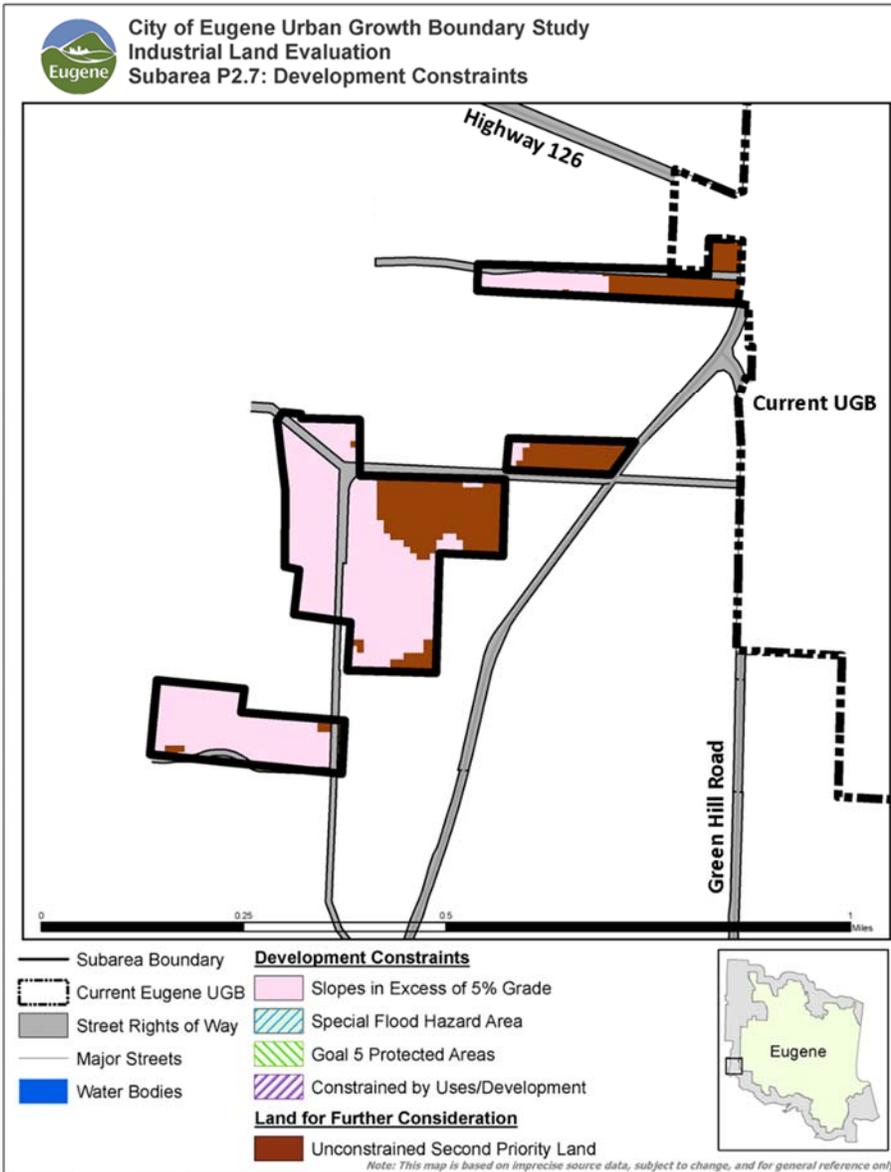
**(7) Subarea P2.7**

Subarea P2.7 is located to the southwest of the current UGB, near Green Hill Road and Highway 126, as shown on the “Extent” map. This subarea is composed of 59.1 acres of second priority land designated Rural Residential.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



<sup>24</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P2.7: Development Constraints” shows the development constraints present in Subarea P2.7. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. The map “Subarea P2.7: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 40.2 acres of the land in Subarea P2.7 (68 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P2.7 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

None of the land in Subarea P2.7 is constrained by Lane County Goal 5 protections.

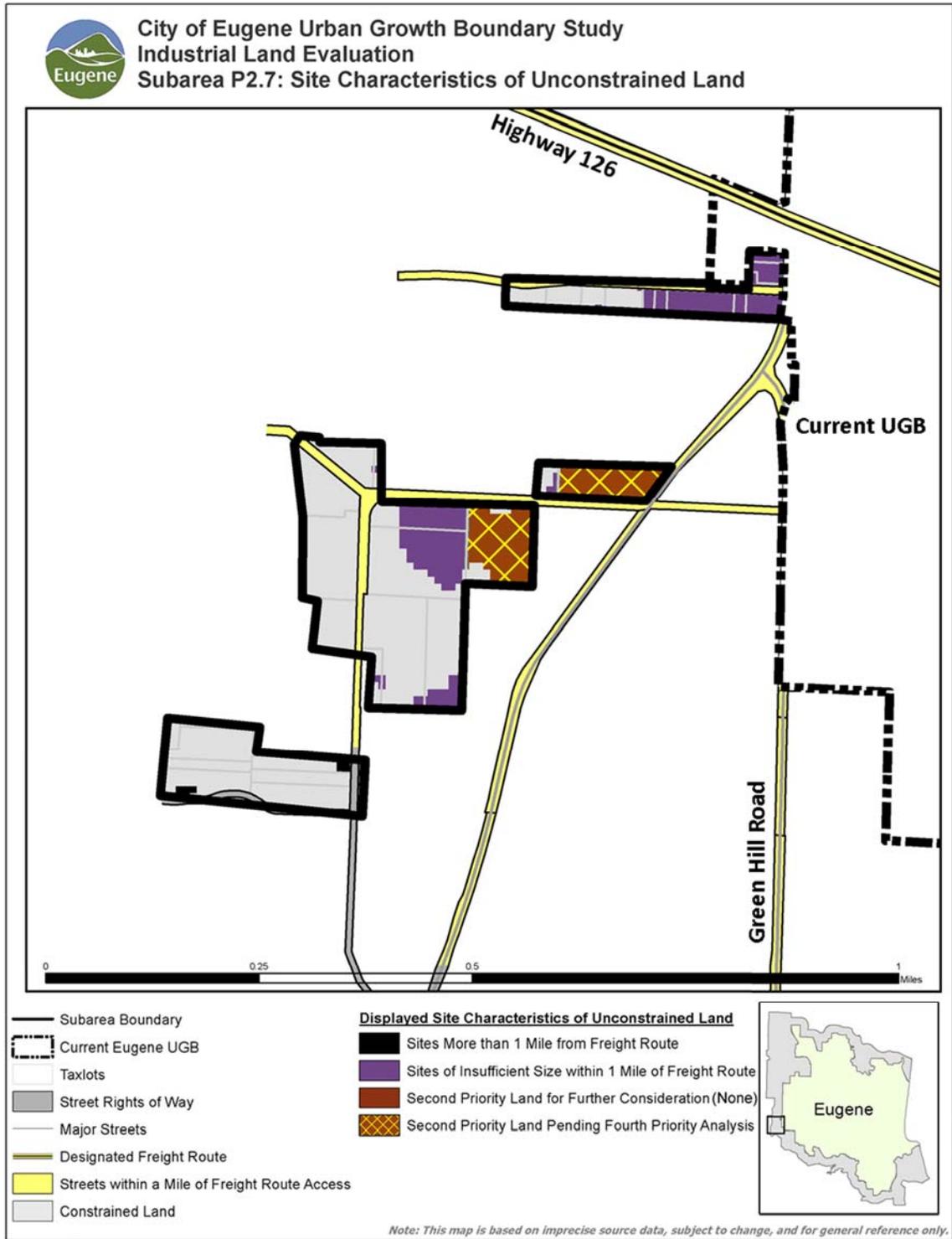
*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

None of the land in Subarea P2.7 is constrained by existing uses or development.

Summary of Development Constraints

In all, 40.2 acres of the land in Subarea P2.7 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 18.9 acres of land in Subarea P2.7 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.7: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.7 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.7 is Highway 126. All remaining land under consideration in this subarea is within one mile of Highway 126 except the two southern-most sites.<sup>25</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites. While insufficient to accommodate any need exclusively with second priority land, two sites (identified above on the map “Subarea P2.7: Site Characteristics of Unconstrained Land”) are adjacent to fourth priority land that has some potential to be combined with the second priority land to create sites large enough to accommodate some portion of the industrial need. For this reason, these two sites of second priority land are not dismissed at this point. They will be considered for inclusion in the UGB when the subject fourth priority land (Subarea P4.6) is analyzed for inclusion under Section III(f)6, below.

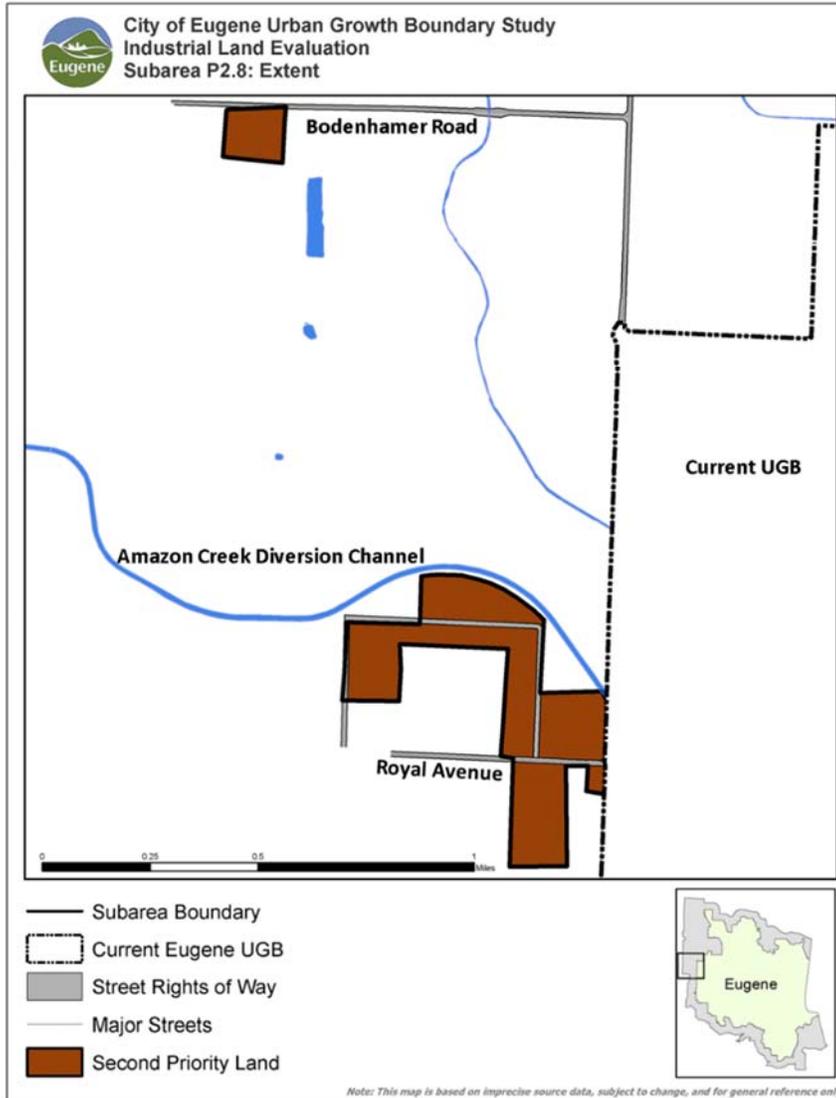
**Subarea P2.7 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.7 is suitable for industrial expansion without combining it with suitable lower priority land. The two sites noted as candidates for further consideration will be analyzed for inclusion in association with adjacent fourth priority land under Section 2(f)6 below.

---

<sup>25</sup> Were these two sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.

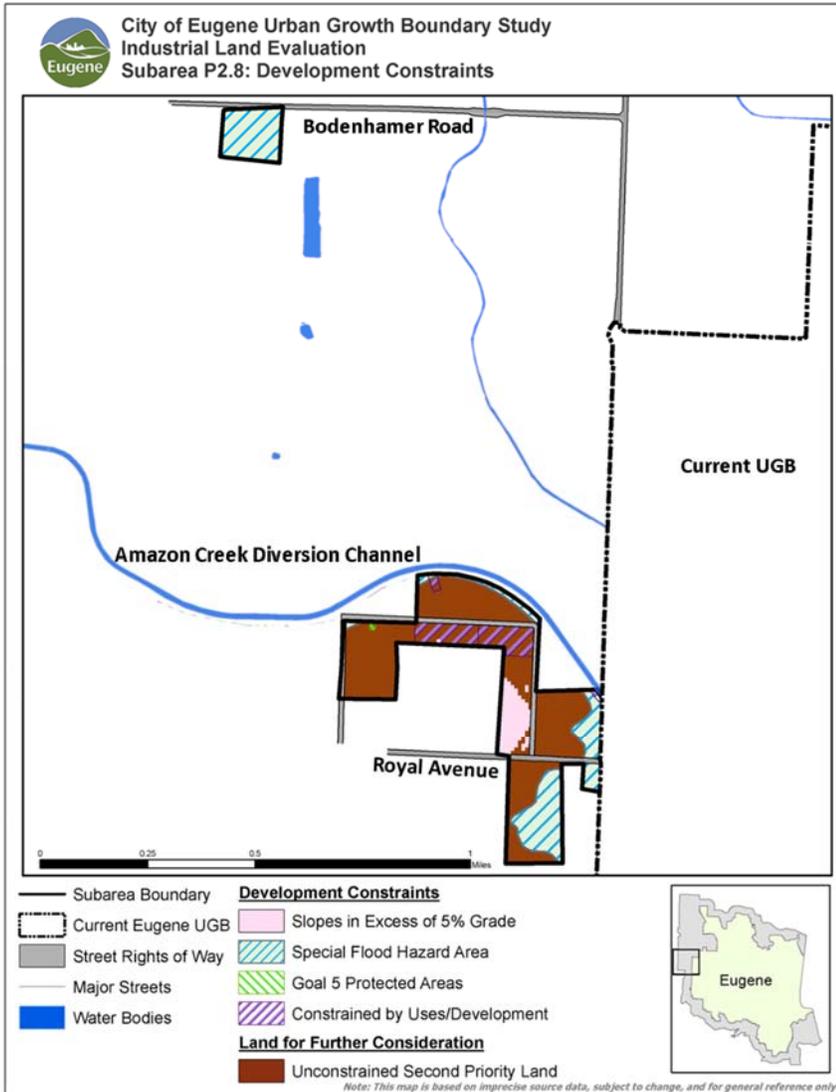
**(8) Subarea P2.8**

Subarea P2.8 is located to the west of the current UGB, near the Amazon Creek Diversion Channel and Bodenhamer Road, as shown on the “Extent” map. This subarea is composed of 104.0 acres of second priority land designated Rural Residential and Rural Commercial.



**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**

The map “Subarea P2.8: Development Constraints” shows the development constraints present in Subarea P2.8. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.8 subarea has more than one type of development constraint. The map “Subarea P2.8: Development Constraints” is a visual representation of the following information:



*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 6.6 acres of the land in Subarea P2.8 (6 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

29.8 acres of the land in Subarea P2.8 (29 percent) is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

0.1 acres of the land in Subarea P2.8 (less than 1 percent) is constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

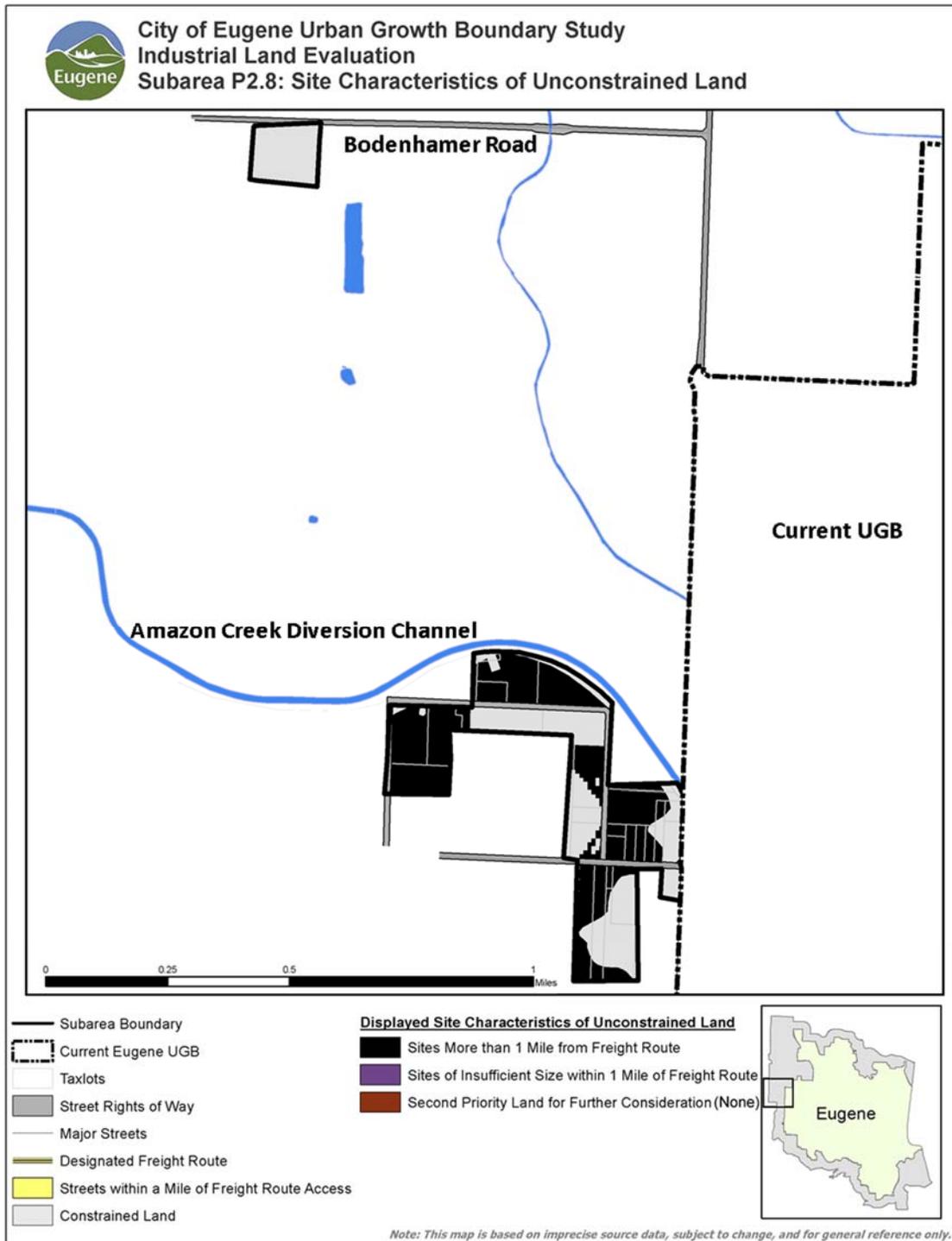
Three (3) tax lots totaling 15.6 acres in Subarea P2.8 (15 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. Two tax lots are used for wetland mitigation by the City of Eugene. The third tax lot is developed by Brownings Dog Ranch Tails Inn.<sup>26</sup> This business already contributes to the employment of the region, and so adding this lot with the intent of converting it to a large-lot industrial properties would fail to meet the City’s economic development needs, resulting in either the same number of jobs or a net loss, depending on employment density.

Summary of Development Constraints

In all, 51.9 acres of the land in Subarea P2.8 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 52.1 acres of land in Subarea P2.8 are addressed below.

<sup>26</sup> Were these tax lots not discarded for uses/development that make industrial redevelopment highly unlikely, they would be discarded for lack of access within one mile to a Freight Route.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.8: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.8 with the following site characteristic elements displayed:

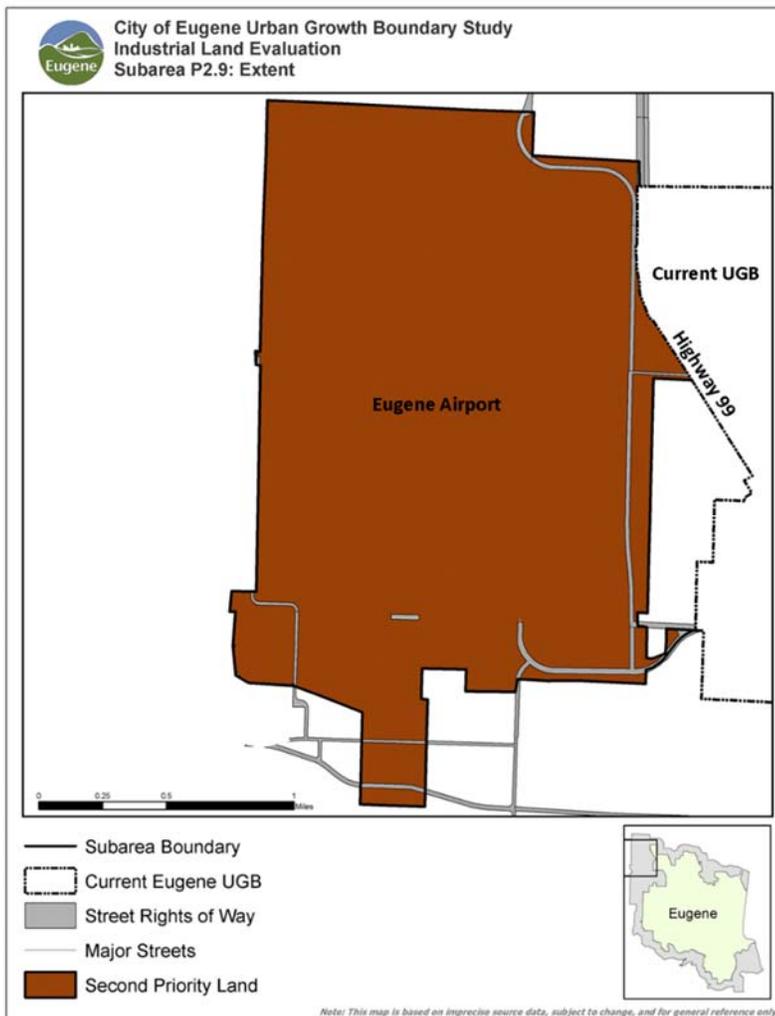
*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.8 is Highway 126. No remaining land under consideration in this subarea is within one mile of Highway 126.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

As explained above, no sites in Subarea P2.8 remain for consideration under this criterion.

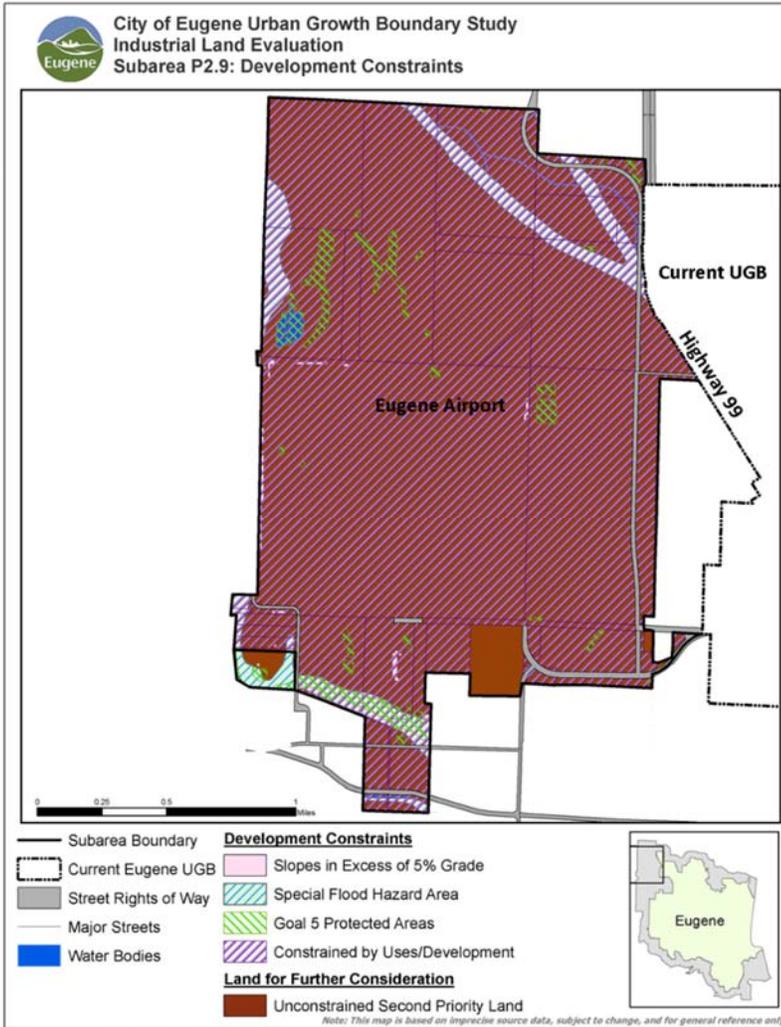


**Subarea P2.8 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.8 is suitable for industrial expansion.

## **(9) Subarea P2.9**

Subarea P2.9 is located to the west of the current UGB, near the Eugene Airport, as shown on the “Extent” map. This subarea is composed of 2,269.1 acres of second priority land designated Government & Education and Rural Residential.

### **(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



The map “Subarea P2.9: Development Constraints” shows the development constraints present in Subarea P2.9. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.9 subarea has more than one type of development constraint. The map “Subarea P2.9: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 8.8 acres of the land in Subarea P2.9 (less than 1 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

139.8 acres of the land in Subarea P2.9 (6 percent) are constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

66.8 acres of the land in Subarea P2.9 (3 percent) are constrained by Lane County Goal 5 protections.

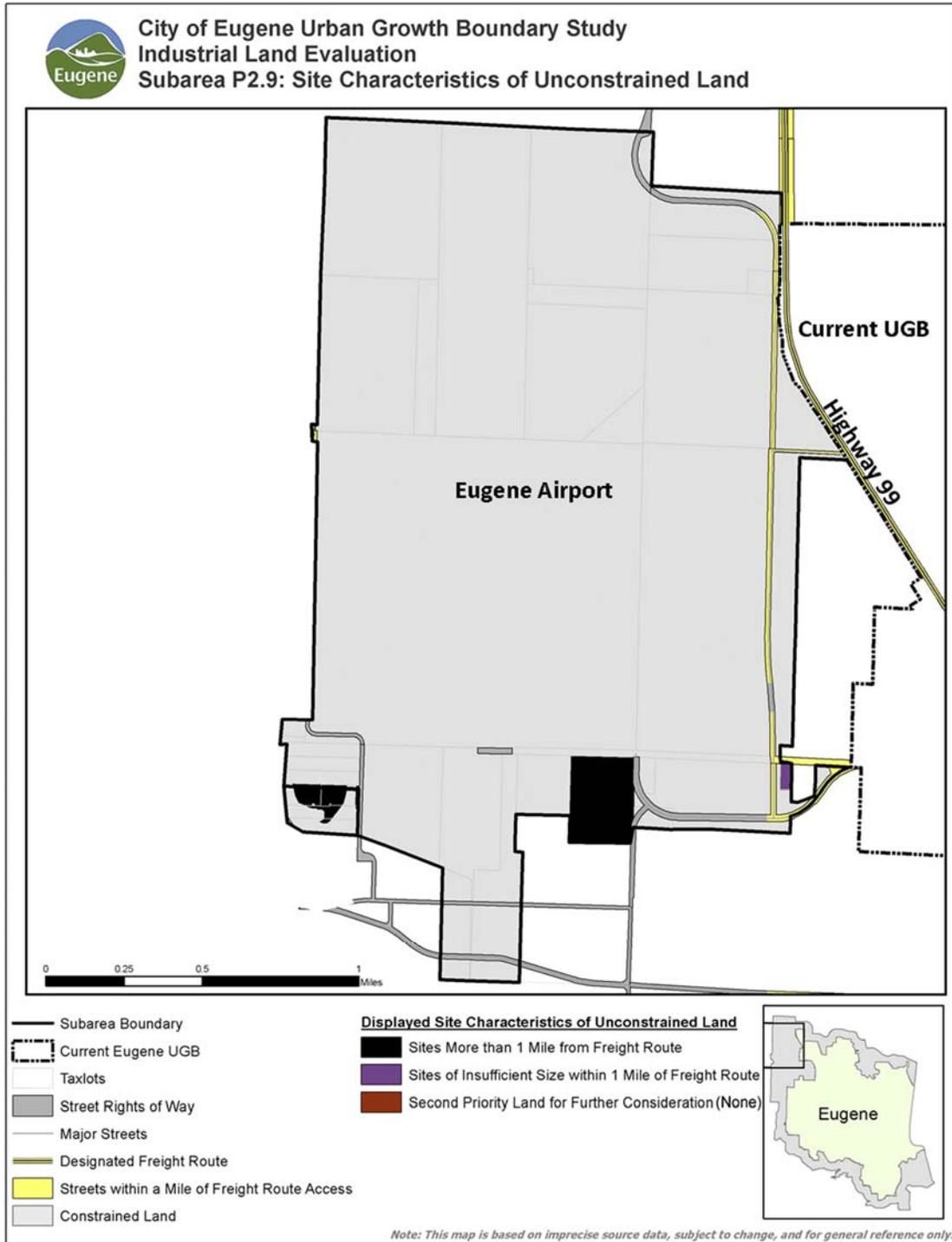
*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Thirty (30) tax lots totaling 2,209 acres in Subarea P2.9 (97 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. These tax lots are committed to use by the Eugene Airport, an important transportation facility for the region.

Summary of Development Constraints

In all, 2,227.6 acres of the land in Subarea P2.9 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 41.5 acres of land in Subarea P2.9 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.9: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.9 with the following site characteristic elements displayed:

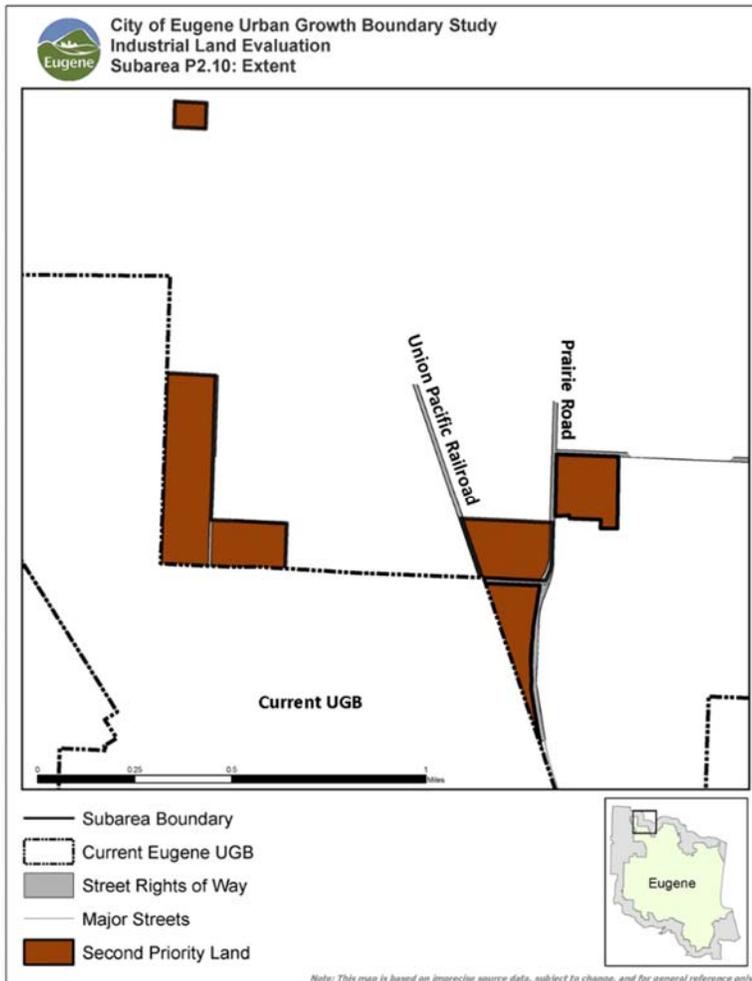
*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.9 is Highway 99. Only the eastern-most remaining site under consideration in this subarea is within one mile of Highway 99.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites. Further, the only remaining site is not adjacent to lower priority land that has potential, when combined with the second priority land, to create a site large enough to accommodate a needed industrial site.

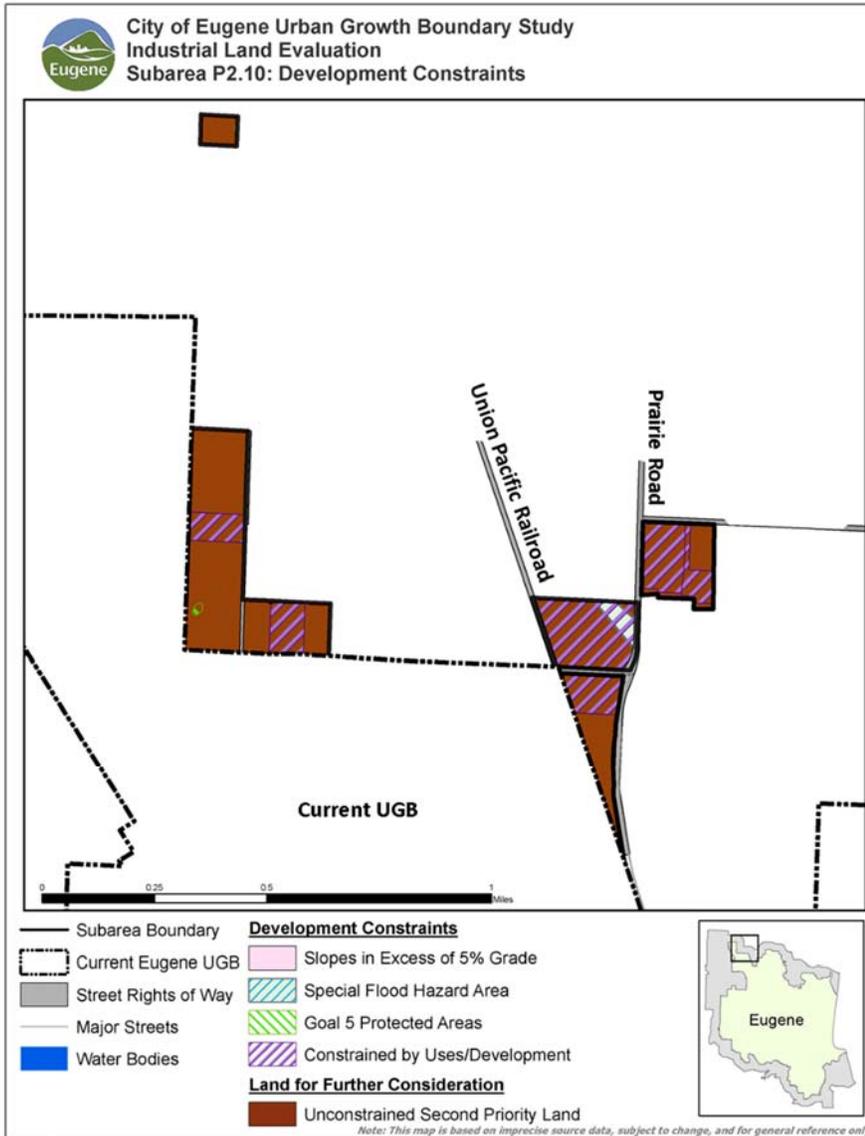


**Subarea P2.9 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.9 is suitable for industrial expansion.

**(10) Subarea P2.10**

Subarea P2.10 is located to the north of the current UGB, near Prairie Road, as shown on the “Extent” map. This subarea is composed of 115.7 acres of second priority land designated Rural Residential and Rural Industrial.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



The map “Subarea P2.10: Development Constraints” shows the development constraints present in Subarea P2.10. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P2.10 subarea has more than one type of development constraint. The map “Subarea P2.10: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

None of the land in Subarea P2.10 is constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

2.7 acres of the land in Subarea P2.10 (2 percent) are constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

0.3 acres of the land in Subarea P2.10 (less than 1 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Six (6) tax lots totaling 49.6 acres in Subarea P2.10 (43 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. These tax lots are developed by businesses along Awbrey Lane and Prairie Road (Valley Iron and Steel Company, Industrial Scrap Corporation, Eugene Pallet Services LLC, Eugene RV and Boat Storage, and Oregon Aquatics). These businesses already contribute to the employment of the region, and so adding these lots with the intent of converting them to large-lot industrial properties would fail to meet the City’s economic

development needs, resulting in either the same number of jobs or a net loss, depending on employment density.

### Summary of Development Constraints

In all, 49.9 acres of the land in Subarea P2.10 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 65.8 acres of land in Subarea P2.10 are addressed below.

### **(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

The map “Subarea P2.10: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.10 with the following site characteristic elements displayed:

#### *Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.10 is Highway 99. All remaining land under consideration in this subarea is within one mile of Highway 99 except the land east of the Union Pacific Railroad.<sup>27</sup>

#### *Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

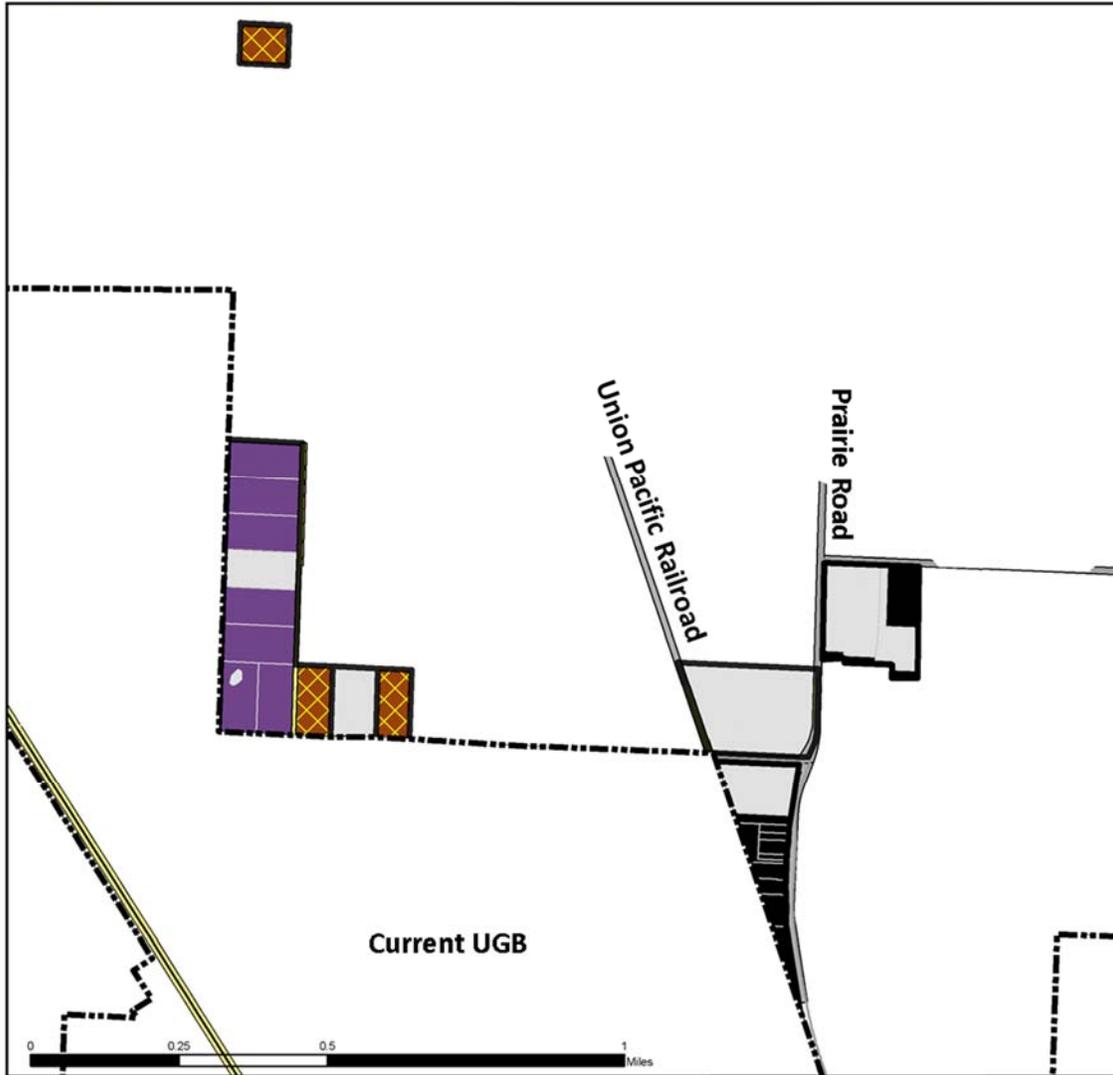
This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites. While insufficient to accommodate any need exclusively with second priority land, three sites (identified above on the map “Subarea P2.10: Site Characteristics of Unconstrained Land”) are adjacent to fourth priority land that has some potential to be combined with the second priority land to create sites large enough to accommodate some portion of the industrial need. For this reason, these three sites of second priority land are not dismissed at this point; they will be considered for inclusion in the UGB when the subject fourth priority land (Subarea P4.8) is analyzed for inclusion under section III(f)8, below.

---

<sup>27</sup> Were these sites not discarded for distance from a Freight Route, they would be discarded for insufficient size to meet the identified site characteristics.



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Subarea P2.10: Site Characteristics of Unconstrained Land



- Subarea Boundary
- - - Current Eugene UGB
- Taxlots
- Street Rights of Way
- Major Streets
- Designated Freight Route
- Streets within a Mile of Freight Route Access
- Constrained Land

**Displayed Site Characteristics of Unconstrained Land**

- Sites More than 1 Mile from Freight Route
- Sites of Insufficient Size within 1 Mile of Freight Route
- Second Priority Land for Further Consideration (None)
- Second Priority Land Pending Fourth Priority Analysis



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

**Subarea P2.10 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.10 is suitable for industrial expansion without combining it with suitable lower priority land. The three sites noted as candidates for further consideration will be analyzed for inclusion in association with adjacent fourth priority land under Section 2(f)8 below.

