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February 1, 2010

Mayor Bob Andrews
Newberg City Council
414 E. First Street
Newberg OR 97132

Dear Mayor Andrews and Council members:

Thank you for the opportunity to comment on the draft *Revised Economic Opportunities Analysis (EOA)* and related text amendments to the comprehensive plan. 1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas.

1000 Friends of Oregon and Friends of Yamhill County support efforts to plan for Newberg's future and we maintain a keen interest in the outcome of these efforts.

It is evident that considerable work has gone into the analysis. Nonetheless, we have several concerns regarding the document's underlying assumptions and the resulting conclusions, as well as concerns regarding the technical analysis.

On December 10th, 2009 the Planning Commission took testimony on the draft *Revised Economic Opportunities Analysis (EOA)*, dated November 2009. The Planning Commission considered the matter further at its next meeting scheduled on January 14, 2010 and voted to make significant revisions to the draft presented at the first hearing, including increasing the amount of projected employment growth and increasing the amount of land to accommodate that growth. The draft before you reflects those revisions.

We believe the draft *EOA* overestimates the amount of employment land Newberg will need over the planning period and underestimates the capacity of available lands within the existing UGB to meet those needs. This will result in overexpansion of the urban area.

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Celebrating Thirty-five Years of Innovation

1. TARGETED INDUSTRIAL CLUSTER

Under Goal 9's implementing rules, the estimate of the types and amounts of industrial and other employment uses in the EOA must be based on "what is *likely* to occur in the planning area." (OAR 660-009-015(4); emphasis added).

A key "target" "industry cluster that Newberg has identified as part of its economic strategy is manufacturing.¹ Based on the available data, this is an economic development strategy based more on wishful thinking than on what is likely to occur and, as such, seems doomed to failure.

In the last two years, the local economy has shed thousands of jobs in the worst recession in decades. Manufacturing and other sectors that use industrial land have been particularly hard hit.

The most recent Oregon Employment Division (OED) long-range projections for Regions 2, 3, and 15 project that manufacturing jobs will decline between 2008 and 2018.² They have made no projections of growth in that sector beyond that date.

The draft *EOA* projects that in 2018, Newberg will have less manufacturing jobs than in 2008 and at most, a handful of more jobs overall that utilize industrial space.³

Nonetheless, much of Newberg's economic development strategy relies upon urbanizing a very large block of prime agricultural land to attract new industrial employment. According to the draft *EOA*, the largest component of this new employment on this converted land will be in the manufacturing sector.

The city has announced its intention to pursue an Urban Growth Boundary amendment to bring much of this block of farmland into the UGB, even though there is no demonstrable short-term need for this land, and any long-term demand is, at best, speculative.⁴

This prime farmland is not undeveloped land waiting for urbanization. It is already developed industrial land that supports the leading industry in Yamhill County- agriculture. The agricultural industry is a primary driver of Newberg's economy.

Newberg is located in Yamhill County within 2 or 3 miles of Marion County, Washington County, and Clackamas County. These four counties rank first, fourth, fifth and eight among all Oregon counties in gross farm and ranch sales with over \$1.5 *billion* in direct 2008 receipts.¹ Area farmers provide thousands of jobs, many to Newberg residents, and indirectly support tens of thousands more.

¹ See proposed Comprehensive Plan amendments, Section D.

² Region 2 is Multnomah and Washington Counties, Region 3 is Marion, Yamhill, and Polk Counties, and Region 15 is Clackamas County.

³ Draft EOA, Tables 12-14 and Table 12-18

⁴ The city has been referring to this farmland as the South Industrial Area

The city's proposal would harm the local economy by undercutting the land base that supports this leading industry. If the draft *EOA* is adopted, no one would tile a field, plant an orchard crop, or make any other long-term investments in agricultural production.

2. "REQUIRED" INDUSTRIAL SITE CHARACTERISTICS

Table 12-22 of the draft *EOA* identifies the site suitability characteristics that are supposedly required by the targeted industries identified in Tables 12-19 and 12-20. While *some* of these characteristics may be desirable to *some* of the identified industries, they are by no means requirements. In many respects they appear to be reverse engineered so that the only suitable site is the large block of prime farmland that the city wants to develop as the South Industrial Area. The following "Required Industrial Site Suitability Characteristics" have not been justified:

- Site Size

The draft *EOA* identifies a minimum parcel size of 5 vacant acres for the targeted industries identified in Tables 12-19 and 12-20 unless the site is adjacent to an industrial use or a group of 20 suitable acres, in which case the parcel could be smaller. (Table 12-22)

However, many of the targeted industries can and do locate on much smaller sites, including sites that are not adjacent to another industrial use. Table 12-19 gives many such examples of existing Newberg firms. These include Professional Services, Creative Services, Wineries, and several others. The draft *EOA* does not explain its conclusion that these targeted industries require large sites, except for a footnote stating that:

"Much of this site size need [the 2030 need for approximately 24 acres of very small (under 2 acre) sites and 75 acres of small (2- to 10-acre) sites] can be most efficiently accommodated by master planned business parks."

The *EOA* is thus flawed in two respects. First, it inflates the parcels size allegedly needed by assuming that these targeted industries will only locate together, thereby requiring large parcel(s). Second, it assumes that none of these targeted industries will go into vacant spaces in existing office parks or onto "stand-alone" existing small parcels. Not only is there no evidence to support this, but it is contrary to common sense and observation of how industrial and office parks evolve.

- Proximity to Transportation and Services

The draft *EOA* contends that the targeted industries identified in Tables 12-19 and 12-20 require sites that are either "adjacent to existing industrial areas," or on "an agglomeration of at least 100 new acres to facilitate agglomeration economies and minimize adverse impacts." (Table 12-22)

None of the targeted industries requires a site larger than 50 acres. The draft *EOA* does not explain why any of the targeted industries must be part of an agglomeration of at least 100 acres. To the best of our knowledge, none of the existing industries in Newberg that fall within the targeted industry clusters, including wineries, professional and business services, and Newberg's largest manufacturers, are located within an industrial area totaling at least 100 acres. The *EOA* does not provide evidence that any of the targeted industries requires agglomeration of any size or kind.

The draft *EOA* also contends that the targeted industries identified in Tables 12-19 and 12-20 require sites within 1/8 mile (660 feet) of a major arterial or state highway without travel through non-industrial properties. (Table 12-22). The only roadway classified as a major arterial in Newberg's Transportation Systems Plan (TSP) is Highway 99W, which is also a state highway.

While some of the targeted industries may find such a location desirable, it is *not* required. Most of Newberg's largest existing industrial users, all of whom are in the targeted industry clusters, are not located within 660 feet of a state highway or major arterial. These include, at a minimum, A-dec, SP Newsprint/White Birch, and Ushio. Traffic from many of them, including A-dec and Ushio, passes through non-industrial areas.

The draft *EOA* states that the targeted industries identified in Tables 12-19 and 12-20 require sites that have a connection to I-5 via Highway 219. (Table 12-22).

Any site in Newberg can connect to I-5 via Highway 219. If the city contends that only sites with direct access to Highway 219 meet site requirements this is unjustified. No rationale is provided as to why the targeted industries would require this. As noted above, Newberg's largest manufacturers do not have direct access to Highway 219. For other industrial users, such as wineries, professional services, etc, such a locational requirement seems even more tenuous.

- Topography

The draft *EOA* categorically excludes as unsuitable all sites with slopes greater than 10% and all sites that do not have a developable area that is generally rectangular in shape. (Table 12-22).

The draft *EOA* does not explain why *all* targeted industries require a flat, rectangular site nor why any specific targeted industry requires a flat, rectangular site. While such sites may be generally cheaper to develop and service, many users use sites that do not have these characteristics. The categorical exclusion is not justified

- Compatibility (residential, downtown and resource land)

The draft *EOA* categorically excludes as unsuitable all sites that abut residential neighborhoods on more than 25% of the site perimeter unless buffers are present or planned. (Table 12-22).