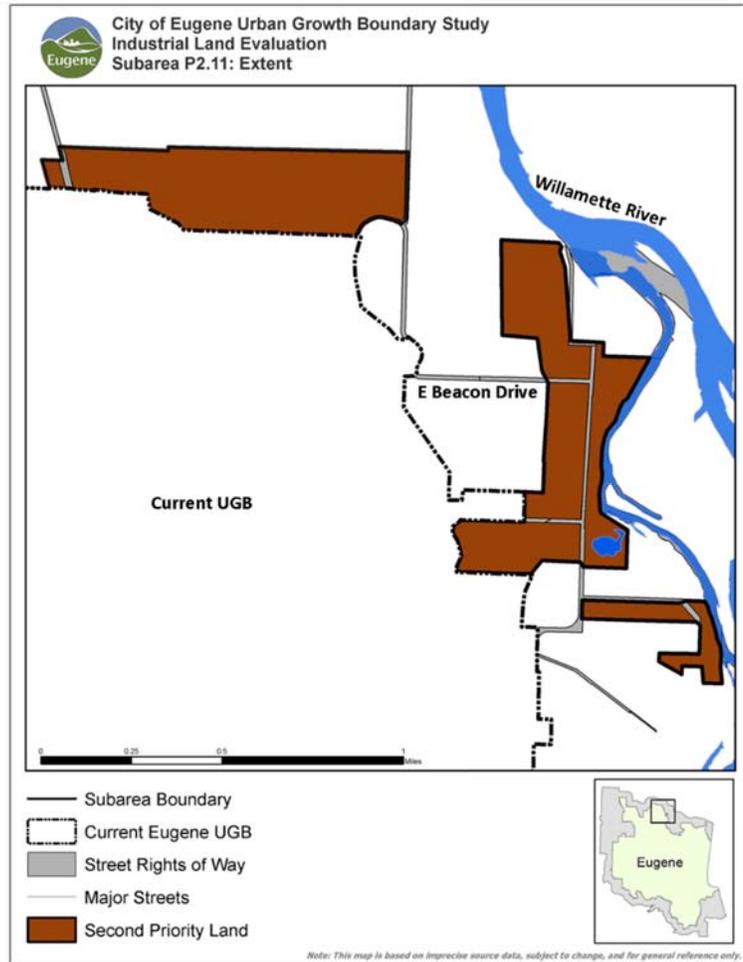
**(11) Subarea P2.11**

Subarea P2.11 is located to the north of the current UGB, near the Willamette River and East Beacon Drive, as shown on the “Extent” map. This subarea is composed of 275.2 acres of second priority land designated Rural Residential.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**

The map “Subarea P2.11: Development Constraints” shows the development constraints present in Subarea P2.11. See constraint maps, in Section II.b

above, showing the location of each development constraint throughout study area. Some land in the P2.11 subarea has more than one type of development constraint. The map “Subarea P2.11: Development Constraints” is a visual representation of the following information:



*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

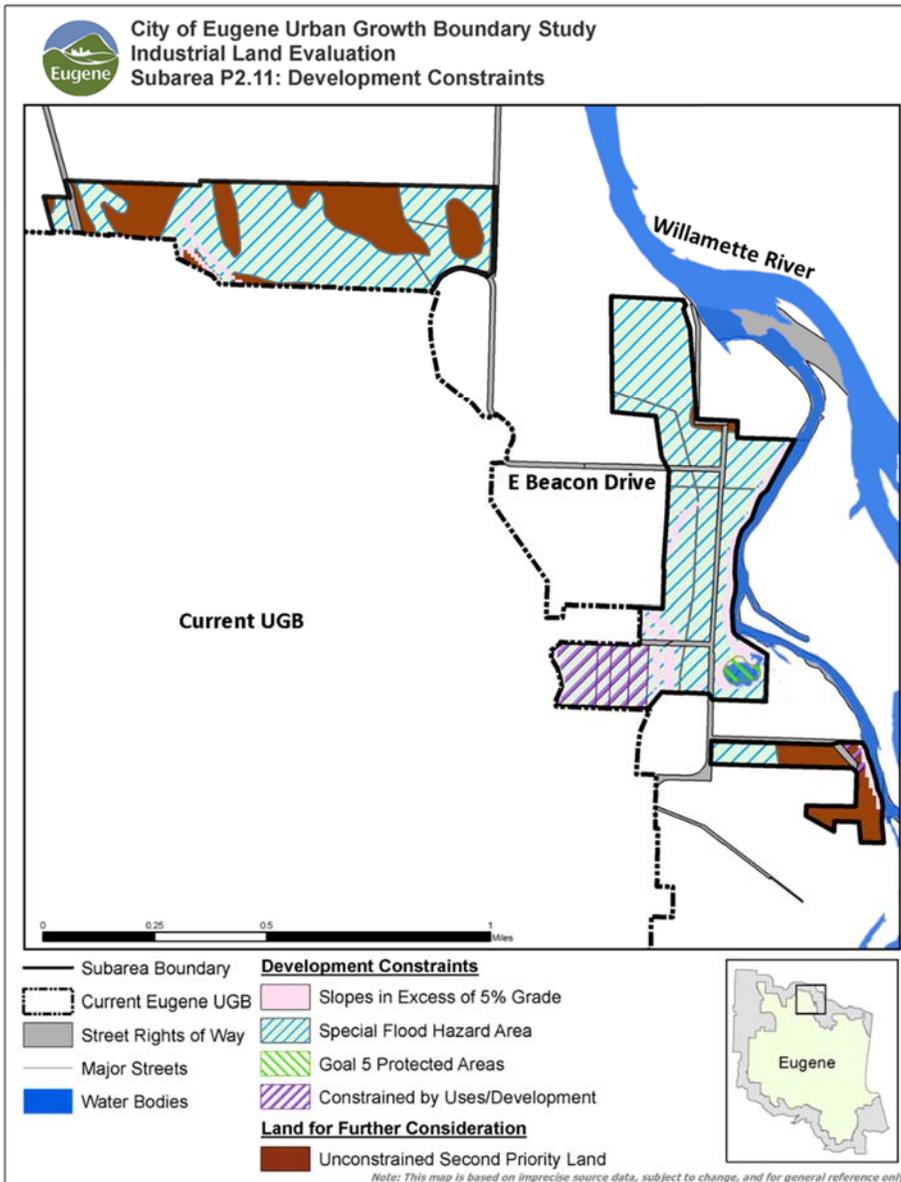
The United States Geological Survey’s 10-meter digital elevation model shows that 22.5 acres of the land in Subarea P2.11 (8 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

217.6 acres of the land in Subarea P2.11 (79 percent) is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

2.2 acres of the land in Subarea P2.11 (less than 1 percent) is constrained by Lane County Goal 5 protections.



*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Four (4) tax lots totaling 18.9 acres in Subarea P2.11 (7 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. These tax lots are identified (see the Park Expansion Study) as land for future development as a community park needed for the Santa Clara neighborhood.

Summary of Development Constraints

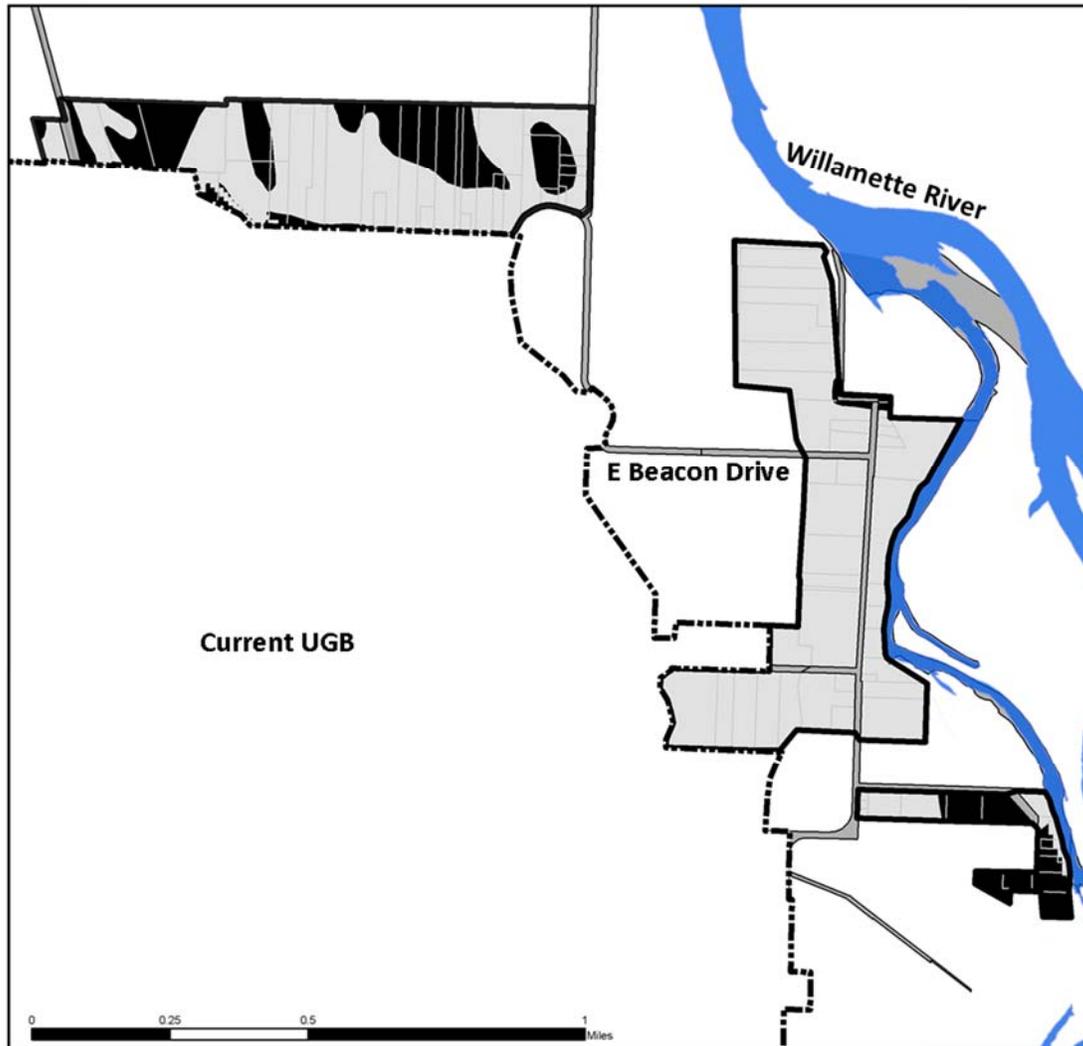
In all, 217.6 acres of the land in Subarea P2.11 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 57.6 acres of land in Subarea P2.11 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

The map “Subarea P2.11: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P2.11 with the following site characteristic elements displayed:



City of Eugene Urban Growth Boundary Study  
 Industrial Land Evaluation  
 Subarea P2.11: Site Characteristics of Unconstrained Land



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.11 are Highway 99 and the Randy Papé Beltline. No remaining land under consideration in this subarea is within one mile of these Freight Routes.

Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

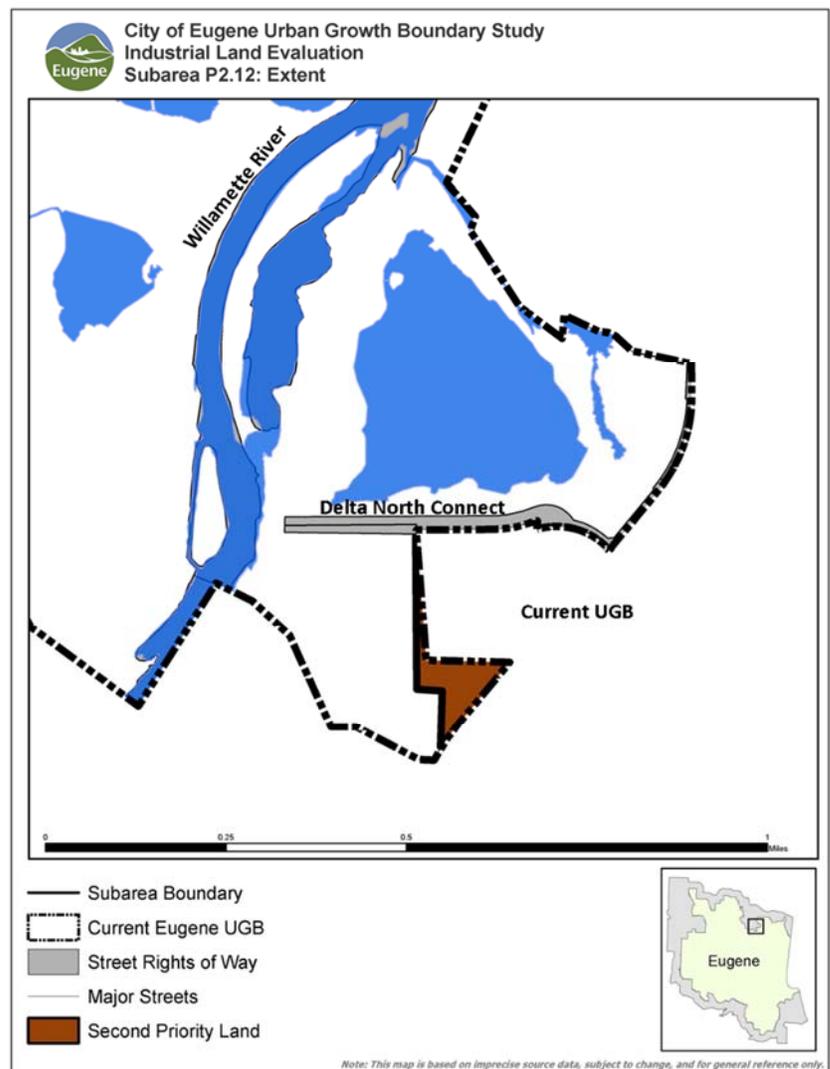
As explained above, no sites in Subarea P2.11 remain for consideration under this criterion.

**Subarea P2.11 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.11 is suitable for industrial expansion.

**(12) Subarea P2.12**

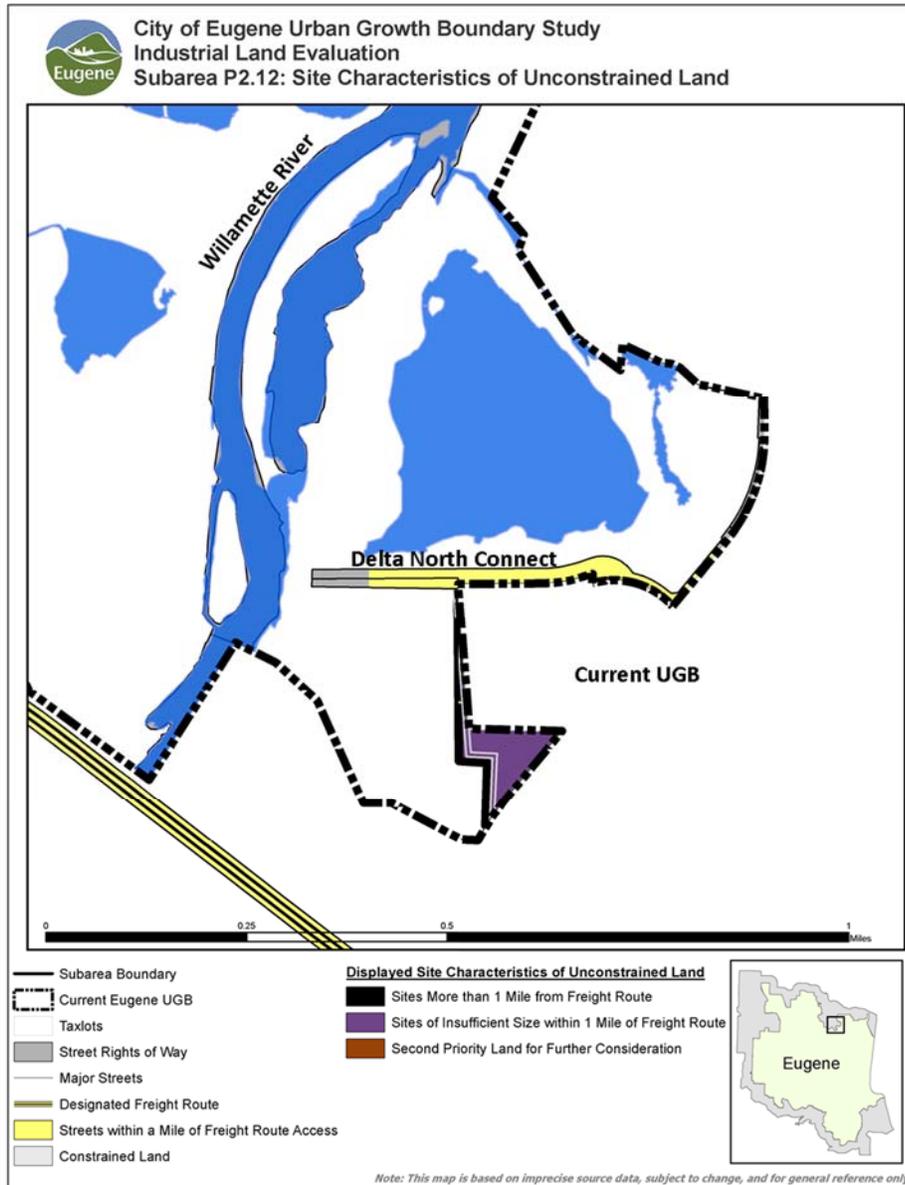
Subarea P2.12 is located to the north of the current UGB, near the Willamette River and the Randy Papé Beltline, as shown on the “Extent” map. It is composed of 5.4 acres of second priority land surrounded by the current UGB and land designated Sand and Gravel (a Goal 5 protected Mineral and Aggregate designation). The land in this subarea is designated as Industrial.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**





**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P2.12: Site Characteristics of Unconstrained Land”, above, shows the remaining / unconstrained land in Subarea P2.12 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P2.12 is and the Randy Papé Beltline. All land under consideration in this subarea is within one mile of an access point to and the Randy Papé Beltline.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

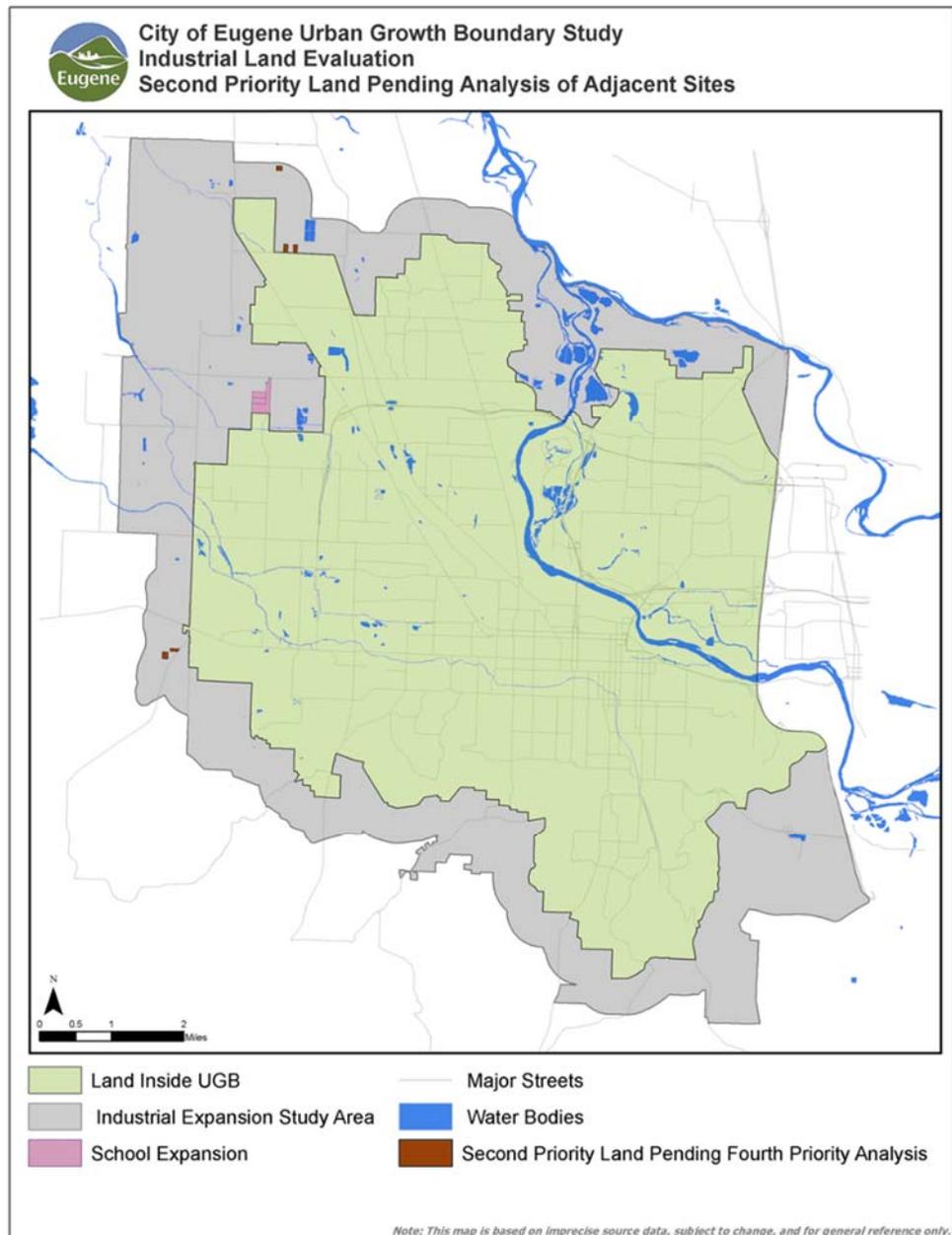
Subarea P2.12 is divided into two small lots and small portions of two additional lots owned by a single organization. None of the remaining land in this subarea is of sufficient size to

accommodate any of the needed industrial sites. Further, none of the remaining sites are adjacent to lower priority land that has potential, when combined with the second priority land, to create sites large enough to accommodate a needed industrial site.

**Subarea P2.12 Summary.** Based on these findings, the City has determined that none of the land in Subarea P2.12 is suitable for industrial expansion.

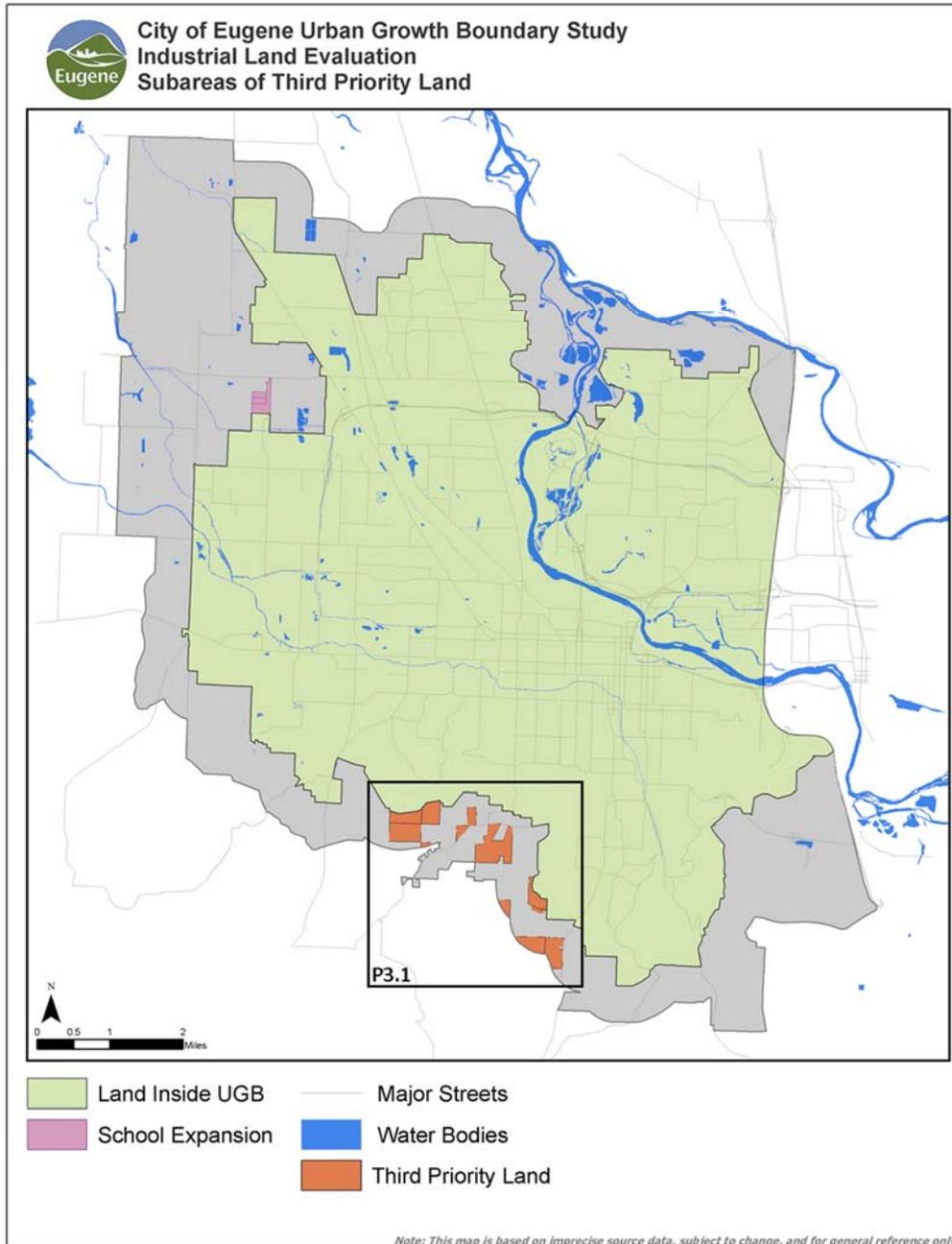
### (13) Second Priority Land -- Conclusion

Based on these findings, the City has determined that the study area has no second priority land suitable for industrial expansion as independent sites. Four sites will be reconsidered with fourth priority land to determine whether they could be combined to create a viable site for meeting the industrial need.



### e. Third Priority Land – Apply State’s Factors for Dismissal of Candidate Land

The third priority land in Eugene’s study area is evaluated within a single Priority 3 (“P3”) subarea shown below on the “Subareas of Third Priority Land” map. This subarea allows for a more detailed view of the land within the study area. The analysis that follows evaluates all land in the subarea. It does not determine the suitability of the subarea as a whole.

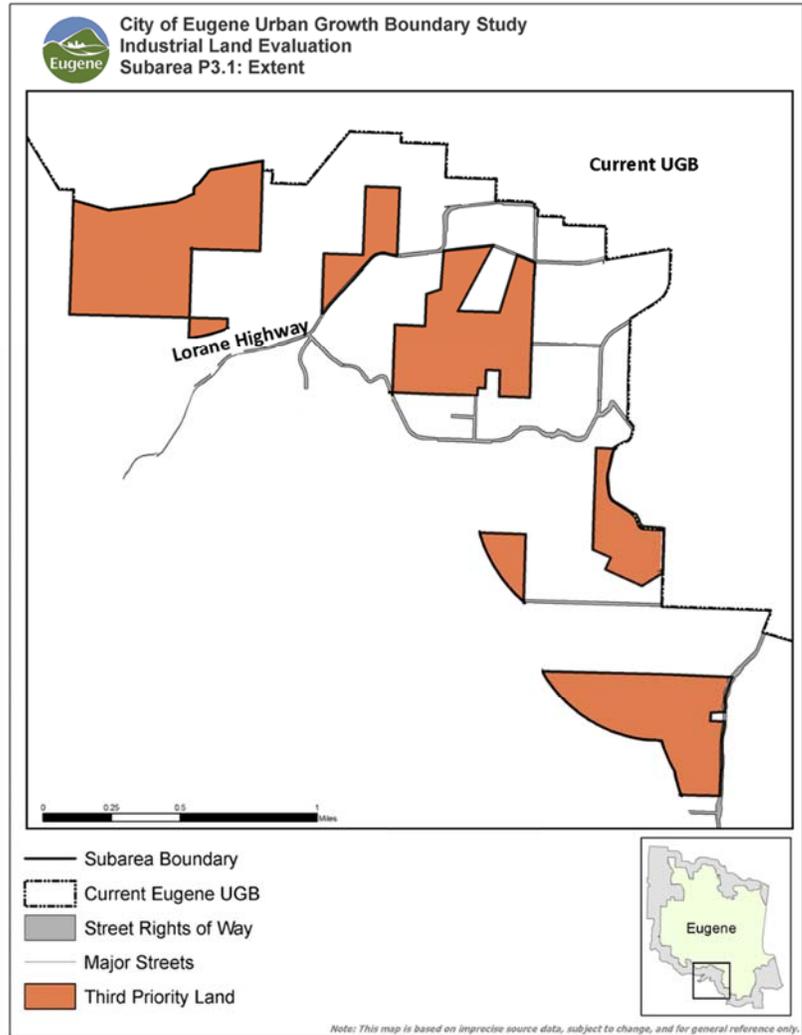


**(1) Subarea P3.1**

Subarea P3.1 is located to the south of the current UGB, near Lorane Highway, as shown on the “Extent” map. It is composed of 488.6 acres of third priority. The land in this subarea is designated as Marginal Land.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**

The map “Subarea P3.1: Development Constraints” shows the development constraints present in Subarea P3.1. See constraint maps, in Section II.b above, showing the location of each development constraint throughout the study area. Some land in the P3.1 subarea has more than one type of development constraint. The map “Subarea P3.1: Development Constraints” is a visual representation of the following information:

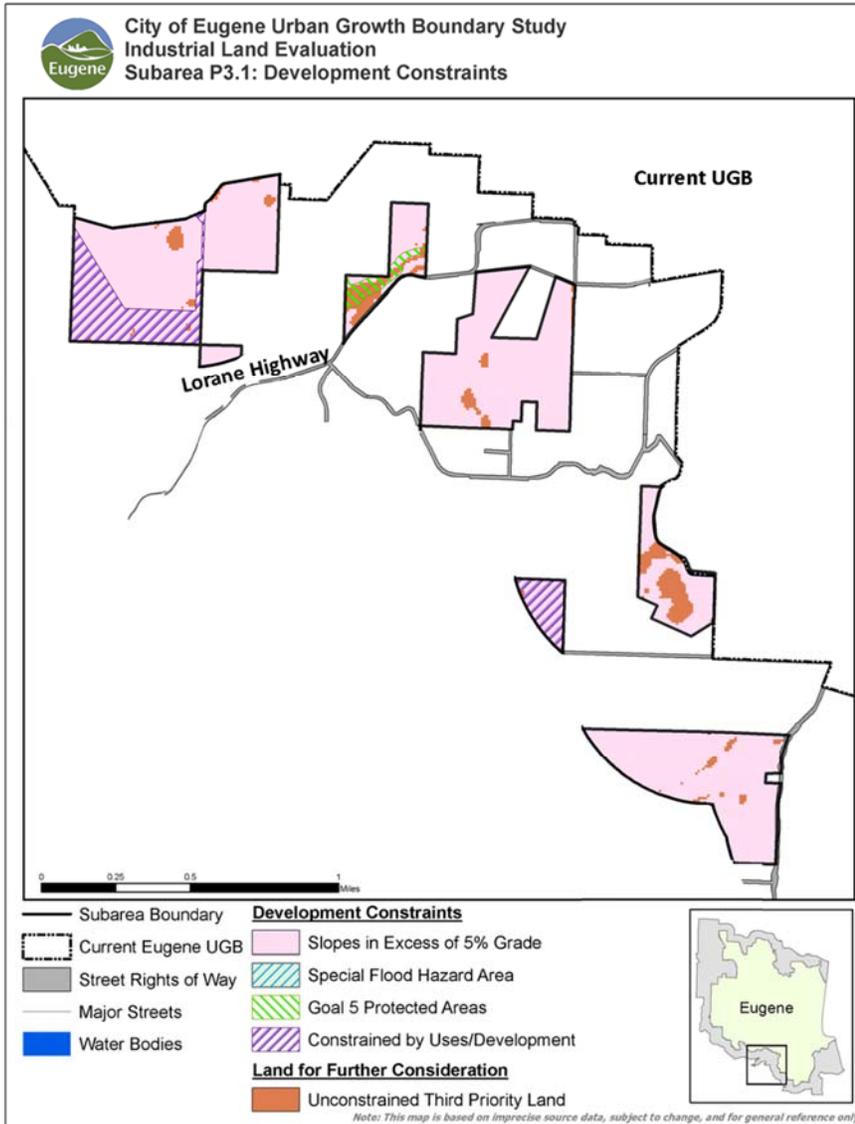


*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 453.3 acres of the land in Subarea P3.1 (93 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P3.1 is constrained by the FEMA mapped Special Flood Hazard Area.



*Dismissal of Land with Goal 5 Protections (natural resources)*

8.8 acres of the land in Subarea P3.1 (2 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Two (2) tax lots totaling 66.6 acres of the land in Subarea P3.1 (14 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. These two tax lots are owned by City of Eugene Parks and Open Space. The western lot is part of the Wild Iris Ridge and the eastern lot is held for future park development.<sup>28</sup>

Summary of Development Constraints

In all, 457.7 acres of the land in Subarea P3.1 have one or more development constraints

(“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 30.9 acres of land in Subarea P3.1 are addressed below.

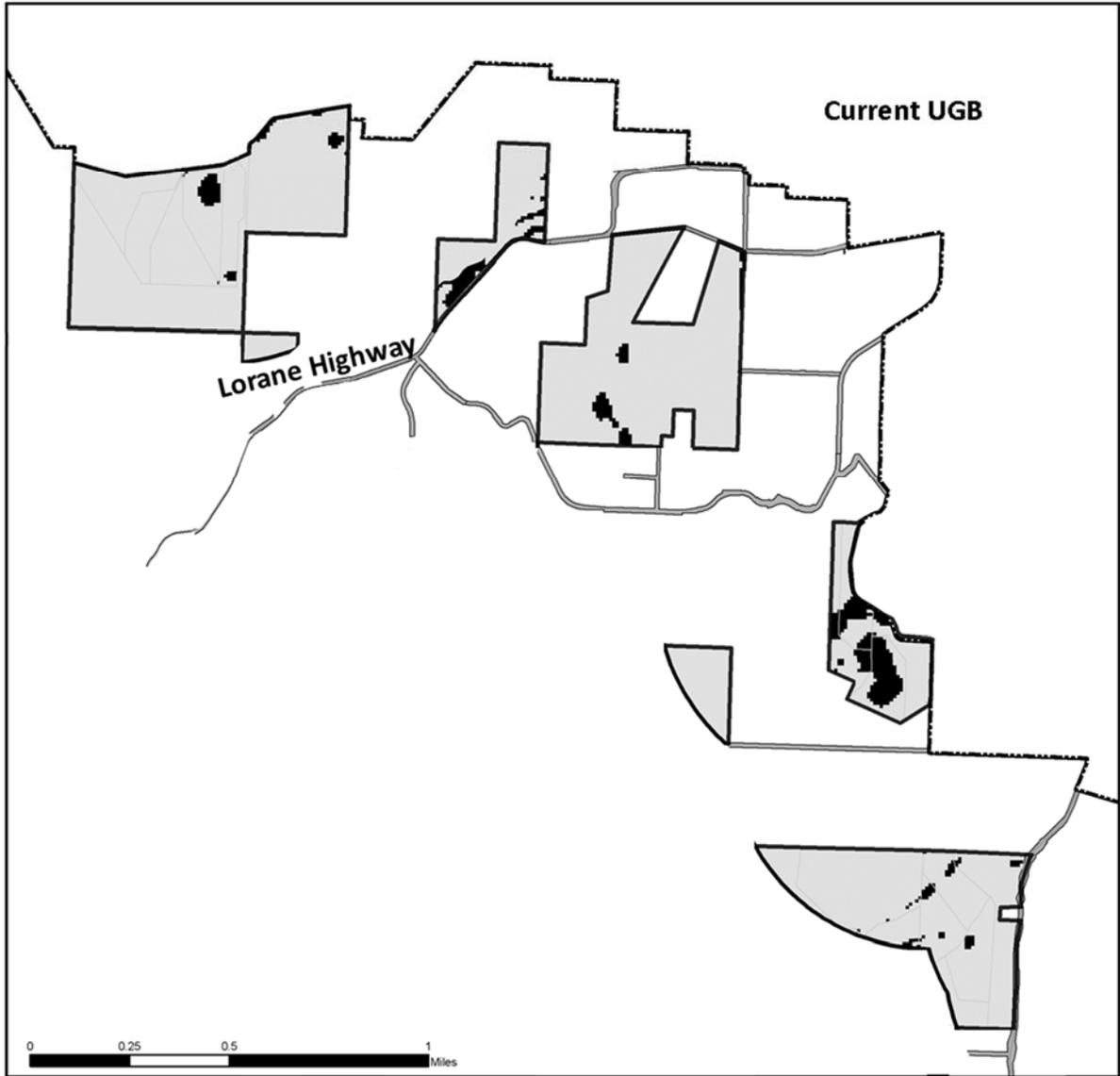
**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

The map “Subarea P3.1: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P3.1 with the following site characteristic elements displayed:

<sup>28</sup> All P3.1 sites dismissed due to existing uses would also be dismissed for slope in excess of 5%.



City of Eugene Urban Growth Boundary Study  
 Industrial Land Evaluation  
 Subarea P3.1: Site Characteristics of Unconstrained Land



- Subarea Boundary
- Current Eugene UGB
- Taxlots
- Street Rights of Way
- Major Streets
- Designated Freight Route
- Streets within a Mile of Freight Route Access
- Constrained Land

- Displayed Site Characteristics of Unconstrained Land**
- Sites More than 1 Mile from Freight Route
  - Sites of Insufficient Size within 1 Mile of Freight Route
  - Third Priority Land for Further Consideration (None)



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved: 8/15/2018

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P3.1 is Highway 126. No land under consideration in this subarea is within one mile of Highway 126.<sup>29</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

As explained above, no sites in Subarea P3.1 remain for consideration under this criterion.

**Subarea P3.1 Summary.** Based on these findings, the City has determined that none of the land in Subarea P3.1 is suitable for industrial expansion.

### **(3) Third Priority Land -- Conclusion**

Based on these findings, the City has determined that no third priority land in the study area is suitable for industrial expansion.

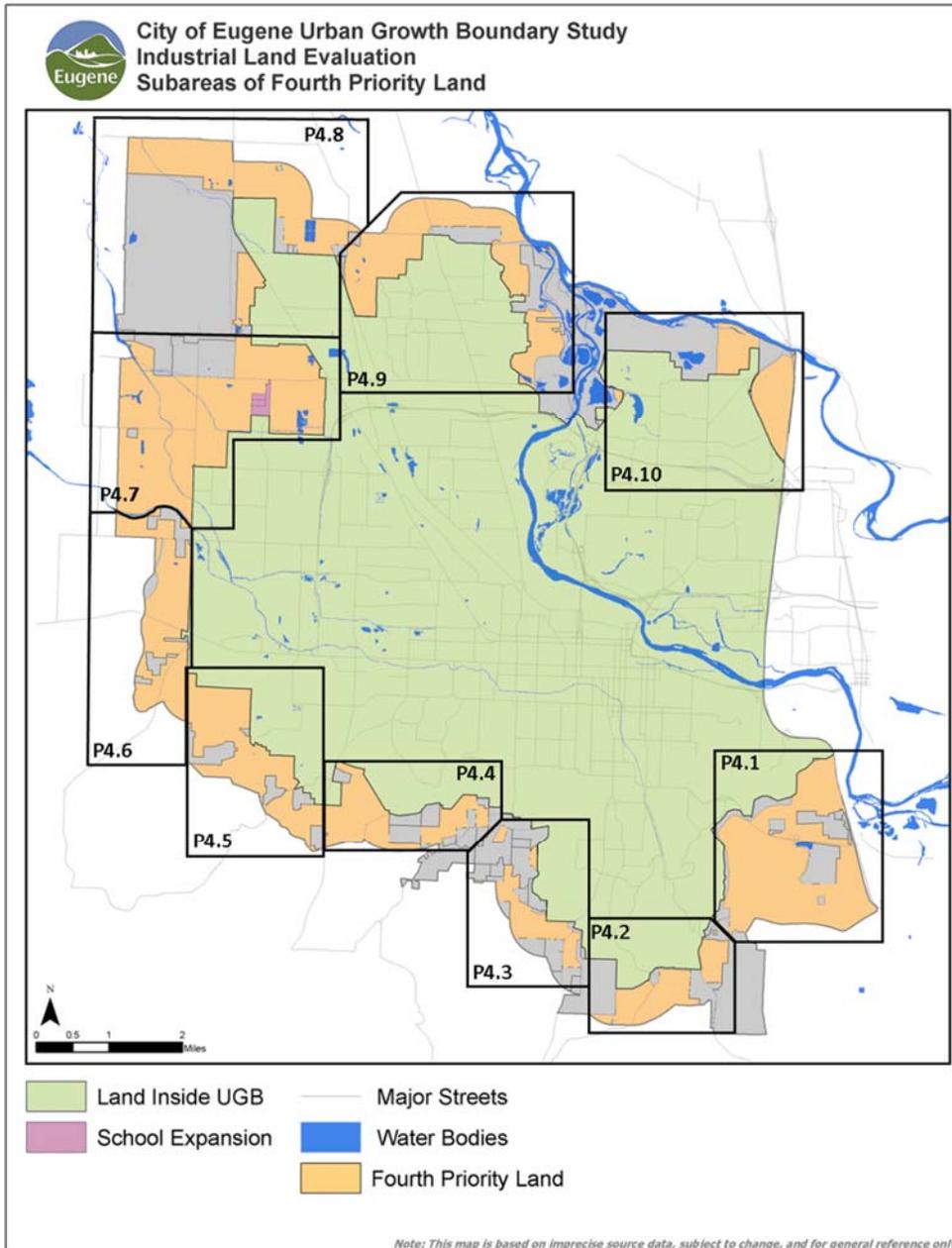
---

<sup>29</sup> Were they not discarded for distance from a Freight Route, these sites would be discarded for insufficient size to meet the identified site characteristics.

## f. Fourth Priority Land – Apply State’s Factors for Dismissal of Candidate Land

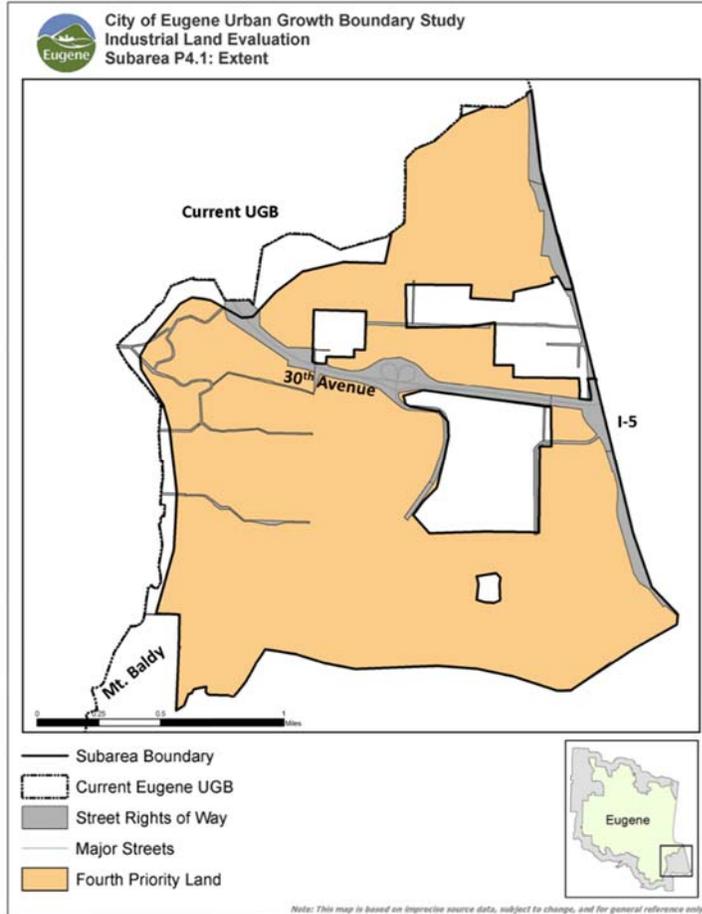
The fourth priority land in Eugene’s study area is divided into 10 subareas for evaluation. These Priority 4 (“P4”) subareas are shown on the “Subareas of Fourth Priority Land” map. As noted above, these subareas allow for a more detailed view of the land within the study area. The analysis that follows evaluates all land in each subarea. It does not determine the suitability of subareas as a whole.

Each of the ten subareas of fourth priority category land was evaluated using the standards and process set out in Section II.c, above. Analysis that walks through that evaluation follows.



## (1) Subarea P4.1

Subarea P4.1 is located to the southeast of the current UGB, near 30th Avenue and Interstate 5, as shown on the “Extent” map. It is composed of 1804.4 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

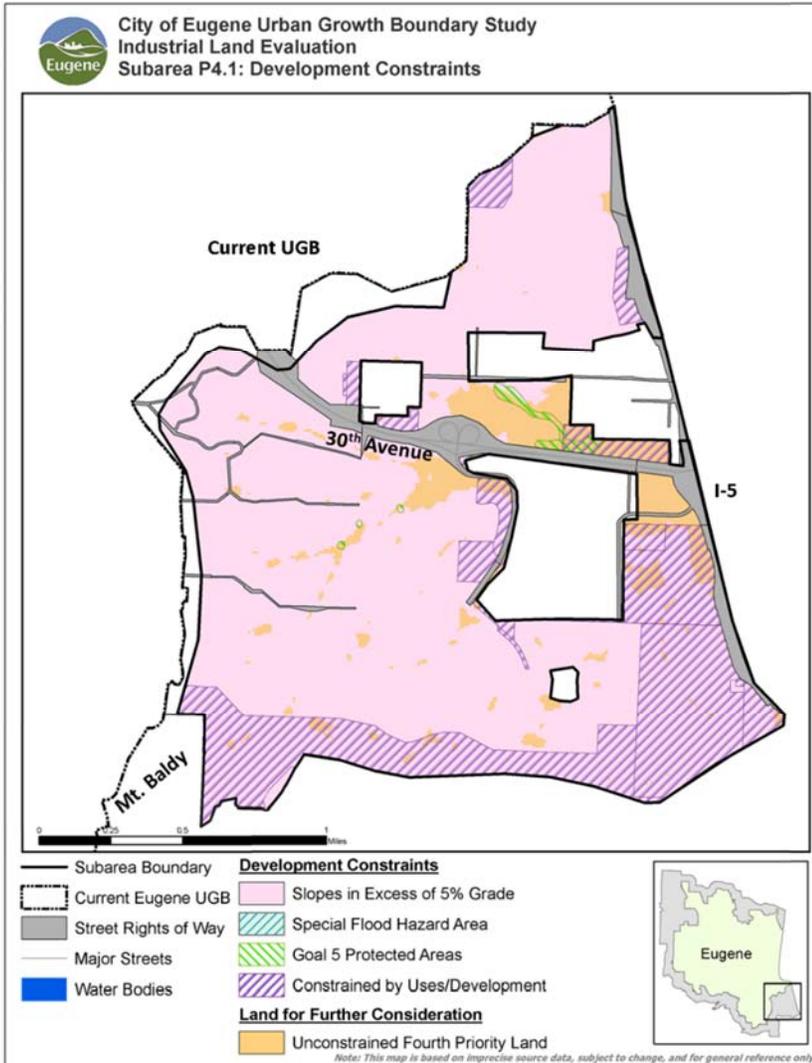


### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit

The map “Subarea P4.1: Development Constraints” shows the development constraints present in Subarea P4.1. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.1 subarea has more than one type of development constraint. The map “Subarea P4.1: Development Constraints” is a visual representation of the following information:

#### *Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 1594.6 acres of the land in Subarea P4.1 (88 percent) are constrained by slopes greater than 5%.



*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P4.1 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

12.9 acres of the land in Subarea P4.1 (less than 1 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Fifteen (15) tax lots totaling 572.8 acres of the land in Subarea P4.1 (32 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.<sup>30</sup>

The majority of this land is in 2 tax lots that the City of Eugene owns and maintains as Moon Mountain Park to the north and Mt. Baldy Park

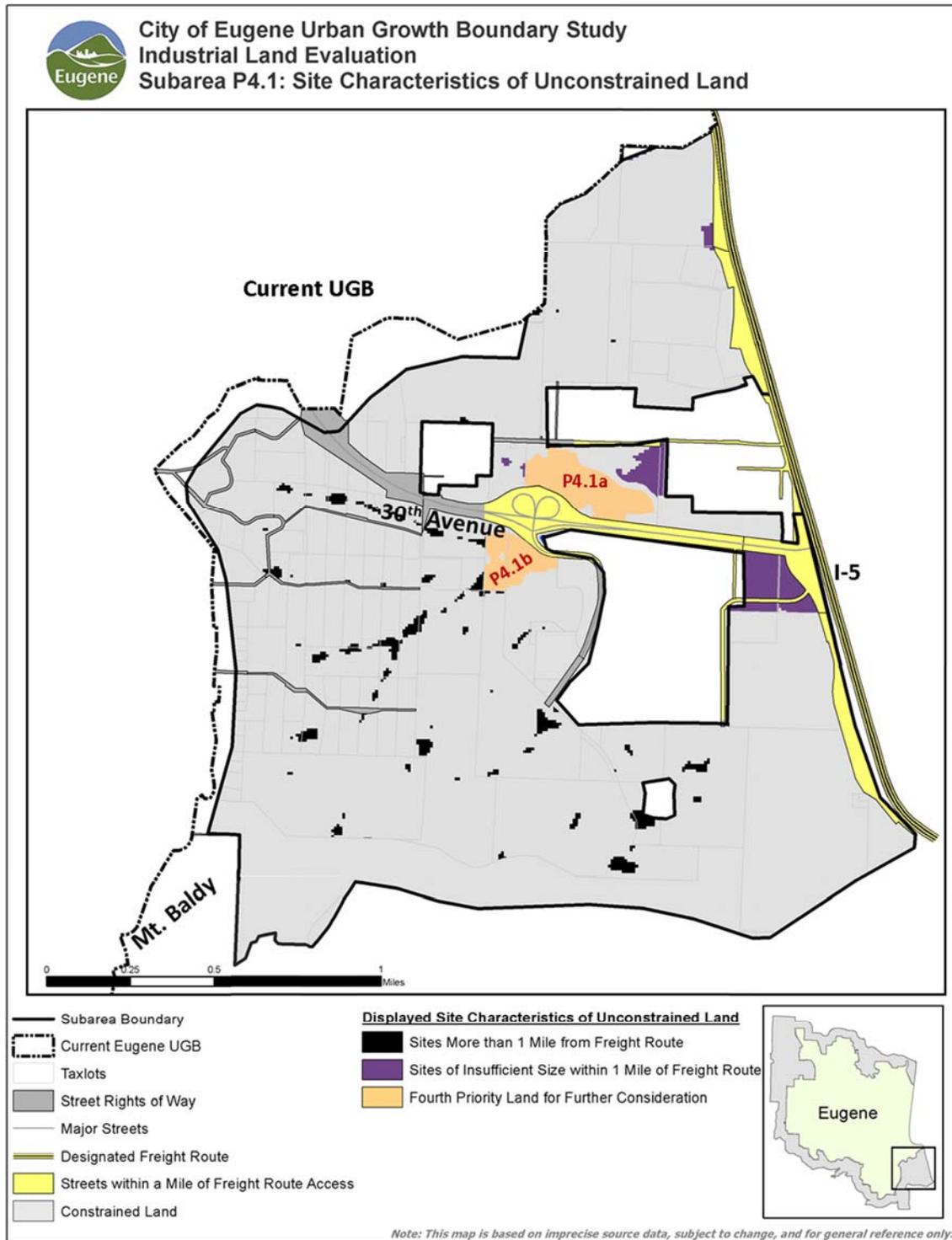
(one of an interconnected series of parks that make up the Ridgeline Trail System with over 12 miles of trails) to the south. Lane Community College owns 4 tax lots to support future growth of the college. Other government agencies own 7 remaining tax lots, including: Oregon Department of Transportation (2 tax lots), Eugene Water and Electric Board (2 tax lots), Lane County (2 tax lots), and the Bonneville Power Administration (1 tax lot). The final 2 tax lots are owned and operated by Oak Hill School as a K-12 school campus.

Summary of Development Constraints

In all, 1,633.3 acres of the land in Subarea P4.1 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 171.1 acres of land in Subarea P4.1 are addressed below.

<sup>30</sup> Except for one site owned by Lane Community College (immediately north of the main campus), all P4.1 sites dismissed due to existing uses would otherwise need to be dismissed due to excessive slope or below under (b) due to insufficient size.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.1: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.1 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.1 is Interstate 5. All remaining land under consideration in the eastern portion of this subarea is within one mile of I-5 except land south of Lane Community College main campus, which lacks access within a mile of I-5.<sup>31</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

Subarea P4.1 is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. Two sites in this subarea are of sufficient size to accommodate any of the needed industrial sites. These sites are labeled as P4.1a and P4.1b on the map “Subarea P4.1: Site Characteristics of Unconstrained Land” above.

**Subarea P4.1 Summary.** Based on these findings, the City has determined that Subarea P4.1 has two sites (P4.1a and P4.1b) suitable for further consideration for industrial expansion.

**(c) Dismiss Candidate Land to which Future Urban Services Could not Reasonably be Provided Due to Topographical or other Physical Constraints**

All land in Subarea P4.1 can be served.

**(d) Dismiss Candidate Land if its Inclusion in the UGB would be Untenable Considering the Comparative Environmental, Energy, Economic and Social Consequences that would Result from its Inclusion in the UGB**

**Site P4.1a –**

This site is 28 contiguous acres of a 50 acre tax lot designated for Agriculture. Land to the west is designated for forest use, while land to the north and east is designated for rural residential use. Land to the south is currently developed as the primary campus for Lane Community College.

---

<sup>31</sup> Were they not discarded for distance from a Freight Route, these southern sites would be discarded for insufficient size to meet the identified site characteristics.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to forest land to the west. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* While the addition of industrial employment near residential areas may decrease energy use from commuter traffic, an isolated employer or two is unlikely to have significant benefits, and is just as likely to draw employees from other parts of the region. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.1a to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.1a is separated from the current UGB by productive forest land. For Site P4.1a to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.1a until the site is contiguous with the city limits, either through annexation of the intervening forest land (which would not serve an identified need for the City), or a significant (and arguably unreasonable) "cherry stem" annexation of 30<sup>th</sup> Avenue. Given that it is therefore highly unlikely that Site P4.1a would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this site (including transportation improvements for the connection to I-5) is disproportionate to the site's benefits. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for nearby rural residents and students exposed to traffic and other impacts of such uses adjacent to their homes and school. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges to developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.1a is discarded from further consideration.

#### **Site P4.1b –**

This site is assembled from 15.7 contiguous acres of an 8.6 acre tax lot and a 36.5 acre tax lot both designated for Forest. Land to the south, west and north is designated for forest use, while land to the east is designated for Government and Education and is currently developed as the primary campus for Lane Community College.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site surrounded by forest land on three sides. This adjacency could have potential minor environmental consequences. This site also has the negative consequence of more than half of the acreage of the two tax lots is constrained by slope, leading to a considerable amount of forest land that would be taken into the urban growth boundary by expanding for this site without serving an identified need. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative.

*Energy:* While the addition of industrial employment moderately close to residential areas may decrease energy use from commuter traffic, an isolated employer or two is unlikely to have significant benefits, and is just as likely to draw employees from other parts of the region. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.1b to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.1b is separated from the current UGB by productive forest land. For Site P4.1b to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.1b until the site is contiguous with the city limits, either through annexation of the intervening forest land (which would not serve an identified need for the City), or a significant (and arguably unreasonable) "cherry stem" annexation of 30<sup>th</sup> Avenue. Given that it is therefore highly unlikely that Site P4.1b would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this site (including transportation improvements for the connection to I-5) is disproportionate to the site's benefits. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for students exposed to traffic and other impacts of such uses adjacent to their school. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges to developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.1b is discarded from further consideration.

**(e) Dismiss Candidate Land if its Inclusion in the UGB to Address the Identified Industrial Land Deficit would be Incompatible with Nearby Agricultural or Forest Activities Occurring on Farm or Forest Land Outside the UGB**

As explained above, Site P4.1a and Site P4.1b are separated from the existing UGB by productive forest land that is not suitable for the City's industrial land needs. Development of these sites could require the City to also bring that intervening forest land into the UGB and to annex it into the city limits if the lengthy "cherry stem" annexation is determined to be unreasonable. In that way, inclusion of either of these sites in the UGB to address the identified industrial land deficit would be incompatible with the nearby forest activities now occurring on forest land outside the UGB. Even if there was not a sufficient basis for dismissing Site P4.1a and Site P4.1b based on the ESEE consequences discussed above, these sites would be dismissed from further consideration for this reason.

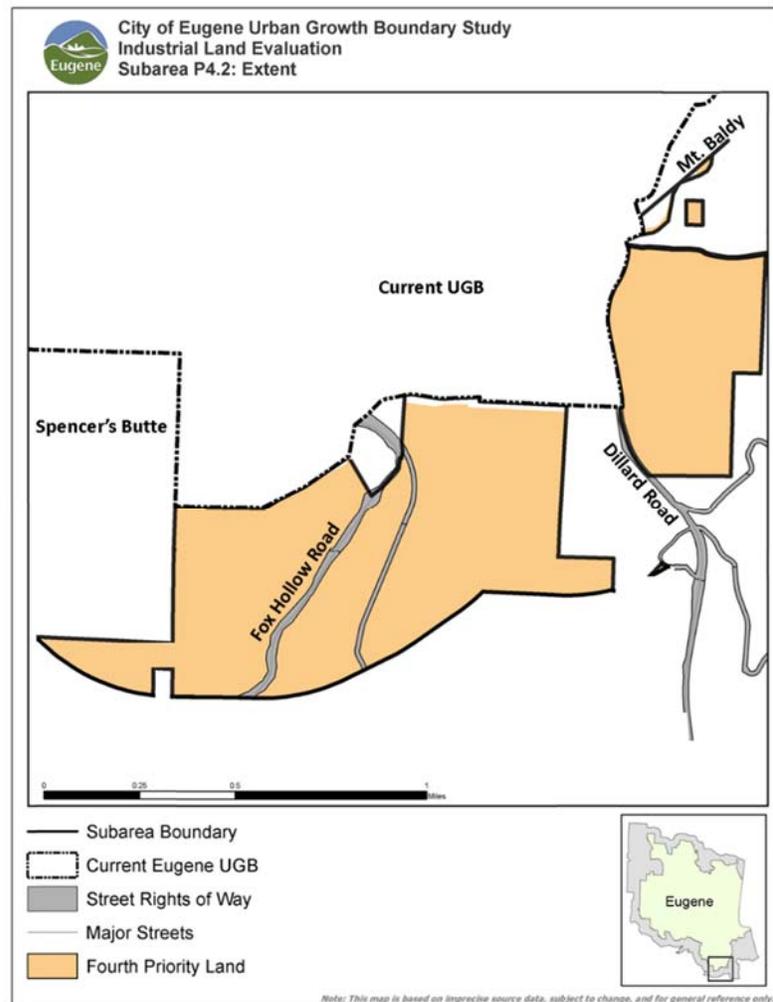
**Subarea P4.1 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.1 is suitable for industrial expansion.

## (2) Subarea P4.2

Subarea P4.2 is located to the southeast of the current UGB, between Mt. Baldy and Spencer's Butte, as shown on the "Extent" map. It is composed of 499.4 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

### (a) Dismiss Candidate Land with "Development Constraints" – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit

The map "Subarea P4.2: Development Constraints" shows the development constraints present in Subarea P4.2. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.2 subarea has more than one type of development constraint. The map "Subarea P4.2: Development Constraints" is a visual representation of the following information:



#### *Dismissal of Land with Slopes in Excess of 5 Percent Grade*

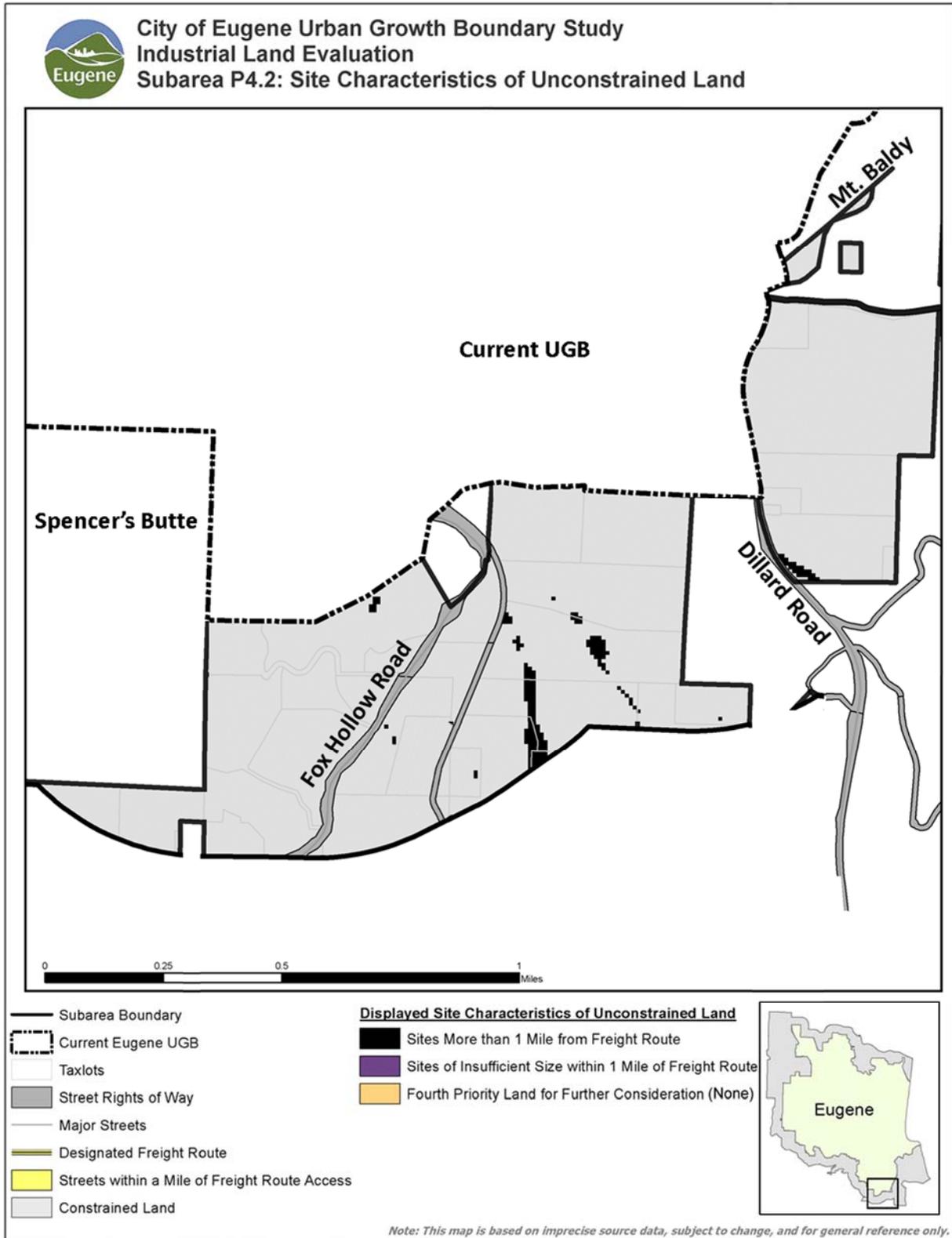
The United States Geological Survey's 10-meter digital elevation model shows that 490.9 acres of the land in Subarea P4.2 (98 percent) are constrained by slopes greater than 5%.

#### *Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P4.2 is constrained by the FEMA mapped Special Flood Hazard Area.



The map “Subarea P4.2: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.2 with the following site characteristic elements displayed:



*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.2 is Interstate 5. All remaining land under consideration in this subarea is more than one mile from I-5.<sup>33</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

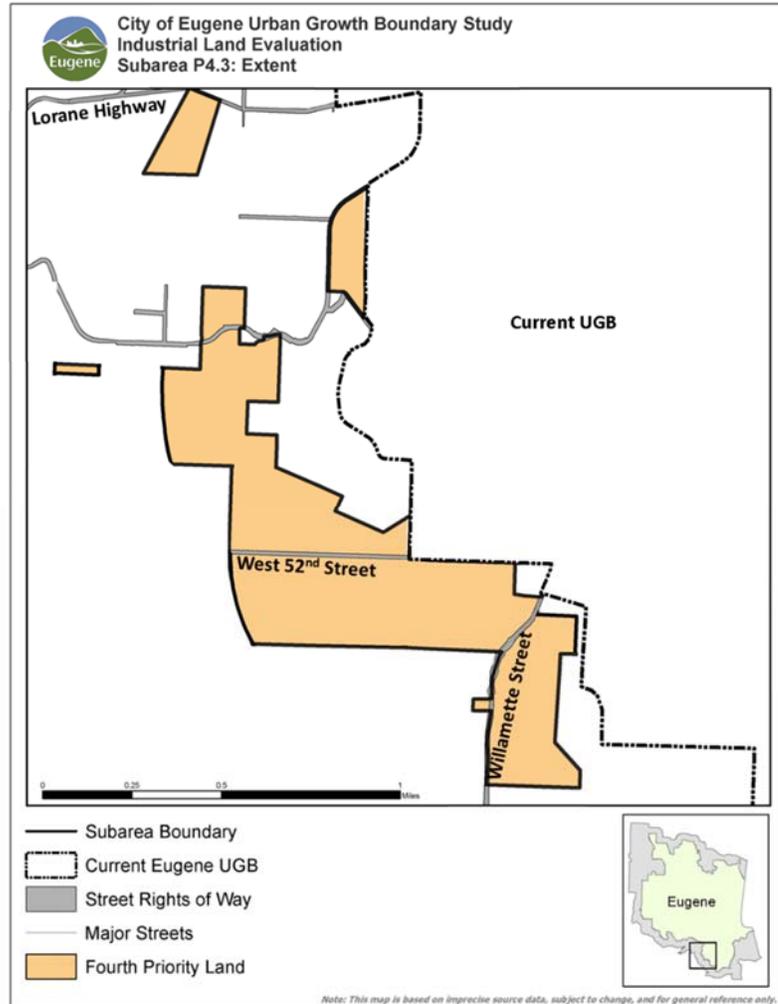
As explained above, no sites in Subarea P4.2 remain for consideration under this criterion.

**Subarea P4.2 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.2 is suitable for industrial expansion.

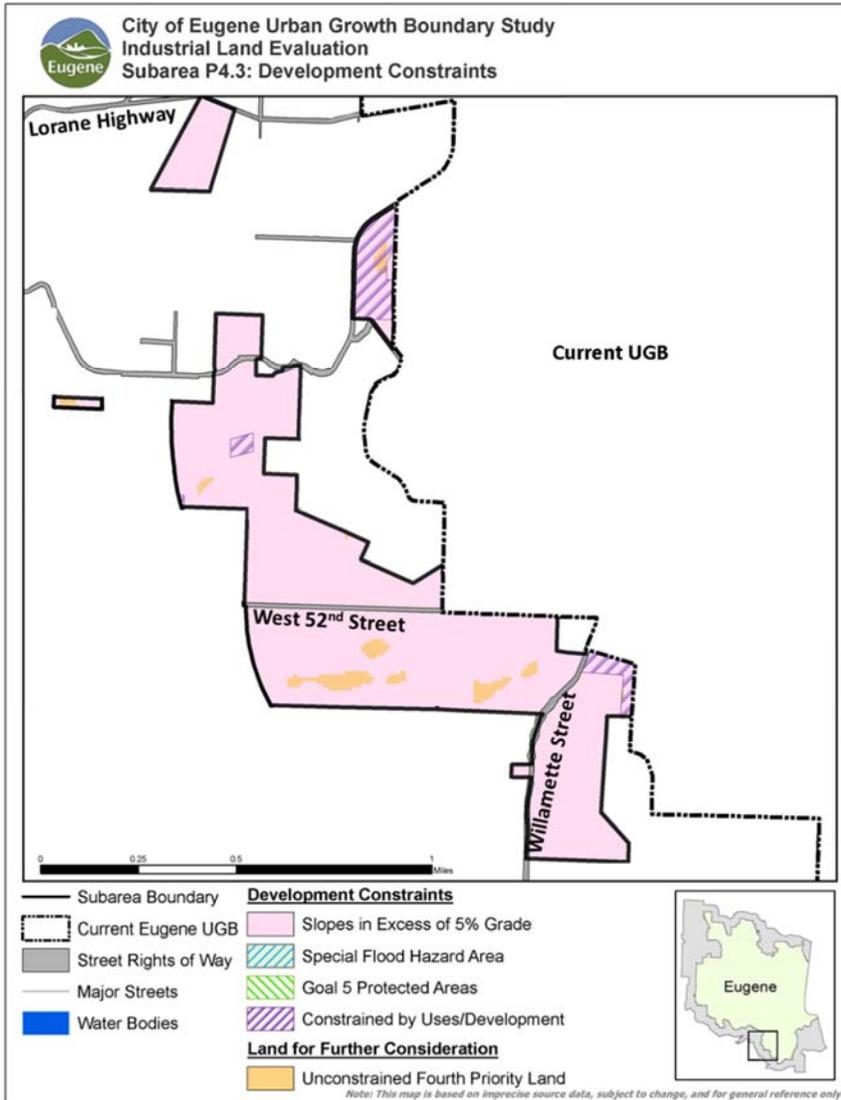
### (3) Subarea P4.3

Subarea P4.3 is located to the south of the current UGB, between Spencer’s Butte and Lorane Highway, as shown on the “Extent” map. It is composed of 352.8 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

#### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit



<sup>33</sup> Were they not discarded for distance from a Freight Route, the remaining sites would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P4.3: Development Constraints” shows the development constraints present in Subarea P4.3. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.3 subarea has more than one type of development constraint. The map “Subarea P4.3: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 339.8 acres of the land in Subarea P4.3 (96 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P4.3 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

None of the land in Subarea P4.3 is constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

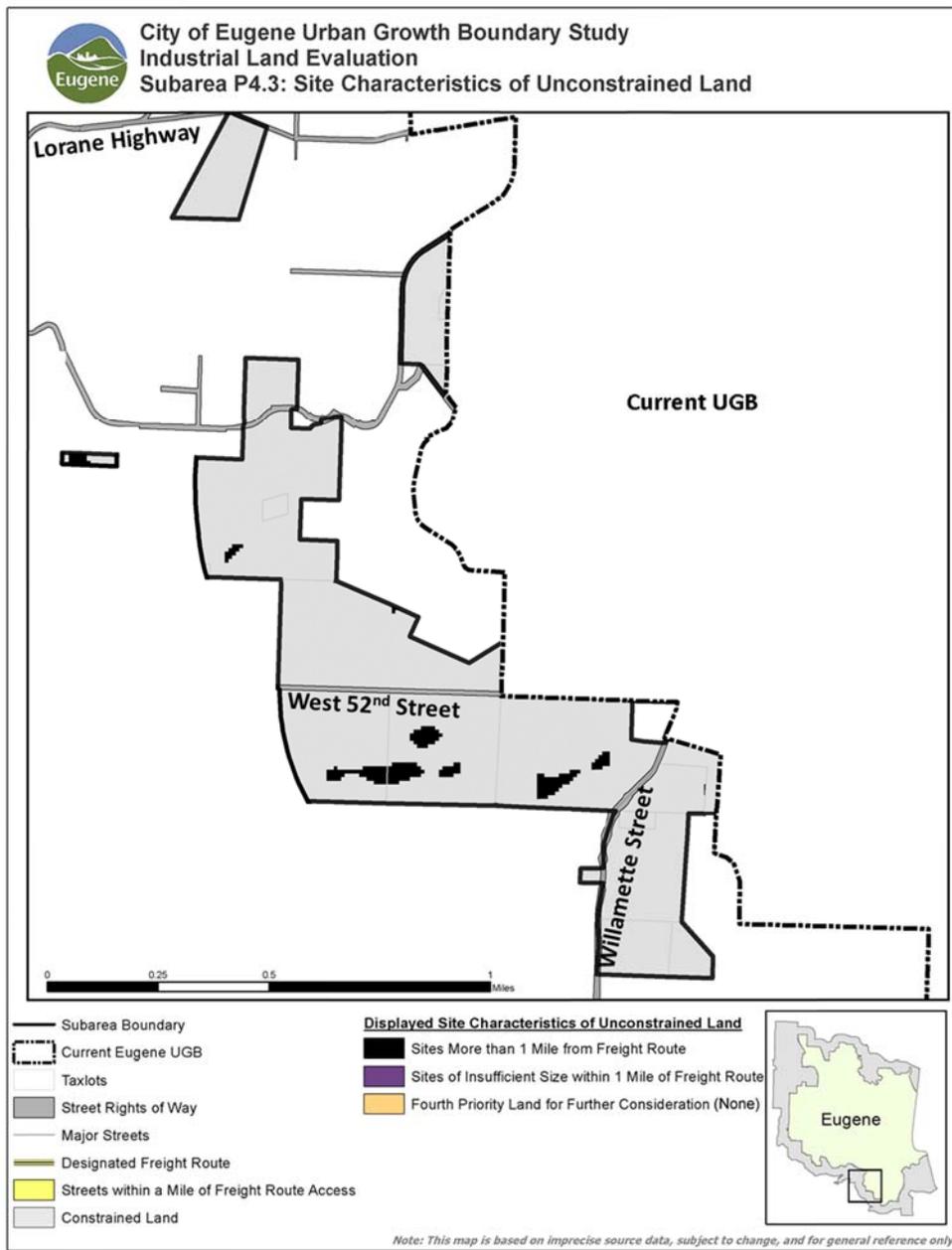
Three (3) tax lots totaling 17.0 acres of the land in Subarea P4.3 (5 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.<sup>34</sup> All of these tax lots are owned by the City of Eugene. Two are portions of parks (Blanton Ridge Trailhead and Spencer’s Butte, which are part of an interconnected series of parks that make up the Ridgeline Trail System with over 12 miles of trails), and the other provides water storage.

<sup>34</sup> All P4.3 sites dismissed due to existing uses would otherwise need to be dismissed due to excessive slope.

Summary of Development Constraints

In all, 339.8 acres of the land in Subarea P4.3 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 13.0 acres of land in Subarea P4.3 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.3: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.3 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.3 is Interstate 5. All remaining land under consideration in this subarea is more than one mile from I-5.<sup>35</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

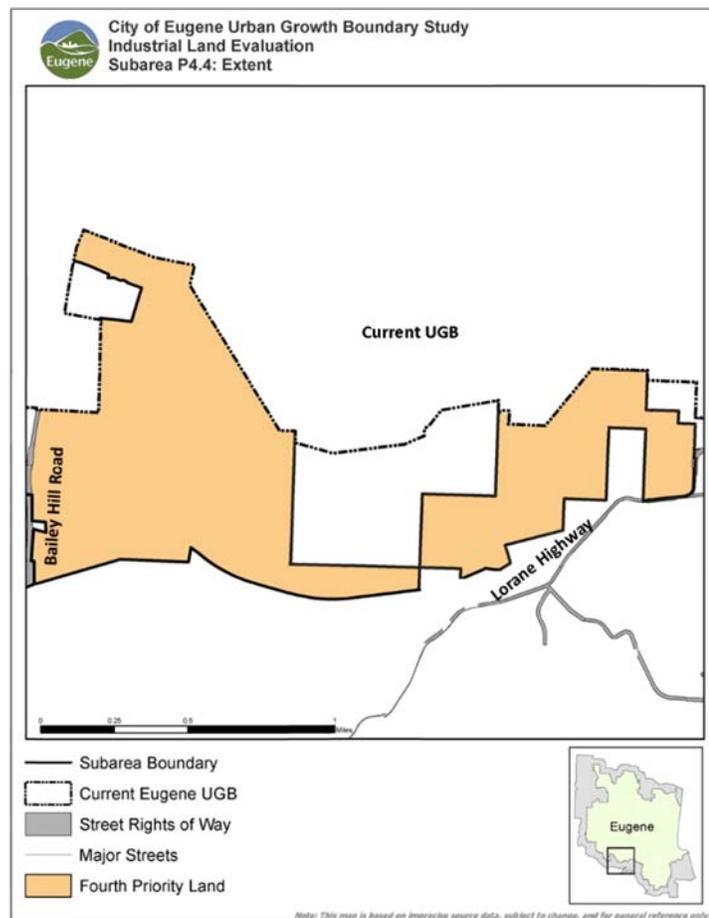
As explained above, no sites in Subarea P4.3 remain for consideration under this criterion.

**Subarea P4.3 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.3 is suitable for industrial expansion.

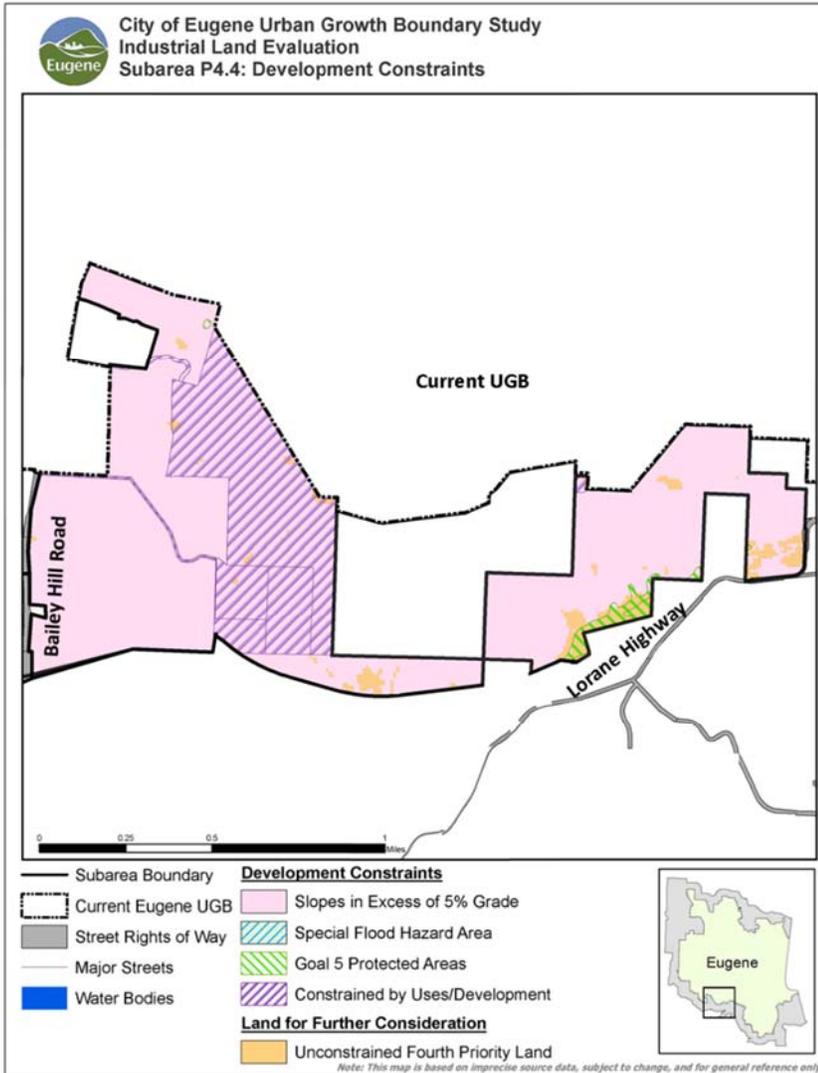
#### (4) Subarea P4.4

Subarea P4.4 is located to the south of the current UGB, between Lorane Highway and Bailey Hill Road, as shown on the “Extent” map. It is composed of 656.9 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

##### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit



<sup>35</sup> Were they not discarded for distance from a Freight Route, the remaining sites would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P4.4: Development Constraints” shows the development constraints present in Subarea P4.4. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.4 subarea has more than one type of development constraint. The map “Subarea P4.4: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 628.2 acres of the land in Subarea P4.4 (96 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P4.4 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

10.1 acres of the land in Subarea P4.4 (2 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

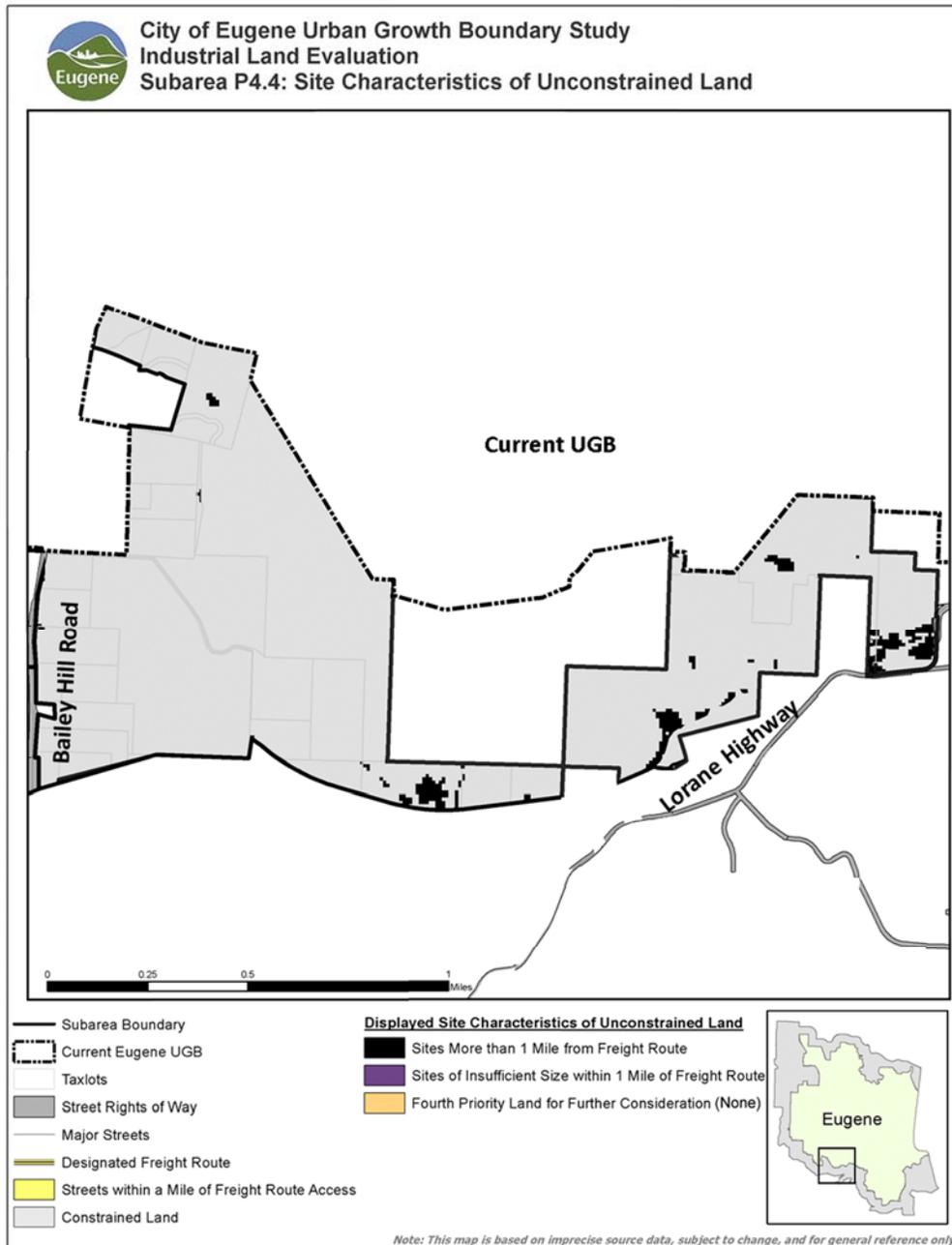
Six (6) tax lots totaling 173.0 acres of the land in Subarea P4.4 (26 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.<sup>36</sup> Five of these tax lots are owned by Eugene Parks and Open Space and are a portion of Wild Iris Ridge. One tax lot is owned and operated by the Eugene Water and Electric Board as a substation.

<sup>36</sup> All P4.4 sites dismissed due to existing uses would otherwise need to be dismissed due to excessive slope.

Summary of Development Constraints

In all, 638.2 acres of the land in Subarea P4.4 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 18.7 acres of land in Subarea P4.4 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.4: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.4 with the following site characteristic elements displayed:

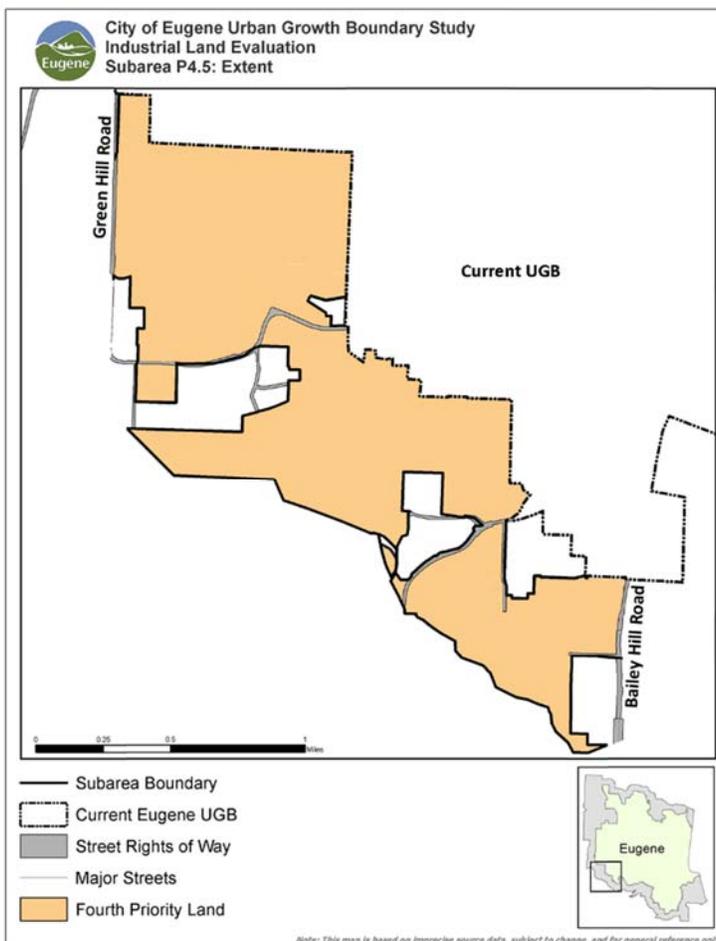
*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.4 is Highway 126. All remaining land under consideration in this subarea is more than one mile from Highway 126.<sup>37</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

As explained above, no sites in Subarea P4.4 remain for consideration under this criterion.



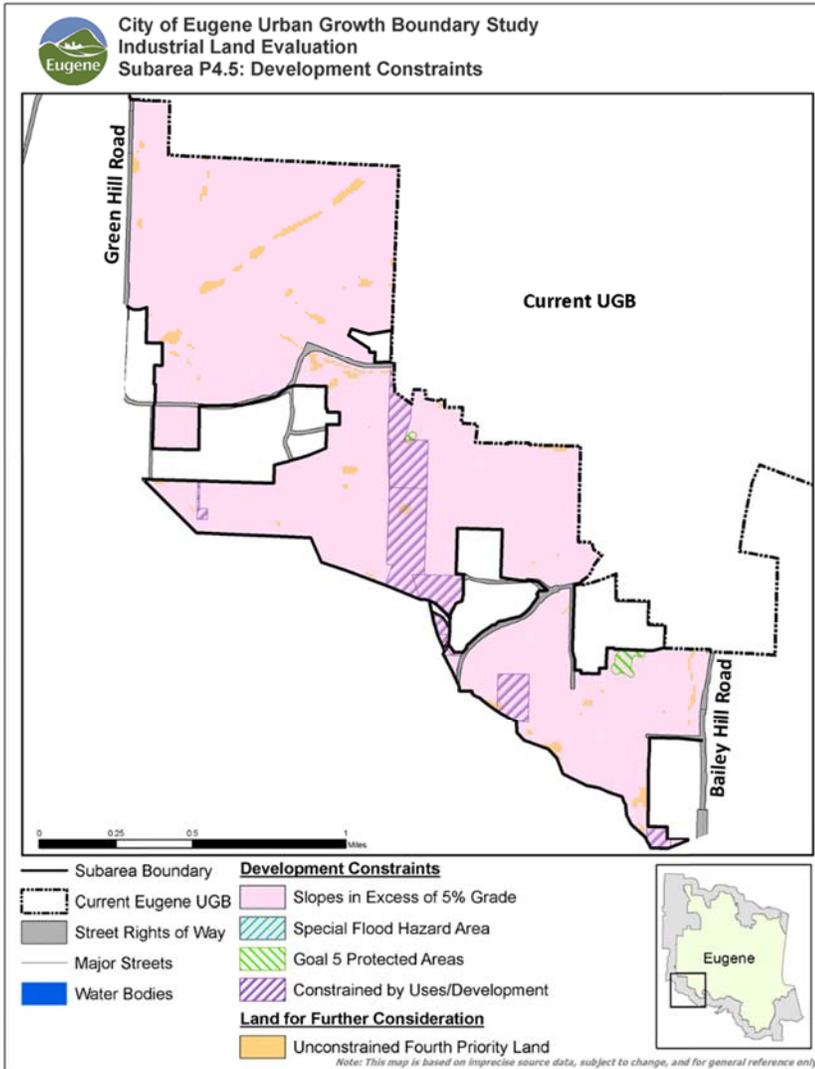
**Subarea P4.4 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.4 is suitable for industrial expansion.

**(5) Subarea P4.5**

Subarea P4.5 is located to the southwest of the current UGB, between Bailey Hill Road and Green Hill Road, as shown on the “Extent” map. It is composed of 986.4 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**

<sup>37</sup> Were they not discarded for distance from a Freight Route, the remaining sites would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P4.5: Development Constraints” shows the development constraints present in Subarea P4.5. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.5 subarea has more than one type of development constraint. The map “Subarea P4.5: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 962.5 acres of the land in Subarea P4.5 (98 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

None of the land in Subarea P4.5 is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

3.8 acres of the land in Subarea P4.5 (less than 1 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

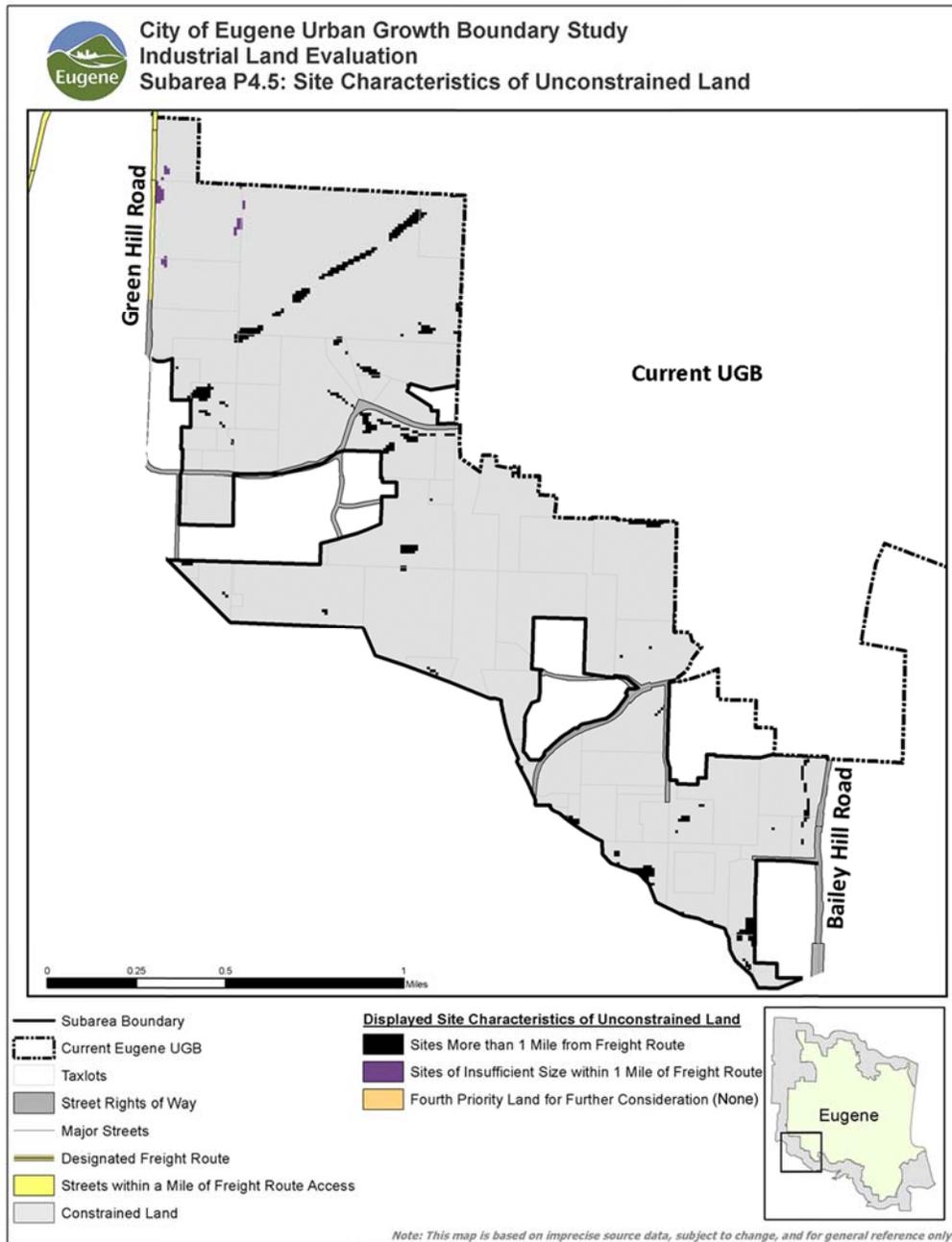
Seven (7) tax lots totaling 71.7 acres of the land in Subarea P4.5 (7 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.<sup>38</sup> Six of these tax lots are owned by Eugene Parks and Open Space and are a portion of Murray Hill Park and two undeveloped park areas. One tax lot is owned by the Eugene Water and Electric Board.