The draft *EOA* does not explain why *all* targeted industries require sites that are buffered from residential land. While such buffering may be desirable for certain industries, such as food processing or heavy manufacturing, it is not required or even necessarily desirable for certain other users.

In fact, some of Newberg's largest existing industrial employers within the targeted industry clusters do abut residential neighborhoods, including A-dec, SP Newsprint/White Birch, and Ushio, as do many existing users in the targeted professional and business services sector.

The draft *EOA* also categorically excludes as unsuitable all sites that abut large tracts of agricultural land unless effective buffers are present or planned. (Table 12-22). The draft *EOA* does not explain why all or any targeted industries require sites that are buffered from agricultural land. Of the various urban uses, industrial use is considered to be more compatible with agricultural uses and other urban uses, such as residential, are less compatible with agricultural uses.

The draft *EOA* also categorically excludes as unsuitable any site that will result in truck traffic through downtown. There are several problems with this exclusion.

First, there is no definition here. Is one truck trip a day unacceptable, or does it take 50 trucks a day?

Second, Highway 99W through downtown is classified in the Newberg TSP as a major arterial, intended to "serve truck movements."⁵ The Oregon Highway Plan (OHP) classifies Ore 99W as a freight route through the City of Newberg.⁶ The categorical exclusion of any site that will result in truck traffic through downtown is inconsistent with these adopted and acknowledged plans.

Third, a logical place for industrial development that is higher priority under ORS 197.298 is the area of flat, relatively large parcels in the SW exception area. This area is served by rail. In addition, the Newberg-Dundee bypass is identified in the Newberg TSP as a future improvement. Once the first phase is completed, the bypass will provide an alternate route that avoids downtown for truck traffic originating in this higher priority area.

For all the preceding reasons, the "Required Industrial Site Suitability Characteristics" have not been justified.

3. INDUSTRIAL USES: INTENSIFICATION, REDEVELOPMENT, AND INFILL.

Our testimony to the Planning Commission pointed out the significant amount of employment growth that is typically absorbed through intensification of existing employment uses. This job growth is accommodated on existing developed sites without new development and without redevelopment.

⁵ Newberg TSP, p. 30

⁶ Newberg TSP, p. 41

During the staff response to testimony, Economic Planner David Beam discounted the potential for job growth to be accommodated without physical development or redevelopment occurring, based on his observation that there are very few vacant industrial properties in Newberg. Those comments overlook the reality of how and where significant job creation occurs and how it is accommodated.

In the real world many new jobs are created without land being developed or redeveloped: a processing plant or manufacturer adds staff or even a second shift; laid-off workers are recalled; a restaurant adds additional staff in the dining room and kitchen. None of these involves development or redevelopment of new or existing sites.

The text of Newberg's draft *EOA* recognizes this dynamic and states:

"The data ... includes assumptions that most (55%) of Newberg's future industrial employment will be located on sites 10 acres or less, and that one-third of those future new industrial firms under 10 acres in size, and one-half of firms under 2 acres in size, will find a site through infill redevelopment or intensification of existing employment land uses. (*EOA*, p. 43)"⁷

These stated assumptions are not carried over into the land need calculations.

Newberg projects an additional 1,642 new jobs will use industrial space through 2030.⁸

Table 12-21 allocates projected new industrial employees through 2030 by number of employees, by employees per firm, by site size, and by number of needed sites. The explanatory text states:

"The total land needs equate to approximately 10 employees per developed acre, which reflects the reality that many firms look for sites that allow for future expansion, and is consistent with the site size per employee ratio of many of Newberg's largest industrial employers."⁹

In response to our previous testimony, city staff amended Table 12-21 to add the lines labeled "infill & redevelopment." The amended table is reproduced below:

⁷ Draft *EOA*, p, 45

⁸ Draft *EOA*, p, 41, Table 12-18

⁹ Draft *EOA*, p, 45

Table 12- 21: Site Size Distribution by Firm Employment (2010-2030)

Employees per Firm	Percent of Employment	Number of Employees	Number of Firms	Sites Needed	Size Range (Acres)	Average Site Size (Acres)	Average ROW Need (Acres)	Gross Buildable Acres Needed
0-9	15%	246	41	21	<2	1	0.15	24
				20	infill & redevelopment			0
10 to 74	40%	657	19	13	2 - 10	5	0.75	75
				6	infill & redevelopment			0
75 to 150	15%	246	2	2	10 - 30	20	1.00	42
150+	30%	493	1	1	30 - 50	40	2.00	42
Total	100%	1,642	63	63				183

Source: Winterbrook Planning 2009, Newberg Planning Division

While the table now assigns a number of *sites* to infill and redevelopment, it either does not assign any actual *employment* growth to these sites, or the actual planned employment density is far less than the 10 employees per developed acre claimed in the text, and far less than what Newberg has historically experienced.

The draft *EOA* concludes that 183 gross buildable acres are needed.

If half the 246 employees projected on sites smaller than 2 acres and 1/3 of the employees projected on sites 2-10 acres in size will be accommodated through infill redevelopment or intensification of existing employment land uses, as stated in the draft *EOA*, only 1081 new employees will need new buildable land, not 1642. On 183 acres, this is an employment density of only 5.9 employees per gross buildable acre or 6.5 employees per developed acre.

If *all* 1642 projected new employees are allocated to the new land, then, and only then, will the employment density approximate the 10 employees per developed acre claimed in the text.

Newberg should resolve these inconsistencies in the draft *EOA* and plan for future industrial users to use land *more* efficiently than they have in the past, not *less* efficiently

In addition, it is not clear why the stated assumptions limit refill potential to sites smaller than 10 acres. At least some job growth will also be absorbed through intensification of existing employment uses on larger sites. The draft *EOA* should account for this certainty.

4. DUPLICATIVE ALLOCATION OF JOB GROWTH TO INDUSTRIAL AND OFFICE

For several sectors of projected job growth the draft *EOA* apparently allocates some jobs twice - to both industrial space and to office space. These errors lead to erroneous conclusions regarding land need.

For example, the draft *EOA* projects a total of 76 jobs in the Information sector in 2030. The draft *EOA* allocates 88% of these jobs to Industrial Space (67 jobs) and 90% of these jobs to office space (69 jobs), for a total of 136 jobs, nearly double what is projected.¹⁰

In the Transportation, Warehousing & Utilities sector the draft *EOA* allocates 93% of projected jobs to Industrial Space and 30% to office space.

Projected jobs in the Professional & Business sector and the Other Services sector also appear to be allocated more than once- to both Industrial Space and Office Space.

These errors must be resolved.

5. "REQUIRED" COMMERCIAL SITE CHARACTERISTICS

The draft *EOA* categorically excludes as unsuitable all sites with slopes greater than 10% and all sites that do not have a developable area that is generally rectangular in shape. (Table 12-29).

The draft *EOA* does not explain why new office and retail development requires a flat, rectangular site. While such sites may be generally cheaper to develop and service, many users use sites that do not have these characteristics. The categorical exclusion is not justified.

6. EMPLOYMENT AND POPULATION PROJECTIONS

The employment projections in the draft *EOA* are based upon an assumption that employment in certain sectors will grow by the same rate as Newberg's population and that after 2018, all employment in all sectors will grow by the same rate as Newberg's population.

The draft *EOA* states this was done in accordance with the "safe harbor" provisions of OAR-660-024-0040(9) and also states that the population projections in Newberg's adopted plan have been coordinated with Yamhill County as required by ORS 195.036.

We disagree. To the best of our knowledge, adequate coordination has not occurred.

It is our understanding that the "coordination" with the County to which the city refers is a letter from the County Planning Director that accepts the population projection proposed by the city. In addition, the Board of Commissioners adopted *findings* in support of Newberg's 2006 UGB amendment and its remanded URA proposal that also contained the population projection.

This is not adequate coordination. ORS 195.036 and 195.025 require adoption of a county-wide forecast by the governing body, in this case the Board of Commissioners, not the

¹⁰ Draft *EOA*, Tables 12-14, 12-18, and 12-25

Planning Director. The Board of Commissioners cannot delegate to the Planning Director the authority to coordinate population forecasts on an ad-hoc basis.