<sup>38</sup> All P4.5 sites dismissed due to existing uses would otherwise need to be dismissed due to excessive slope.

Summary of Development Constraints

In all, 962.5 acres of the land in Subarea P4.5 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 23.9 acres of land in Subarea P4.5 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.5: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.5 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.5 is Highway 126. All remaining land under consideration in this subarea is more than one mile from Highway 126 except small pockets of land in the three more northwestern tax lots.<sup>39</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

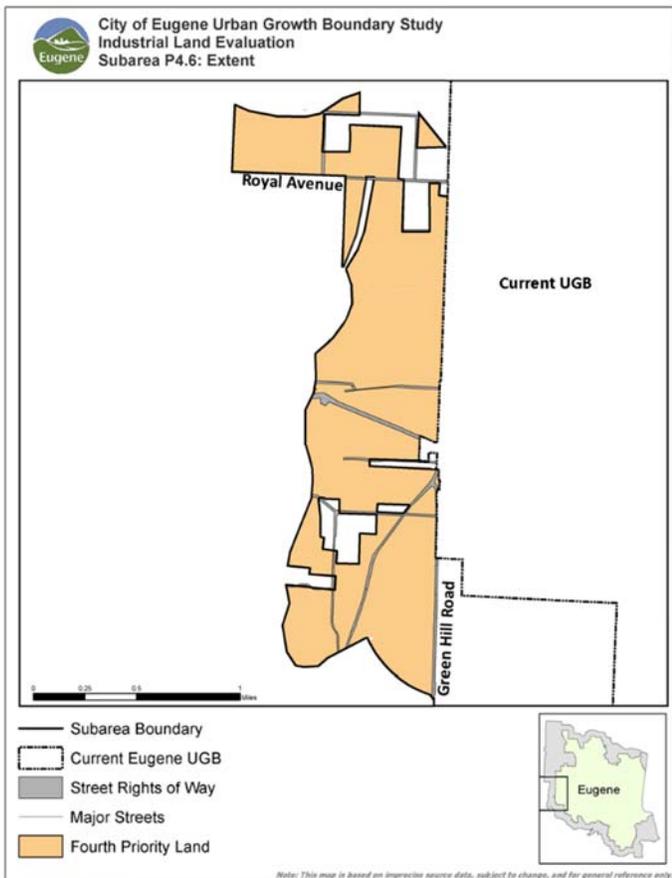
This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites.

**Subarea P4.5 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.5 is suitable for industrial expansion.

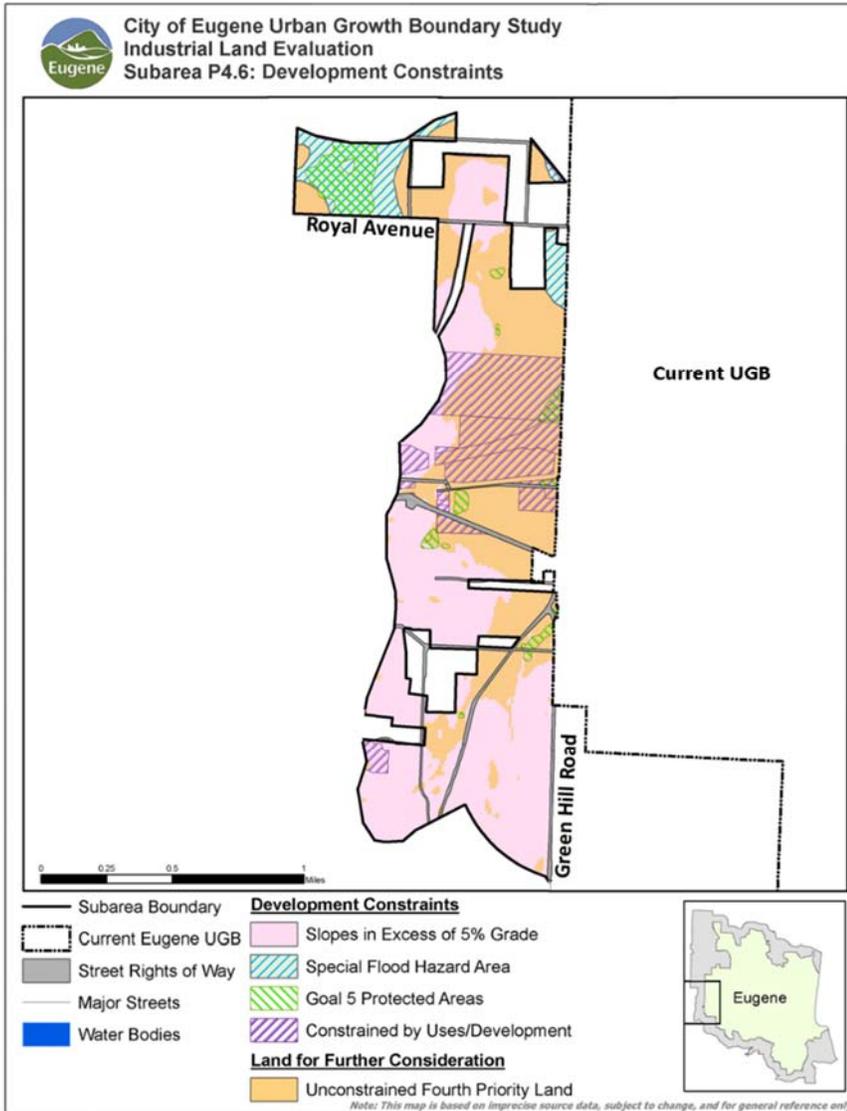
## (6) Subarea P4.6

Subarea P4.6 is located to the west of the current UGB, between Green Hill Road and the Amazon Creek Diversion Channel, as shown on the “Extent” map. It is composed of 961.2 acres of fourth priority land. The land in this subarea is designated as either Forest or Agriculture.

### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit



<sup>39</sup> Were they not discarded for distance from a Freight Route, the remaining sites would be discarded for insufficient size to meet the identified site characteristics.



The map “Subarea P4.6: Development Constraints” shows the development constraints present in Subarea P4.6. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.6 subarea has more than one type of development constraint. The map “Subarea P4.6: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 441.6 acres of the land in Subarea P4.6 (46 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

81.6 acres of the land in Subarea P4.6 (8 percent) is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

50.6 acres of the land in Subarea P4.6 (5 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Twelve (12) tax lots totaling 223.2 acres of the land in Subarea P4.6 (23 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. The ten tax lots north of Highway 126 are owned by a variety of public entities (Bureau of Land Management, Oregon Department of Transportation, Eugene Water and Electric Board, and the Port of Coos Bay) to protect them as a part of the West

Eugene Wetlands / Rivers to Ridges Program.<sup>40</sup> The two tax lots south of Highway 126 include one developed as an active business (2002 Restorations)<sup>41</sup> and one owned by the Eugene Water and Electric Board.<sup>42</sup>

### Summary of Development Constraints

In all, 673.2 acres of the land in Subarea P4.6 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 288.0 acres of land in Subarea P4.6 are addressed below.

## **(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

The map “Subarea P4.6: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.6 with the following site characteristic elements displayed:

### *Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.6 is Highway 126. Most remaining land under consideration in this subarea is within one mile of Highway 126. The areas dismissed for being more than a mile from a Freight Route are some small pockets of land along the southern boundary of the subarea and some northerly land that is not immediately adjacent to Green Hill Road.<sup>43</sup>

### *Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

---

<sup>40</sup> In the early 1990s, based upon objectives set out in the West Eugene Wetlands Plan, a partnership of multiple agencies and non-profit organizations was formed in an effort to conserve and restore wetlands in the West Eugene area. See <https://www.eugene-or.gov/650/Rivers-to-Ridges-Partnership>.

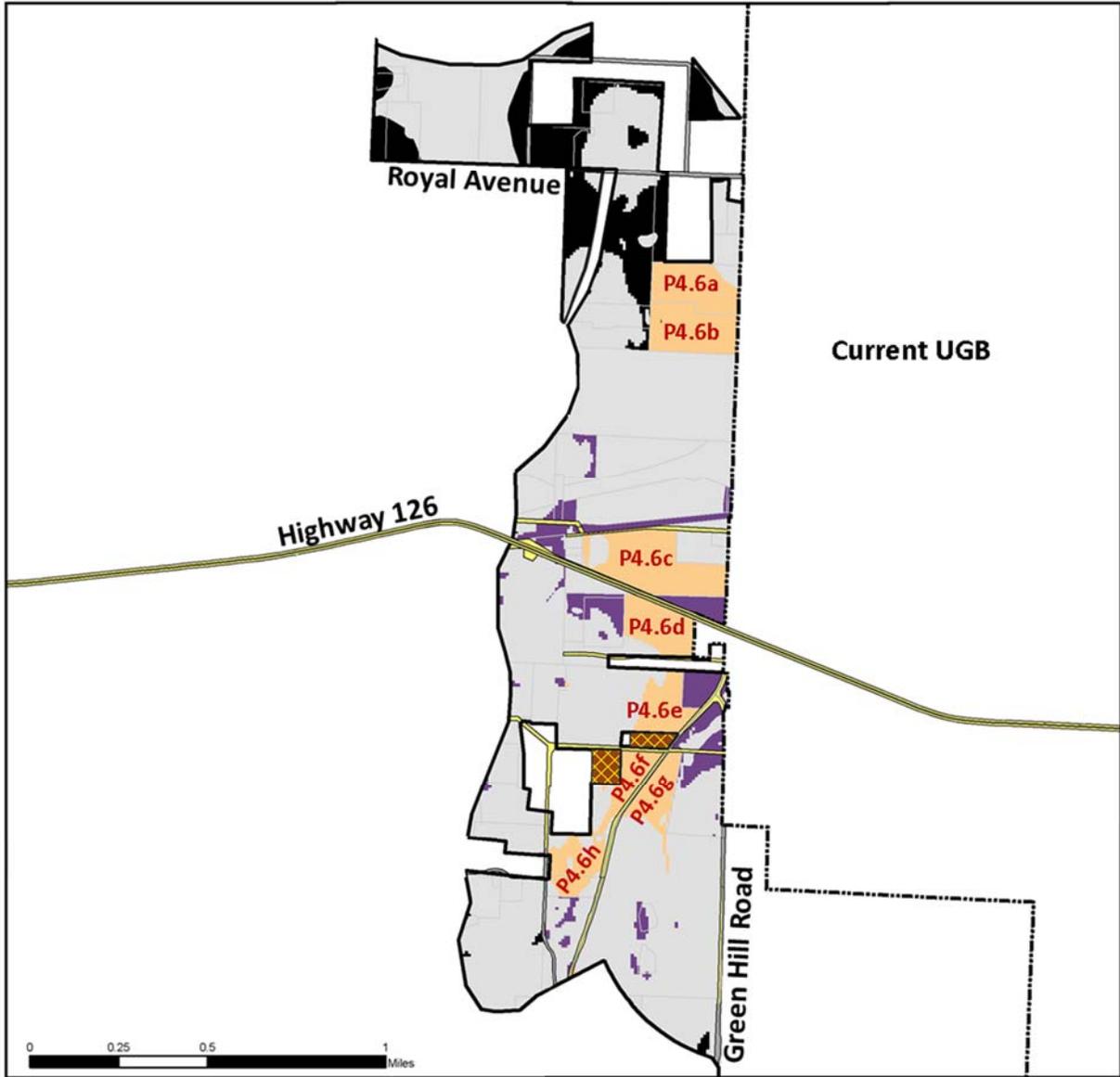
<sup>41</sup> Were this site not discarded for existing development, it would be discarded for insufficient size to meet the identified site characteristics.

<sup>42</sup> Were this site not discarded for existing development, it would be discarded for excessive slope and distance from a Freight Route.

<sup>43</sup> Were they not discarded for distance from a Freight Route, the southern sites would be discarded for insufficient size to meet the identified site characteristics.



**City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Subarea P4.6: Site Characteristics of Unconstrained Land**



- Subarea Boundary
- - - Current Eugene UGB
- Taxlots
- Street Rights of Way
- Major Streets
- Designated Freight Route
- Streets within a Mile of Freight Route Access
- Constrained Land
- Second Priority Land Pending Fourth Priority Analysis
- Displayed Site Characteristics of Unconstrained Land**
- Sites More than 1 Mile from Freight Route
- Sites of Insufficient Size within 1 Mile of Freight Route
- Fourth Priority Land for Further Consideration



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. Additionally, two small areas of second priority land in Subarea P2.7 were identified in prior analysis, above, as being of insufficient size to meet a portion of the industrial land need, but which would be considered here in association with adjacent sites of fourth priority land. Eight sites in this subarea are of sufficient size to accommodate a needed industrial site. These sites are labeled as P4.6a through P4.6h on the map “Subarea P4.6: Site Characteristics of Unconstrained Land.”

**Subarea P4.6 Summary.** Based on these findings, the City has determined that Subarea P4.6 has eight sites (P4.6a-h) suitable for further consideration for industrial expansion.

**(c) Dismiss Candidate Land to which Future Urban Services Could not Reasonably be Provided Due to Topographical or other Physical Constraints**

All land in Subarea P4.6 can be served.

**(d) Dismiss Candidate Land if its Inclusion in the UGB would be Untenable Considering the Comparative Environmental, Energy, Economic and Social Consequences that would Result from its Inclusion in the UGB**

**Site P4.6a –**

This site is 16.9 contiguous acres of a 19.9 acre tax lot designated for Agriculture. It is immediately adjacent to the UGB on its eastern edge, where land inside the UGB is designated Industrial. Land to the west and south is designated for a mixture of Agriculture and Forest use, while land to the north is designated Rural Residential. The tax lot immediately to the south is developed by the Greenhill Humane Society.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to forest and agricultural land to the west. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB suggests potential positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.6a would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. Negative economic consequences include the cost to extend urban services to this site, which is isolated from all but one other small potential industrial expansion site (P4.6b). Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for immediately adjacent residents exposed to traffic and other impacts of such uses adjacent to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.6a is, therefore, to be considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.6b –**

This site is a 19.8 acre unconstrained tax lot designated for Agriculture, with a small portion of the southwest corner of the tax lot designated for Forest. It is immediately adjacent to the UGB on its eastern edge, where land inside the UGB is designated Industrial. Land to the west is designated for forest use, while land to the north and south is designated Agriculture.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to forest and agricultural land to the west. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB suggests potential positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.6b would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. Negative economic consequences include the cost to extend urban services to this site, which is isolated from all but one other small potential industrial expansion site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for nearby residents exposed to traffic and other impacts of such uses close to their homes. A more significant negative social consequence would be the displacement of the Greenhill Humane Society animal shelter currently operating on this site, which saves the lives of approximately 3,000 dogs, cats and other animals each year. Overall social consequences from expanding onto this site for industrial use would be negative.

**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.6b is, therefore, to be considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.6c –**

This site is 29.8 contiguous acres of a 33.7 acre tax lot designated for Agriculture. It is immediately adjacent to the UGB on its eastern edge, where land inside the UGB is designated Campus Industrial. Rural land surrounding the site is designated for Agriculture. Site P4.6c is bordered by the railroad to the north and Highway 126 to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural land. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of nearby uses and the adjacency of this site to the current UGB suggests potential positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.6c would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. Negative economic consequences include the cost to extend urban services to this site, which is isolated from all but one other potential industrial expansion site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have minimal social consequences of any kind due to its separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.6c is, therefore, to be considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.6d –**

This site is 15.7 contiguous acres of a 22.9 acre tax lot designated for Agriculture. It is immediately adjacent to the UGB on its eastern edge, where land inside the UGB is designated Commercial. Rural land surrounding the site is designated for Agriculture, with the exception of a narrow strip of Rural Residential to the immediate south. Site P4.6d is bordered by Bonnie Heights Road to the north and Highway 126 to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural land. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of nearby uses and the adjacency of this site to the current UGB suggests potential positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.6d would have positive economic consequences, as it is contiguous with the UGB and near the city limits, making it likely to develop within the planning period. Negative economic consequences include the cost to extend urban services to this site, which is relatively isolated from all but one other potential industrial expansion site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for nearby residents exposed to traffic and other impacts of such uses close to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.6d is, therefore, to be considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.6e –**

This site is 12.8 contiguous acres of a 45.1 acre tax lot designated Agricultural. If suitable, Site P4.6e could meet the need for one of four sites of between 10 and 20 acres. It could potentially be assembled with the adjacent second priority site, which is a 3.1 acre tax lot designated Rural Residential (see analysis of Subarea P2.7, above). If combined with the second priority site (3.1 acres), however, it would still fall into the 10-20 acre category at 15.9 acres. As such, including the second priority site does not enable the City to include fewer acres of lower priority land, because the adjacent fourth priority site is equally viable without it. The second priority site therefore does not assist the City in meeting any industrial land need, and is now dismissed from further analysis. Site P4.6e is surrounded by land designated Agriculture, with the exception of Rural Residential designated land to the south. The site is bordered by Crow Road to the east.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural land. This adjacency could have potential minor environmental consequences. Additionally, 72% of the tax lot is constrained by slope, leading to a considerable amount of fourth priority land that would be taken in by expanding for this site, but would not directly serve the industrial need. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative.

*Energy:* The mix of nearby uses and the proximity of this site to the current UGB suggests potential positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.6e to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.6e is separated from the current UGB by Rural Residential and agricultural land. For Site P4.6e to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.6e until the site is contiguous with the city limits, either through annexation of the intervening residential or agricultural land (which would not serve an identified need for the City), or an (arguably unreasonable) "cherry stem" annexation of Crow Road. Given that it is highly unlikely that Site P4.6e would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for residents exposed to traffic and other impacts of such uses adjacent to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.6e is discarded from further consideration.

#### **Site P4.6f –**

This site is 9.8 contiguous acres of a 13.8 acre tax lot designated Agricultural. It could potentially be assembled with the adjacent second priority site, which is 4.3 contiguous acres of a 4.8 acre tax lot designated Rural Residential (see analysis of Subarea P2.7, above). Together, these two tax lots meet the minimum size need of 10 acres (at 14.2 acres), where neither tax lot meets this minimum independently. The contiguous, unconstrained area of these two tax lots will therefore be considered as a single site (P4.6f) below. Land to the north and west is designated Rural Residential, while land to the south and east is designated Agricultural and Forest. The site is bordered by Crow Road to the east.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural and forest land. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* While the addition of industrial employment near residential areas may decrease energy use from commuter traffic, a given employer is just as likely to draw employees from other parts of the region. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.6f to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.6f is separated from the current UGB by residential and agricultural land. For Site P4.6f to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.6f until the site is contiguous with the city limits, either through annexation of the intervening residential or agricultural land (which would not serve an identified need for the City), or an (arguably unreasonable) "cherry stem" annexation of Crow Road. Given that it is therefore highly unlikely that Site P4.6f would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for residents exposed to traffic and other impacts of such uses adjacent to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site into the City during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.6f is discarded from further consideration.

#### **Site P4.6g –**

This site is 13.5 contiguous acres of a 115.5 acre tax lot designated Agricultural and Forest. Land to the north and west is designated Agricultural with some nearby Rural Residential, while land to the south and east is designated Forest. The site is bordered by Crow Road to the west.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural and forest land. This adjacency could have potential minor environmental consequences. Additionally, 88% of the tax lot is constrained by slope, leading to a considerable amount of fourth priority land that would be taken into the UGB by expanding for this site, but would not directly serve the industrial need. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative.

*Energy:* While the addition of industrial employment near residential areas may decrease energy use from commuter traffic, a given employer is just as likely to draw employees from other parts of the region. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.6g to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.6g is separated from the current UGB by rural residential and agricultural land. For Site P4.6g to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.6g until the site is contiguous with the city limits, either through annexation of the intervening residential or agricultural land (which would not serve an identified need for the City), or an (arguably unreasonable) "cherry stem" annexation of Crow Road. Given that it is highly unlikely that Site P4.6g would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for residents exposed to traffic and other impacts of such uses close to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.6g is discarded from further consideration.

#### **Site P4.6h –**

This site is assembled from 8.8 contiguous acres of a 12.2 acre tax lot and a 3.4 contiguous acres of a 5.42 acre tax lot both designated Agricultural. Together they form a 12.2 acre site. Land to the east and west is designated Forest, while land to the north is designated Rural Residential. Land to the south and northeast is designated Agricultural.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural and forest land. This adjacency could have potential minor environmental consequences.

Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* While the addition of industrial employment near residential areas may decrease energy use from commuter traffic, a given employer is just as likely to draw employees from other parts of the region. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.6h to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.6h is separated from the current UGB by residential and agricultural land. For Site P4.6h to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.6h until the site is contiguous with the city limits, either through annexation of the intervening residential or agricultural land (which would not serve an identified need for the City), or an (arguably unreasonable) "cherry stem" annexation of Crow Road. Given that it is highly unlikely that Site P4.6h would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for residents exposed to traffic and other impacts of such uses adjacent to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.6h is discarded from further consideration.

**(e) Dismiss Candidate Land if its Inclusion in the UGB to Address the Identified Industrial Land Deficit would be Incompatible with Nearby Agricultural or Forest Activities Occurring on Farm or Forest Land Outside the UGB**

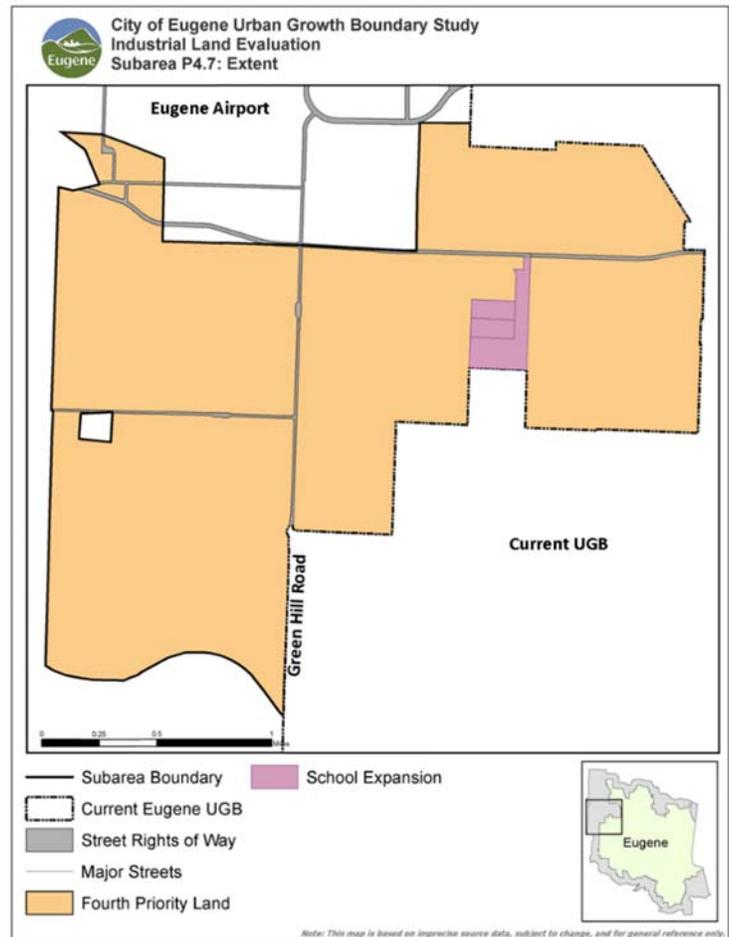
As explained above, Sites P4.6e, P4.6f, P4.6g, and P4.6h are separated from the existing UGB by productive agricultural land that is not suitable for the City's industrial land needs. Expanding the UGB to include any of these sites would require the City to also bring that intervening agricultural land into the UGB (or extend the city limits in an arguably unreasonable "cherry stem"), making it urbanizable land. In that way, inclusion of Sites P4.6e, P4.6f, P4.6g, and P4.6h in the UGB to address the identified industrial land deficit would be incompatible with the nearby agricultural activities now occurring on land outside the UGB. Even if there was not a sufficient bases for dismissing Sites P4.6e, P4.6f, P4.6g, and P4.6h based on the ESEE consequences discussed above, they are dismissed from further consideration for this reason.

## (7) Subarea P4.7

Subarea P4.7 is located adjacent to and to the west of the current UGB, between the Amazon Creek Diversion Channel and Eugene Airport, as shown on the “Extent” map. It is composed of 2,601.5 acres of fourth priority land. The land in this subarea is designated as Agriculture.

### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit

The map “Subarea P4.7: Development Constraints” shows the development constraints present in Subarea P4.7. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.7 subarea has more than one type of development constraint. The map “Subarea P4.7: Development Constraints” is a visual representation of the following information:



#### *Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 13.3 acres of the land in Subarea P4.7 (less than 1 percent) are constrained by slopes greater than 5%.

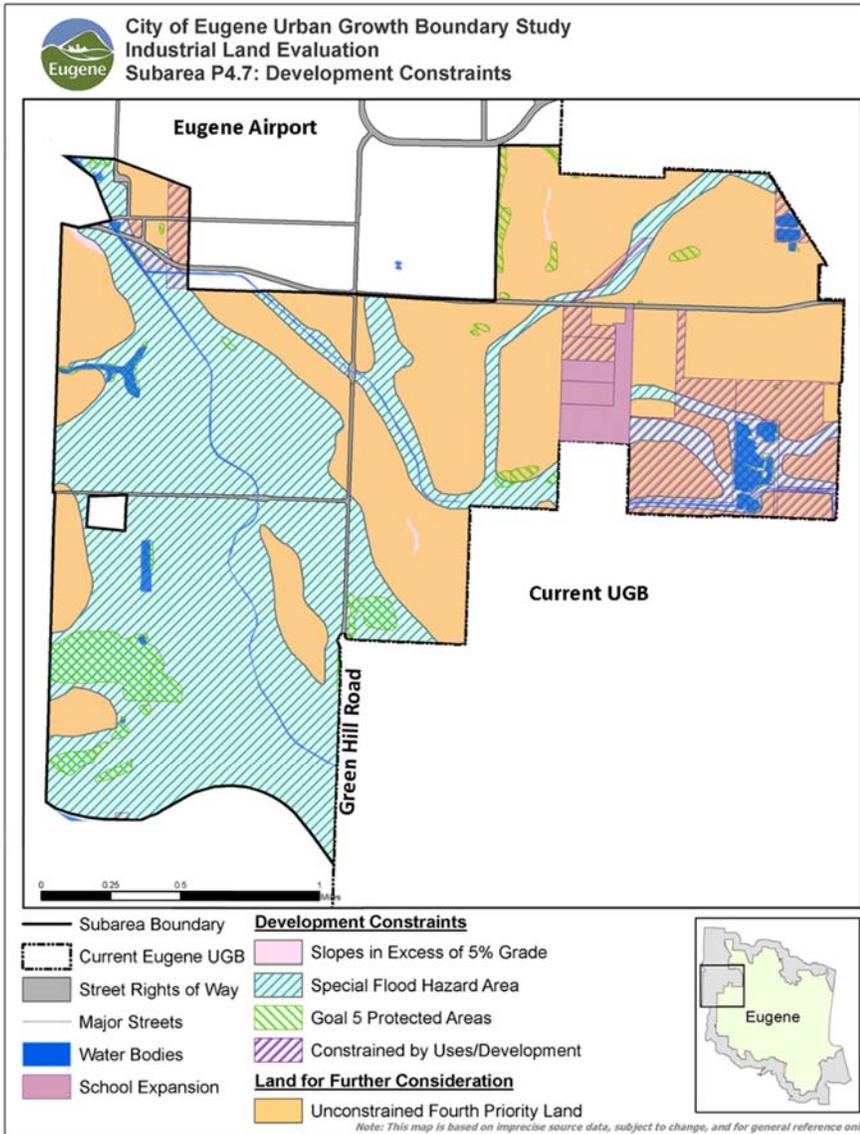
#### *Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

1,312.2 acres of the land in Subarea P4.7 (50 percent) is constrained by the FEMA mapped Special Flood Hazard Area.

#### *Dismissal of Land with Goal 5 Protections (natural resources)*

135.5 acres of the land in Subarea P4.7 (5 percent) are constrained by Lane County Goal 5 protections.

#### *Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*



Twelve (12) tax lots totaling 265.3 acres of the land in Subarea P4.7 (10 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. Six of these tax lots are owned by City of Eugene as open space/future park use around the Golden Gardens Ponds. The two tax lots adjacent to the school expansion are owned by Bethel School District for future, collocated school facilities.<sup>44</sup> One tax lot, which is owned and operated by Bonneville Power Administration for power lines, bisects a larger tax lot just north of the school property. Two tax lots adjacent to the airport are owned by the Airport for the airport’s needs. The last tax lot is predominantly constrained by several large ponds, and is owned and operated by the Oregon Department of Transportation.

Summary of Development Constraints

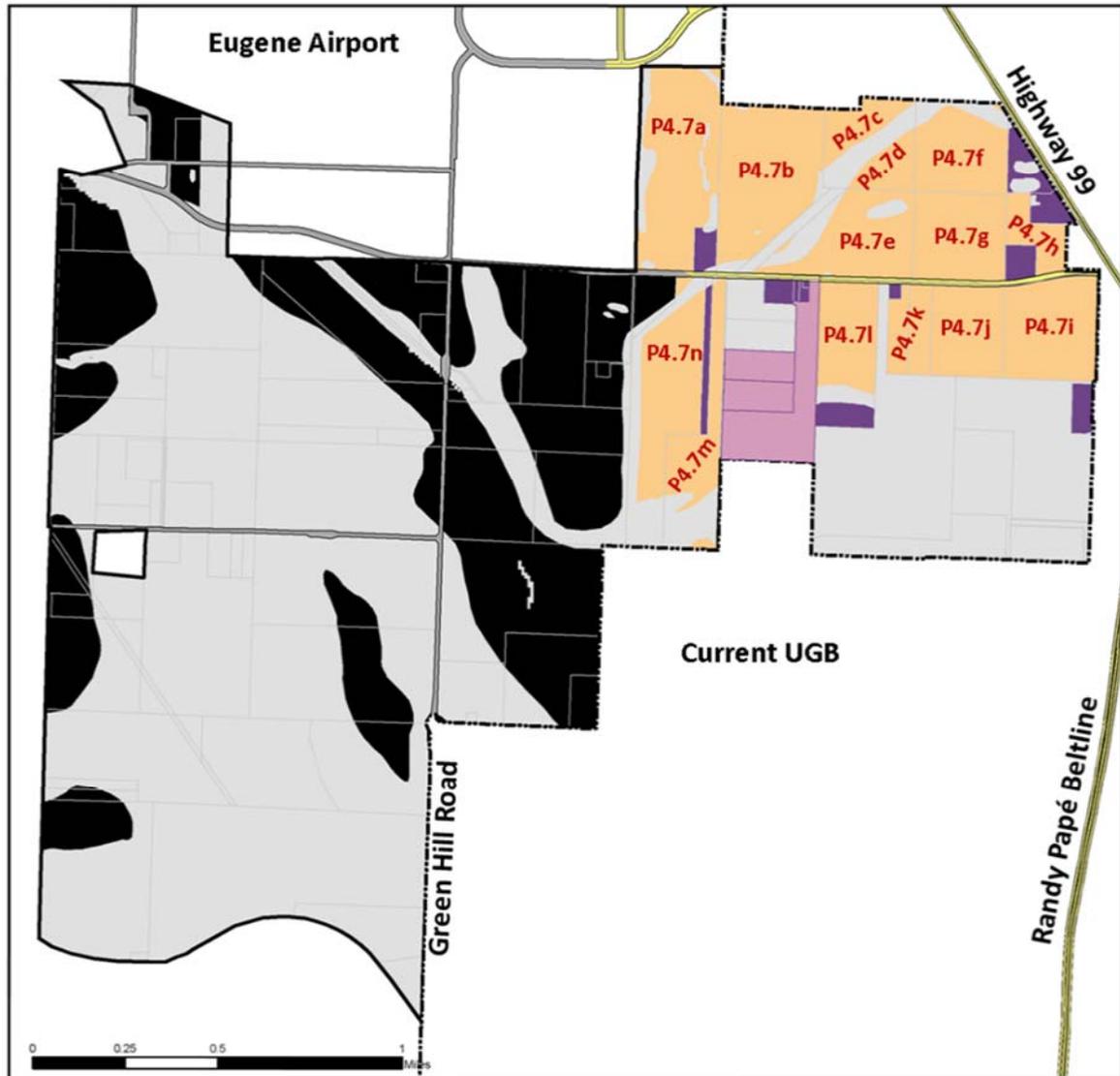
In all, 1,534.3 acres of the land in Subarea P4.7 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 1,067.2 acres of land in Subarea P4.7 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

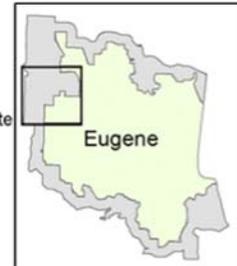
<sup>44</sup> In the City’s School Expansion Study, this acreage owned by the Bethel School District was found to be in excess of what the school district needs to meet its needs at this time, so that land was not included in the school UGB expansion area as part of this legislative review of the UGB. Bethel School anticipates that the land is likely to be needed in the future.



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Subarea P4.7: Site Characteristics of Unconstrained Land



- Subarea Boundary
- Current Eugene UGB
- Taxlots
- Street Rights of Way
- Major Streets
- Designated Freight Route
- Streets within a Mile of Freight Route Access
- Constrained Land
- School Expansion
- Displayed Site Characteristics of Unconstrained Land
- Sites More than 1 Mile from Freight Route
- Sites of Insufficient Size within 1 Mile of Freight Route
- Fourth Priority Land for Further Consideration



Note: This map is based on imprecise source data, subject to change, and for general reference only.

The map “Subarea P4.7: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.7 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.7 is Highway 99. All remaining land under consideration that is east of the eastern edge of the airport in this subarea is within one mile of Highway 99 except a single tax lot<sup>45</sup> at the intersection of the airport reserves and Clear Lake Road. Remaining land to the west of that line is too far from Highway 99 access.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

This subarea is divided into a mixture of large and small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. Fourteen sites in this subarea are of sufficient size to accommodate any of the needed industrial sites. These sites are labeled as P4.7a through P4.7n on the map “Subarea P4.7: Site Characteristics of Unconstrained Land” above.

**Subarea P4.7 Summary.** Based on these findings, the City has determined that Subarea P4.7 has fourteen sites (P4.7a-n) suitable for further consideration for industrial expansion.

**(c) Dismiss Candidate Land to which Future Urban Services Could not Reasonably be Provided Due to Topographical or other Physical Constraints**

All land in Subarea P4.7 can be served.

**(d) Dismiss Candidate Land if its Inclusion in the UGB would be Untenable Considering the Comparative Environmental, Energy, Economic and Social Consequences that would Result from its Inclusion in the UGB**

**Site P4.7a –**

This site is 62.0 contiguous acres of an 84.5 acre tax lot designated Agricultural and Government and Education. The portion of the tax lot designated Government and Education falls under the “Other” category with regard to priority. It is immediately adjacent to the current UGB at its northeastern corner, where land inside the UGB is designated Light Medium Industrial. Non-UGB land not under consideration surrounding the site is designated Government and Education, with the exception of a

---

<sup>45</sup> Were this tax lot not discarded for distance from a Freight Route, it would be discarded for insufficient size to meet the identified site characteristics.

narrow strip of Agricultural to the southeast. The site is bordered by Airport Road to the north and Clear Lake Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and the Eugene Airport, and separated from active agriculture by Clear Lake Road. This separation could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7a would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7a is considered as a candidate industrial expansion site in Section III(g), below.

#### **Site P4.7b –**

This site is 63.3 contiguous acres of a 113.6 acre tax lot (which also contains Site P4.7e) designated Agricultural. It is immediately adjacent to the current UGB on its northern edge, where land inside the UGB is designated Light Medium Industrial. Rural land not under consideration south of the site is designated Agricultural. The tax lot is bordered by Clear Lake Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites, and separated from active agriculture by Clear Lake Road. This separation could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7b would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to

extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7b is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7c –**

This site is 13.1 contiguous acres of a 38.8 acre tax lot (which also contains Site P4.7d) designated Agricultural. It is immediately adjacent to the current UGB on its northern edge, where land inside the UGB is designated Light Medium Industrial. All rural surrounding the site is under consideration for industrial expansion.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites. This separation from agricultural and forest land could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7c would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7c is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7d –**

This site is 12.0 contiguous acres of a 38.8 acre tax lot (which also contains Site P4.7c) designated Agricultural. It is just south of the current UGB, where land inside the UGB is designated Light Medium Industrial. All rural land surrounding the site is under consideration for industrial expansion.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites. This separation from agricultural and forest land could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7d would have positive economic consequences, as the tax lot containing it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7d is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7e –**

This site is 37.2 contiguous acres of a 113.6 acre tax lot (which also contains Site P4.7b) designated Agricultural. Rural land not under consideration for industrial expansion south of the site is designated Agricultural. The site is bordered by Clear Lake Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites, and separated from active agriculture by Clear Lake Road. This separation could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7e would have positive economic consequences, as the tax lot containing it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7e is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7f –**

This site is 33.5 contiguous acres of a 40.0 acre tax lot designated Agricultural. It is immediately adjacent to the current UGB on its northern edge, where land inside the UGB is designated Light Medium Industrial. Rural land not under consideration surrounding the site is designated Agricultural. The site is bordered by Highway 99 on its northeastern corner.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites. This separation from agricultural and forest land could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7f would have positive economic consequences, as the tax lot containing it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7f is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7g –**

This site is a 37.7 acre unconstrained tax lot designated Agricultural. Non-UGB land not under consideration surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent, almost entirely, to other potential industrial sites. This separation from agricultural and forest land could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7g would have positive economic consequences, as the tax lot containing it is contiguous with the UGB and near the city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7g is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7h –**

This site is 12.9 contiguous acres of a 13.4 acre tax lot designated Agricultural. It is immediately adjacent to the current UGB on its eastern edge, where land inside the UGB is designated Light Medium Industrial. Non-UGB land surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent, mostly, to other potential industrial sites and lots too small to meet the industrial need. This limited adjacency could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7h would have positive economic consequences, as the tax lot containing it is contiguous with the UGB and near the city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7h is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7i –**

This site is a 44.3 acre unconstrained tax lot designated Agricultural. Rural land not under consideration for industrial expansion surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and tax lots under consideration for a community park. This adjacency to a park would be unlikely to have negative environmental consequences, given the developed nature of community parks. This limited adjacency to agricultural and forest land could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7i would have positive economic consequences, as the tax lot containing it is contiguous with the UGB and relatively near the city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7i is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7j –**

This site is a 30.6 acre unconstrained tax lot designated Agricultural. Land not under consideration for industrial expansion surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and tax lots under consideration for a community park. This adjacency to a park would be unlikely to have negative environmental consequences, given the developed nature of community parks. This limited adjacency to agricultural and forest land could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7j would have positive economic consequences, as the tax lot containing it is connected to the UGB by other potential industrial sites and relatively near the city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7j is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7k –**

This site is assembled from a 9.8 acre unconstrained tax lot and an 8.0 acre unconstrained tax lot totaling 17.8 acres, both designated Agricultural. Rural land not under consideration surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and tax lots under consideration for a community park. This adjacency to a park would be unlikely to have negative environmental consequences, given the developed nature of community parks. This limited adjacency to agricultural and forest land could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7k would have positive economic consequences, as the tax lot containing it is connected to the UGB by other potential industrial sites and relatively near the

city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7k is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.7l –**

This site is 29.1 contiguous acres of a 40.1 acre tax lot designated Agricultural. Rural land not under consideration surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to tax lots identified for a school expansion and tax lots under consideration for a community park, and near other potential industrial sites across Clear Lake Road. This adjacency to a park or school would be unlikely to have negative environmental consequences, given the developed nature of these uses. This limited adjacency could significantly reduce potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7l would have positive economic consequences, as the tax lot containing it is connected to the UGB by the identified school expansion and other potential industrial sites and relatively near the city limits, making it likely to develop during the planning period. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences based on the adjacency to the identified school expansion. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7l is considered as a candidate industrial expansion site in Section III.g, below.

**Site P4.7m –**

This site is 26.6 contiguous acres of a 40.1 acre tax lot designated Agricultural. It is immediately adjacent to the current UGB on its southeastern corner, where land inside the UGB is designated Low Density Residential. Non-UGB land surrounding the site is designated Agricultural, with the exception of a narrow strip of Residential to the immediate south. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural land to the northeast. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7m would have positive economic consequences, as the tax lot containing it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for immediately adjacent residents and students exposed to traffic and other impacts of such uses adjacent to their homes and school. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7l is considered as a candidate industrial expansion site in Section III.g, below.

**Site P4.7n –**

This site is 43.1 contiguous acres of a 63.6 acre tax lot designated for Agriculture. It is immediately adjacent to the current UGB on its southern edge, where land inside the UGB is designated Low Density Residential. Non-UGB land surrounding the site is designated Agricultural. The site is bordered by Clear Lake Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to agricultural land to the west. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and proximity to the airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.7n would have positive economic consequences, as the tax lot containing it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated with multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for immediately adjacent residents exposed to traffic and other impacts of such uses adjacent to their homes. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.7n is considered as a candidate industrial expansion site in Section III.g, below.

**(e) Dismiss Candidate Land if its Inclusion in the UGB to Address the Identified Industrial Land Deficit would be Incompatible with Nearby Agricultural or Forest Activities Occurring on Farm or Forest Land Outside the UGB**

As explained above, all of the sites in this area are either adjacent to the existing UGB, or connected by other potential industrial expansion sites. While some sites may impact farm or forest land, those impacts would depend on the configuration of expansion, and will therefore be evaluated in Section III.g, below. No sites in this subarea are dismissed from further consideration for incompatibility with nearby agricultural or forest activities.

## (8) Subarea P4.8

Subarea P4.8 is located to the west of the current UGB, between Eugene Airport and Prairie Road, as shown on the “Extent” map. It is composed of 1,326.3 acres of fourth priority land. The land in this subarea is designated as Agriculture.

### (a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit

The map “Subarea P4.8: Development Constraints” shows the development constraints present in Subarea P4.8. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.8

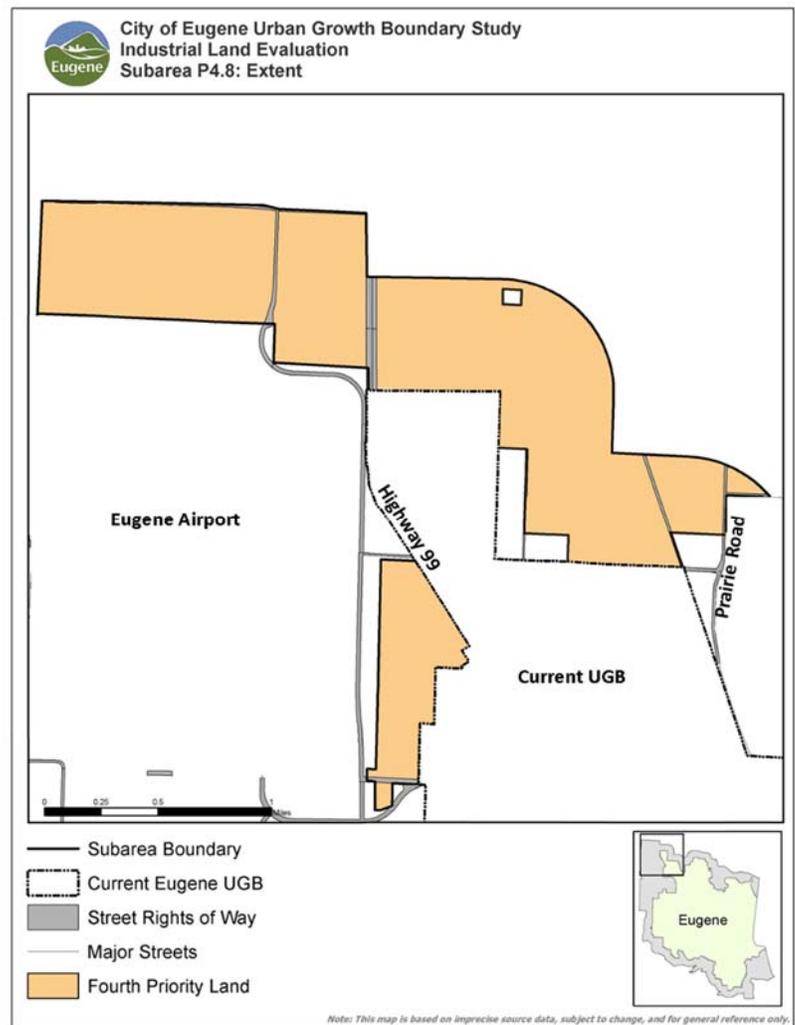
subarea has more than one type of development constraint. The map “Subarea P4.8: Development Constraints” is a visual representation of the following information:

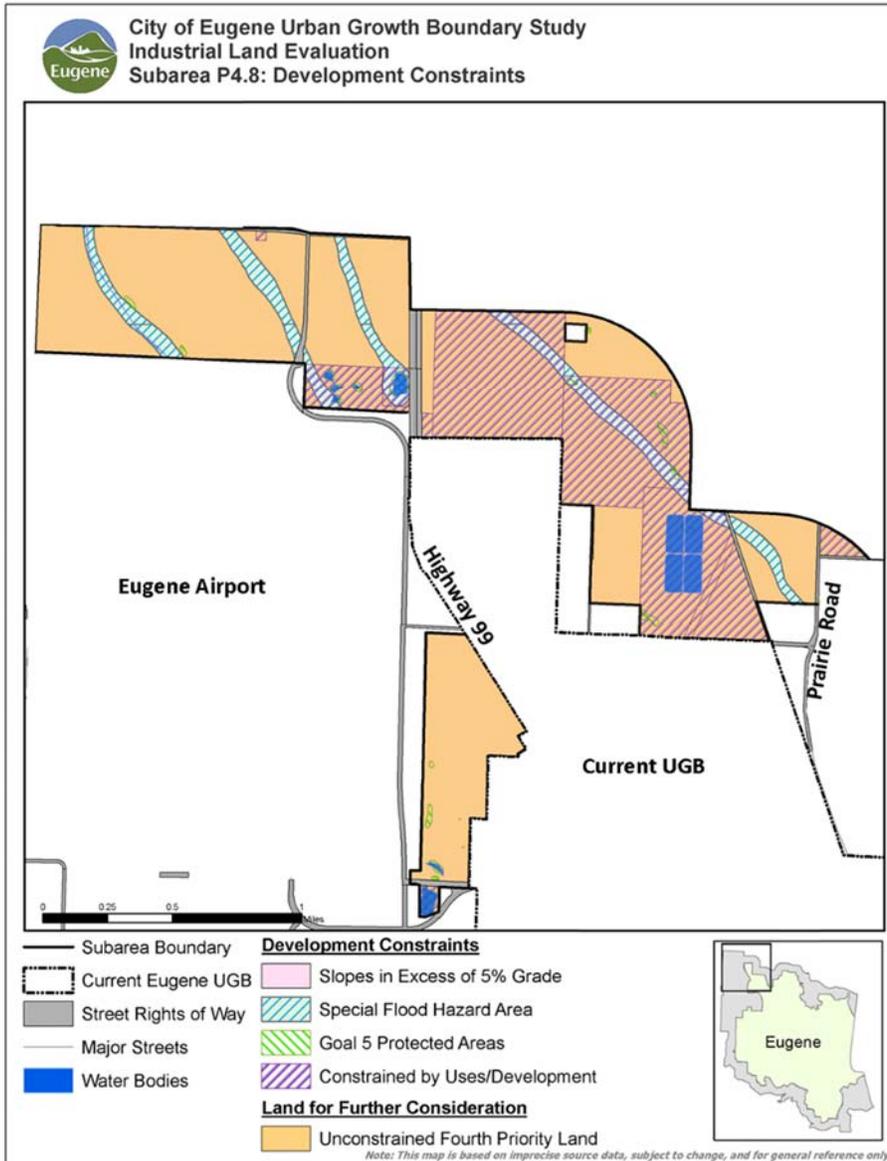
#### *Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that none of the land in Subarea P4.8 is constrained by slopes greater than 5%.

#### *Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

117.7 acres of the land in Subarea P4.8 (9 percent) is constrained by the FEMA mapped Special Flood Hazard Area.





*Dismissal of Land with Goal 5 Protections (natural resources)*

56.0 acres of the land in Subarea P4.8 (4 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Ten (10) tax lots totaling 499.6 acres of the land in Subarea P4.8 (38 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses. The southernmost tax lot, which is also constrained by a large pond, is owned and managed by Oregon Department of Fish and Wildlife. The small tax lot to the far north of the subarea is operated as a mobile home park by Lane County.<sup>46</sup> The two tax lots adjacent to Eugene Airport are developed as Fiddler’s

Green Golf Course.<sup>47</sup> The largest area dismissed for existing uses consists of five tax lots owned by Springfield Metropolitan Wastewater as a bio-cycle facility for sewage. The easternmost tax lot (the majority of which is located outside of the study area) is owned by the City of Eugene.<sup>48</sup>

Summary of Development Constraints

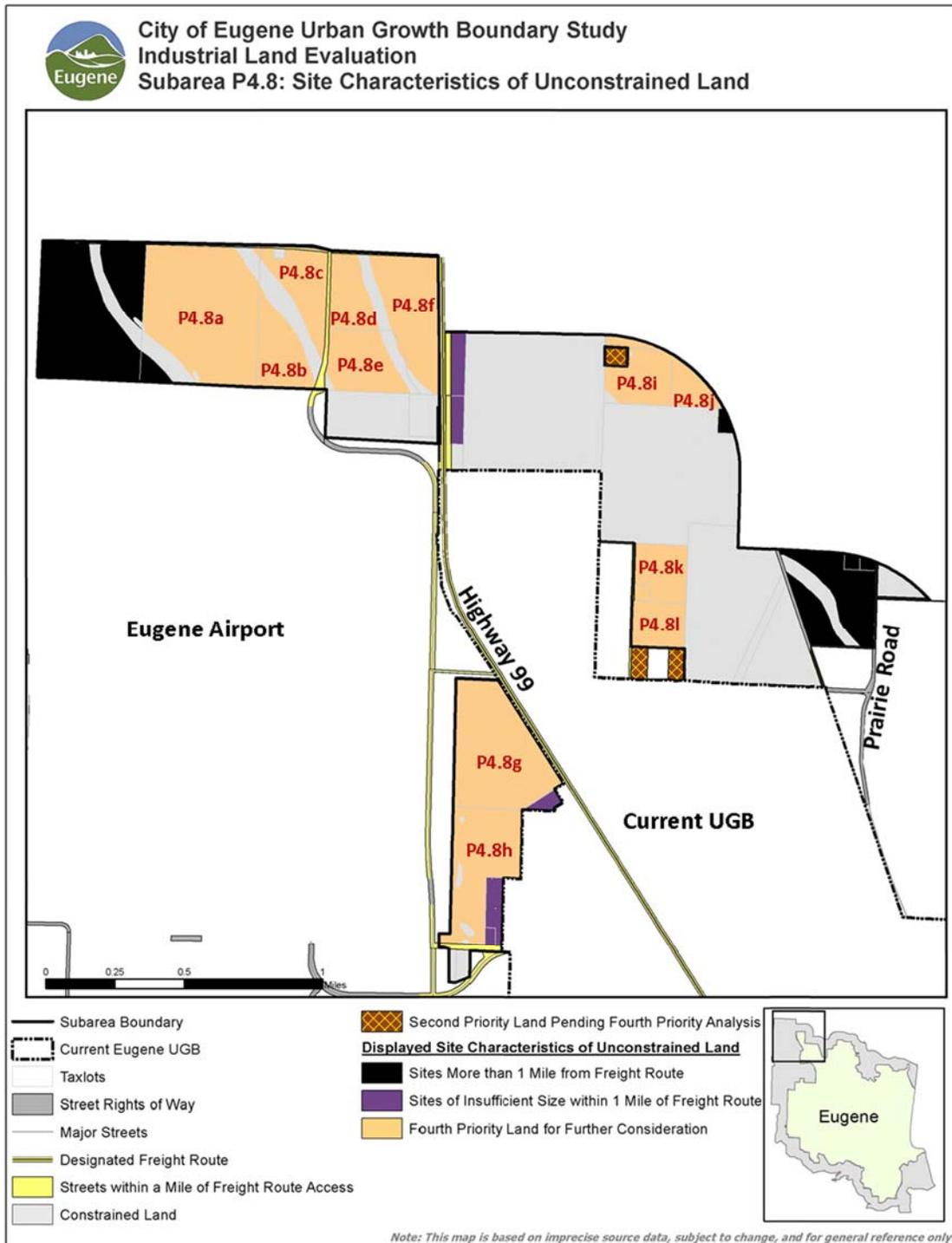
In all, 437.7 acres of the land in Subarea P4.8 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 808.6 acres of land in Subarea P4.8 are addressed below.

<sup>46</sup> Were this site not discarded for existing development, it would be discarded for insufficient size to meet the identified site characteristics.

<sup>47</sup> Were this site not discarded for existing development, it would be discarded for environmental impacts, including inability to annex into the city limits within the planning period.

<sup>48</sup> Were it not discarded for existing development, this site would be discarded for distance from a Freight Route.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.8: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.8 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Route to Subarea P4.8 is Highway 99. All remaining land under consideration in this subarea is within one mile of Highway 99 except six tax lots (or portions of tax lots fragmented by constraints) to the far east and west of the study area.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

This subarea is divided primarily into large lots, with some small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. Additionally, three small areas of second priority land in Subarea P2.10 were identified in prior analysis, above, as being of insufficient size to meet a portion of the industrial land need, but which would be considered here, in association with adjacent sites of fourth priority land. Twelve sites in this subarea are of sufficient size to accommodate the needed industrial sites. These sites are labeled as P4.8a through P4.8l on the map “Subarea P4.8: Site Characteristics of Unconstrained Land.”

**Subarea P4.8 Conclusion.** Based on these findings, the City has determined that Subarea P4.8 has twelve sites (P4.8a-l) suitable for further consideration for industrial expansion.

**(c) Dismiss Candidate Land to which Future Urban Services Could not Reasonably be Provided Due to Topographical or other Physical Constraints**

All land in Subarea P4.8 can be served.

**(d) Dismiss Candidate Land if its Inclusion in the UGB would be Untenable Considering the Comparative Environmental, Energy, Economic and Social Consequences that would Result from its Inclusion in the UGB**

**Site P4.8a –**

This site is 115.9 contiguous acres of a 133.6 acre tax lot designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north and west, and Government and Education to the south. The site is bordered by Meadowview Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north and west. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8a to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8a is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8a to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8a until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an unreasonable "cherry stem" annexation along Highway 99. Given that it is therefore highly unlikely that Site P4.8a would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the inability to annex this site into the City during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8a is discarded from further consideration.

#### **Site P4.8b –**

This site is 30.1 contiguous acres of a 76.4 acre tax lot (which also contains Site P4.8c) designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north, and Government and Education to the south. The site is bordered by Meadowview Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8b to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8b is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8b to be developed for the needed urban industrial use, it would first need

to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8b until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an (arguably unreasonable) “cherry stem” annexation of Highway 99. Given that it is highly unlikely that Site P4.8b would be annexable during the planning period, expanding the UGB to include it for industrial employment would create “phantom” capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8b is discarded from further consideration.

#### **Site P4.8c –**

This site is 30.6 contiguous acres of a 76.4 acre tax lot (which also contains Site P4.8b) designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north, and Government and Education to the south. The site is bordered by Meadowview Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site’s considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8c to serve the City’s need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8c is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8c to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8c until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an (arguably unreasonable) “cherry stem” annexation of Highway 99. Given that it is highly unlikely that Site P4.8c would be annexable during the planning period, expanding the UGB to include it for industrial employment would create “phantom” capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site into the City during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8c is discarded from further consideration.

**Site P4.8d –**

This site is 24.1 contiguous acres of an 85.2 acre tax lot (which also contains Site P4.8f) designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north. The site is bordered by Meadowview Road to the north.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8d to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8d is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8d to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8d until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an (arguably unreasonable) "cherry stem" annexation of Highway 99. Given that it is therefore highly unlikely that Site P4.8d would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8d is discarded from further consideration.

**Site P4.8e –**

This site is 33.7 contiguous acres of a 40.3 acre tax lot designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the south. The site is bordered by Green Hill Road to the west.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to designated agriculture to the south. This adjacency could have potential minor environmental

consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8e to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8e is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8e to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8e until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an (arguably unreasonable) "cherry stem" annexation of Highway 99. Given that it is highly unlikely that Site P4.8e would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8e is discarded from further consideration.

#### **Site P4.8f –**

This site is 51.4 contiguous acres of an 85.2 acre tax lot (which also contains Site P4.8d) designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north and east. The site is bordered by Meadowview Road to the north and Highway 99 to the east.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* A UGB expansion to include Site P4.8f to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8f is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8f to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8f until the site is contiguous with the city limits, either through annexation of the intervening land which would not

serve an identified need for the City, or an (arguably unreasonable) “cherry stem” annexation of Highway 99. Given that it is highly unlikely that Site P4.8f would be annexable during the planning period, expanding the UGB to include it for industrial employment would create “phantom” capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8f is discarded from further consideration.

#### **Site P4.8g –**

This site is an 84.6 acre unconstrained tax lot designated Agricultural. It is immediately adjacent to the current UGB on its eastern edge, where land inside the UGB is designated Heavy Industrial and Light Medium Industrial. Rural land not under consideration surrounding the site is designated Government and Education. The site is bordered by Highway 99 to the east.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and the Eugene Airport, and significantly separated from active agriculture. This separation could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.8g would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated near multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.8g is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.8h –**

This site is 58.6 contiguous acres of a 60.7 acre tax lot designated Agricultural. It is immediately adjacent to the current UGB on its eastern edge, where land inside the UGB is designated Light Medium Industrial. Rural land not under consideration surrounding the site is designated Government and Education, with the exception of a narrow strip of Agricultural to the southeast. The site is bordered by Airport Road to the south.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent other potential industrial sites and the Eugene Airport, and significantly separated from active agriculture. This separation could significantly limit potential environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be neutral.

*Energy:* The mix of surrounding uses and the adjacency of this site to the current UGB and airport suggests positive energy impacts due to efficient location of employment relative to other uses. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* A UGB expansion to include Site P4.8h would have positive economic consequences, as it is contiguous with both the UGB and the city limits, making it immediately developable. This site is also collocated near multiple other potential industrial expansion sites, allowing for efficiencies in the cost to extend urban services to this site. Overall economic consequences from expanding onto this site for industrial use would be positive.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Should several of the potential sites in a contiguous area be selected for industrial expansion, the collective impact would have both positive consequences of an employment hub and potential negative consequences resulting in additional regulation. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to minimal environmental, energy, economic and social concerns associated with expanding on this site, Site P4.8h is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.8i –**

This site is 26.4 contiguous acres of a 31.9 acre tax lot designated Agricultural and Industrial. The 3.4 acre portion of this tax lot that is designated Industrial is second priority land (identified in Subarea P2.10, above) that was identified through the second priority analysis to be of insufficient size to accommodate need as an independent site. Despite the fact that the second priority land does not change the size category of the site, it is part of a single tax lot, and will therefore be included in the analysis. Considered together with the fourth priority portion, this tax lot will be evaluated as a single 29.8 acre site. Land not under consideration surrounding the site is designated Agricultural.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods and other potential industrial expansion sites. Overall energy consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Economic:* A UGB expansion to include Site P4.8i to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8i is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8i to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8i until the site is contiguous with the city limits, either through annexation of the intervening land which would not serve an identified need for the City, or an (arguably unreasonable) "cherry stem" annexation of Highway 99 and Meadowview Road, extending outside of the study area. Given that it is highly unlikely that Site P4.8i would be annexable during the planning period, expanding the UGB to include it for industrial employment would create "phantom" capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8i is discarded from further consideration.

#### **Site P4.8j –**

This site is 13.3 acres within the study area of a 78.8 acre tax lot designated Agricultural (83% of the tax lot in question is outside of the study area. Land not under consideration surrounding the site is designated Agricultural. The site is bordered by the railroad to the east.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to active agriculture to the north. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The adjacency of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods and other potential industrial expansion sites. Overall energy consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Economic:* A UGB expansion to include Site P4.8j to serve the City's need for industrial employment land is not likely to actually result in a site that is truly available for economic development during the planning period. Site P4.8j is separated from the current UGB by land that does not serve an identified need for the City. For Site P4.8j to be developed for the needed urban industrial use, it would first need to be annexed into the city limits. The City would be legally prohibited from annexing Site P4.8j until the site is contiguous with the city limits, either through annexation of the intervening land which would not

serve an identified need for the City, or an (arguably unreasonable) “cherry stem” annexation of Highway 99 and Meadowview Road, extending outside of the study area. Given that it is highly unlikely that Site P4.8j would be annexable during the planning period, expanding the UGB to include it for industrial employment would create “phantom” capacity, failing to meet the goals of the expansion. Overall economic consequences of expanding the UGB onto this site for industrial use would be negative.

*Social:* Expanding the UGB for industrial use in this location would have neutral social consequences given the separation from residential areas. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Due to the economic challenges of developing this site during the planning period, as well as other environmental, energy, economic and social concerns, Site P4.8j is discarded from further consideration.

#### **Site P4.8k –**

This site is a 23.0 acre unconstrained tax lot designated Agricultural. Land not under consideration surrounding the site is designated Agricultural to the north and east, and Rural Residential to the west. The site is bordered by Brown Lane to the west.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to one other potential industrial site and tax lots designated for Agriculture. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The proximity of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site’s considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Economic:* This site is connected to the UGB by another potential industrial expansion site (P4.8l), but is at a considerable distance from the current city limits, making it questionable whether the site would develop (be annexable) during the planning period. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be slightly negative to neutral.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for adjacent residents exposed to traffic and other impacts of such uses close to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.8k is considered as a candidate industrial expansion site in Section III.g, below.

#### **Site P4.8l –**

This site is a 20.4 acre tax lot designated Agricultural. Two adjacent second priority tax lots (identified in Subarea P2.10, above) measuring 4.5 (western site) and 4.2 (eastern site) acres could be considered with this site, connecting it to the current UGB. Inclusion of one of these sites would not change the size category of land need addressed by the site, but because it is necessary to make the fourth priority site contiguous with the UGB and viable with regard to annexation, they will be evaluated as a single site. The western second priority tax lot is actively used for agricultural activities, while the eastern second priority tax lot is vacant, only serving as a driveway. For the purposes of this analysis, therefore, the eastern site is considered more appropriate and will be included in the analysis of the fourth priority site. Together, these two tax lots form a 24.6 acre site.

*Environmental:* Expansion onto this site for industrial purposes would create an industrial site adjacent to one other potential industrial site and tax lots designated for Agriculture. This adjacency could have potential minor environmental consequences. Overall environmental consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Energy:* The proximity of this site to the airport presents positive energy impacts that are balanced by negative impacts arising from the site's considerable distance from urban neighborhoods. Overall energy consequences from expanding onto this site for industrial use would be slightly negative to neutral.

*Economic:* This site is connected to the UGB, but is at a considerable distance from the current city limits, making it questionable whether the site would develop (be annexable) during the planning period. Additionally, the cost of extending urban services to this area for the few available candidate sites is disproportionate to the benefit. Overall economic consequences of expanding the UGB onto this site for industrial use would be slightly negative to neutral.

*Social:* Expanding the UGB for industrial use in this location would have slight potentially negative social consequences for adjacent residents exposed to traffic and other impacts of such uses close to their homes. Overall social consequences from expanding onto this site for industrial use would be neutral.

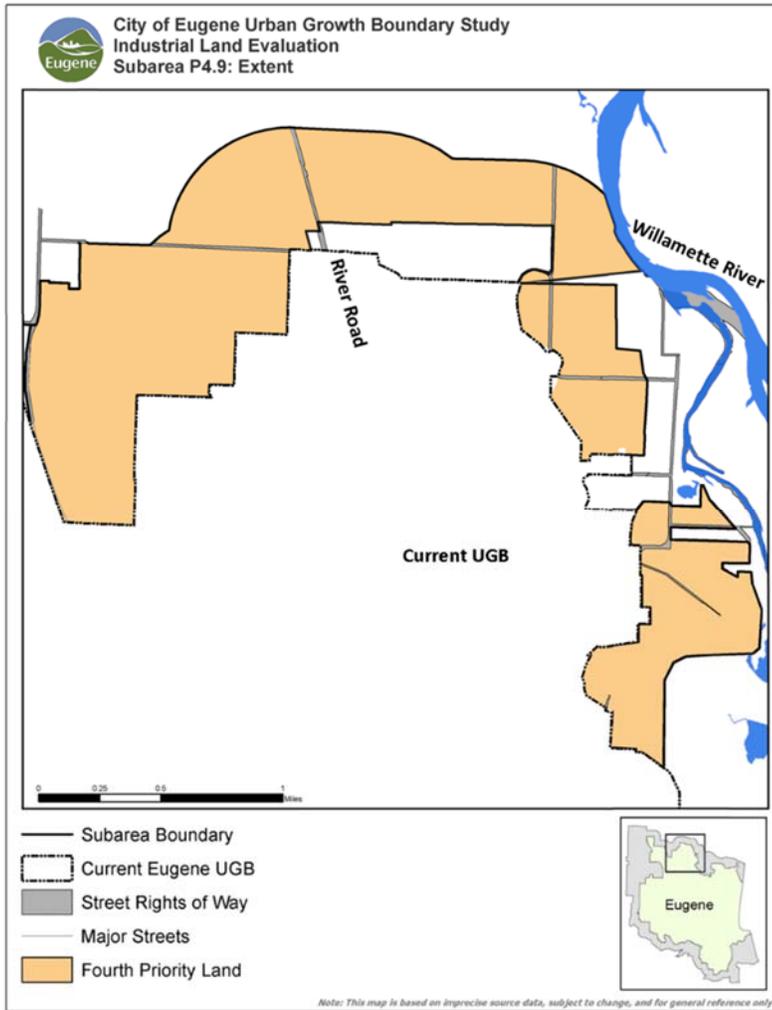
**Summary:** Although there are some environmental, energy, economic and social concerns associated with expanding on this site, they are insufficient to discard it from further consideration at this juncture. Site P4.8l is considered as a candidate industrial expansion site in Section III.g, below.

#### **(e) Dismiss Candidate Land if its Inclusion in the UGB to Address the Identified Industrial Land Deficit would be Incompatible with Nearby Agricultural or Forest Activities Occurring on Farm or Forest Land Outside the UGB**

As explained above, Sites P4.8a, P4.8b, P4.8c, P4.8d, P4.8e, P4.8f, P4.8i, and P4.8j are separated from the existing UGB by agricultural land that is not suitable for the City's industrial land needs. Expanding the UGB to include any of these sites would require the City to also bring that intervening agricultural land into the UGB (or extend the city limits in an arguably unreasonable "cherry stem"), making it urbanizable land. In that way, inclusion of Sites P4.8a, P4.8b, P4.8c, P4.8d, P4.8e, P4.8f, P4.8i, and P4.8j in the UGB to address the identified industrial land deficit would be incompatible with the nearby

agricultural activities now occurring on land outside the UGB. Even if there was not a sufficient bases for dismissing Sites P4.8a, P4.8b, P4.8c, P4.8d, P4.8e, P4.8f, P4.8i, and P4.8j based on the ESEE consequences discussed above, they are dismissed from further consideration for this reason.

**(9) Subarea P4.9**



Subarea P4.9 is located to the north of the current UGB, between Prairie Road and the Willamette River, as shown on the “Extent” map. It is composed of 1,311.4 acres of fourth priority land. The land in this subarea is designated as Agriculture.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**

The map “Subarea P4.9: Development Constraints” shows the development constraints present in Subarea P4.9. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.9 subarea has more than one type of development constraint. The map “Subarea P4.9: Development Constraints” is a visual representation of

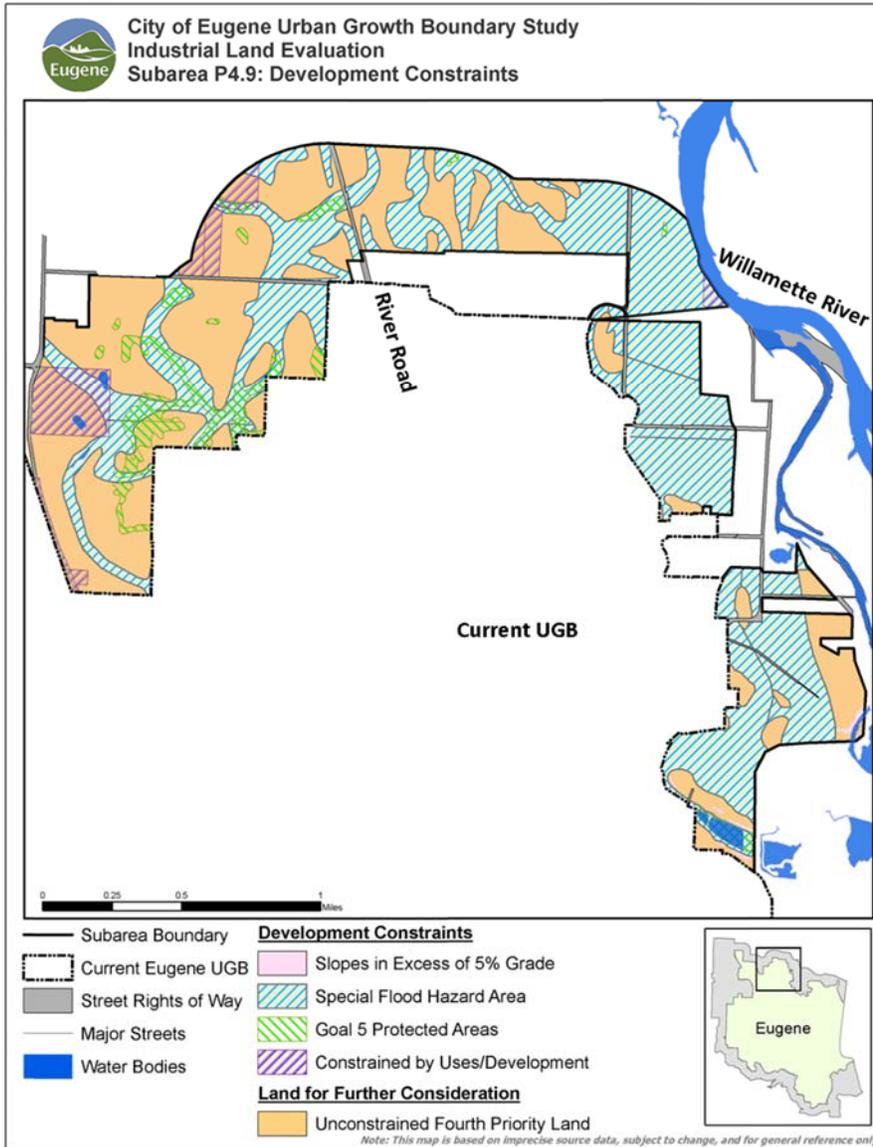
the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 14.5 acres of the land in Subarea P4.9 (less than 1 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

700.1 acres of the land in Subarea P4.9 (53 percent) is constrained by the FEMA mapped Special Flood Hazard Area.



*Dismissal of Land with Goal 5 Protections (natural resources)*

72.2 acres of the land in Subarea P4.9 (6 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Seven (7) tax lots totaling 89.7 acres of the land in Subarea P4.9 (6 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for industrial uses.<sup>49</sup> Two tax lots form part of the right-of-way for Prairie Road. A small tax lot adjacent to these right-of-way lots is owned and operated by the Eugene Water and Electric Board. The largest tax lot is owned and operated by the Oregon Horse Center. Two lots west of River Road are owned and operated by Springfield Metro Wastewater. The easternmost tax lot is owned

by the Oregon Department of Transportation.

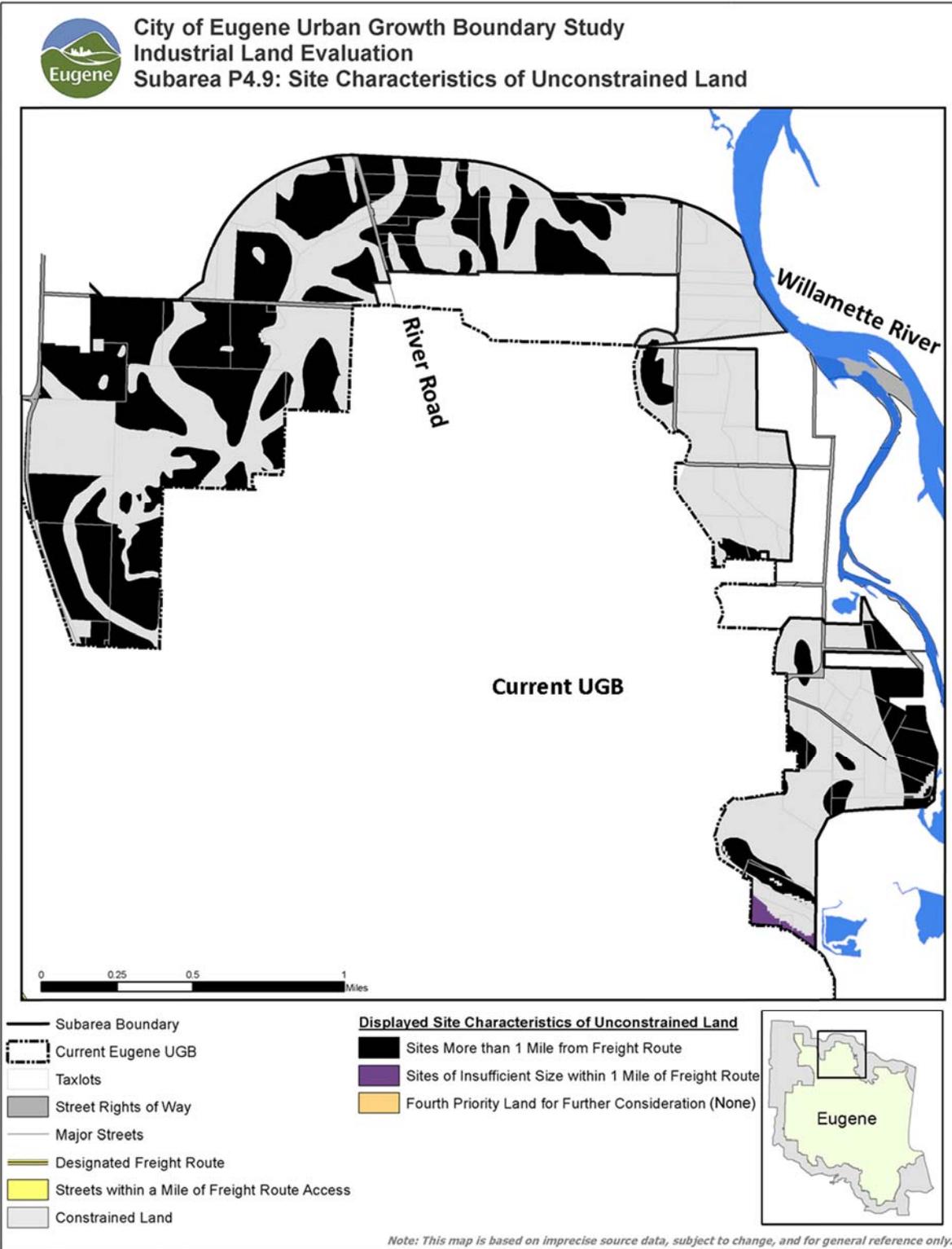
Summary of Development Constraints

In all, 795.3 acres of the land in Subarea P4.9 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 516.1 acres of land in Subarea P4.9 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be**

<sup>49</sup> All P4.9 sites dismissed due to existing uses would otherwise need to be dismissed due to distance from a Freight Route.

**Expected to Provide the Appropriate Site Characteristics for the Proposed Use**



The map “Subarea P4.9: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.9 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Routes to Subarea P4.9 are Highway 99 and Randy Papé Beltline. All remaining land under consideration in this subarea is more than one mile from these Freight Routes, except for the southernmost sites, which have access within one mile of Randy Papé Beltline.<sup>50</sup>

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

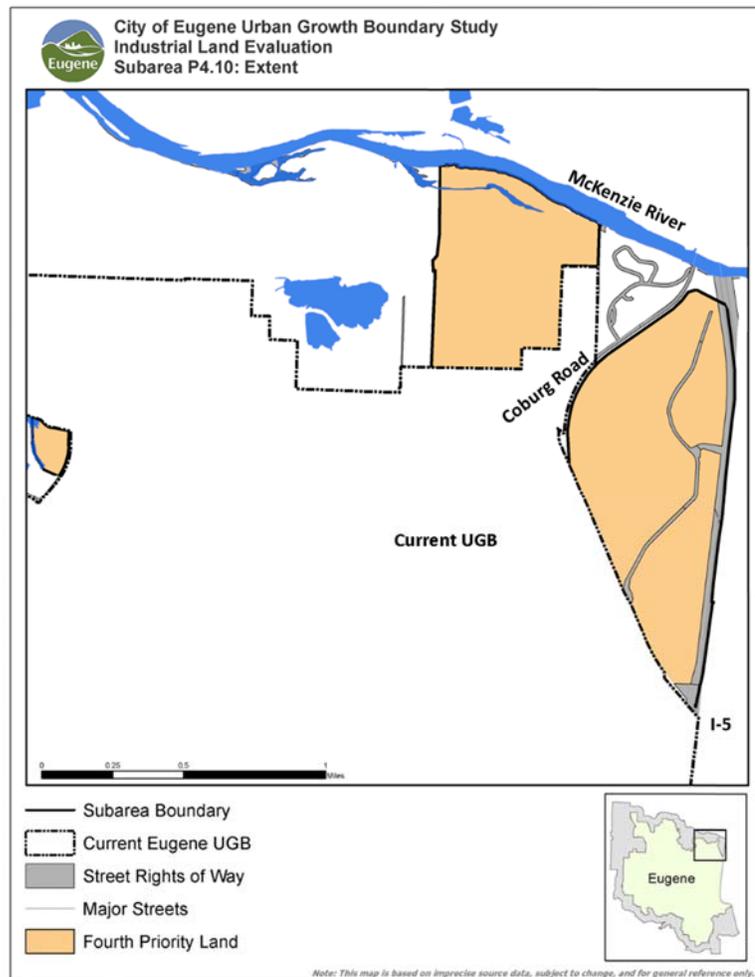
- an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)
- an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)
- an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)
- an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)

This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. None of the remaining land in this subarea is of sufficient size to accommodate any of the needed industrial sites.

**Subarea P4.9 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.9 is suitable for industrial expansion.

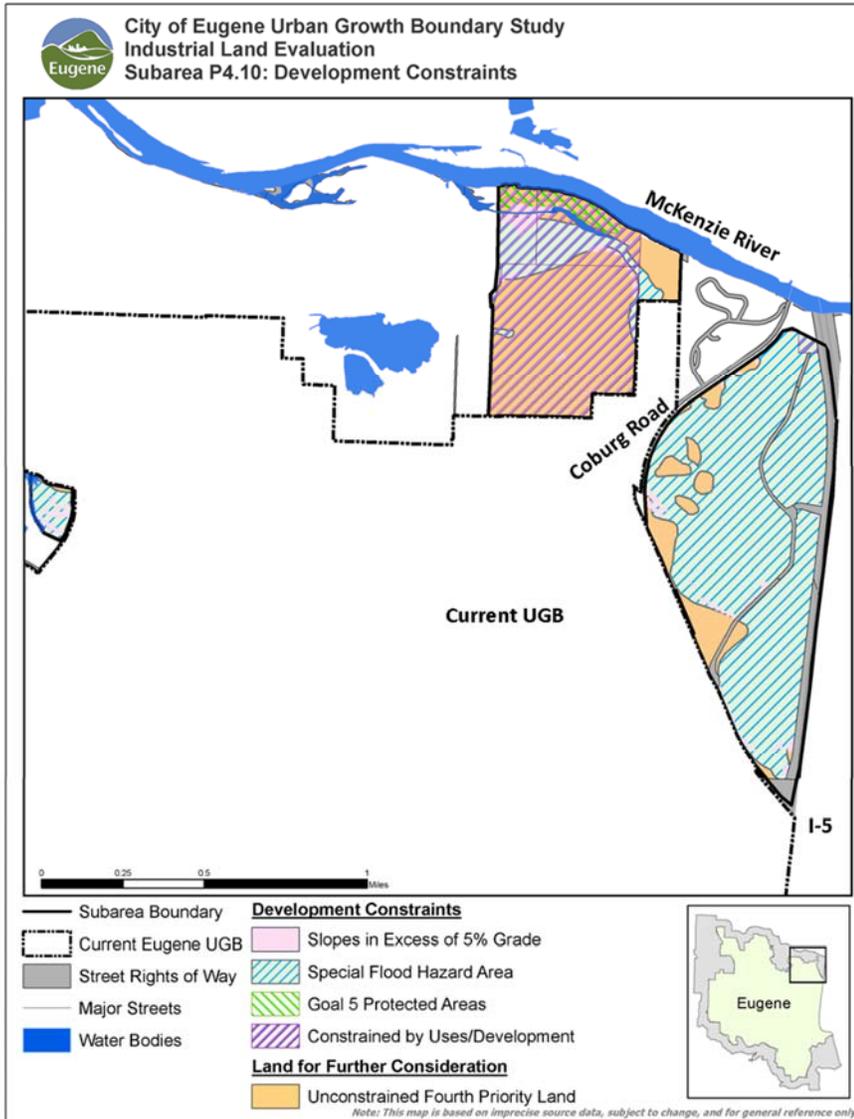
## (10) Subarea P4.10

Subarea P4.10 is located to the north of the current UGB, between the Willamette River and I-5, as shown on the “Extent” map. It is composed of 567.2 acres of fourth priority land. The land in this subarea is designated as Agriculture.



<sup>50</sup> Were they not discarded for distance from a Freight Route, these sites would be discarded for insufficient size to meet the identified site characteristics.

**(a) Dismiss Candidate Land with “Development Constraints” – Factors that Temporarily or Permanently Limit or Prevent Use of Land to Address the Identified Industrial Land Deficit**



The map “Subarea P4.10: Development Constraints” shows the development constraints present in Subarea P4.10. See constraint maps, in Section II.b above, showing the location of each development constraint throughout study area. Some land in the P4.10 subarea has more than one type of development constraint. The map “Subarea P4.10: Development Constraints” is a visual representation of the following information:

*Dismissal of Land with Slopes in Excess of 5 Percent Grade*

The United States Geological Survey’s 10-meter digital elevation model shows that 39.3 acres of the land in Subarea P4.10 (7 percent) are constrained by slopes greater than 5%.

*Dismissal of Land within FEMA Flood Zones (Special Flood Hazard Area)*

343.8 acres of the land in Subarea P4.10 (61 percent) is constrained by the FEMA mapped Special Flood Hazard Area.

*Dismissal of Land with Goal 5 Protections (natural resources)*

17.0 acres of the land in Subarea P4.10 (3 percent) are constrained by Lane County Goal 5 protections.

*Dismissal of Land with Existing Uses / Development that makes Industrial Redevelopment Highly Unlikely in Planning Period*

Six (6) tax lots totaling 185.1 acres of the land in Subarea P4.10 (33 percent) have existing uses or development that makes it highly unlikely that, if added to the UGB, the sites would be redeveloped for

industrial uses. Two tax lots are owned and operated by Lane County as part of Armitage Park. The other four lots are owned and operated as Camp Harlow.<sup>51</sup>

Summary of Development Constraints

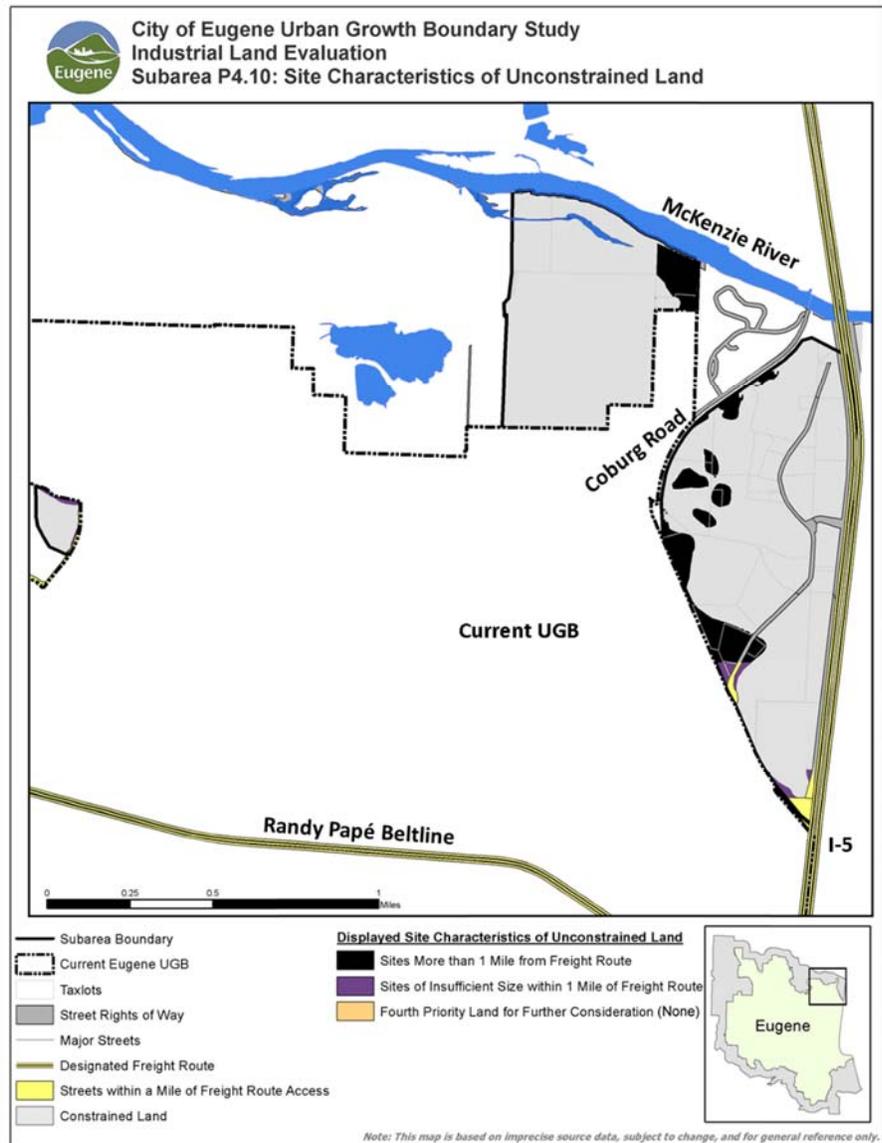
In all, 518.3 acres of the land in Subarea P4.10 have one or more development constraints (“factors that temporarily or permanently limit or prevent the use of land for economic development” per OAR 660-009-005(2)). The remaining 48.9 acres of land in Subarea P4.10 are addressed below.

**(b) Dismiss Remaining Candidate Land that Cannot Reasonably Accommodate the Specific Types of Land Needs / Cannot be Expected to Provide the Appropriate Site Characteristics for the Proposed Use**

The map “Subarea P4.10: Site Characteristics of Unconstrained Land” shows the remaining / unconstrained land in Subarea P4.10 with the following site characteristic elements displayed:

*Dismissal of sites that are more than 1 mile by road from access to a State Designated Freight Route*

The nearest State Designated Freight Routes to Subarea P4.10 are Interstate-5 and Randy Papé Beltline. The two access points nearest this subarea from I-5 are north of the area at Coburg, and south of the area where it joins Randy Papé Beltline. Due to this distribution of highway exits from I-5, all remaining land under consideration in this subarea is more than one mile from these Freight Routes, except for small



<sup>51</sup> All P4.10 sites dismissed due to existing uses would otherwise need to be dismissed due to distance from a Freight Route.

portions of land in the southeastern part of the subarea and fragments of the westernmost tax lot, both of which have access within one mile of Randy Papé Beltline.

*Dismissal of land that could not accommodate one of the following sites on a contiguous area comprised of one or two tax lots:*

- *an industrial site of 75 acres or larger (Eugene needs to add 2 such sites)*
- *an industrial site of between 50 and 75 acres (Eugene needs to add 3 such sites)*
- *an industrial site of between 20 and 50 acres (Eugene needs to add 2 such sites)*
- *an industrial site of between 10 and 20 acres (Eugene needs to add 4 such sites)*

This subarea is divided into many small lots in a diversity of ownership. The sites are fragmented by the constraints identified in the previous section. The only remaining land in this subarea is of insufficient size to accommodate any of the needed industrial sites.