OAR 660-024-0030 provides, in part:

“In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.”

To the best of our knowledge, the County has not adopted the forecast into its comprehensive plan or in a document referenced by the plan, as required by OAR 660-024-0030, nor did the County follow the procedures and requirements in ORS 197.610 to 197.650.

In addition, coordination with all other local jurisdictions in the county is also required.¹¹ When it adopted findings in support of Newberg’s 2007 UGB amendment and its remanded URA proposal the County did not provide notice that it was considering adoption of a population forecast nor, to the best of our knowledge, did they provide notice to all other local governments in the county. Finally, to the best of our knowledge, when the city adopted the population forecast into its plan, it also failed to notify the other local governments in the County that it was adopting a population forecast.

For these reasons, we conclude that the city’s population forecast has not been adequately coordinated with the county and other local governments and cannot form the basis for “safe harbor” employment projections.

7. Related Comprehensive Plan Amendments

In addition to the draft *EOA*, the city is also proposing to amend the “Land Need and Supply” section of the comprehensive plan.

These proposed comprehensive plan amendments have not been justified. The proposed amendments that relate to industrial and commercial land have not been justified for the preceding reasons.

The city also proposes to amend the buildable land inventories of Residential, Park, and Institutional land in Table IV-1. The public notice for this hearing makes no mention of amendments to residential, park, and institutional land inventories. No justification or explanation of how they were derived is presented in the staff report or elsewhere in the Council Packet. No findings are proposed in support of their adoption.

¹¹ **195.036 Area population forecast; coordination.** The coordinating body under ORS 195.025 (1) shall establish and maintain a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans, and shall coordinate the forecast with the local governments within its boundary. [1995 c.547 §7 (enacted in lieu of 195.035)]

For these reasons, the proposed amendments to the buildable land inventories of Residential, Park, and Institutional land in Table IV-1 have not been justified.

8. Conclusion

We recognize the considerable work that Newberg has undertaken in producing the Draft *Economic Opportunities Analysis*. Additional work remains and it is our hope that the final product is one we can support.

We hope these comments are helpful in achieving that outcome. Please include them in the official record of these proceedings and notify us of any decisions and/or future hearings in this matter.

Sincerely,

Sid Friedman
1000 Friends of Oregon

Ilsa Perse
Friends of Yamhill County

Cc (electronic): DLCD
Yamhill County Planning Department
Oregon Department of Agriculture

BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON

FRIENDS OF YAMHILL COUNTY,
LEE DOES, AMY DOES, GRACE
SCHAAD, RANEE SOLOMONSSON,
CHERYL MCCAFFREY

Petitioners,

v.

CITY OF NEWBERG

Respondent

LUBA No.: 2010-_____

NOTICE OF INTENT TO APPEAL

I.

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2 Notice is hereby given that the petitioners intend to appeal the land use decision of the
3 respondent entitled "Ordinance No. 2010-2723 -- An Ordinance Adopting the Revised Economic
4 Opportunities Analysis for the City of Newberg and Adopting Associated Comprehensive Plan
5 Amendments." A copy of the decision is attached. The decision was made on February 1, 2010.

6 II.

7 The petitioners are represented by James S. Coon, Swanson Thomas & Coon, 820 SW
8 2nd Ave Ste 200, Portland, OR 97204; phone no. 503-228-5222.

9 III.

10 The respondent's mailing address is 414 E 1st Street, Newberg, OR 97132; phone
11 number 503-538-9421. Its legal counsel is Terrence D. Mahr, 414 E 1st Street, Newberg, OR
12 97132; phone number 503-538-9421.

13 IV.

14 Other persons mailed written notice of the land use decision by the City of Newberg, as
15 indicated by its records, consist of the persons listed in the attachment to this Notice.

1 NOTICE:

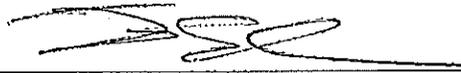
2 Anyone designated in the attachment to this Notice who desires to participate as a party
3 in this case before the Land Use Board of Appeals must file with the Board a Motion to
4 Intervene in this proceeding as required by OAR 661-10-0050.

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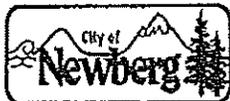
6 DATED: February 22, 2010

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Respectfully submitted,
SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners



ORDINANCE NO. 2010-2723

AN ORDINANCE ADOPTING THE REVISED ECONOMIC OPPORTUNITIES ANALYSIS FOR THE CITY OF NEWBERG AND ADOPTING ASSOCIATED COMPREHENSIVE PLAN AMENDMENTS

RECITALS:

1. The original Economic Opportunities Analysis (EOA) was adopted by City Council in January 2006 by Ordinance 2006-2635. The EOA is considered part of the Comprehensive Plan and implements the goals and policies in Section H. The Economy. Much of the information found in the EOA is statistical and dynamic in nature, including demographic and economic statistics, population and employment projections, and buildable land inventories. Therefore, the EOA is not a static document and is meant to be updated with current information from time to time. Having an updated EOA also ensures the City's compliance with Statewide Planning Goal 9: Economic Development.
2. The updates to the EOA include the following: population, demographic, economic and employment statistics; an economic trends analysis section that looks at national, state and regional trends, regional economic development industry clusters and target industries, Yamhill County agri-business, and regional industrial land availability; a new section that covers an assessment of our community economic development potential; a more robust discussion of Newberg's economic development strategy; and updated buildable land inventories and the addition of maps that illustrate the available industrial and commercial buildable land by area.
3. The Comprehensive Plan document has a small section with population and land supply and need information. Those numbers have changed with the updated EOA and need to also be updated in the Comprehensive Plan document. The Comprehensive Plan amendments also add five new policies to Section H.
4. The Newberg Planning Commission held hearings on December 10, 2009 and January 14, 2010 to consider the request. The Planning Commission passed Resolution 2009-275, recommending that the City Council adopt the revised Economic Opportunities Analysis and the accompanying Comprehensive Plan amendments.
5. After proper notice, the City Council held a hearing on February 1, 2010 to consider the request. The Council finds that the proposal meets the applicable criteria.

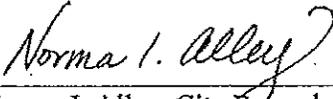
THE CITY OF NEWBERG ORDAINS AS FOLLOWS:

1. The revised Economic Opportunities Analysis, as shown in Exhibit "A", is hereby adopted and by this reference incorporated.
2. The Comprehensive Plan amendments, as shown in Exhibit "B", are hereby adopted and by this reference incorporated.

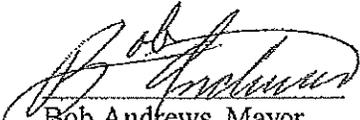
3. The findings in support of this proposal, as shown in Exhibit "C", are hereby adopted and by this reference incorporated.

➤ **EFFECTIVE DATE** of this ordinance is 30 days after the adoption date, which is: March 2, 2010.

ADOPTED by the City Council of the City of Newberg, Oregon, this 1st day of February, 2010, by the following votes: **AYE: 7 NAY: 0 ABSENT: 0 ABSTAIN: 0**


Norma I. Alley, City Recorder

ATTEST by the Mayor this 4th day of February, 2010.


Bob Andrews, Mayor

LEGISLATIVE HISTORY

By and through the Newberg Planning Commission at their 01/14/2010 meeting.