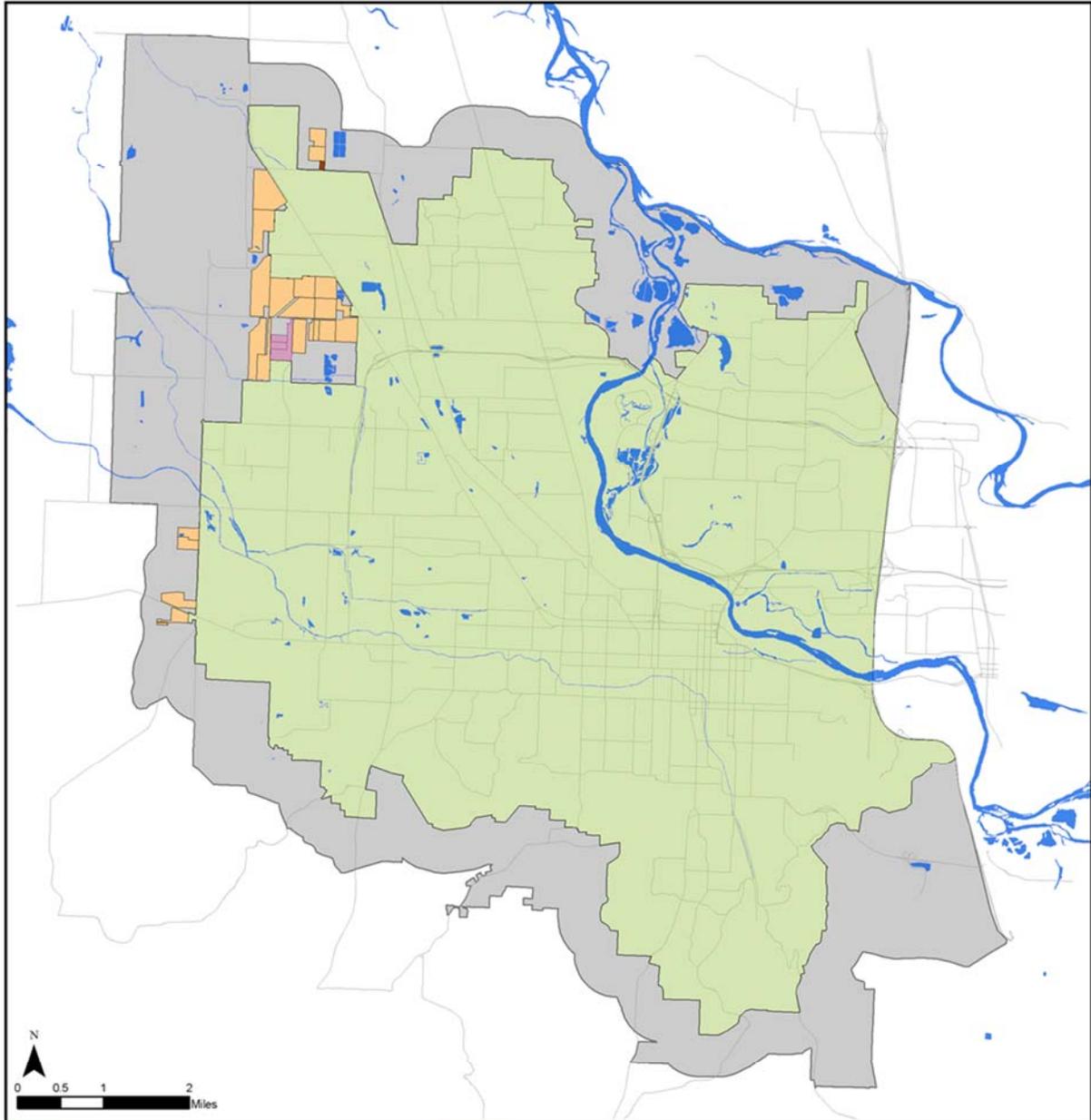
**Subarea P4.10 Summary.** Based on these findings, the City has determined that none of the land in Subarea P4.10 is suitable for industrial expansion.

## **(11) Fourth Priority Land -- Conclusion**

Based on these findings, the City has determined that the industrial study area has 22 sites of fourth priority land (in one case combined with a small lot of second priority land) that are suitable candidates for meeting the City's industrial land need, as shown in the "Remaining Candidate Sites for Expansion" map.



**City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Remaining Candidate Sites for Expansion**



- |                                 |  |
|---------------------------------|--|
| Land Inside UGB                 | Remaining Fourth Priority Candidate Tax Lots |
| Major Streets                   | Second Priority Portion of P4.8I             |
| Water Bodies                    |  |
| Industrial Expansion Study Area |  |
| School Expansion                |  |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved: 01/13/2018

## **g. Apply the Boundary Location Factors of Goal 14 to Select which Remaining Fourth Priority Land should be Included in the UGB**

### **(1) Prioritizing Land with Lower-Capability Soil (ORS 197.298(2))**

State law requires that, among the Fourth Priority land that is suitable to accommodate the City's need, "higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use." The capability classification system pertains to agricultural land; the cubic foot site classification system pertains to forest land. Since none of the remaining land under consideration is designated for Forest, the forestry classification of cubic foot site is not applicable in this analysis.

All remaining land under consideration is designated primarily for Agriculture.<sup>52</sup> Therefore, the agriculture soil capability classification system is used in this analysis. There are several components to the "soil capability classification system." The USDA (through the Natural Resources Conservation Service or "NRCS") has categorized all the nation's soil types into eight general capability classifications. At that macro level, "Class I" soil types have the highest agricultural capability and "Class VIII" soil types have the lowest. The NRCS recognizes that these classifications are only an "indicator" of soil value, however. The agricultural capability of these soils is variable, depending upon the kinds of crops grown in a state or locality. Therefore, for more accurate soil classification, the NRCS has identified certain soils as "prime" or "unique" soils for particular regions. Lane County includes some prime, but no unique, soils. For purposes of Oregon's land use program, DLCDC classifies the most productive agricultural soils in Oregon as "high value farmland." The Agricultural Land Rule (OAR 660-033) specifies the way in which "high value farmland" is to be identified.<sup>53</sup> Eugene is situated in the Willamette Valley which includes large areas of high value farmland, many of which carry a Class III or Class IV general classification on a national level.

The (pre-2016) OARs that apply to Eugene's UGB expansion do not include any direction regarding the statutory requirement that "higher priority shall be given to land of lower capability as measured by the capability classification system." Further, there are no LCDC, LUBA or Court decisions that explain how

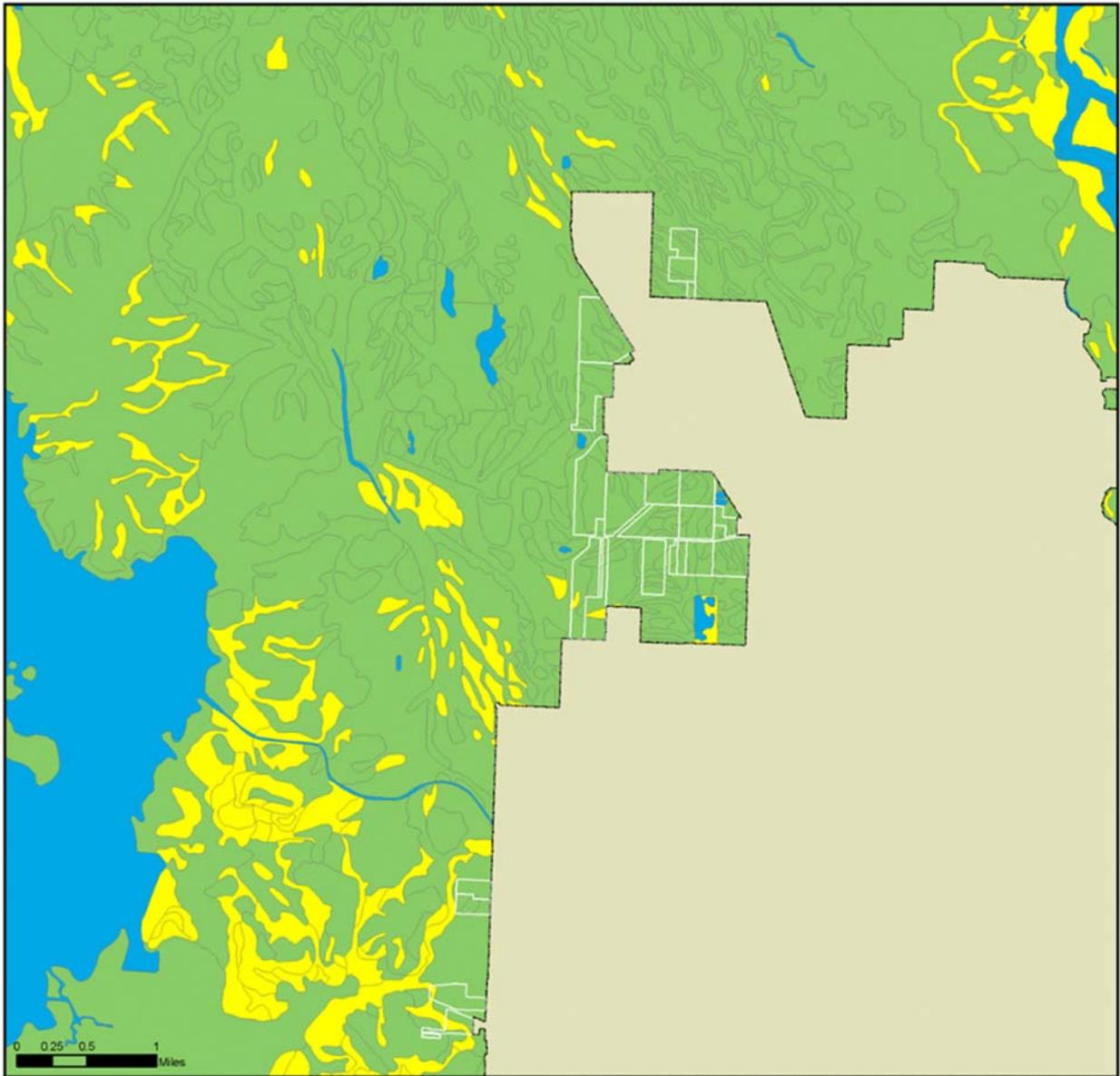
---

<sup>52</sup> Two sites that remain under consideration at this point in the analysis include some non-agricultural land. Site P4.8l is predominantly designated Agriculture, but the second priority tax lot that would connect it to the current UGB is designated Residential. Site P4.7c is on a tax that has a split designation; the northern portion is designated Government and Education, which is noted in earlier in this report as "other" with regard to the priority system.

<sup>53</sup> As applicable to Eugene's expansion area, OAR 660-033-0020(8)(a) defines "High-Value Farmland" as: "land in a tract [OAR 660-033-0020 (14) "Tract" means one or more contiguous lots or parcels under the same ownership] composed predominantly of soils that are: (A) Irrigated and classified prime, unique, Class I or II; or (B) Not irrigated and classified prime, unique, Class I or II. \* \* \* and (c) . . . tracts composed predominantly of the following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils: (A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill; (B) Subclassification IIIw, specifically, Concord, Conser, Cornelius Variant, Dayton (thick surface) and Sifton (occasionally flooded); (C) Subclassification IVe, specifically, Bellpine Silty Clay Loam, Carlton, Cornelius, Jory, Kinton, Latourell, Laurelwood, Powell, Quatama, Springwater, Willakenzie and Yamhill; and (D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson."



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
High Value Farmland Designations



- Land Inside UGB
- High Value Farmland
- Not High Value Farmland
- Unidentified Soil (Primarily Under Water)
- Remaining Candidate Tax Lots



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved: 8/22/2018

this sub-prioritization should take place. DLCD’s new UGB administrative rules (2016) provide some direction for cities and counties in terms of how the classification system should be used to prioritize potential expansion areas. Cities that fall under the new UGB expansion rules at OAR 660-024-0067 are explicitly required to prioritize in terms of “farm land that is not predominantly high-value farm land” verses “agricultural land that is predominantly high-value farmland.” While the current UGB expansion for Eugene and Lane County are not subject to this new rule, the rule demonstrates the significance of Oregon’s “high value farmland” in terms of prioritizing land under the capability classification system.

Lane County’s “Lane County Soil Ratings for Forestry and Agriculture” document provides a list of all the high value soils in Lane County based on data from the United States Department of Agriculture – Natural Resources Conservation Service (NRCS) and the Oregon Department of Land Conservation and Development (DLCD). Both those agencies, and the Oregon Department of Forestry (ODA), reviewed Lane County’s list and support the methodology used to produce it.

As the “High Value Farmland Designations” map shows, the portion of Eugene’s industrial expansion study area that contains the remaining candidate sites is almost completely composed of high value farmland soils. Furthermore, although small portions of soil not identified as high value farmland soil is present on a few sites, every remaining candidate site is predominantly high value farmland.<sup>54</sup> Sites, as defined in this analysis, are consistent with the use of the term “tracts” in OAR 660-033-0020 in that tracts presuppose tax lots with common ownership, and sites (including the options that combine sites) indicate areas with the opportunity for aggregation of ownership.

Considering that all of Eugene’s options for expanding its UGB to add suitable industrial sites require expansion onto high value farmland, Eugene’s prioritization is based on identifying the expansion option that disrupts as few areas of high value farmland as possible. This prioritization is addressed along with the application of the boundary location factors of Goal 14, below.

## **(2) Boundary Location Factors of Goal 14 / Selecting the Land for Inclusion in the UGB**

Twenty-two (22) sites were identified in Section (f), above, as sufficiently unconstrained and having the needed site characteristics for at least one of the acreage-based categories of industrial land needed. As addressed previously, the City of Eugene has identified a need for eleven (11) total sites, with the following size characteristics:

- Two (2) industrial sites of 75 acres or larger
- Three (3) industrial sites of between 50 and 75 acres
- Two (2) industrial sites of between 20 and 50 acres
- Four (4) industrial sites of between 10 and 20 acres

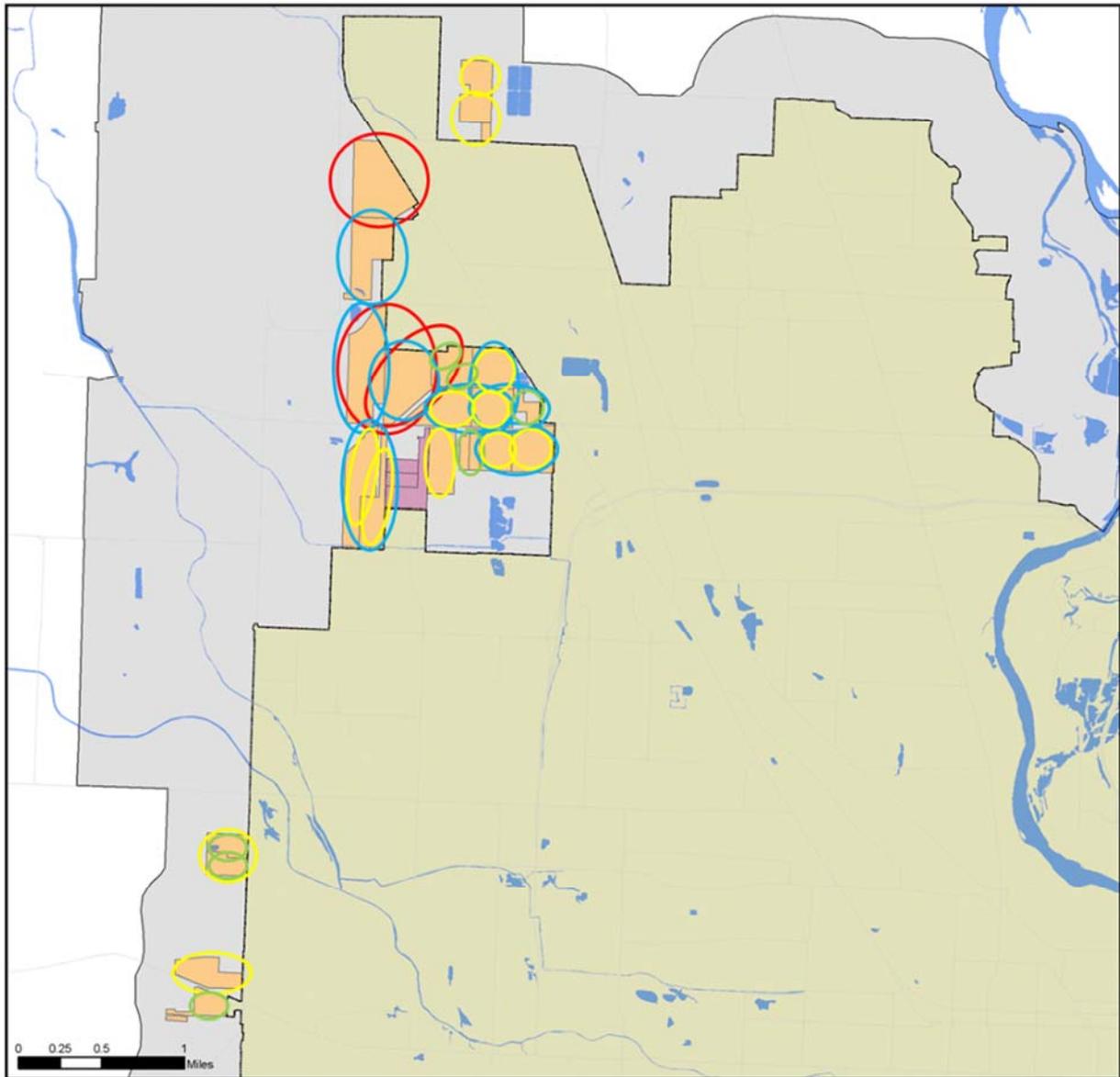
The remaining candidate land includes sites that meet all of these size characteristics, as shown in the map “Size Categories of Remaining Candidate Sites.” Multiple combinations of these sites could be used to meet the need for the full 11-site portfolio. Different combinations would have a different impact on the urban form, and so are evaluated below for how they address the Goal 14 boundary location factors.

---

<sup>54</sup> Appendix A analyzes the specific soil content of each candidate site and corresponding tax lot.



# City of Eugene Urban Growth Boundary Study Industrial Land Evaluation Size Categories of Remaining Candidate Sites



- Land Inside UGB
- Major Streets
- Water Bodies
- Industrial Expansion Study Area
- Tax Lots Selected for School Expansion
- Remaining Candidate Tax Lots
- 75+ Acre Options
- 50-75 Acre Options
- 20-50 Acre Options
- 10-20 Acre Options



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*  
Date PDF Saved: 10/4/2014

The Goal 14 boundary location factors are:

1. Efficient accommodation of identified land needs
2. Orderly and economic provision of public facilities and services
3. Comparative environmental, energy, economic, and social consequences
4. Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

This analysis evaluates the Goal 14 boundary location factors for five high-level expansion options. Each option focuses the expansion in one or more of the geographic regions with remaining candidate sites. While these five options do not show all possible portfolios of candidate sites, they do exemplify the consequences with regard to the Goal 14 boundary location factors for the full range of sites. Because candidate sites of 75 acres or larger and 50-75 acres are only present in the area around Clear Lake Road, sites from that area are necessarily included in every expansion area evaluated below.

### **(3) Evaluation of Possible Expansion Areas**

**Focused Expansion Option 1.** The first possible expansion option evaluated for the Goal 14 boundary location factors focuses on the Clear Lake Road area, which contains the only potential 50-75 acre and 75+ acre sites that meet the needs of the industrial expansion portfolio.

The expansion option presented in the map “Focused Expansion Option: Clear Lake Road” presents one possible site configuration. This particular area provides multiple possible site configurations to meet the full needed portfolio, geographically focused around the 50-75 and 75+ acre candidate sites. Each of the Goal 14 boundary location factors are evaluated for this expansion option below.

#### **Factor 1: Efficient accommodation of identified land needs**

This expansion option accommodates the entire portfolio of needed sites in a single cohesive area. In association with the school expansion and parkland that is under consideration for expansion to develop as a community park, this area also fills in an indentation in the urban growth boundary, reducing the urban/rural interface from 6.0 miles along this stretch to 3.4 miles, much of which is adjacent to the Eugene Airport. This area would require the inclusion of nine small tax lots and part of one tax lot totaling 46.3 acres (up to a possible 268.4 acres depending on park expansion proposals) that are otherwise not under consideration to avoid the creation of small islands of rural land inside the UGB.<sup>55</sup>

#### **Factor 2: Orderly and economic provision of public facilities and services**

As a single expansion area, this option would allow for master planned public facilities, maximizing the efficiency and orderliness of providing services as development requires. Extending facilities in a single area is also far more cost effective than doing so in multiple areas.

#### **Factor 3: Comparative environmental, energy, economic, and social consequences**

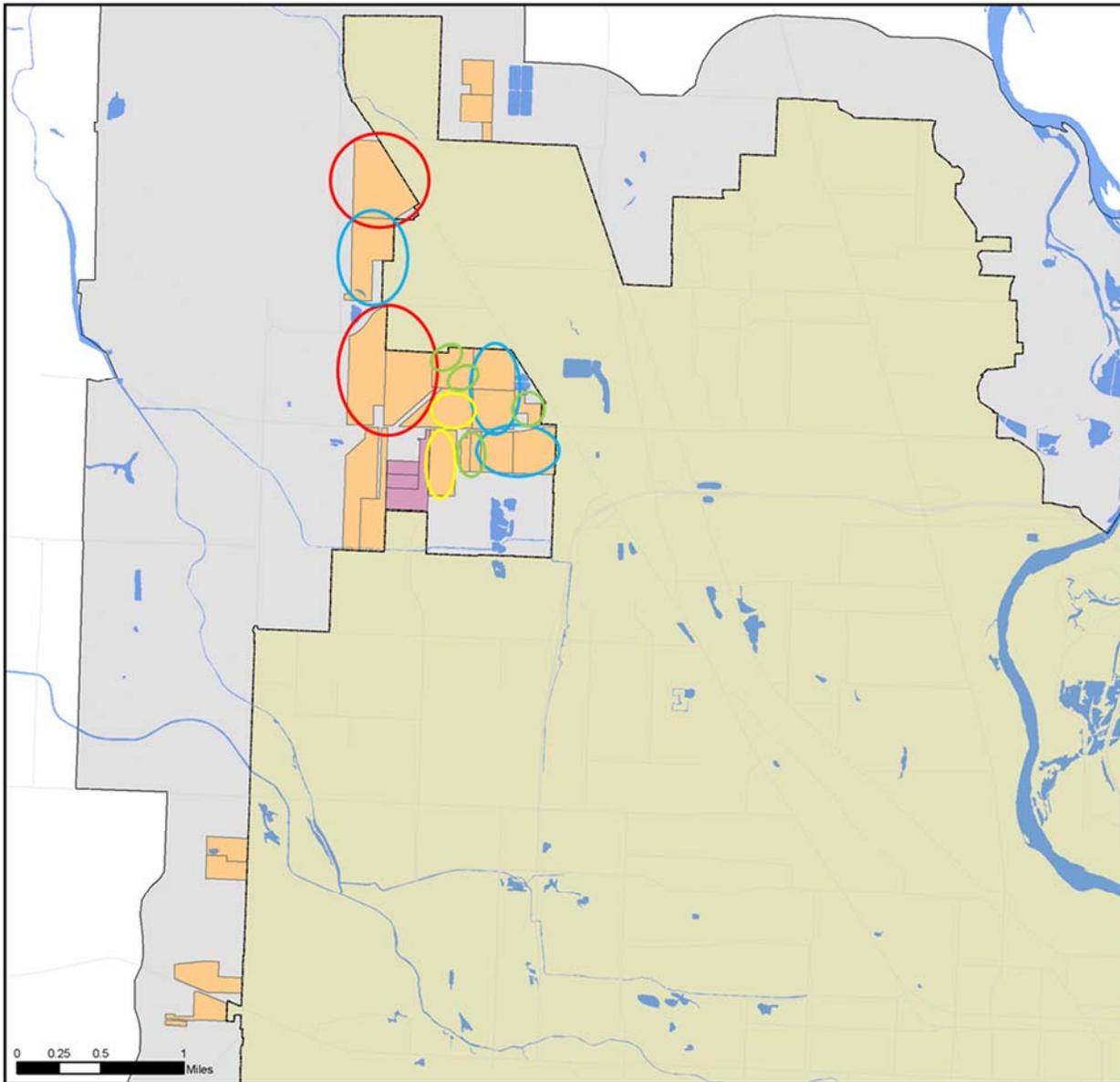
*Environmental:* The Clear Lake-focused expansion option contains some scattered Goal 5 protected areas and two areas constrained by the Special Hazard Flood Area. These environmental constraints

---

<sup>55</sup> This is addressed in more detail in the Addendum to this study.



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Focused Expansion Option 1: Clear Lake Road



- Land Inside UGB
- Major Streets
- Water Bodies
- Other Land Within Industrial Expansion Study Area
- Tax Lots Selected for School Expansion
- Remaining Candidate Tax Lots
- 75+ Acre Options
- 50-75 Acre Options
- 20-50 Acre Options
- 10-20 Acre Options



Note: This map is based on imprecise source data, subject to change, and for general reference only.

would require additional guidelines or regulation to mitigate potential consequences. The cohesive nature of the area would allow such regulations to be integrated into planning considerations. Overall environmental consequences from expanding into this area for industrial use would be neutral.<sup>56</sup>

*Energy:* This expansion option would promote energy efficiencies through proximity to the airport and transportation corridors, and relative proximity to residential areas to the south. The cohesive nature of the expansion option also increases energy efficiency opportunities for transit by including multiple destinations in a single area. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* This expansion option would create additional industrial employment land, as all expansions would. Comparative economic benefits of this expansion option include the efficiency of providing services to a single area and the high level of connection to the current urban growth boundary. The overall economic consequences of expanding the UGB for industrial uses in this location are positive.

*Social:* While expanding the UGB for industrial use in this area would impact very few residents, it could have potentially negative social consequences for students exposed to traffic and other impacts of such uses adjacent to proposed school expansion. These impacts would require planning to limit the intensity of uses allowed in close proximity to the school facility. Additional employment sites near but not directly adjacent to residential neighborhoods provide a positive social consequence. Overall social consequences of expanding into this area for industrial use would be neutral to positive.

#### **Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

The configuration of this area presents a unique opportunity to expand urban uses in such a way that no agricultural or forest land would be adjacent to the expansion. The area north of Clear Lake Road is bordered by the Eugene Airport, Airport Reserves, and Clear Lake Road itself. The school expansion would transition between the industrial uses south of Clear Lake Road and farmland to the west. This separation provides the highest level of compatibility with nearby agricultural and forest activities.

**Focused Expansion Option 2.** The second possible expansion area evaluated for the Goal 14 boundary location factors focuses on the Green Hill Road area, which contains one 10-20 acre site, one 20-50 acre site, and two additional 10-20 acre sites that could be combined to create a single 20-50 acre site. The expansion option presented in the map “Focused Expansion Option: Green Hill Road” presents one possible configuration of sites using all sites west of Green Hill Road and additional sites in the Clear Lake area as needed to meet the full needed portfolio. Each of the Goal 14 boundary location factors are evaluated for this expansion option below.

#### **Factor 1: Efficient accommodation of identified land needs**

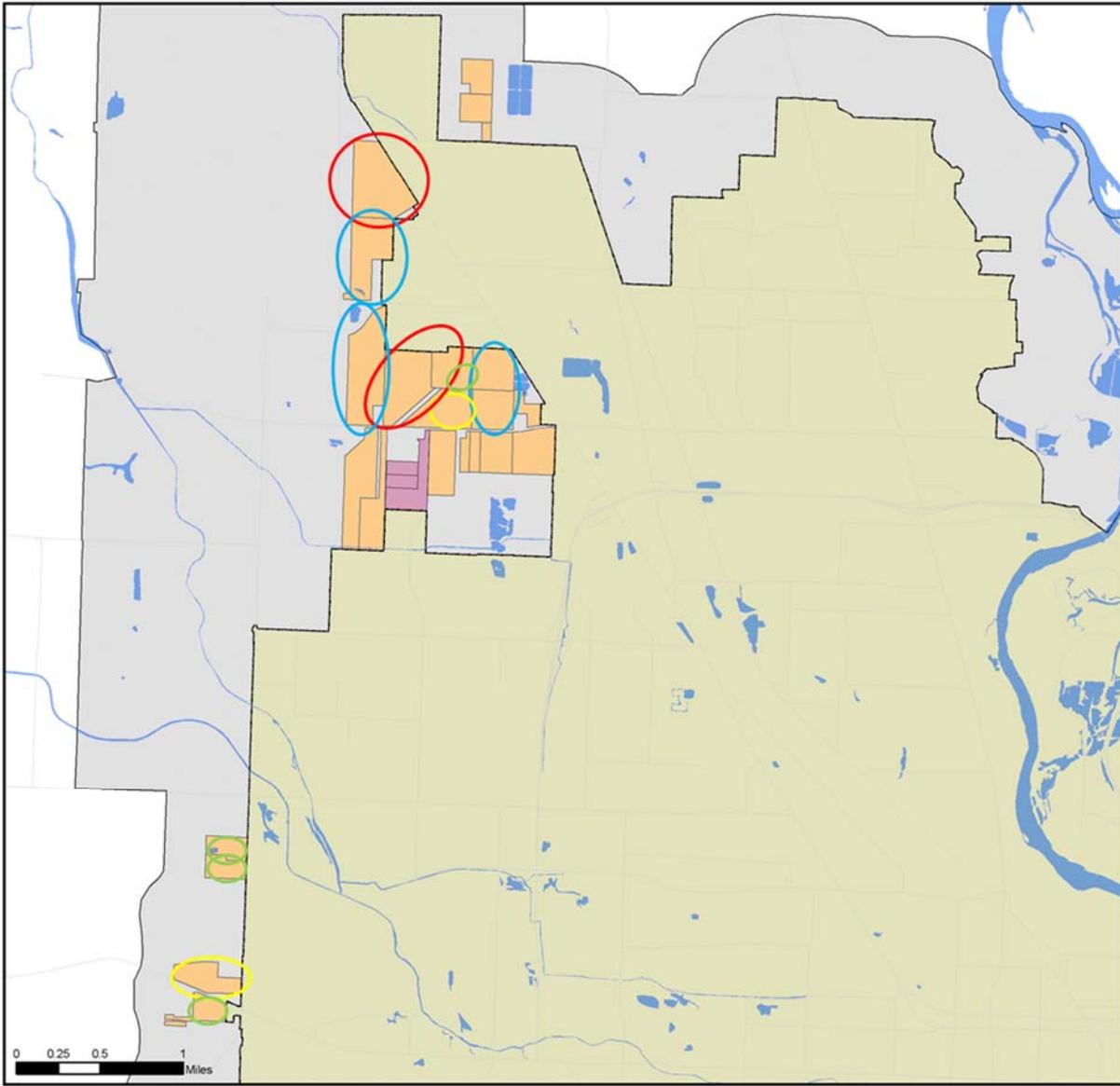
This expansion option meets the entire portfolio of needed sites in three distinct expansion areas. Expanding onto the two areas on Green Hill Road would increase the urban/rural interface from 0.6 miles to 2.3 miles along those boundaries. This area would require the inclusion of one small tax lot totaling 5.3 acres (between Sites P4.6c and P4.6d) that is otherwise not under consideration to avoid the creation of a small island of rural land inside the UGB.

---

<sup>56</sup> This is addressed in more detail in the Addendum to this study.



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Focused Expansion Option 2: Green Hill Road



- Land Inside UGB
- Major Streets
- Water Bodies
- Other Land Within Industrial Expansion Study Area
- Tax Lots Selected for School Expansion
- Remaining Candidate Tax Lots
- 75+ Acre Options
- 50-75 Acre Options
- 20-50 Acre Options
- 10-20 Acre Options



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

The area north of Clear Lake Road that supplements this area would complete the needed portfolio of sites. This would reduce the urban/rural interface from 6.0 miles along this stretch to 3.4 miles due to additional lands incorporated, noted below. This option would require the inclusion of nine small tax lots and part of one tax lot totaling 58.8 acres that are otherwise not under consideration as would be required under Option 1, but it would also require the inclusion of a significant number of additional unneeded acres due to a larger rural island that would otherwise be created. Because the school expansion connects to Clear Lake Road, and City policy requires that the urban growth boundary include bordering rights-of-way, this expansion option would also require the inclusion of all land east of the school expansion and south of Clear Lake Road, or 362.2 acres. Some of this land (222.1 acres) is under consideration for a park expansion, but the remaining 140.1 acres taken in by this expansion, plus the 58.8 acres north of Clear Lake Road and the 5.3 acres on Green Hill Road (for a total of 204.2 acres up to a possible 462.3 acres depending on park expansion proposals) would not meet any established need. This option is extremely inefficient.

### **Factor 2: Orderly and economic provision of public facilities and services**

As a three-area expansion, this option would require planning of public facilities and services with three different sets of conditions and timing, reducing the efficiency and orderliness of providing services as development requires.

### **Factor 3: Comparative environmental, energy, economic, and social consequences**

*Environmental:* The Green Hill-focused expansion option contains some scattered Goal 5 protected areas and two areas constrained by the Special Hazard Flood Area. The two northern sites are also adjacent to the West Eugene Wetlands area. These environmental constraints would require additional guidelines or regulation to mitigate potential consequences. Overall environmental consequences from this expansion option would be neutral to slightly negative.

*Energy:* Portions of this expansion area would promote energy efficiencies through proximity to the airport and transportation corridors, and relative proximity to various residential areas. The divided nature of the expansion option would limit energy efficiency opportunities for transit. Overall energy consequences from this expansion option would be neutral.

*Economic:* This expansion option would create additional industrial employment land, as all expansions would. Providing public services to the three areas would be comparatively costly, creating negative economic consequences. The overall economic consequences of this expansion option are neutral.

*Social:* This expansion option would impact very few residents, and would not include land adjacent to the proposed school expansion. Additional employment sites near but not directly adjacent to residential neighborhoods provide a positive social consequence. Expanding onto Site P4.6b for industrial purposes would potentially limit the viability of the non-profit animal shelter currently in operation on this site. Overall social consequences of expanding into this area for industrial use would be neutral to positive.

#### **Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

The configuration of this expansion option includes direct adjacency to both farm and forest land surrounding the southern sites. While compatibility issues with this adjacency are likely to be minimal, there is a possibility of undesirable impacts.

**Focused Expansion Option 3.** The third possible expansion option evaluated for the Goal 14 boundary location factors focuses on the Awbrey Lane area, which contains two 20-50 acre sites, one of which requires the other to connect to the current UGB. The expansion option presented in the map “Focused Expansion Option: Awbrey Lane” presents one possible configuration of sites using both sites north of Awbrey Lane and additional sites in the Clear Lake area as needed to meet the full needed portfolio. Each of the Goal 14 boundary location factors are evaluated for this expansion option below.

#### **Factor 1: Efficient accommodation of identified land needs**

This expansion option meets the entire portfolio of needed sites in two distinct expansion areas. Expanding onto the two sites north of Awbrey Lane would increase the urban/rural interface from 0.1 miles to 1.4 miles along those boundaries.

The area around Clear Lake Road that supplements this area would complete the needed portfolio of sites. This would ultimately reduce the urban/rural interface from 6.0 miles along this stretch to 3.4 miles due to additional lands incorporated, noted below. This option would require the inclusion of nine small tax lots and part of one tax lot totaling 46.3 acres, as well as one larger tax lot and a significant portion of a tax lot totaling 89.1 acres that would not be used to meet an identified need. Like Option 2, this option would also require the inclusion of a significant number of additional acres due to a larger rural island that would otherwise be created. Because the school expansion connects to Clear Lake Road, and City policy requires that the urban growth boundary include bordering rights-of-way, this expansion option would also require the inclusion of all land east of the school expansion and south of Clear Lake Road, including land accounted for above, a 5.0 acre tax lot and 222.1 acres that are under consideration for a park expansion. In total, 140.4 acres up to a possible 362.5 depending on park expansion proposals would be included in this expansion option without meeting any established need. This option is extremely inefficient.

#### **Factor 2: Orderly and economic provision of public facilities and services**

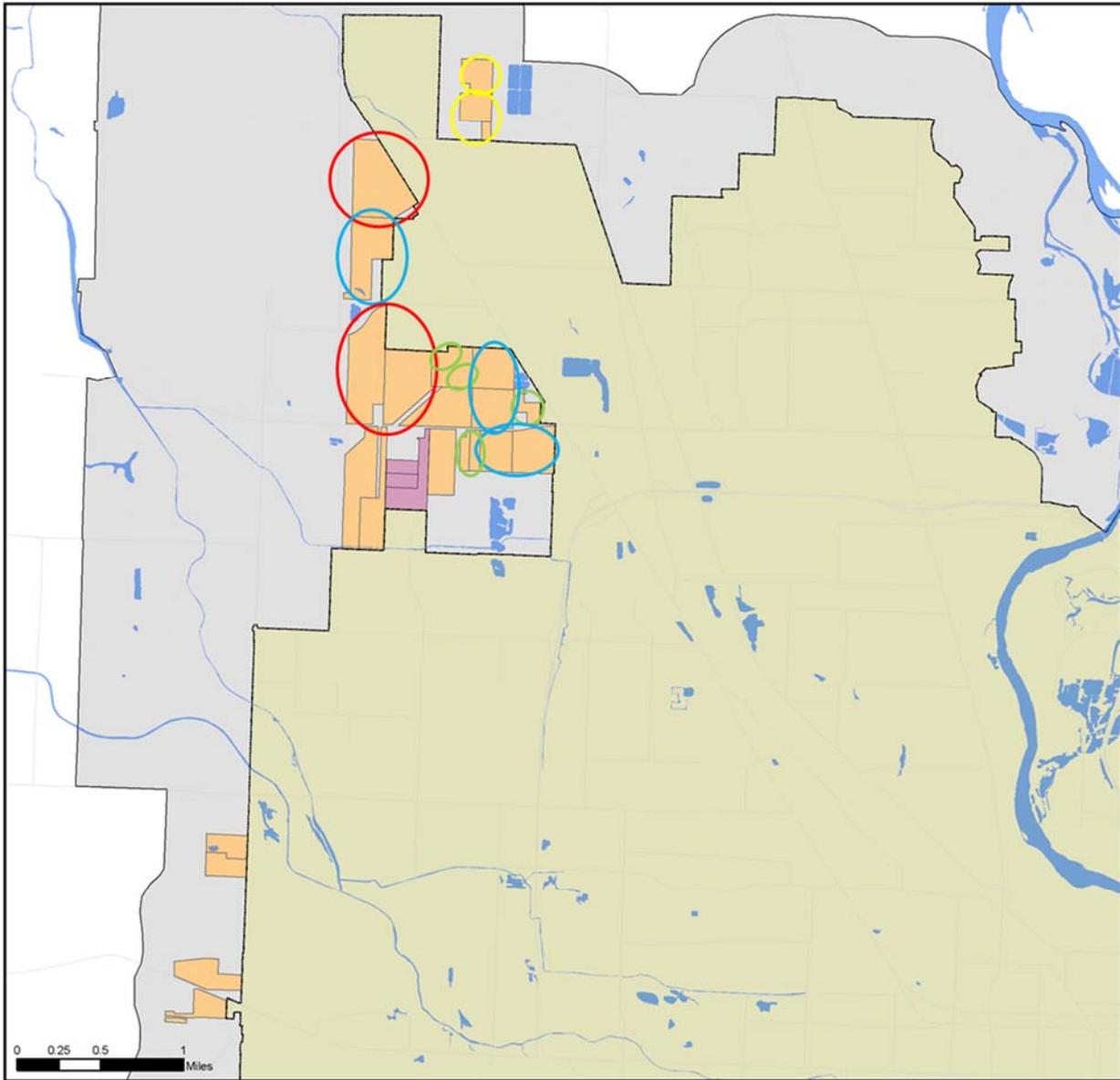
As a two-area expansion, this option would require planning of public facilities and services with two different sets of conditions and timing, reducing the efficiency and orderliness of providing services as development requires.

#### **Factor 3: Comparative environmental, energy, economic, and social consequences**

*Environmental:* The Awbrey Lane-focused expansion option contains some scattered Goal 5 protected areas and one area constrained by the Special Hazard Flood Area. These environmental constraints would require additional guidelines or regulation to mitigate potential consequences. Overall environmental consequences from expanding into this area for industrial use would be neutral.



City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Focused Expansion Option 3: Awbrey Lane



- Land Inside UGB
- Major Streets
- Water Bodies
- Other Land Within Industrial Expansion Study Area
- Tax Lots Selected for School Expansion
- Remaining Candidate Tax Lots
- 75+ Acre Options
- 50-75 Acre Options
- 20-50 Acre Options
- 10-20 Acre Options



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

Date PDF Saved: 10/4/2015

*Energy:* Portions of this expansion area would promote energy efficiencies through proximity to the airport and transportation corridors, and relative proximity to various residential areas, with the exception of the northern sites, which are distant from urban residential neighborhoods, but adjacent to a rural residential neighborhood. The divided nature of the expansion option would limit energy efficiency opportunities for transit. Overall energy consequences from this expansion option would be neutral.

*Economic:* This expansion option would create additional industrial employment land, as all expansions would. Providing public services to the two areas would be comparatively costly, creating negative economic consequences. The overall economic consequences of this expansion option are neutral.

*Social:* This expansion option would impact more residents than the other two options due to the rural residential neighborhood to the west of the northern sites. A mix of additional employment sites directly adjacent to and near but not directly adjacent to residential neighborhoods provide a neutral to positive social consequence. Overall social consequences of expanding into this area for industrial use would be neutral.

#### **Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

The configuration of this expansion option includes direct adjacency to land designated for agriculture around the northern sites. While compatibility issues with this adjacency are likely to be minimal, there is a possibility of undesirable impacts.

**Focused Expansion Option 4.** The fourth possible expansion option evaluated for the Goal 14 boundary location factors focuses on the Green Hill Road and Awbrey Lane areas, which contain three 20-50 acre sites, one 10-20 acre site, and two additional 10-20 acre sites that can be combined into a single 20-50 acre site. The expansion option presented in the map “Focused Expansion Option: Green Hill Road and Awbrey Lane” presents one possible configuration of sites using all sites west of Green Hill Road and one site north of Awbrey Lane, with additional sites in the Clear Lake area as needed to meet the full needed portfolio. Each of the Goal 14 boundary location factors are evaluated for this expansion option below

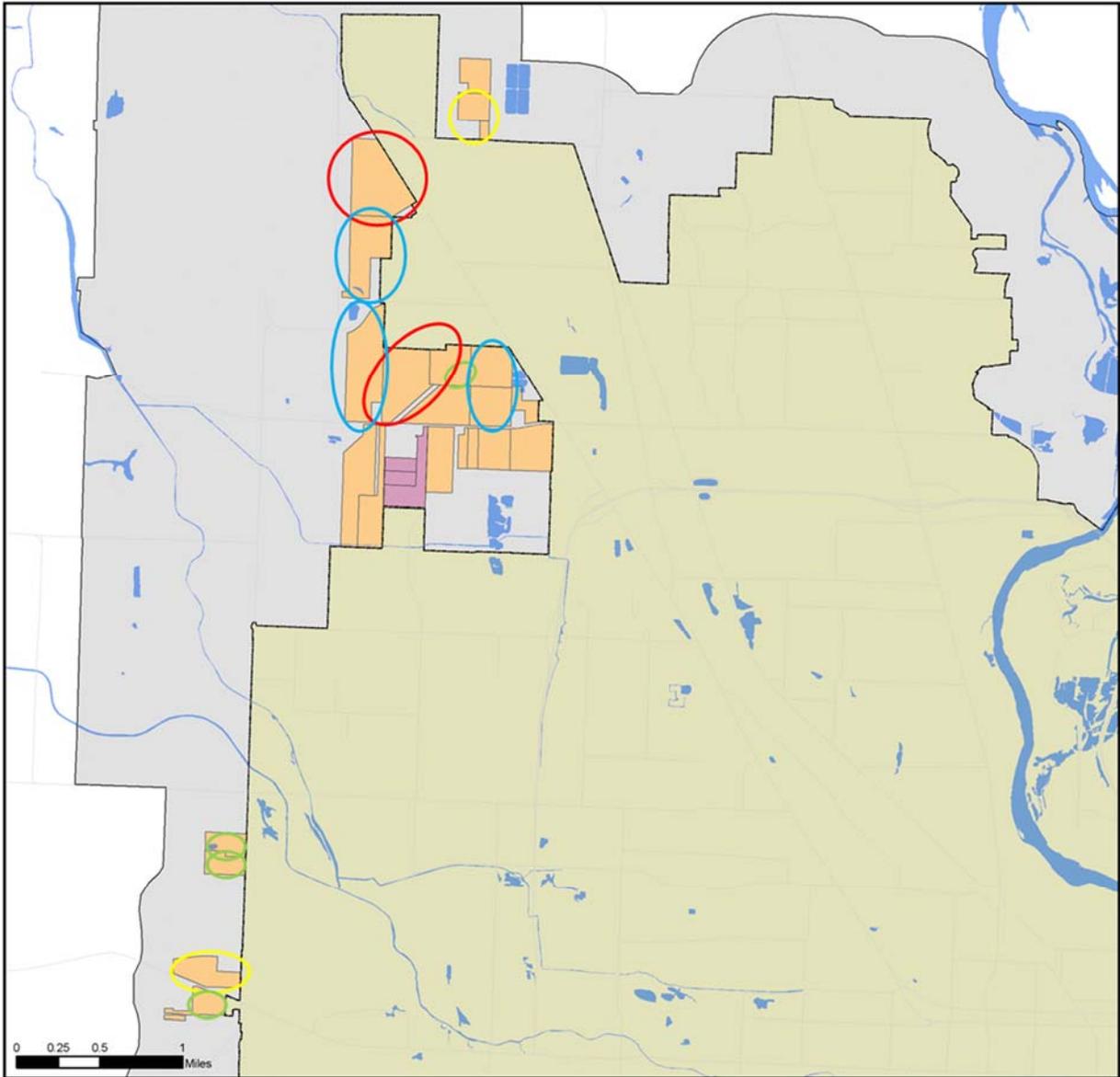
#### **Factor 1: Efficient accommodation of identified land needs**

This expansion option meets the entire portfolio of needed sites in four distinct expansion areas. Expanding onto the site adjacent to Awbrey Lane would increase the urban/rural interface from 0.1 miles to 0.9 miles along that boundary. Expanding onto the four areas on Green Hill Road would increase the urban/rural interface from 0.6 miles to 2.3 miles along those boundaries and would require the inclusion of one small tax lot totaling 5.3 acres (between Sites P4.6c and P4.6d) that is otherwise not under consideration to create a contiguous urban growth boundary.

The area north of Clear Lake Road that supplements this area would complete the needed portfolio of sites. Expanding into this area would ultimately reduce the urban/rural interface from 6.0 miles along this stretch to 3.4 miles due to additional lands incorporated, noted below. This area north of Clear Lake Road would require the inclusion of nine small tax lots and part of one tax lot totaling 58.8 acres and 48.9 acres of a partial tax lot that are otherwise not under consideration. Like Option 2, this option would also require the inclusion of a significant number of additional acres due to a larger rural island that would otherwise be created. Because the school expansion connects to Clear Lake Road, and City policy requires that the urban growth boundary include bordering rights-of-way, this expansion option



**City of Eugene Urban Growth Boundary Study  
Industrial Land Evaluation  
Focused Expansion Option 4: Green Hill Road and Awbrey Lane**



-  Land Inside UGB
-  Major Streets
-  Water Bodies
-  Other Land Within Industrial Expansion Study Area
-  Tax Lots Selected for School Expansion
-  Remaining Candidate Tax Lots
-  75+ Acre Options
-  50-75 Acre Options
-  20-50 Acre Options
-  10-20 Acre Options



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

would also require the inclusion of all land east of the school expansion and south of Clear Lake Road, or 362.2 acres. Some of this land (222.1 acres) is under consideration for a park expansion, but the remaining 140.1 acres taken in by this expansion, plus the 107.7 acres north of Clear Lake Road and the 5.3 acres on Green Hill Road (for a total of 253.1 acres up to a possible 475.2 acres depending on park expansion proposals) would not meet any established need. This option is extremely inefficient.

### **Factor 2: Orderly and economic provision of public facilities and services**

As a four-area expansion, this option would require planning of public facilities and services with four different sets of conditions and timing, dramatically reducing the efficiency and orderliness of providing services as development requires.

### **Factor 3: Comparative environmental, energy, economic, and social consequences**

*Environmental:* The Green Hill and Awbrey Lane-focused expansion option contains some scattered Goal 5 protected areas and two areas constrained by the Special Hazard Flood Area. The two northern Green Hill sites are also adjacent to the West Eugene Wetlands area. These environmental constraints would require additional guidelines or regulation to mitigate potential consequences. Overall environmental consequences from expanding into this area for industrial use would be neutral to slightly negative.

*Energy:* Portions of this expansion area would promote energy efficiencies through proximity to the airport and transportation corridors, and relative proximity to various residential areas. The divided nature of the expansion option would limit energy efficiency opportunities for transit. Overall energy consequences from expanding onto this site for industrial use would be neutral.

*Economic:* This expansion option would create additional industrial employment land, as all expansions would. Providing public services to the four areas would be comparatively costly, creating negative economic consequences. The overall economic consequences of this expansion option are neutral to negative.

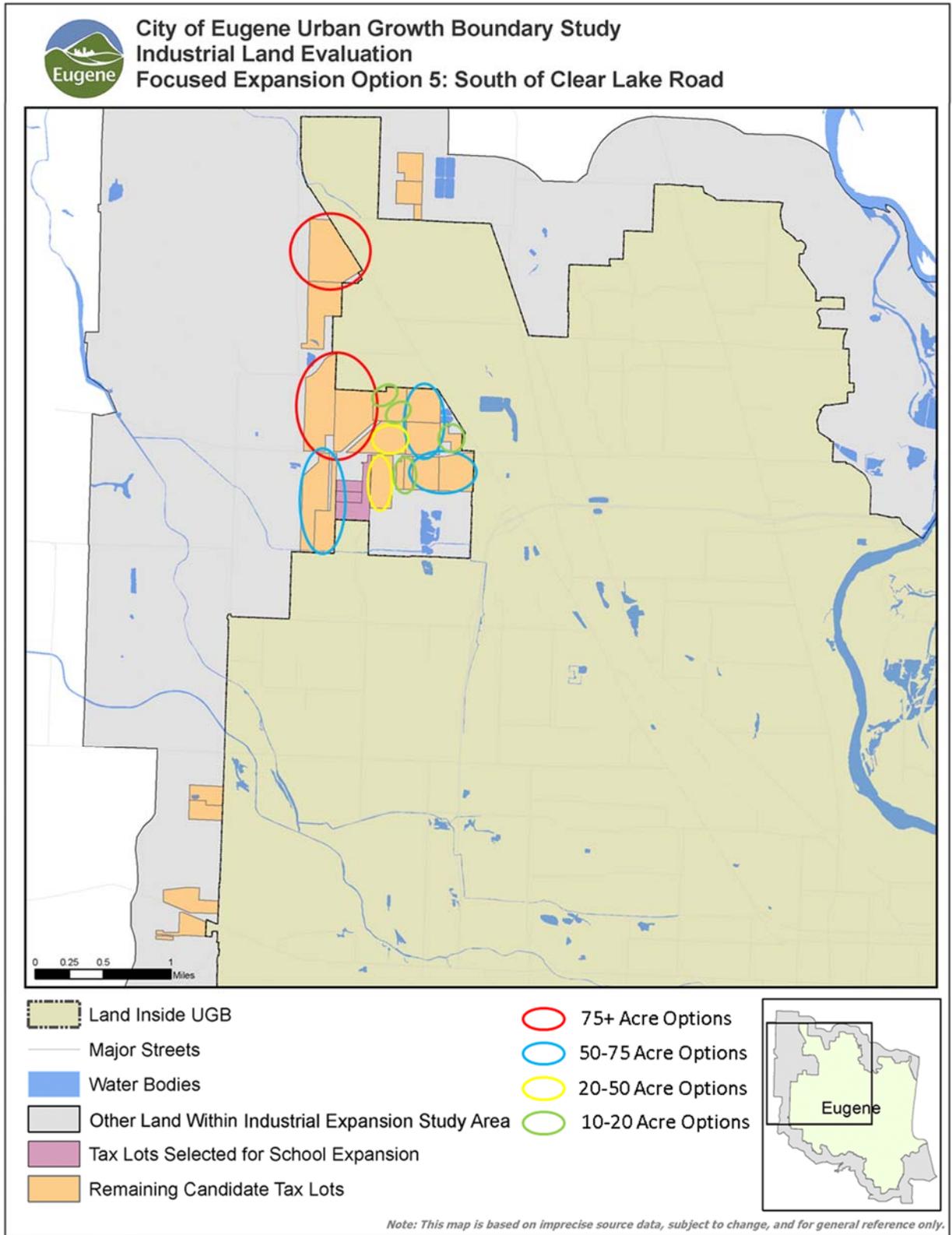
*Social:* This expansion option would impact relatively few residents, and would not include land adjacent to the proposed school expansion. A mix of additional employment sites adjacent to and near but not directly adjacent to residential neighborhoods provide a positive social consequence. Expanding onto Site P4.6b for industrial purposes would potentially limit the viability of the non-profit animal shelter currently in operation on this site. Overall social consequences of expanding into this area for industrial use would be neutral.

### **Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

The configuration of this expansion option includes direct adjacency to both farm and forest land surrounding several sites. While compatibility issues with this adjacency are likely to be minimal, there is a possibility of undesirable impacts.

**Focused Expansion Option 5.** The fifth possible expansion option evaluated for the Goal 14 boundary location factors focuses on the area south of Clear Lake Road, which contains the identified school expansion and a potential expansion area for parks. It is also broadly in the area with the only potential 50-75 acre and 75+ acre sites that meet the needs of the industrial expansion portfolio. The expansion option presented in the map “Focused Expansion Option: South of Clear Lake Road” presents one

possible configuration of sites. This particular area provides multiple possible configurations to meet the full needed portfolio, geographically focused around the southern portion of the area. Each of the Goal 14 boundary location factors are evaluated for this expansion option below.



### **Factor 1: Efficient accommodation of identified land needs**

This expansion option accommodates the entire portfolio of needed sites in a relatively cohesive area with one outlier site. In association with the school expansion and parkland that is under consideration for expansion to develop as a community park, this area also fills in an indentation in the urban growth boundary, reducing the urban/rural interface from 6.5 miles along this stretch to 3.1 miles. This area would require the inclusion of fifteen small tax lots and part of one tax lot totaling 6570 acres (up to a possible 289.1 acres depending on park expansion proposals) that are otherwise not under consideration.

### **Factor 2: Orderly and economic provision of public facilities and services**

As a two-area expansion without much spread, this option would still allow for master planned public facilities, enhancing the efficiency and orderliness of providing services as development requires.

### **Factor 3: Comparative environmental, energy, economic, and social consequences**

*Environmental:* The south Clear Lake-focused expansion option contains some scattered Goal 5 protected areas and three areas constrained by the Special Hazard Flood Area. These environmental constraints would require additional guidelines or regulation to mitigate potential consequences. The cohesive nature of the area with constraints would allow such regulations to be integrated into planning considerations. Overall environmental consequences from expanding into this area for industrial use would be neutral.

*Energy:* This expansion option would promote energy efficiencies through proximity to the airport and transportation corridors, and relative proximity (even adjacency in the case of the southernmost site) to residential areas to the south. The cohesive nature of the site also increases energy efficiency opportunities for transit by including multiple destinations in a single area. Overall energy consequences from expanding onto this site for industrial use would be positive.

*Economic:* This expansion option would create additional industrial employment land, as all expansions would. Comparative economic benefits of this expansion option include the efficiency of providing services to a single area and the high level of connection to the current urban growth boundary. The overall economic consequences of expanding the UGB for industrial uses in this location are positive.

*Social:* While expanding the UGB for industrial use in this area would have impact very few residents, it could have potentially negative social consequences for students exposed to traffic and other impacts of such uses adjacent to both sides of the proposed school expansion. These impacts would require planning to limit the intensity of uses allowed in close proximity to the school facility. Additional employment sites near but not directly adjacent to residential neighborhoods provide a positive social consequence. Overall social consequences of expanding into this area for industrial use would be neutral to positive.

**Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

The configuration of this expansion option includes direct adjacency to farm land bordering a single site. While compatibility issues with this adjacency are likely to be minimal, there is a possibility of undesirable impacts.

**(4) Conclusion of Goal 14 Boundary Location Factors**

**Factor 1: Efficient accommodation of identified land needs**

Efficient accommodation of identified land needs is best evaluated based on the most compact configuration of sites. This can be measured by comparing the number of collateral acres that must be included in each of the five options. Of the five options evaluated above, **Option 1** was the most efficient, based on the fact that it requires the inclusion of between 46.3 and 267.4 acres of collateral land (depending on park expansion analysis). In order of efficiency, the other options were:

- Option 5 – includes between 67.0 and 289.1 acres,
- Option 3 – includes between 140.4 and 362.5 acres,
- Option 2 – includes between 204.2 and 426.3 acres, and
- Option 4 – includes between 253.1 and 475.2 acres.

**Factor 2: Orderly and economic provision of public facilities and services**

In Eugene, where services can be extended to any of the areas, the most orderly and economic provision of public facilities and services is maximized by expanding in the most compact way, in the fewest total number of areas, allowing for master planned facilities and services. Of the five options evaluated above, **Option 1** allows for the most orderly and economic provision of services due to its concentration in a single area. In order of most orderly and economic provision of services, the other options were:

- Option 5 – two close areas,
- Option 3 – two dispersed areas,
- Option 2 – three dispersed areas, and
- Option 4 – four dispersed areas.

**Factor 3: Comparative environmental, energy, economic, and social consequences**

Comparative environmental, energy, economic and social consequences are dependent on the context of the candidate expansion areas. Of the five expansion areas, **Option 1 and Option 5** are evaluated equally, with neutral environmental consequences, positive energy and economic consequences and neutral to positive social consequences. In order of evaluation of consequences, the other options were:

- Option 2 – neutral/slightly negative environmental, neutral energy and economic, neutral/positive social consequences;
- Option 3 – neutral for environmental, energy, economic and social consequences; and
- Option 4 – neutral/slightly negative environmental, neutral energy, neutral to negative economic, and neutral social consequences.

**Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB**

Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB is maximized by limiting the direct adjacency of urban uses with farm and forest land (i.e. maximizing adjacency to roads and non-farm or forest uses). Negative consequences arising from adjacency to industrial sites is expected to be minimal. Of the five expansion areas, **Option 1** avoids all compatibility concerns through the separation from farm or forest land. In order of least to most adjacency to farm or forest land, the other options are:

- Option 3 – adjacent to land designated for agriculture, but under long-term anticipated public use,
- Option 5 – adjacent to farmland along a single tax lot,
- Option 2 – adjacent to both active farm and forest land, and
- Option 4 – adjacent to both active and potential farm and forest land along the greatest length.

**Conclusion**

Based on the evaluation of these factors, the area that maximizes each of the four Goal 14 Location Factors is Option 1. This area is therefore identified as the preferred expansion area to meet the City of Eugene’s industrial land deficit.

**(5) Evaluation of Tax Lots Required for a Contiguous Urban Growth Boundary**

As discussed above, in order to include the eleven (11) sites selected above for industrial expansion, nine (9) additional tax lots and one partial tax lot totaling 46.3 acres must also be included to maintain a contiguous urban growth boundary. These tax lots are identified in the “Contiguous Industrial Expansion Area” map, and are evaluated below in detail.

| Contiguity Lot | Map & Taxlot Number | Acres |
|----------------|---------------------|-------|
| 1              | 1704050003100       | 3.62  |
| 2              | 1704050001100       | 8.30  |
| 3              | 1704050001000       | 1.54  |
| 4              | 1704080001401       | 1.65  |
| 5              | 1704080002300       | 4.79  |
| 6              | 1704080003000       | 6.31  |
| 7              | 1704092001400       | 9.00  |
| 8              | 1704090001300       | 5.31  |
| 9              | 1704090001400       | 4.88  |
| 10             | 1704090002600       | 0.92  |

Lot 1 is one of three contiguous tax lots owned by Blachly Lane County Electric. The other two tax lots of this property are inside the current urban growth boundary. Including this property within the expansion area would not change its current function.

Lot 2 is owned by the Gary R Henry Revocable Trust. While it is under separate ownership from Site P4.8, which it is adjacent to, aerial photography suggests that the two sites currently function as a single agricultural property. Upon development, the tax lots may continue to function as a single property, or may be developed separately.

Lot 3 is a privately owned small residential lot. As with Lot 2, this lot may be combined with larger adjacent tax lots upon development, or kept separate.

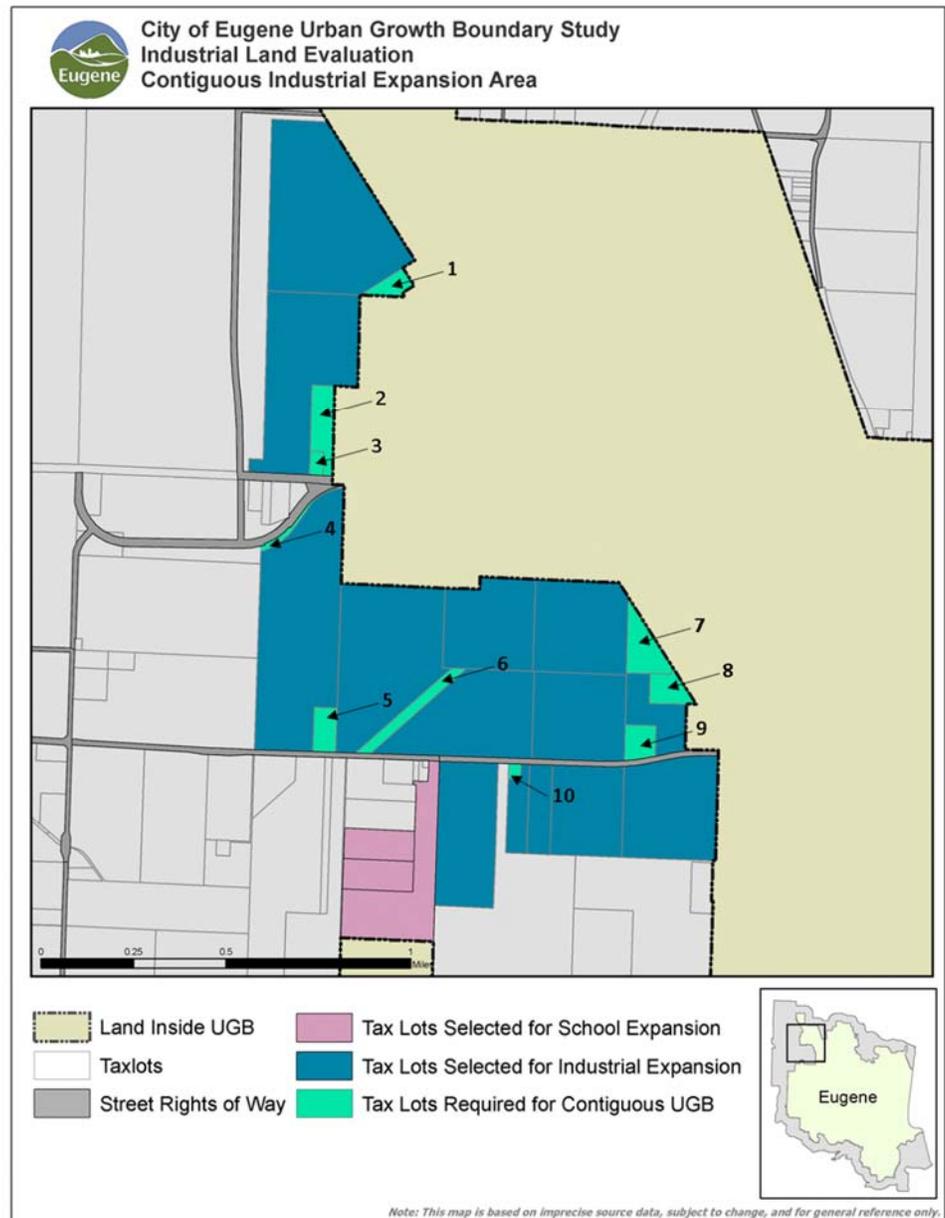
Lot 4 is a small portion of a larger tax lot that is owned by the Eugene Airport. While the majority of the tax lot is dedicated to use by the Airport, this small portion is expected to be incorporated into the Airport Road right-of-way when future improvements are needed. Including this portion of the tax lot in the urban growth boundary is necessary to include the current Airport Road right-of-way, as required by City policies.

Lot 5 is a privately owned small residential lot. This lot, like Lot 2 and Lot 3, may be combined with larger adjacent tax lots upon development, or kept separate.

Lot 6 is an electric transmission right-of-way owned by the Bonneville Power Administration. Lot 7 is a property owned by the Oregon Department of Transportation for large ponds. Including these properties within the expansion area would not change their current function.

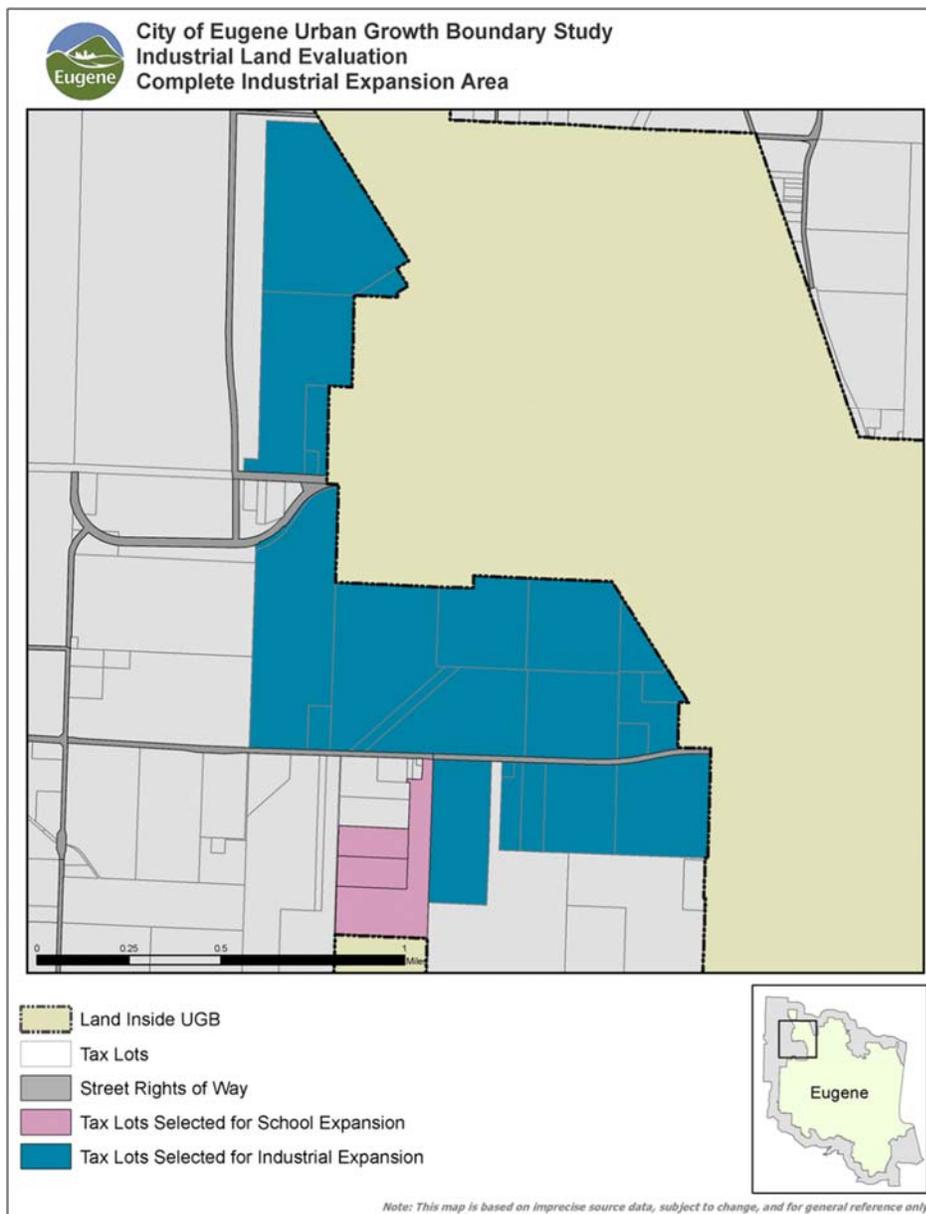
Lot 8 is owned by CBS Outdoor, Inc. and developed as a small apartment building. Lot 9 is a privately owned manufactured home residence. Either or both of these sites could be combined with site P4.7h or developed separately.

Lot 10 is a privately owned residence. Its location on Clear Lake Road, near the school expansion site, Golden Gardens Park and within half a mile of a residential neighborhood makes it ideally located to serve as a smaller-scale support business or service for the expansion area, as noted in City policies, and will therefore be designated for commercial use in the expansion area.



### 3. Conclusion – UGB Expansion Area to Address the Industrial Land Deficit

Through the preceding analysis, the entire study area of 18,734 acres was evaluated for suitability to meet the City’s industrial land deficit. 633 acres were selected as the most desirable for expansion as shown on the map below, “Complete Industrial Expansion Area.” In accordance with City of Eugene policies, this expansion area will undergo further analysis (see the Addendum to this study) to enable land use planning that is sensitive to environmental issues such as wetlands not identified in the current Goal 5 inventory and environmental justice concerns regarding the expansion. This further analysis may lead to adjustments in the specific distribution of sites within the area, but will maintain the large lots needed to meet the identified industrial need.



## Appendix A. Soil Evaluation of Suitable Candidate Sites

This appendix to the City of Eugene Industrial Land Study provides a detailed account of the soil analysis used to address the state mandate to give higher priority to suitable land of lower soil capability for purposes of urban growth boundary expansion. The first section summarizes the legal basis (found in more detail in subsection II.g.1 of the Industrial Land Study) for the use of high value farmland designation for identifying lower and higher capability soils within the study area. The second section lists the specific soil makeup of each tax lot under consideration. This analysis shows that all tax lots that contain land that meets the development constraint and site characteristics required for industrial expansion are predominantly composed of soil classified as high value farmland.

### High Value Farmland and Soil Capability

State law requires that, among the Fourth Priority land, “higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.” The capability classification system pertains to agricultural land, while the cubic foot site classification system pertains to forest land. Since none of the remaining land under consideration is designated for Forest, the forestry classification of cubic foot site is not applicable in this analysis.

There are several components to the “soil capability classification system.” The USDA (through the Natural Resources Conservation Service or “NRCS”) has categorized all the nation’s soil types into eight general capability classifications. At that macro level, “Class I” soil types have the highest agricultural capability and “Class VIII” soil types have the lowest. The NRCS recognizes that these classifications are only an “indicator” of soil value, however. For purposes of Oregon’s land use program, DLCD classifies the most productive agricultural soils in Oregon as “high value farmland.” The Agricultural Land Rule (OAR 660-033) specifies the way in which “high value farmland” is to be identified<sup>1</sup>. Eugene is situated in the Willamette Valley which includes large areas of high value farmland, many of which carry a Class III or Class IV general classification on a national level.

The (pre-2016) OARs that apply to Eugene’s UGB expansion do not include any direction regarding the statutory requirement that “higher priority shall be given to land of lower capability as measured by the capability classification system.” DLCD’s new UGB administrative rules (2016) provide some direction for

---

<sup>1</sup> As applicable to Eugene’s expansion area, OAR 660-033-0020(8)(a) defines "High-Value Farmland" as: “land in a tract [OAR 660-033-0020 (14) “Tract” means one or more contiguous lots or parcels under the same ownership] composed predominantly of soils that are: (A) Irrigated and classified prime, unique, Class I or II; or (B) Not irrigated and classified prime, unique, Class I or II. \* \* \* and (c) . . . tracts composed predominantly of the following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils: (A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill; (B) Subclassification IIIw, specifically, Concord, Conser, Cornelius Variant, Dayton (thick surface) and Sifton (occasionally flooded); (C) Subclassification IVe, specifically, Bellpine Silty Clay Loam, Carlton, Cornelius, Jory, Kinton, Latourell, Laurelwood, Powell, Quatama, Springwater, Willakenzie and Yamhill; and (D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.”

cities and counties in terms of how the classification system should be used to prioritize potential expansion areas. Cities that fall under the new UGB expansion rules at OAR 660-024-0067 are explicitly required to prioritize in terms of “farm land that is not predominantly high-value farm land” versus “agricultural land that is predominantly high-value farmland.” While the current UGB expansion for Eugene and Lane County are not subject to this new rule, the rule demonstrates the significance of Oregon’s “high value farmland” in terms of prioritizing land under the capability classification system.

**Soil Analysis Tables**

The following tables show the specific soil makeup<sup>2</sup> of each of the twenty-two sites and the tax lots that they are in that were sufficiently unconstrained and had the needed site characteristics to be considered potential candidate sites for meeting the City’s industrial need. The tables include percentage and acreage of the tax lot for each soil type description, what the NRCS agricultural soil class is for that soil type, and whether that type is considered high value farmland. The soil analysis is organized by candidate site as identified in the Industrial Expansion Study. In two instances (Site P4.7k and Site P4.8l) a site is composed of two tax lots, which are analyzed as a single unit. In two other instances (Site P4.7b/P4.7e and Site P4.7c/P4.7d) a single tax lot contains two distinct sites that are created by development constraints. In this case the tax lot analysis is presented once, with the notation that it applies to both sites.

Although the analysis of the suitability of candidate sites excludes constrained portions of tax lots, this analysis includes the entire tax lot (or tax lots) in question. This inclusion reflects the acknowledgement that although constrained portions of a tax lot may not be suitable for industrial development, they would nevertheless be included in the expansion, and thereby removed from agricultural use. These tables show that all twenty-two (22) tax lots under consideration as potential candidate sites for expansion are predominantly (and in most cases exclusively) composed of soil classified as high value farmland.

**Site P4.6a: Soil Classification**

Map & Taxlot# 17-04-30-00-00801

| Soil Type Description               | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|-------------------------------------|-------------|-------|-------------------|---------------------|
| Willakenzie clay loam, 2-12% slopes | 3%          | 0.60  | 3                 | Yes                 |
| Dayton silt loam, clay substratum   | 97%         | 19.30 | 4                 | Yes                 |

<sup>2</sup> All soil analysis information was drawn from the Regional Land Information Database of Lane County (RLID)

**Site P4.6b: Soil Classification**

Map &amp; Taxlot# 17-04-30-00-00800

| Soil Type Description               | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|-------------------------------------|-------------|-------|-------------------|---------------------|
| Willakenzie clay loam, 2-12% slopes | 32%         | 6.34  | 3                 | Yes                 |
| Pengra silt loam, 1-4 % slopes      | 1%          | 0.20  | 3                 | No*                 |
| Dayton silt loam, clay substratum   | 67%         | 13.27 | 4                 | Yes                 |

\* Pengra silt loam is considered high value farmland only when drained. This area is noted as "somewhat poorly drained"

**Site P4.6c: Soil Classification**

Map &amp; Taxlot# 17-04-31-00-00200

| Soil Type Description                  | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--|-------------|-------|-------------------|---------------------|
| Pengra silt loam, 1-4 % slopes         | 7%          | 2.36  | 3                 | No*                 |
| Bellpine silty clay loam, 3-12% slopes | 1%          | 0.34  | 3                 | Yes                 |
| Dayton silt loam, clay substratum      | 92%         | 31.00 | 4                 | Yes                 |

\* Pengra silt loam is considered high value farmland only when drained. This area is noted as "somewhat poorly drained"

**Site P4.6d: Soil Classification**

Map &amp; Taxlot# 17-04-31-00-00400

| Soil Type Description                   | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|---|-------------|-------|-------------------|---------------------|
| Pengra silt loam, 1-4 % slopes          | 30%         | 6.87  | 3                 | No*                 |
| Bellpine silty clay loam, 12-20% slopes | 16%         | 3.66  | 3                 | Yes                 |
| Bellpine silty clay loam, 3-12% slopes  | 14%         | 3.21  | 3                 | Yes                 |
| Dayton silt loam, clay substratum       | 40%         | 9.16  | 4                 | Yes                 |

\* Pengra silt loam is considered high value farmland only when drained. This area is noted as "somewhat poorly drained"

**Site P4.7a: Soil Classification**

Map & Taxlot# 17-04-08-00-01000

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 6%          | 5.07  | 1                 | Yes                 |
| Salem gravelly silt loam | 56%         | 47.32 | 2                 | Yes                 |
| Bashaw clay              | 39%         | 32.96 | 4                 | Yes                 |

**Site P4.7b/P4.7e: Soil Classification**

Map & Taxlot# 17-04-08-00-02400

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 10%         | 11.36 | 1                 | Yes                 |
| Salem gravelly silt loam | 59%         | 67.02 | 2                 | Yes                 |
| Conser silty clay loam   | 1%          | 1.14  | 3                 | Yes                 |
| Bashaw clay              | 23%         | 26.13 | 4                 | Yes                 |
| Awbrig silty clay loam   | 8%          | 9.09  | 4                 | Yes                 |

**Site P4.7c/P4.7d: Soil Classification**

Map & Taxlot# 17-04-09-20-00800

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 33%         | 12.80 | 1                 | Yes                 |
| Salem gravelly silt loam | 15%         | 5.82  | 2                 | Yes                 |
| Coburg silty clay loam   | 4%          | 1.55  | 2                 | Yes                 |
| Bashaw clay              | 45%         | 17.46 | 4                 | Yes                 |
| Awbrig silty clay loam   | 3%          | 1.16  | 4                 | Yes                 |

**Site P4.7f: Soil Classification**

Map & Taxlot# 17-04-09-20-01300

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 13%         | 5.20  | 1                 | Yes                 |
| Salem gravelly silt loam | 46%         | 18.40 | 2                 | Yes                 |
| Coburg silty clay loam   | 4%          | 1.60  | 2                 | Yes                 |
| Bashaw clay              | 37%         | 14.80 | 4                 | Yes                 |

**Site P4.7g: Soil Classification**

Map &amp; Taxlot# 17-04-09-00-01100

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 9%          | 3.39  | 1                 | Yes                 |
| Coburg silty clay loam   | 29%         | 10.93 | 2                 | Yes                 |
| Salem gravelly silt loam | 19%         | 7.16  | 2                 | Yes                 |
| Bashaw clay              | 32%         | 12.06 | 4                 | Yes                 |
| Awbrig silty clay loam   | 11%         | 4.15  | 4                 | Yes                 |

**Site P4.7h: Soil Classification**

Map &amp; Taxlot# 17-04-09-00-01200

| Soil Type Description      | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|----------------------------|-------------|-------|-------------------|---------------------|
| Malabon-Urban land complex | 30%         | 4.02  | 1                 | Yes                 |
| Coburg silty clay loam     | 3%          | 0.40  | 2                 | Yes                 |
| Awbrig silty clay loam     | 66%         | 8.84  | 4                 | Yes                 |

**Site P4.7i: Soil Classification**

Map &amp; Taxlot# 17-04-09-00-02400

| Soil Type Description      | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|----------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam    | 20%         | 8.86  | 1                 | Yes                 |
| Malabon-Urban land complex | 1%          | 0.44  | 1                 | Yes                 |
| Coburg silty clay loam     | 40%         | 17.72 | 2                 | Yes                 |
| Salem gravelly silt loam   | 7%          | 3.10  | 2                 | Yes                 |
| Awbrig silty clay loam     | 31%         | 13.73 | 4                 | Yes                 |

**Site P4.7j: Soil Classification**

Map &amp; Taxlot# 17-04-09-00-02500

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 32%         | 9.79  | 1                 | Yes                 |
| Coburg silty clay loam   | 16%         | 4.90  | 2                 | Yes                 |
| Salem gravelly silt loam | 5%          | 1.53  | 2                 | Yes                 |
| Bashaw clay              | 32%         | 9.79  | 4                 | Yes                 |
| Awbrig silty clay loam   | 15%         | 4.59  | 4                 | Yes                 |

**Site P4.7k: Soil Classification**

Map & Taxlot# 17-04-09-00-02501 and 17-04-09-00-02502

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 0%          | 0.00  | 1                 | Yes                 |
| Salem gravelly silt loam | 0%          | 0.00  | 2                 | Yes                 |
| Bashaw clay              | 0%          | 0.00  | 4                 | Yes                 |

**Site P4.7l: Soil Classification**

Map & Taxlot# 17-04-09-00-02700

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 44%         | 17.64 | 1                 | Yes                 |
| Salem gravelly silt loam | 26%         | 10.43 | 2                 | Yes                 |
| Coburg silty clay loam   | 12%         | 4.81  | 2                 | Yes                 |
| Awbrig silty clay loam   | 12%         | 4.81  | 4                 | Yes                 |
| Bashaw clay              | 6%          | 2.41  | 4                 | Yes                 |

**Site P4.7m: Soil Classification**

Map & Taxlot# 17-04-17-00-00400

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 5%          | 2.01  | 1                 | Yes                 |
| Salem gravelly silt loam | 37%         | 14.84 | 2                 | Yes                 |
| Oxley gravelly silt loam | 12%         | 4.81  | 3                 | No                  |
| Conser silty clay loam   | 3%          | 1.20  | 3                 | Yes                 |
| Bashaw clay              | 42%         | 16.84 | 4                 | Yes                 |

**Site P4.7n: Soil Classification**

Map & Taxlot# 17-04-17-00-00500

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Malabon silty clay loam  | 8%          | 5.09  | 1                 | Yes                 |
| Salem gravelly silt loam | 20%         | 12.72 | 2                 | Yes                 |
| Oxley gravelly silt loam | 5%          | 3.18  | 3                 | No                  |
| Conser silty clay loam   | 3%          | 1.91  | 3                 | Yes                 |
| Bashaw clay              | 65%         | 41.34 | 4                 | Yes                 |

**Site P4.8g: Soil Classification**

Map & Taxlot# 17-04-05-00-00400

| Soil Type Description  | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|------------------------|-------------|-------|-------------------|---------------------|
| Coburg silty clay loam | 45%         | 38.07 | 2                 | Yes                 |
| Awbrig silty clay loam | 55%         | 46.53 | 4                 | Yes                 |

**Site P4.8h: Soil Classification**

Map & Taxlot# 17-04-05-00-00900

| Soil Type Description    | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|--------------------------|-------------|-------|-------------------|---------------------|
| Coburg silty clay loam   | 46%         | 27.32 | 2                 | Yes                 |
| Salem gravelly silt loam | 5%          | 3.04  | 2                 | Yes                 |
| Awbrig silty clay loam   | 44%         | 26.71 | 4                 | Yes                 |
| Bashaw clay              | 5%          | 3.04  | 4                 | Yes                 |

**Site P4.8k: Soil Classification**

Map & Taxlot# 16-04-33-00-01006

| Soil Type Description  | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|------------------------|-------------|-------|-------------------|---------------------|
| Coburg silty clay loam | 66%         | 15.18 | 2                 | Yes                 |
| Awbrig silty clay loam | 34%         | 7.82  | 4                 | Yes                 |

**Site P4.8l: Soil Classification**

Map & Taxlot# 16-04-33-00-01000 and 16-04-33-00-01004

| Soil Type Description  | % of Taxlot | Acres | Agriculture Class | High Value Farmland |
|------------------------|-------------|-------|-------------------|---------------------|
| Coburg silty clay loam | 79%         | 19.55 | 2                 | Yes                 |
| Awbrig silty clay loam | 21%         | 5.05  | 4                 | Yes                 |

## Addendum to UGB Expansion Analysis for Employment Land

Through the City of Eugene UGB Expansion Analysis for Employment Land, the City evaluated the area around the current UGB to identify sites that could meet the City’s need for additional industrial land. The City’s need is for eleven (11) total sites, including:

- Two (2) industrial sites of 75 acres or larger
- Three (3) industrial sites of between 50 and 75 acres
- Two (2) industrial sites of between 20 and 50 acres
- Four (4) industrial sites of between 10 and 20 acres

The UGB Expansion Analysis for Employment Land concluded that sites of this size with the characteristics needed could best be accommodated in the Clear Lake area, between the current UGB and Eugene Airport. This area also includes land to meet the City’s need for additional school and park land. The tax lots in this area could be assembled in multiple combinations to meet the identified industrial need. Regardless of configuration, some sites of less than 10 acres in size, in addition to the identified need for 11 large sites, are necessarily included in the expansion area to avoid having islands of rural land inside the UGB.<sup>1</sup> In addition, as noted in the Employment Land Supply Study, efficiency measures applied to address commercial land need and public uses on existing industrial land have created a small deficit (26 acres) of industrial sites under 10 acres. This deficit is accommodated by sites that must be brought into the UGB to meet the large lot industrial need.

After reaching the general conclusion of the UGB Expansion Analysis for Employment Land, the City of Eugene engaged in additional analysis and planning in order to preserve the ability of the Clear Lake expansion area to provide the needed portfolio of large industrial lots. This additional analysis examined future services and environmental considerations throughout the Clear Lake expansion area. This Addendum summarizes that analysis and provides a more detailed conclusion to preserve the Clear Lake area for development of the large lot portfolio.

### **Initial Constraint Analysis**

In the UGB Expansion Analysis for Employment Land, land with the following constraints was dismissed as unsuitable for industrial development:

- Land that has a slope of 5 percent or greater
- Land within a Special Flood Hazard Areas (SFHA) (aka floodplain)
- Land subject to Statewide Planning Goal 5 protections
- Tax lots committed to a use or development that is not reasonably likely to be discontinued during the planning period, making industrial redevelopment highly unlikely during planning period

The map below, “Development Constraints within Industrial Expansion Area,” shows the extent of those constraints in the thirteen (13) large tax lots, and eleven (11) small tax lots filling in the spaces between (including one partial tax lot and one small tax lot identified for inclusion in the UGB through the UGB

---

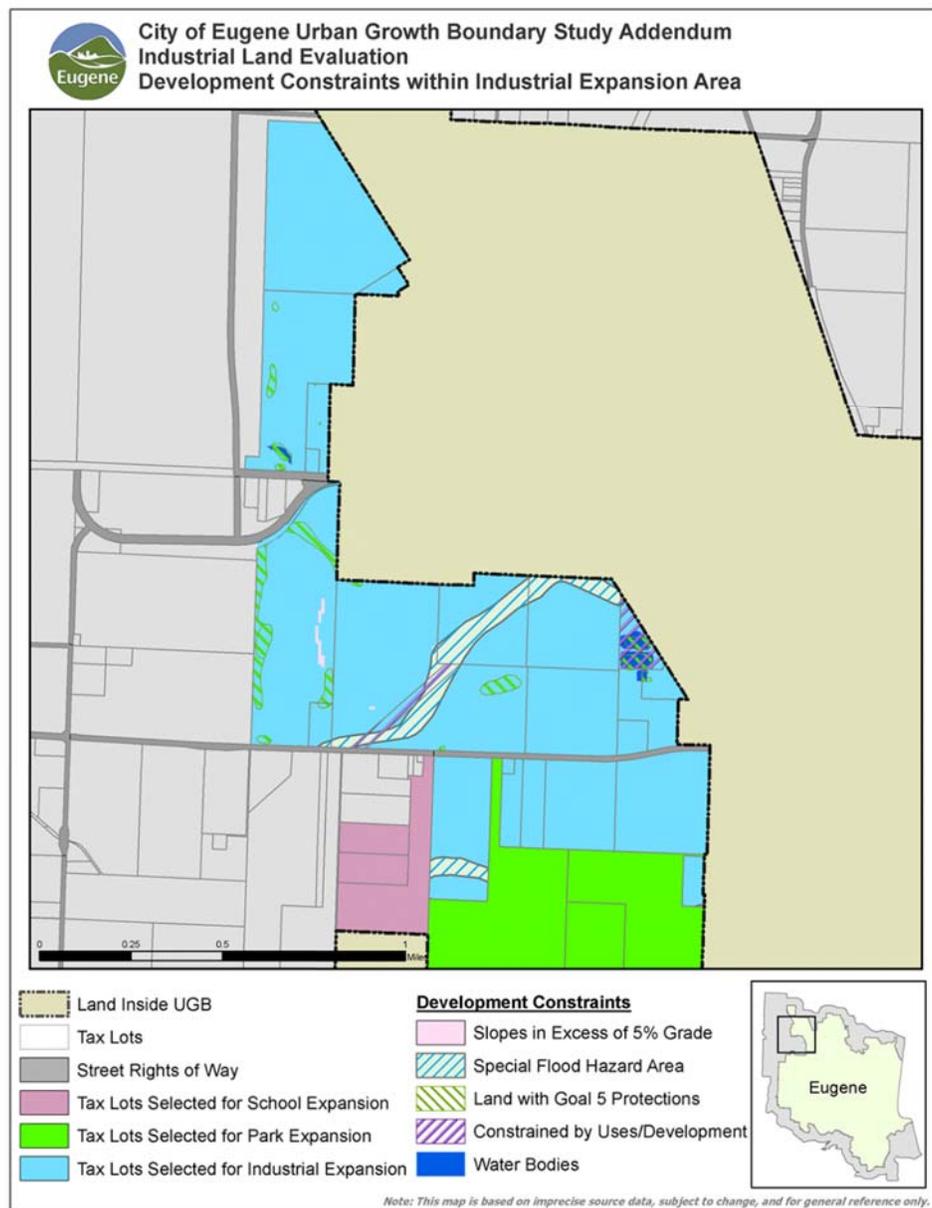
<sup>1</sup> For a map of these small sites, see the “Contiguous Industrial Expansion Area” map in Section 2.g.5 of the UGB Expansion Analysis for Employment Land.

Expansion Analysis for Park Land). Only two tax lots include any slope in excess of 5%, which constrains only very small areas.

The Special Flood Hazard Area (commonly known as the floodplain or 100-year floodplain) crosses the expansion area in two places. The larger area crosses from Clear Lake Road northeast to the current UGB, bisecting two tax lots, and constraining the northern portion of a third. The smaller area bisects a single industrial tax lot south of Clear Lake Road, with more significant impact on the school and park expansion areas.