Attachment A

Public Testimony for EOA - written and oral						
Name	Street Address	City	State	Zip	Meeting Date	
Roger Currier	504 Pinehurst Dr	Newberg	OR	97132	12/10/2009	
Grace Schaad	31525 NE Schaad Rd	Newberg	OR	97132	12/10/2009 & 2/1/10	
Vicki Shepherd	30230 NE Benjamin Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
Robert & Dorothy Roholt	31150 NE Schaad Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
Sid Friedman / 1000 Friends of Oregon	189 Liberty St NE	Salem	OR	97301	12/10/09, 1/14/10, 2/1/10	
Ken Wegter	3872 Camishaun Ct NE	Salem	OR	97305	12/10/09 & 2/1/10	
Lee & Dr. Amy Does	10730 NE Renne Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
MaryAnn Tack	1400 Villa Rd	Newberg	OR	97132	12/10/2009	
Marvin Schneider	1159 N Main St	Newberg	OR	97132	01/14/2010	
Craig Markham	22245 NE Ilafem Ln	Dundee	OR	97115	12/10/2009	
Julie Fugate	14500 NE Richard Ln	Newberg	OR	97132	02/01/2010	
Sydney Wermilinger	20895 Arbor Grove Rd NE	St Paul	OR	97137	1/14/10 & 2/1/10	
Lewis Schaad	31655 NE Schaad Rd	Newberg	OR	97132	02/01/2010	
Saj Jivanjee	32230 NE Old Parrett Mt Rd	Newberg	OR	97132	12/10/09 & 2/1/10	

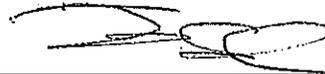
CERTIFICATE OF FILING AND SERVICE

I hereby certify that on February 22, 2010, I filed the original of this **Notice of Intent to Appeal** together with two (2) copies, with the Land Use Board of Appeals, 550 Capitol Street NE, Suite 235, Salem, Oregon 97301-2552, by certified mail.

I also certify that on February 22, 2010, I served a true and correct copy of this **Notice of Intent to Appeal** on the City of Newberg at 414 E 1st Street, Newberg, OR 97132, on Terrence D. Mahr at 414 E 1st Street, Newberg, OR 97132, and on all persons listed in paragraph IV of this Notice (including those persons listed in Attachment A), pursuant to OAR 661-10-0015(2), by first class mail.

DATED: February 22, 2010.

SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners

BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON

FRIENDS OF YAMHILL COUNTY,
LEE DOES, AMY DOES, GRACE
SCHAAD, RANEE SOLOMONSSON,
CHERYL MCCAFFREY

Petitioners,

v.

CITY OF NEWBERG

Respondent

LUBA No.: 2010-____

CERTIFICATE OF FILING

I hereby certify that on February 22, 2010, I filed the original Notice of Intent to Appeal,
together with two copies, with the Land Use Board of Appeals at the following address:

Land Use Board of Appeals
Public Utilities Building
550 Capitol Street, NE, Suite 235
Salem, OR 97301-2552

By United States Postal Service, certified mail/return receipt requested. The proof from the post
office (i.e., receipt of certified mail, with the certified mail number, with the date of mailing
stamped by the United States Postal Service on the receipt) is attached.

DATED: February 22, 2010.

SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2010, I served a true copy of this Notice of Intent to Appeal by first-class mail on:

City of Newberg
414 E 1st Street
Newberg, OR 97132

AND

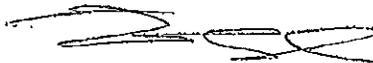
Terrence D. Mahr
414 E 1st Street
Newberg, OR 97132

AND

Each of the parties listed on the notice list attached to the Notice of Intent to Appeal.

DATED: February 22, 2010.

SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners

7007 2560 0001 0947 0675

U.S. Postal Service
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1000 FRIENDS OF OREGON

6866

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	Court Costs				350.00

CHECK DATE	CHECK NO.	PAYEE	DISCOUNTS TAKEN	CHECK AMOUNT
2/22/10	6866	Land Use Board of Appeals		\$350

1000 FRIENDS OF OREGON
 534 SW THIRD AVENUE
 SUITE 300
 PORTLAND, OR 97204-2597
 PH. 503-497-1000

US BANK
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Check Number: 6866

DATE
 Feb 22, 2010
 AMOUNT

Memo: filing fee

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Murphy C. McAuley
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534 SW Third Avenue, Suite 300 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • www.friends.org

Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389

Mid-Willamette Valley Office • 189 Liberty Street NE, Suite 307A • Salem, OR 97301 • (503) 371-7261 • fax (503) 371-7596

Willamette Valley Office • 220 East 11th Avenue, Suite 5 • Eugene, OR 97401 • (541) 520-3763 • fax (503) 575-2416

February 1, 2010

Mayor Bob Andrews
Newberg City Council
414 E. First Street
Newberg OR 97132

Dear Mayor Andrews and Council members:

Thank you for the opportunity to comment on the draft *Revised Economic Opportunities Analysis (EOA)* and related text amendments to the comprehensive plan. 1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas.

1000 Friends of Oregon and Friends of Yamhill County support efforts to plan for Newberg's future and we maintain a keen interest in the outcome of these efforts.

It is evident that considerable work has gone into the analysis. Nonetheless, we have several concerns regarding the document's underlying assumptions and the resulting conclusions, as well as concerns regarding the technical analysis.

On December 10th, 2009 the Planning Commission took testimony on the draft *Revised Economic Opportunities Analysis (EOA)*, dated November 2009. The Planning Commission considered the matter further at its next meeting scheduled on January 14, 2010 and voted to make significant revisions to the draft presented at the first hearing, including increasing the amount of projected employment growth and increasing the amount of land to accommodate that growth. The draft before you reflects those revisions.

We believe the draft *EOA* overestimates the amount of employment land Newberg will need over the planning period and underestimates the capacity of available lands within the existing UGB to meet those needs. This will result in overexpansion of the urban area.

35

Celebrating Thirty-five Years of Innovation

1. TARGETED INDUSTRIAL CLUSTER

Under Goal 9's implementing rules, the estimate of the types and amounts of industrial and other employment uses in the EOA must be based on "what is *likely* to occur in the planning area." (OAR 660-009-015(4); emphasis added).

A key "target" "industry cluster that Newberg has identified as part of its economic strategy is manufacturing.¹ Based on the available data, this is an economic development strategy based more on wishful thinking than on what is likely to occur and, as such, seems doomed to failure.

In the last two years, the local economy has shed thousands of jobs in the worst recession in decades. Manufacturing and other sectors that use industrial land have been particularly hard hit.

The most recent Oregon Employment Division (OED) long-range projections for Regions 2, 3, and 15 project that manufacturing jobs will decline between 2008 and 2018.² They have made no projections of growth in that sector beyond that date.

The draft *EOA* projects that in 2018, Newberg will have less manufacturing jobs than in 2008 and at most, a handful of more jobs overall that utilize industrial space.³

Nonetheless, much of Newberg's economic development strategy relies upon urbanizing a very large block of prime agricultural land to attract new industrial employment. According to the draft *EOA*, the largest component of this new employment on this converted land will be in the manufacturing sector.

The city has announced its intention to pursue an Urban Growth Boundary amendment to bring much of this block of farmland into the UGB, even though there is no demonstrable short-term need for this land, and any long-term demand is, at best, speculative.⁴

This prime farmland is not undeveloped land waiting for urbanization. It is already developed industrial land that supports the leading industry in Yamhill County- agriculture. The agricultural industry is a primary driver of Newberg's economy.

Newberg is located in Yamhill County within 2 or 3 miles of Marion County, Washington County, and Clackamas County. These four counties rank first, fourth, fifth and eight among all Oregon counties in gross farm and ranch sales with over \$1.5 billion in direct 2008 receipts.¹ Area farmers provide thousands of jobs, many to Newberg residents, and indirectly support tens of thousands more.

¹ See proposed Comprehensive Plan amendments, Section D.

² Region 2 is Multnomah and Washington Counties, Region 3 is Marion, Yamhill, and Polk Counties, and Region 15 is Clackamas County.

³ Draft EOA, Tables 12-14 and Table 12-18

⁴ The city has been referring to this farmland as the South Industrial Area

The city's proposal would harm the local economy by undercutting the land base that supports this leading industry. If the draft *EOA* is adopted, no one would tile a field, plant an orchard crop, or make any other long-term investments in agricultural production.

2. "REQUIRED" INDUSTRIAL SITE CHARACTERISTICS

Table 12-22 of the draft *EOA* identifies the site suitability characteristics that are supposedly required by the targeted industries identified in Tables 12-19 and 12-20. While *some* of these characteristics may be desirable to *some* of the identified industries, they are by no means requirements. In many respects they appear to be reverse engineered so that the only suitable site is the large block of prime farmland that the city wants to develop as the South Industrial Area. The following "Required Industrial Site Suitability Characteristics" have not been justified:

- Site Size

The draft *EOA* identifies a minimum parcel size of 5 vacant acres for the targeted industries identified in Tables 12-19 and 12-20 unless the site is adjacent to an industrial use or a group of 20 suitable acres, in which case the parcel could be smaller. (Table 12-22)

However, many of the targeted industries can and do locate on much smaller sites, including sites that are not adjacent to another industrial use. Table 12-19 gives many such examples of existing Newberg firms. These include Professional Services, Creative Services, Wineries, and several others. The draft *EOA* does not explain its conclusion that these targeted industries require large sites, except for a footnote stating that:

"Much of this site size need [the 2030 need for approximately 24 acres of very small (under 2 acre) sites and 75 acres of small (2- to 10-acre) sites] can be most efficiently accommodated by master planned business parks."

The *EOA* is thus flawed in two respects. First, it inflates the parcels size allegedly needed by assuming that these targeted industries will only locate together, thereby requiring large parcel(s). Second, it assumes that none of these targeted industries will go into vacant spaces in existing office parks or onto "stand-alone" existing small parcels. Not only is there no evidence to support this, but it is contrary to common sense and observation of how industrial and office parks evolve.

- Proximity to Transportation and Services

The draft *EOA* contends that the targeted industries identified in Tables 12-19 and 12-20 require sites that are either "adjacent to existing industrial areas," or on "an agglomeration of at least 100 new acres to facilitate agglomeration economies and minimize adverse impacts." (Table 12-22)

None of the targeted industries requires a site larger than 50 acres. The draft *EOA* does not explain why any of the targeted industries must be part of an agglomeration of at least 100 acres. To the best of our knowledge, none of the existing industries in Newberg that fall within the targeted industry clusters, including wineries, professional and business services, and Newberg's largest manufacturers, are located within an industrial area totaling at least 100 acres. The *EOA* does not provide evidence that any of the targeted industries requires agglomeration of any size or kind.

The draft *EOA* also contends that the targeted industries identified in Tables 12-19 and 12-20 require sites within 1/8 mile (660 feet) of a major arterial or state highway without travel through non-industrial properties. (Table 12-22). The only roadway classified as a major arterial in Newberg's Transportation Systems Plan (TSP) is Highway 99W, which is also a state highway.

While some of the targeted industries may find such a location desirable, it is *not* required. Most of Newberg's largest existing industrial users, all of whom are in the targeted industry clusters, are not located within 660 feet of a state highway or major arterial. These include, at a minimum, A-dec, SP Newsprint/White Birch, and Ushio. Traffic from many of them, including A-dec and Ushio, passes through non-industrial areas.

The draft *EOA* states that the targeted industries identified in Tables 12-19 and 12-20 require sites that have a connection to I-5 via Highway 219. (Table 12-22).

Any site in Newberg can connect to I-5 via Highway 219. If the city contends that only sites with direct access to Highway 219 meet site requirements this is unjustified. No rationale is provided as to why the targeted industries would require this. As noted above, Newberg's largest manufacturers do not have direct access to Highway 219. For other industrial users, such as wineries, professional services, etc, such a locational requirement seems even more tenuous.

- Topography

The draft *EOA* categorically excludes as unsuitable all sites with slopes greater than 10% and all sites that do not have a developable area that is generally rectangular in shape. (Table 12-22).

The draft *EOA* does not explain why *all* targeted industries require a flat, rectangular site nor why any specific targeted industry requires a flat, rectangular site. While such sites may be generally cheaper to develop and service, many users use sites that do not have these characteristics. The categorical exclusion is not justified

- Compatibility (residential, downtown and resource land)

The draft *EOA* categorically excludes as unsuitable all sites that abut residential neighborhoods on more than 25% of the site perimeter unless buffers are present or planned. (Table 12-22).

The draft *EOA* does not explain why *all* targeted industries require sites that are buffered from residential land. While such buffering may be desirable for certain industries, such as food processing or heavy manufacturing, it is not required or even necessarily desirable for certain other users.

In fact, some of Newberg's largest existing industrial employers within the targeted industry clusters do abut residential neighborhoods, including A-dec, SP Newsprint/White Birch, and Ushio, as do many existing users in the targeted professional and business services sector.

The draft *EOA* also categorically excludes as unsuitable all sites that abut large tracts of agricultural land unless effective buffers are present or planned. (Table 12-22). The draft *EOA* does not explain why all or any targeted industries require sites that are buffered from agricultural land. Of the various urban uses, industrial use is considered to be more compatible with agricultural uses and other urban uses, such as residential, are less compatible with agricultural uses.

The draft *EOA* also categorically excludes as unsuitable any site that will result in truck traffic through downtown. There are several problems with this exclusion.

First, there is no definition here. Is one truck trip a day unacceptable, or does it take 50 trucks a day?

Second, Highway 99W through downtown is classified in the Newberg TSP as a major arterial, intended to "serve truck movements."⁵ The Oregon Highway Plan (OHP) classifies Ore 99W as a freight route through the City of Newberg.⁶ The categorical exclusion of any site that will result in truck traffic through downtown is inconsistent with these adopted and acknowledged plans.

Third, a logical place for industrial development that is higher priority under ORS 197.298 is the area of flat, relatively large parcels in the SW exception area. This area is served by rail. In addition, the Newberg-Dundee bypass is identified in the Newberg TSP as a future improvement. Once the first phase is completed, the bypass will provide an alternate route that avoids downtown for truck traffic originating in this higher priority area.

For all the preceding reasons, the "Required Industrial Site Suitability Characteristics" have not been justified.

3. INDUSTRIAL USES: INTENSIFICATION, REDEVELOPMENT, AND INFILL.

Our testimony to the Planning Commission pointed out the significant amount of employment growth that is typically absorbed through intensification of existing employment uses. This job growth is accommodated on existing developed sites without new development and without redevelopment.

⁵ Newberg TSP, p. 30

⁶ Newberg TSP, p. 41

During the staff response to testimony, Economic Planner David Beam discounted the potential for job growth to be accommodated without physical development or redevelopment occurring, based on his observation that there are very few vacant industrial properties in Newberg. Those comments overlook the reality of how and where significant job creation occurs and how it is accommodated.

In the real world many new jobs are created without land being developed or redeveloped: a processing plant or manufacturer adds staff or even a second shift; laid-off workers are recalled; a restaurant adds additional staff in the dining room and kitchen. None of these involves development or redevelopment of new or existing sites.

The text of Newberg's draft *EOA* recognizes this dynamic and states:

“The data ... includes assumptions that most (55%) of Newberg's future industrial employment will be located on sites 10 acres or less, and that one-third of those future new industrial firms under 10 acres in size, and one-half of firms under 2 acres in size, will find a site through infill redevelopment or intensification of existing employment land uses. (*EOA*, p. 43)”⁷

These stated assumptions are not carried over into the land need calculations.