The third constraint is land subject to Statewide Planning Goal 5 protections. The areas shown as “land with Goal 5 protections” on the map below are identified by Lane County for Goal 5 protection, based solely on their inclusion on the National Wetlands Inventory.

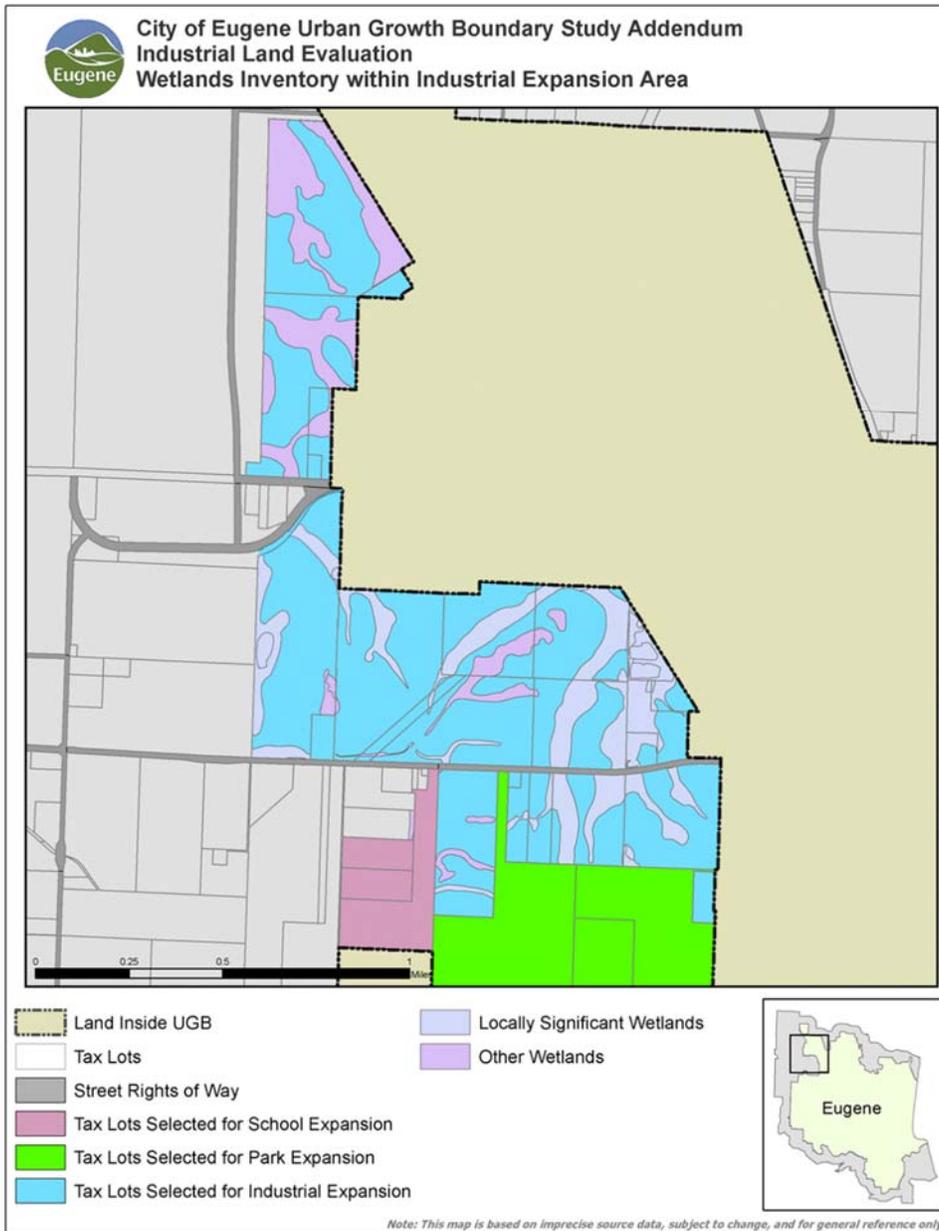
In response to concerns that the area likely has additional wetlands that could complicate development of the area for industrial uses, the City of Eugene conducted a more detailed analysis of the wetlands in the Clear Lake expansion area. The City contracted with Pacific Habitat Services, Inc. (PHS) to conduct a thorough wetlands inventory of the area, including the school and park expansion areas, and to identify which of those wetlands are “significant.” The City of Eugene then contracted with Winterbrook Planning to prepare a “Goal 5 ESEE (Economic, Social, Environmental, and Energy) Analysis for Significant Wetlands and Riparian Corridors” (Winterbrook, 2016). This ESEE analysis formed the basis for shifting from Lane County’s Goal 5 protections to a Eugene-specific program (upon adoption of the UGB), discussed in more detail below.



The fourth constraint evaluated in the Industrial Expansion Study was for tax lots committed to a use or development that is not reasonably likely to be discontinued during the planning period, making industrial redevelopment highly unlikely during planning period. Two small tax lots in the expansion area are constrained by such uses, including an electric transmission right-of-way owned by the Bonneville Power Administration and a property owned by the Oregon Department of Transportation that contains large ponds.

**Updated Wetlands Inventory and Goal 5 ESEE Analysis**

As noted above, instead of continuing to rely on the National Wetlands Inventory, the City of Eugene



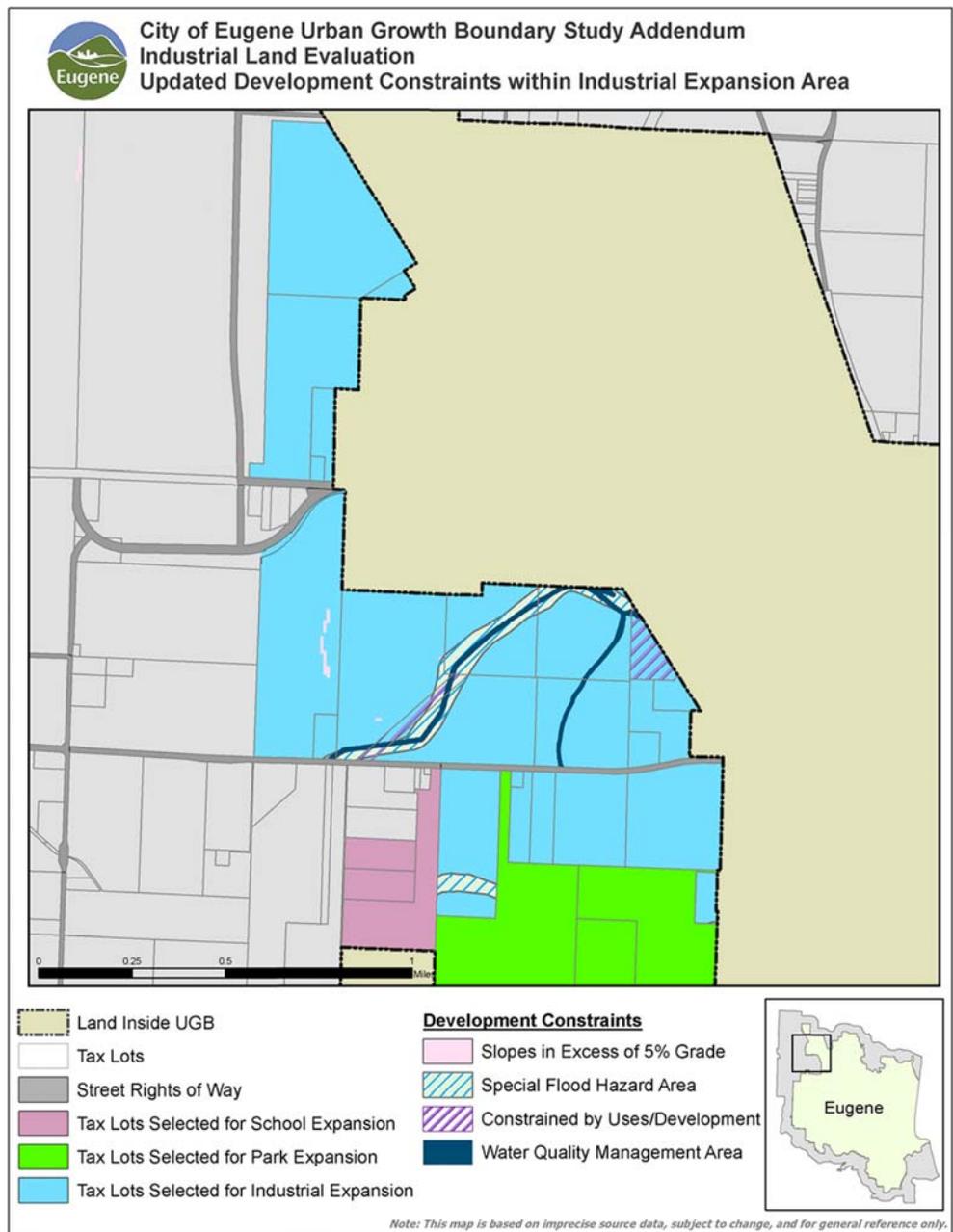
conducted a new analysis of the wetlands in the Clear Lake expansion area. In preparing the local Goal 5 determination of the wetlands and riparian corridors in the expansion area, the City of Eugene relied on an inventory of wetlands and an assessment of the wetlands for their “significance” under Statewide Planning Goal 5, both produced by Pacific Habitat Services, Inc. entitled “City of Eugene Local Wetlands Inventory – Clear Lake Area UGB Expansion” (May 2014). These are shown on the map, “Wetlands Inventory within Industrial Expansion Area.” This served as a foundation for a Goal 5 ESEE analysis of the consequences of local Goal 5 programs for full protection, limited protection, and no local protection of the wetlands.<sup>2</sup>

<sup>2</sup> The “ESEE analysis” required by the State’s Goal 5 regulations is different from the “EES analysis” required by Statewide Planning Goal 14.

These protection options also take into account that certain regulations and protections exist for wetlands beyond the local level. Both the Oregon Department of State Lands and national regulations play a role in determining whether a wetland can be filled, and if so, what mitigation may be required. Local protections of wetlands and other natural resources simply augment other regulations.

Those wetlands determined to be “significant” by Pacific Habitat Services, Inc. were identified as such based on their water quality or hydrological functions, not from fish and wildlife habitat values. In other regards, these wetlands are considerably degraded from agricultural activities in the area over the past several decades. Therefore, the ESEE analysis (to determine the appropriate level of Goal 5 protection for the significant wetlands) resulted in a decision to apply no local Goal 5 protections when the land is added to the Eugene UGB. Instead, wetlands in the area (regardless of local “significance”) will continue to be subject to State

and federal wetland protections. Key water quality functions of specific wetlands will be protected through the City’s application of its /WQ water quality management overlay zone. The decision to apply no local Goal 5 protections to these degraded wetlands reflects the balance of the environmental and economic impacts of seeking industrial sites further from the UGB in order to protect relatively low-value wetlands in this area. The map “Updated Development Constraints within Industrial Expansion Area” reflects this more in-depth look and determination about Goal 5 protections, with updated development constraints, including the water quality management area. (The Water Quality Overlay

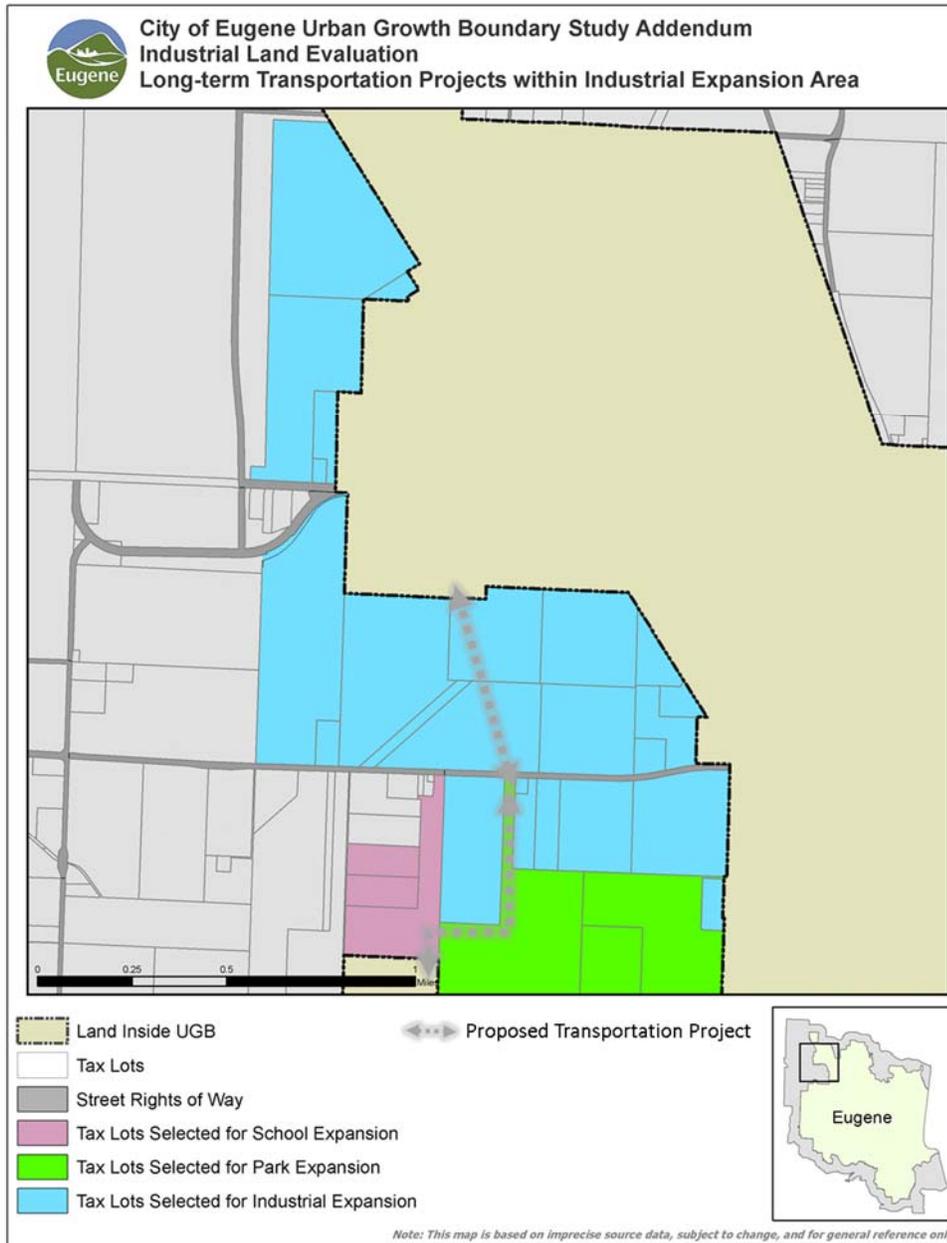


Zone does include some limitations on development, so the areas that will receive that overlay zone are added to the constraints map.)

**Transportation Improvements**

In addition to these existing constraints to development, the City of Eugene has engaged in some preliminary planning for the types of transportation improvements that may be needed to better serve this new industrial area. One proposed transportation project would impact the buildable land in the Clear Lake large lot portfolio of industrial land. This project is an extension of Terry Street from its current terminus at the school expansion site north to the current UGB. The specific route for this extension is yet to be determined, and will be based on local planning efforts with residents and businesses in the area as development occurs. The extension will likely occur in phases, first connecting

Terry Street to Clear Lake Road, then completing the connection at a later time. The map below, “Long-term Transportation Projects within Industrial Expansion Area” shows a possible path for the street extension.

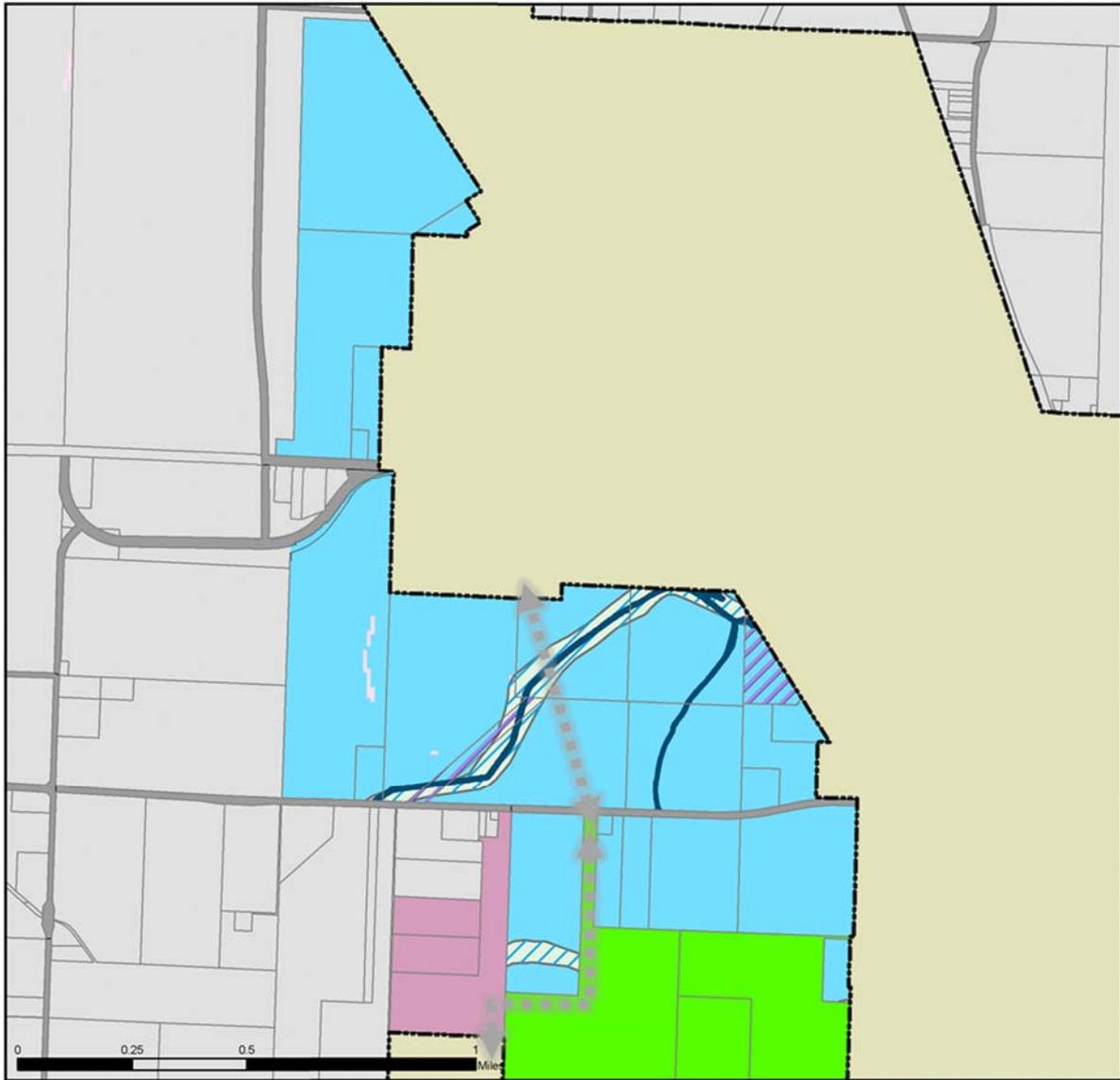


**Large Lot Accommodation**

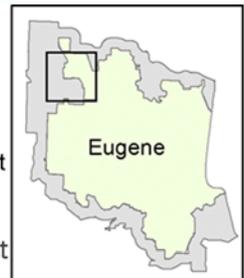
The impacts described above should be taken into account as the City identifies strategies for preserving this area to accommodate the 11 sites needed, in the various size categories listed above. The City refers to this as its “large lot industrial portfolio.” The impacted areas are shown together in the map “Large Industrial Lot Considerations.”



# City of Eugene Urban Growth Boundary Study Addendum Industrial Land Evaluation Large Industrial Lot Considerations



- |  |                                 |
|--|---------------------------------|
| Land Inside UGB                            | <b>Development Constraints</b>  |
| Tax Lots                                   | Slopes in Excess of 5% Grade    |
| Street Rights of Way                       | Special Flood Hazard Area       |
| Tax Lots Selected for School Expansion     | Constrained by Uses/Development |
| Tax Lots Selected for Park Expansion       | Water Quality Management Area   |
| Tax Lots Selected for Industrial Expansion | Proposed Transportation Project |



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

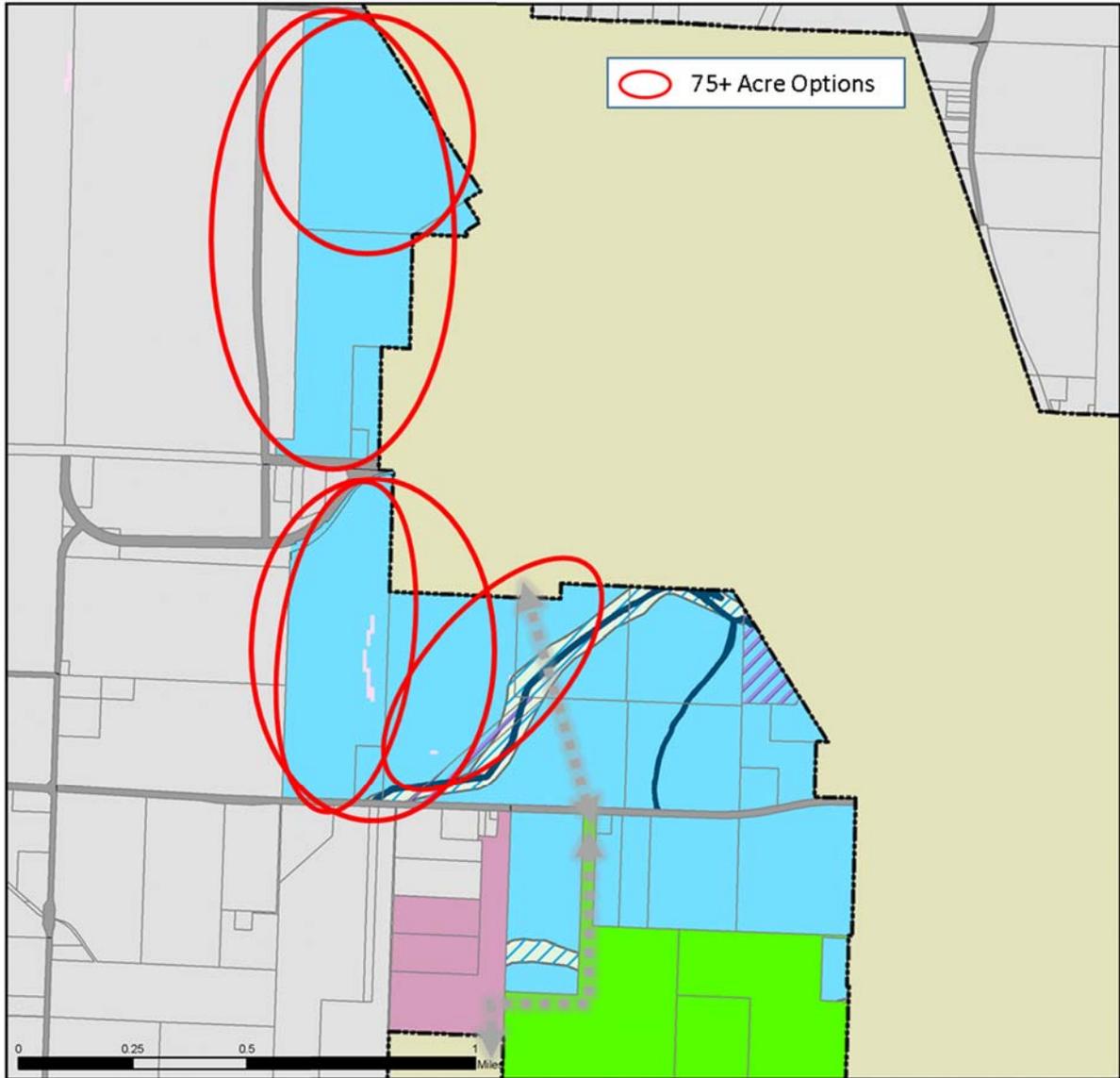
Some of the tax lots in the Clear Lake expansion area are large enough to accommodate even the largest needed site (a site of more than 75 acres), while others would need to be assembled with another tax lot to achieve the needed size. As determined in Part II of the Employment Land Supply Study (the Economic Opportunities Analysis), the need to assemble tax lots adds to the cost and complexity of development, particularly when more than two tax lots need to be assembled. This complication can make an otherwise viable development infeasible. Taking this consideration into account, both the Industrial Expansion Study and this Addendum only consider sites that are composed of one or two tax lots.

The City of Eugene cannot require private property owners to buy, sell, or otherwise combine tax lots. With that limitation in mind, the full range of possible ways to accommodate the large lot portfolio in the Clear Lake expansion area is explored in this Addendum, acknowledging that market forces will have a significant impact on ultimate development decisions. City policy, code and programs will then implement strategies for the preservation of the land to accommodate the large lot portfolio in this expansion area, given the uncertainties. The following four maps show all possible locations for each needed size category of industrial sites, considering the location of the constraints discussed above. The fifth map is a composite of the first four maps.

Given the need to preserve large industrial sites, no tax lot is shown as a candidate for a size category smaller than its unconstrained area. For example, the northernmost tax lot is, by itself, larger than 75 acres. While this tax lot could be divided into smaller sites that also meet a portion of the large lot portfolio, doing so would prevent its use for the largest size category, which is the most difficult category to find. Therefore, this tax lot is only shown as a candidate on the 75+ acre sites map. Because of the tentative nature of the transportation corridor, options that cross potential routes are shown as possible options.



City of Eugene Urban Growth Boundary Study Addendum  
Industrial Land Evaluation  
Large Industrial Lot Considerations: 75+ Acre Sites



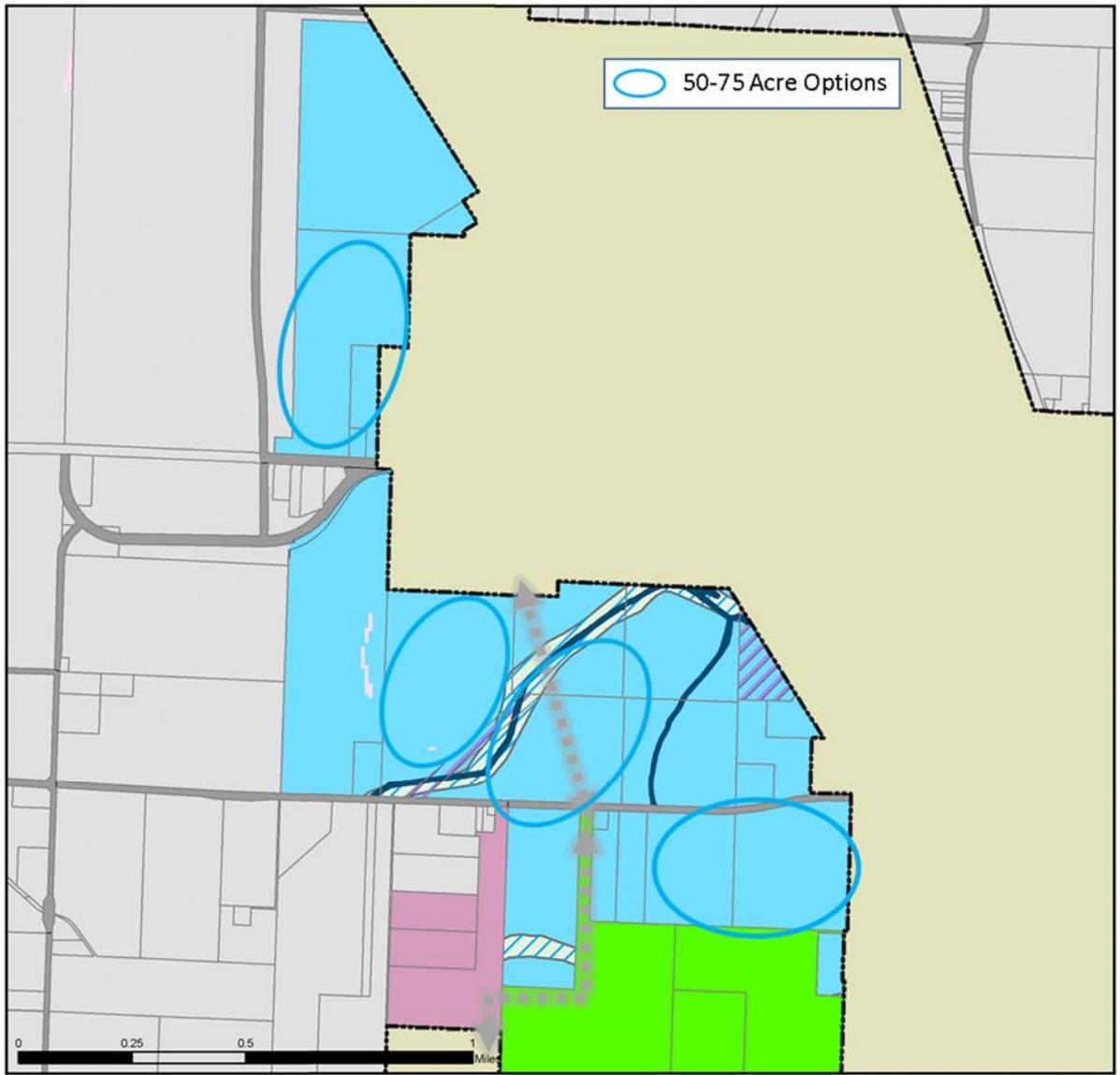
- Land Inside UGB
  - Tax Lots
  - Street Rights of Way
  - Tax Lots Selected for School Expansion
  - Tax Lots Selected for Park Expansion
  - Tax Lots Selected for Industrial Expansion
- Development Constraints**
- Slopes in Excess of 5% Grade
  - Special Flood Hazard Area
  - Constrained by Uses/Development
  - Water Quality Management Area
  - Proposed Transportation Project



Note: This map is based on imprecise source data, subject to change, and for general reference only.



**City of Eugene Urban Growth Boundary Study Addendum  
Industrial Land Evaluation  
Large Industrial Lot Considerations: 50-75 Acre Sites**



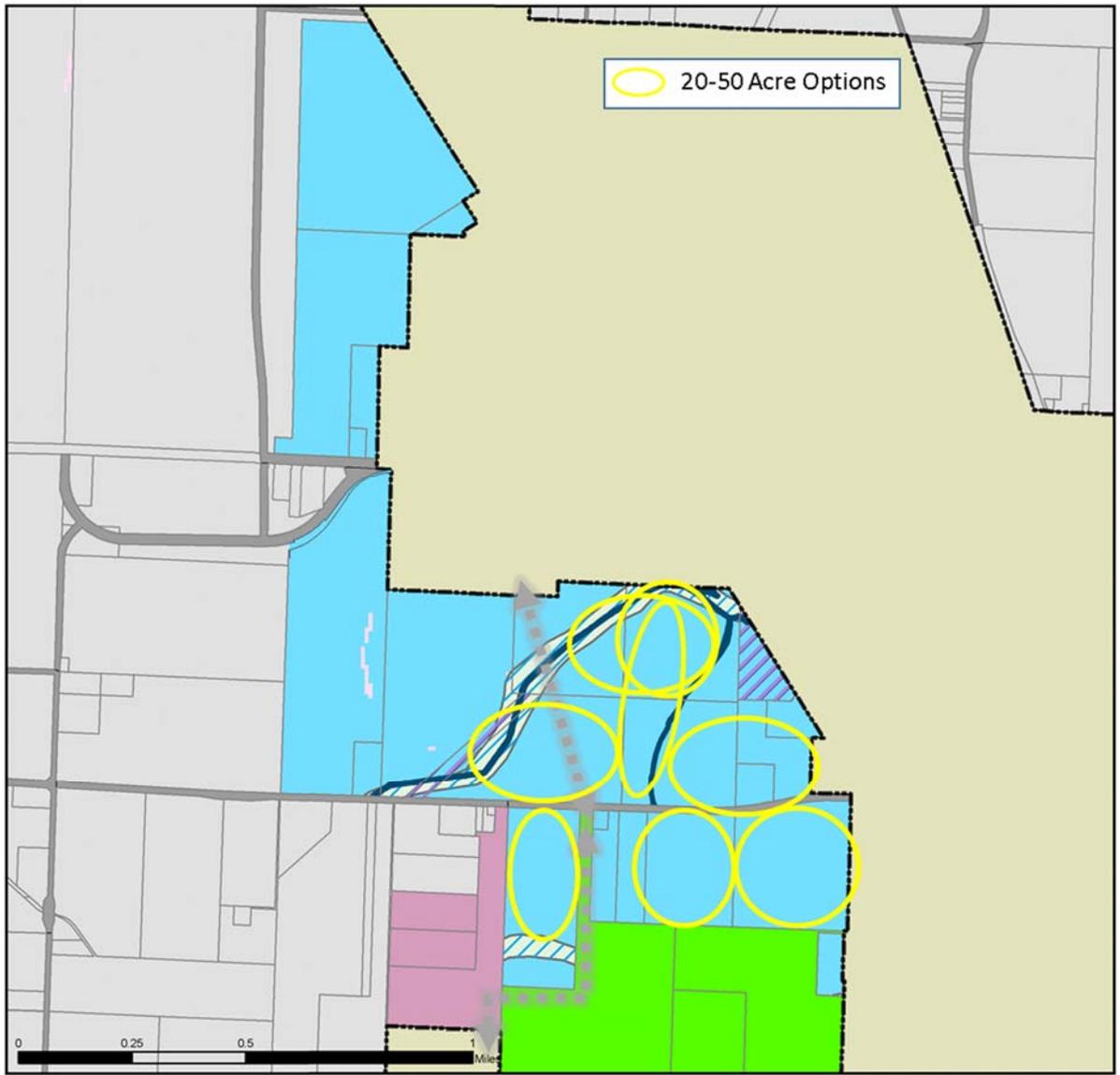
|  |                                 |
|--|---------------------------------|
| Land Inside UGB                            | Slopes in Excess of 5% Grade    |
| Tax Lots                                   | Special Flood Hazard Area       |
| Street Rights of Way                       | Constrained by Uses/Development |
| Tax Lots Selected for School Expansion     | Water Quality Management Area   |
| Tax Lots Selected for Park Expansion       | Proposed Transportation Project |
| Tax Lots Selected for Industrial Expansion |                                 |



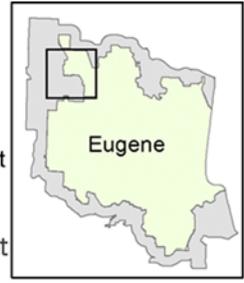
*Note: This map is based on imprecise source data, subject to change, and for general reference only.*



# City of Eugene Urban Growth Boundary Study Addendum Industrial Land Evaluation Large Industrial Lot Considerations: 20-50 Acre Sites



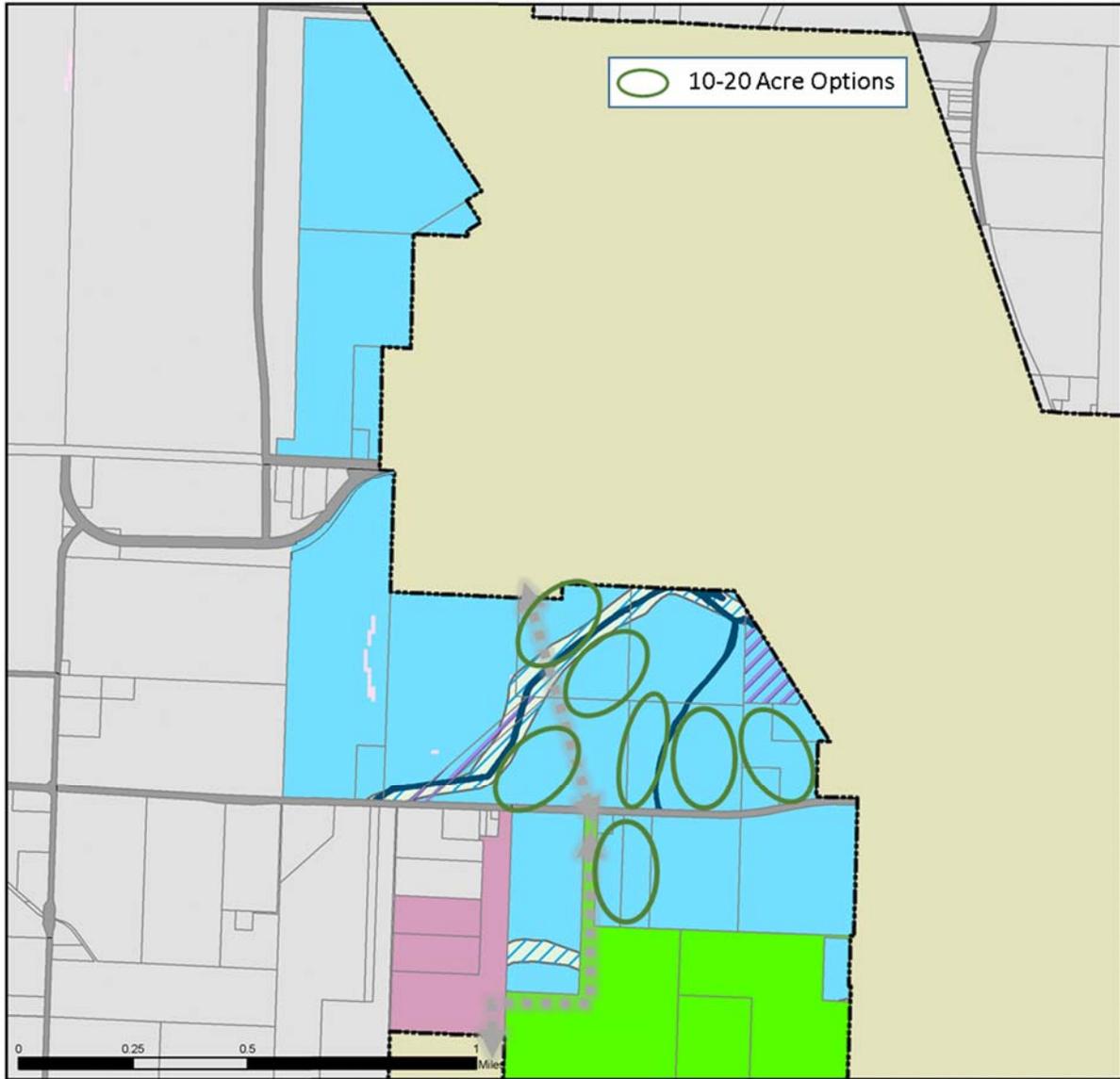
|  |                                 |
|--|---------------------------------|
| Land Inside UGB                            | Slopes in Excess of 5% Grade    |
| Tax Lots                                   | Special Flood Hazard Area       |
| Street Rights of Way                       | Constrained by Uses/Development |
| Tax Lots Selected for School Expansion     | Water Quality Management Area   |
| Tax Lots Selected for Park Expansion       | Proposed Transportation Project |
| Tax Lots Selected for Industrial Expansion |                                 |



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*



**City of Eugene Urban Growth Boundary Study Addendum  
Industrial Land Evaluation  
Large Industrial Lot Considerations: 10-20 Acre Sites**



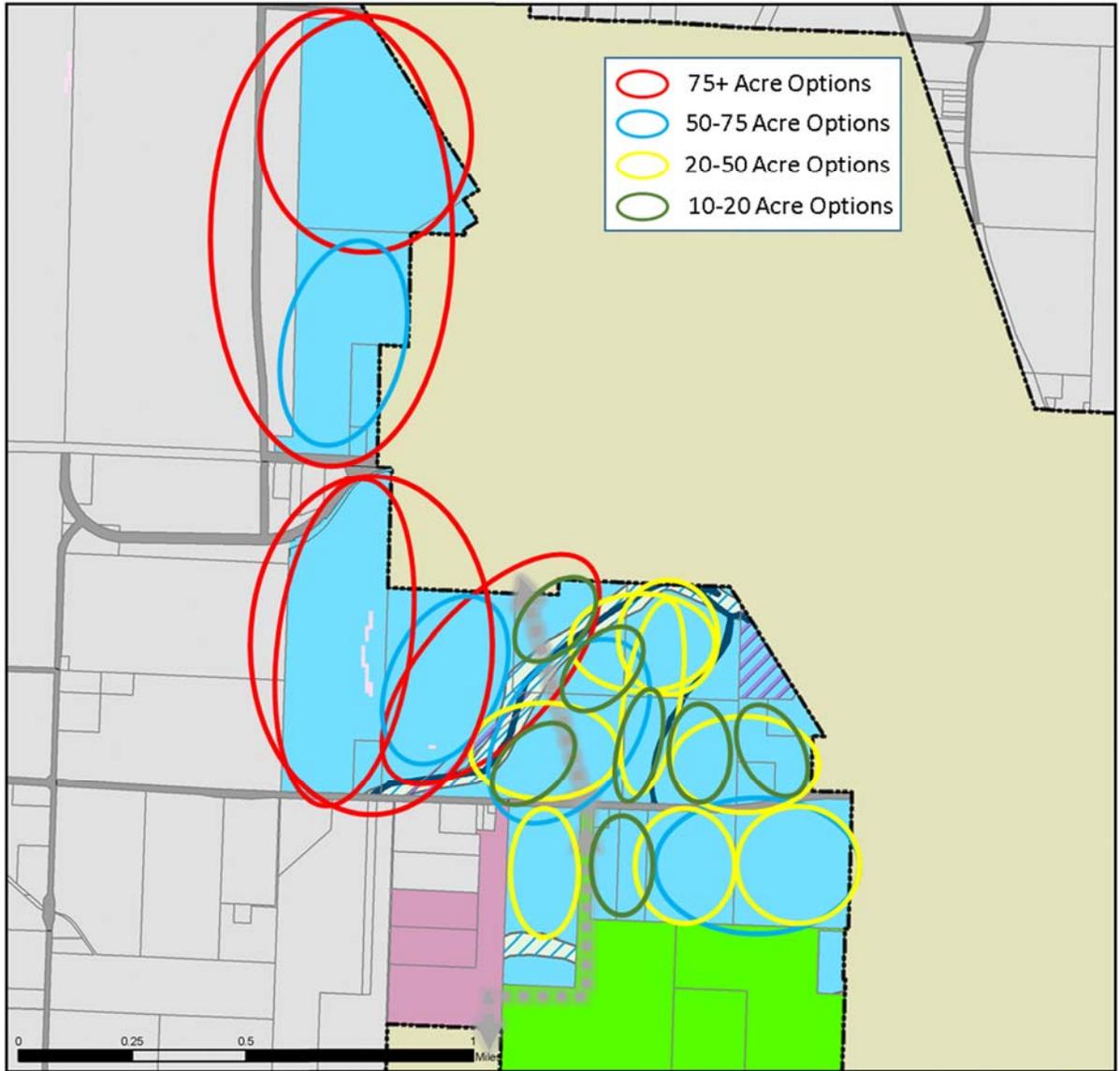
- |  |                                 |
|--|---------------------------------|
| Land Inside UGB                            | <b>Development Constraints</b>  |
| Tax Lots                                   | Slopes in Excess of 5% Grade    |
| Street Rights of Way                       | Special Flood Hazard Area       |
| Tax Lots Selected for School Expansion     | Constrained by Uses/Development |
| Tax Lots Selected for Park Expansion       | Water Quality Management Area   |
| Tax Lots Selected for Industrial Expansion | Proposed Transportation Project |



*Note: This map is based on imprecise source data, subject to change, and for general reference only.*



# City of Eugene Urban Growth Boundary Study Addendum Industrial Land Evaluation Large Industrial Lot Considerations: All Sites



|  |                                 |  |
|--|---------------------------------|--|
| Land Inside UGB                            | <b>Development Constraints</b>  |  |
| Tax Lots                                   | Slopes in Excess of 5% Grade    |  |
| Street Rights of Way                       | Special Flood Hazard Area       |  |
| Tax Lots Selected for School Expansion     | Constrained by Uses/Development |  |
| Tax Lots Selected for Park Expansion       | Water Quality Management Area   |  |
| Tax Lots Selected for Industrial Expansion | Proposed Transportation Project |  |

*Note: This map is based on imprecise source data, subject to change, and for general reference only.*

## **Conclusion**

After further analysis, including conducting a local Goal 5 evaluation and long-range transportation planning for the Clear Lake expansion area, there are multiple possible site configurations to accommodate all needed industrial site sizes. In general, the northwest portion of the area must be preserved for the largest site sizes, while the eastern portion must be preserved for the smaller needed sites. Some tax lots have greater uncertainty than others, particularly those potentially impacted by the future extension of Terry Street. Additionally, while the decision to impose no local Goal 5 protections to the wetlands will allow for filling of some wetlands due to their degraded nature, both the cost of filling wetlands and the requirements of state and federal agencies (which are unknown until a specific development is proposed) may impact the full utilization of the tax lots in this area.<sup>3</sup>

Through a new overlay zone for the Clear Lake expansion area (the /CL Clear Lake Overlay Zone), the land will be preserved to accommodate the large lot industrial portfolio, consistent with the possible configurations set out in this Addendum.

---

<sup>3</sup> For more information about the potential impact of state and national wetland requirements in this area, see Appendix A to the Clear Lake UGB Expansion Area ESEE Analysis.