Newberg projects an additional 1,642 new jobs will use industrial space through 2030.⁸

Table 12-21 allocates projected new industrial employees through 2030 by number of employees, by employees per firm, by site size, and by number of needed sites. The explanatory text states:

“The total land needs equate to approximately 10 employees per developed acre, which reflects the reality that many firms look for sites that allow for future expansion, and is consistent with the site size per employee ratio of many of Newberg's largest industrial employers.”⁹

In response to our previous testimony, city staff amended Table 12-21 to add the lines labeled “infill & redevelopment.” The amended table is reproduced below:

⁷ Draft *EOA*, p, 45

⁸ Draft *EOA*, p, 41, Table 12-18

⁹ Draft *EOA*, p, 45

Table 12- 21: Site Size Distribution by Firm Employment (2010-2030)

Employees per Firm	Percent of Employment	Number of Employees	Number of Firms	Sites Needed	Size Range (Acres)	Average Site Size (Acres)	Average ROW Need (Acres)	Gross Buildable Acres Needed
0-9	15%	246	41	21	<2	1	0.15	24
				20	infill & redevelopment			0
10 to 74	40%	657	19	13	2 - 10	5	0.75	75
				6	infill & redevelopment			0
75 to 150	15%	246	2	2	10 - 30	20	1.00	42
150+	30%	493	1	1	30 - 50	40	2.00	42
Total	100%	1,642	63	63				183

Source: Winterbrook Planning 2009, Newberg Planning Division

While the table now assigns a number of *sites* to infill and redevelopment, it either does not assign any actual *employment* growth to these sites, or the actual planned employment density is far less than the 10 employees per developed acre claimed in the text, and far less than what Newberg has historically experienced.

The draft *EOA* concludes that 183 gross buildable acres are needed.

If half the 246 employees projected on sites smaller than 2 acres and 1/3 of the employees projected on sites 2-10 acres in size will be accommodated through infill redevelopment or intensification of existing employment land uses, as stated in the draft *EOA*, only 1081 new employees will need new buildable land, not 1642. On 183 acres, this is an employment density of only 5.9 employees per gross buildable acre or 6.5 employees per developed acre.

If *all* 1642 projected new employees are allocated to the new land, then, and only then, will the employment density approximate the 10 employees per developed acre claimed in the text.

Newberg should resolve these inconsistencies in the draft *EOA* and plan for future industrial users to use land *more* efficiently than they have in the past, not *less* efficiently

In addition, it is not clear why the stated assumptions limit refill potential to sites smaller than 10 acres. At least some job growth will also be absorbed through intensification of existing employment uses on larger sites. The draft *EOA* should account for this certainty.

4. DUPLICATIVE ALLOCATION OF JOB GROWTH TO INDUSTRIAL AND OFFICE

For several sectors of projected job growth the draft *EOA* apparently allocates some jobs twice - to both industrial space and to office space. These errors lead to erroneous conclusions regarding land need.

For example, the draft *EOA* projects a total of 76 jobs in the Information sector in 2030. The draft *EOA* allocates 88% of these jobs to Industrial Space (67 jobs) and 90% of these jobs to office space (69 jobs), for a total of 136 jobs, nearly double what is projected.¹⁰

In the Transportation, Warehousing & Utilities sector the draft *EOA* allocates 93% of projected jobs to Industrial Space and 30% to office space.

Projected jobs in the Professional & Business sector and the Other Services sector also appear to be allocated more than once- to both Industrial Space and Office Space.

These errors must be resolved.

5. "REQUIRED" COMMERCIAL SITE CHARACTERISTICS

The draft *EOA* categorically excludes as unsuitable all sites with slopes greater than 10% and all sites that do not have a developable area that is generally rectangular in shape. (Table 12-29).

The draft *EOA* does not explain why new office and retail development requires a flat, rectangular site. While such sites may be generally cheaper to develop and service, many users use sites that do not have these characteristics. The categorical exclusion is not justified.

6. EMPLOYMENT AND POPULATION PROJECTIONS

The employment projections in the draft *EOA* are based upon an assumption that employment in certain sectors will grow by the same rate as Newberg's population and that after 2018, all employment in all sectors will grow by the same rate as Newberg's population.

The draft *EOA* states this was done in accordance with the "safe harbor" provisions of OAR-660-024-0040(9) and also states that the population projections in Newberg's adopted plan have been coordinated with Yamhill County as required by ORS 195.036.

We disagree. To the best of our knowledge, adequate coordination has not occurred.

It is our understanding that the "coordination" with the County to which the city refers is a letter from the County Planning Director that accepts the population projection proposed by the city. In addition, the Board of Commissioners adopted *findings* in support of Newberg's 2006 UGB amendment and its remanded URA proposal that also contained the population projection.

This is not adequate coordination. ORS 195.036 and 195.025 require adoption of a county-wide forecast by the governing body, in this case the Board of Commissioners, not the

¹⁰ Draft *EOA*, Tables 12-14, 12-18, and 12-25

Planning Director. The Board of Commissioners cannot delegate to the Planning Director the authority to coordinate population forecasts on an ad-hoc basis.

OAR 660-024-0030 provides, in part:

“In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.”

To the best of our knowledge, the County has not adopted the forecast into its comprehensive plan or in a document referenced by the plan, as required by OAR 660-024-0030, nor did the County follow the procedures and requirements in ORS 197.610 to 197.650.

In addition, coordination with all other local jurisdictions in the county is also required.¹¹ When it adopted findings in support of Newberg’s 2007 UGB amendment and its remanded URA proposal the County did not provide notice that it was considering adoption of a population forecast nor, to the best of our knowledge, did they provide notice to all other local governments in the county. Finally, to the best of our knowledge, when the city adopted the population forecast into its plan, it also failed to notify the other local governments in the County that it was adopting a population forecast.

For these reasons, we conclude that the city’s population forecast has not been adequately coordinated with the county and other local governments and cannot form the basis for “safe harbor” employment projections.

7. Related Comprehensive Plan Amendments

In addition to the draft *EOA*, the city is also proposing to amend the “Land Need and Supply” section of the comprehensive plan.

These proposed comprehensive plan amendments have not been justified. The proposed amendments that relate to industrial and commercial land have not been justified for the preceding reasons.

The city also proposes to amend the buildable land inventories of Residential, Park, and Institutional land in Table IV-1. The public notice for this hearing makes no mention of amendments to residential, park, and institutional land inventories. No justification or explanation of how they were derived is presented in the staff report or elsewhere in the Council Packet. No findings are proposed in support of their adoption.

¹¹ **195.036 Area population forecast; coordination.** The coordinating body under ORS 195.025 (1) shall establish and maintain a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans, and shall coordinate the forecast with the local governments within its boundary. [1995 c.547 §7 (enacted in lieu of 195.035)]

For these reasons, the proposed amendments to the buildable land inventories of Residential, Park, and Institutional land in Table IV-1 have not been justified.

8. Conclusion

We recognize the considerable work that Newberg has undertaken in producing the Draft *Economic Opportunities Analysis*. Additional work remains and it is our hope that the final product is one we can support.

We hope these comments are helpful in achieving that outcome. Please include them in the official record of these proceedings and notify us of any decisions and/or future hearings in this matter.

Sincerely,

Sid Friedman
1000 Friends of Oregon

Ilsa Perse
Friends of Yamhill County

Cc (electronic): DLCD
Yamhill County Planning Department
Oregon Department of Agriculture

BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON

FRIENDS OF YAMHILL COUNTY,
LEE DOES, AMY DOES, GRACE
SCHAAD, RANEE SOLOMONSSON,
CHERYL MCCAFFREY

Petitioners,

v.

CITY OF NEWBERG

Respondent

LUBA No.: 2010-_____

NOTICE OF INTENT TO APPEAL

I.

1
2 Notice is hereby given that the petitioners intend to appeal the land use decision of the
3 respondent entitled "Ordinance No. 2010-2723 -- An Ordinance Adopting the Revised Economic
4 Opportunities Analysis for the City of Newberg and Adopting Associated Comprehensive Plan
5 Amendments." A copy of the decision is attached. The decision was made on February 1, 2010.

6 II.

7 The petitioners are represented by James S. Coon, Swanson Thomas & Coon, 820 SW
8 2nd Ave Ste 200, Portland, OR 97204; phone no. 503-228-5222.

9 III.

10 The respondent's mailing address is 414 E 1st Street, Newberg, OR 97132; phone
11 number 503-538-9421. Its legal counsel is Terrence D. Mahr, 414 E 1st Street, Newberg, OR
12 97132; phone number 503-538-9421.

13 IV.

14 Other persons mailed written notice of the land use decision by the City of Newberg, as
15 indicated by its records, consist of the persons listed in the attachment to this Notice.

1 NOTICE:

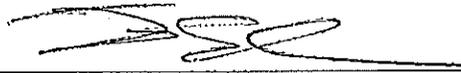
2 Anyone designated in the attachment to this Notice who desires to participate as a party
3 in this case before the Land Use Board of Appeals must file with the Board a Motion to
4 Intervene in this proceeding as required by OAR 661-10-0050.

5

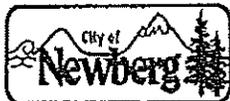
6 DATED: February 22, 2010

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Respectfully submitted,
SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners



ORDINANCE NO. 2010-2723

AN ORDINANCE ADOPTING THE REVISED ECONOMIC OPPORTUNITIES ANALYSIS FOR THE CITY OF NEWBERG AND ADOPTING ASSOCIATED COMPREHENSIVE PLAN AMENDMENTS

RECITALS:

1. The original Economic Opportunities Analysis (EOA) was adopted by City Council in January 2006 by Ordinance 2006-2635. The EOA is considered part of the Comprehensive Plan and implements the goals and policies in Section H. The Economy. Much of the information found in the EOA is statistical and dynamic in nature, including demographic and economic statistics, population and employment projections, and buildable land inventories. Therefore, the EOA is not a static document and is meant to be updated with current information from time to time. Having an updated EOA also ensures the City's compliance with Statewide Planning Goal 9: Economic Development.
2. The updates to the EOA include the following: population, demographic, economic and employment statistics; an economic trends analysis section that looks at national, state and regional trends, regional economic development industry clusters and target industries, Yamhill County agri-business, and regional industrial land availability; a new section that covers an assessment of our community economic development potential; a more robust discussion of Newberg's economic development strategy; and updated buildable land inventories and the addition of maps that illustrate the available industrial and commercial buildable land by area.
3. The Comprehensive Plan document has a small section with population and land supply and need information. Those numbers have changed with the updated EOA and need to also be updated in the Comprehensive Plan document. The Comprehensive Plan amendments also add five new policies to Section H.
4. The Newberg Planning Commission held hearings on December 10, 2009 and January 14, 2010 to consider the request. The Planning Commission passed Resolution 2009-275, recommending that the City Council adopt the revised Economic Opportunities Analysis and the accompanying Comprehensive Plan amendments.
5. After proper notice, the City Council held a hearing on February 1, 2010 to consider the request. The Council finds that the proposal meets the applicable criteria.

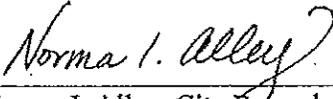
THE CITY OF NEWBERG ORDAINS AS FOLLOWS:

1. The revised Economic Opportunities Analysis, as shown in Exhibit "A", is hereby adopted and by this reference incorporated.
2. The Comprehensive Plan amendments, as shown in Exhibit "B", are hereby adopted and by this reference incorporated.

3. The findings in support of this proposal, as shown in Exhibit "C", are hereby adopted and by this reference incorporated.

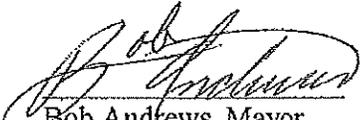
➤ **EFFECTIVE DATE** of this ordinance is 30 days after the adoption date, which is: March 2, 2010.

ADOPTED by the City Council of the City of Newberg, Oregon, this 1st day of February, 2010, by the following votes: **AYE: 7 NAY: 0 ABSENT: 0 ABSTAIN: 0**



Norma I. Alley, City Recorder

ATTEST by the Mayor this 4th day of February, 2010.



Bob Andrews, Mayor

LEGISLATIVE HISTORY

By and through the Newberg Planning Commission at their 01/14/2010 meeting.

Attachment A

Public Testimony for EOA - written and oral						
Name	Street Address	City	State	Zip	Meeting Date	
Roger Currier	504 Pinehurst Dr	Newberg	OR	97132	12/10/2009	
Grace Schaad	31525 NE Schaad Rd	Newberg	OR	97132	12/10/2009 & 2/1/10	
Vicki Shepherd	30230 NE Benjamin Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
Robert & Dorothy Roholt	31150 NE Schaad Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
Sid Friedman / 1000 Friends of Oregon	189 Liberty St NE	Salem	OR	97301	12/10/09, 1/14/10, 2/1/10	
Ken Wegter	3872 Camishaun Ct NE	Salem	OR	97305	12/10/09 & 2/1/10	
Lee & Dr. Amy Does	10730 NE Renne Rd	Newberg	OR	97132	12/10/09 & 2/1/10	
MaryAnn Tack	1400 Villa Rd	Newberg	OR	97132	12/10/2009	
Marvin Schneider	1159 N Main St	Newberg	OR	97132	01/14/2010	
Craig Markham	22245 NE Ilafem Ln	Dundee	OR	97115	12/10/2009	
Julie Fugate	14500 NE Richard Ln	Newberg	OR	97132	02/01/2010	
Sydney Wermilinger	20895 Arbor Grove Rd NE	St Paul	OR	97137	1/14/10 & 2/1/10	
Lewis Schaad	31655 NE Schaad Rd	Newberg	OR	97132	02/01/2010	
Saj Jivanjee	32230 NE Old Parrett Mt Rd	Newberg	OR	97132	12/10/09 & 2/1/10	

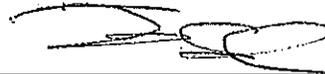
CERTIFICATE OF FILING AND SERVICE

I hereby certify that on February 22, 2010, I filed the original of this **Notice of Intent to Appeal** together with two (2) copies, with the Land Use Board of Appeals, 550 Capitol Street NE, Suite 235, Salem, Oregon 97301-2552, by certified mail.

I also certify that on February 22, 2010, I served a true and correct copy of this **Notice of Intent to Appeal** on the City of Newberg at 414 E 1st Street, Newberg, OR 97132, on Terrence D. Mahr at 414 E 1st Street, Newberg, OR 97132, and on all persons listed in paragraph IV of this Notice (including those persons listed in Attachment A), pursuant to OAR 661-10-0015(2), by first class mail.

DATED: February 22, 2010.

SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners

BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON

FRIENDS OF YAMHILL COUNTY,
LEE DOES, AMY DOES, GRACE
SCHAAD, RANEE SOLOMONSSON,
CHERYL MCCAFFREY

Petitioners,

v.

CITY OF NEWBERG

Respondent

LUBA No.: 2010-____

CERTIFICATE OF FILING

I hereby certify that on February 22, 2010, I filed the original Notice of Intent to Appeal,
together with two copies, with the Land Use Board of Appeals at the following address:

Land Use Board of Appeals
Public Utilities Building
550 Capitol Street, NE, Suite 235
Salem, OR 97301-2552

By United States Postal Service, certified mail/return receipt requested. The proof from the post
office (i.e., receipt of certified mail, with the certified mail number, with the date of mailing
stamped by the United States Postal Service on the receipt) is attached.

DATED: February 22, 2010.

SWANSON THOMAS & COON



James S. Coon, OSB No. 771450
Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2010, I served a true copy of this Notice of Intent to Appeal by first-class mail on:

City of Newberg
414 E 1st Street
Newberg, OR 97132

AND

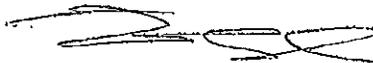
Terrence D. Mahr
414 E 1st Street
Newberg, OR 97132

AND

Each of the parties listed on the notice list attached to the Notice of Intent to Appeal.

DATED: February 22, 2010.

SWANSON THOMAS & COON



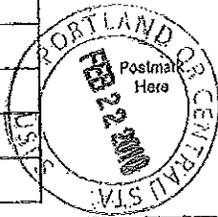
James S. Coon, OSB No. 771450
Attorney for Petitioners

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1000 FRIENDS OF OREGON

6866

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	Court Costs				350.00

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Murphy C. McAuley
 AUTHORIZED SIGNATURE

⑈006866⑈ ⑆123000220⑆ 153600064247⑈

Friends of
French Prairie

Friends of French Prairie
is an Oregon non-profit corporation

PO Box 403 | Donald, Oregon 97020 | www.friendsoffrenchprairie.org



May 20, 2010

Newberg Urban Area Management Commission
Written Comments
File #UGB-09-001
Attn: Jessica Nunley
PO Box 970
Newberg, OR 97132

Yamhill County Planning Dept.
525 NE 5th Street
McMinnville, OR 97128-4601

Greetings;

Friends of French Prairie is a land use organization representing the French Prairie portion of Marion county. French Prairie is the historic and agricultural heartland of Oregon, and includes the area north of Keizer to the Willamette River, and from the Willamette on the west to the Pudding River on the east.

This is the portion of the Willamette Valley with the highest quality soils, making it among the highest quality farm land in North America. Thus, while agriculture is the largest economic sector in Marion County, a large portion of that agriculture is concentrated in French Prairie.

I am writing on behalf of Friends of French Prairie in opposition to the Newberg Urban Growth Boundary amendment to include 260 acres south of the City into the Newberg UGB.

The justification for inclusion of this land in the City of Newberg UGB is to target manufacturing and other industries and to locate them on the south side of the city, where it is claimed that there is access within 10 minutes to I-5 via Hwy. 219 and McKay/Yergen/Ehlen Road to the Donald/Aurora interchange.



The reason for our opposition is twofold. First, the Donald/Aurora interchange is already recognized by ODOT as one of the most unsafe in the state, carrying traffic levels well beyond the capacity that it was designed for. To base urban development in Newberg on the premise that its traffic can be unloaded on an already over-burdened and unsafe freeway interchange in another county is unconscionable!

Second, the result of increased traffic on Hwy. 219 and McKay/Yergen/Ehlen Road will negatively impact agriculture and prime farmland in French Prairie. Both roads are carrying far more traffic today than they were designed for. McKay/Yergen/Ehlen Road is already unsafe due to the volume of traffic and the absence of traffic signals, compounded by very few left turn lanes. Entering, exiting and crossing this road during peak traffic periods literally involves taking your life in your hands. This is especially true for slow moving farm equipment.

Increasing traffic in the magnitude that industrial development in this UGB expansion will produce will result in further pressure for a limited access highway across French Prairie, all of which is high quality prime farm land.

Please note that as recently as April, 2010, the Marion County Commissioners are on record as not supporting a limited access highway across French Prairie.

This proposal, as a fundamental part of its design, ignores normal traffic mitigation. By doing so the benefit accrues to Newberg and Yamhill County, while all traffic related impact is passed on to French Prairie and Marion County.

This is precisely the kind of development that should not be considered in the absence of thorough and comprehensive inter-governmental communication between all parties, and without inter-county agreement on traffic mitigation requirements.

Sincerely



Benjamin D Williams

President, Friends of French Prairie

cc: Marion County Commissioners
City of St Paul
1000 Friends of Oregon
Marion County Farm Bureau
DLCD



STRENGTH
BALANCE
EQUANIMITY



May 25, 2010

Written Comments
File #UGB-09-001

Newberg City Hall

As a 20 year resident of Newberg and a downtown commercial property and business owner, I have a strong interest in both the livability and the economic viability of Newberg. I am afraid that the proposed UGB amendment to repurpose productive farmland to industrial land will harm both those goals.

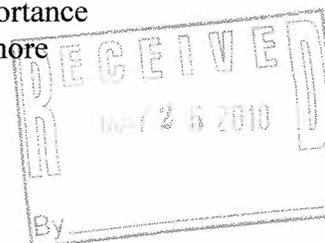
Economic Liabilities

Sprawl: During this economic recession, we see that sprawling communities are suffering vacancies and loss of value much more than more densely developed areas. Newberg’s current UGB is full of gapped and incomplete development. This results in inefficient use of infrastructure and costly and unattractive vacancies.

Currently, we have small scale industrial land with high vacancy in existing buildings and vacant land mixed in with the developed space. Newberg shares this problem with neighboring communities, indicating there is an oversupply of this type of development. The Suntron industrial property is still vacant after their recent move. It would be more efficient to fill existing vacancies and repurpose this inappropriately developed industrial land rather than repurpose productive farmland. While there would be expenses in removing and reworking existing structures, we would not have the expenses of extending infrastructure.

Professional Space: As a commercial property owner, I am painfully aware of the high vacancy rate for professional offices. Neighboring communities share this problem, indicating it may be a long time before we use up existing supply. If the need does arise, it can easily be met with infill, creating a vibrant central core that would nurture stores and restaurants. I see no advantage to moving professional offices away from the city core to an area with no existing businesses and poor pedestrian accessibility. I don’t think it would be good for citizens and visitors, but as a downtown business owner, I *know* it would be bad for me.

Loss of prime farmland: As energy costs increase and the importance of fresh, local, high quality produce is recognized, we become more



aware of how precious prime farm land is, especially near urban centers. This valuable land should be used for other purposes only as a last resort. While Newberg hopes to attract larger industries with this land, no one is actually signed up, are they? That is, this repurposing is speculative while our need for good farmland is assured. This seems like a large economic gamble. We expose ourselves to significant expense and loss with no guarantee of benefit.

Changing housing needs: Current trends show the size of households beginning to increase to more normal levels after a brief period of historic lows. If this trend continues as expected, the current oversupply of housing will grow, even though population continues to expand. In light of these new trends, we might consider shifting land set aside for housing to industrial use.

Livability Problems

Impacts to adjacent agriculture land: Newberg says we need this good agricultural land because of it's proximity to McKay Road in Marion County. The other obvious access from I5, the Wilsonville Road, is absolutely unsuitable (and very dangerous) for truck traffic so Newberg must rely on Marion County's access roads. However, industrial traffic is not a good fit for this local agricultural road and conflicts seem inevitable. Furthermore, this land is very near the river. Increased development will increase run-off into the river due to the increase of impermeable surfaces. Land along the river in French Prairie floods regularly. In a natural system, this is a benefit which replenishes top soils. Will the increased run-off from new industrial land just upstream threaten this important agricultural asset?

Natural Resources: As beauty and native habitat become rarer in our ever developing world, their value increases. Newberg needs viable industry as well as tourism and native beauty. But just as I wouldn't site my manure pile on the most attractive part of my farm, I hesitate to put utilitarian development on land that has real value for its beauty and habitat. We should celebrate our rich river bottom land. It grows fabulous food and serves as important habitat for native species. As we seek to shore up our weaknesses, we shouldn't overlook and spoil our natural strengths.

I fear that this proposed change does a poor job of answering the needs of our community while risking much that is currently working. The environmentally insensitive, sprawling development typical of the 20th century does a poor job of answering 21st century needs. Let's rethink this.

Thank you for your attention.

Sincerely,
Jane Carlsen
Owner/Director First Street Yoga





Ord 2011-2740 - Attachment 8

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

May 25, 2010

Newberg Urban Area Management Council

City of Newberg Planning Department
414 E. First Street
Newberg OR 97132

Yamhill County Planning Department
525 NE 4th Street
McMinnville OR 97128

Re: Docket PA-01-10 (Newberg Urban Growth Boundary Amendment)

Dear Commissioners and Staff:

Thank you for the opportunity to comment on the proposed amendment to add approximately 260 acres to Newberg's Urban Growth Boundary. Most of the land is prime agricultural land (Class I and II soils) that is actively farmed. The land is located southeast of the city along Highway 219 towards the Willamette River bridge to St. Paul. The land is proposed to be included for industrial uses.

1000 Friends of Oregon is a nonprofit, charitable organization working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas. Friends of Yamhill County works to protect natural resources through the implementation of land use planning goals, policies, and laws that will maintain and improve the present and future quality of life in Yamhill County for both urban and rural residents. 1000 Friends of Oregon and Friends of Yamhill County support efforts to plan for Newberg's future and we maintain a keen interest in the outcome of these efforts.

I. Summary and Introduction

It is evident that considerable work has gone into the proposal before you. Nonetheless, we have serious concerns regarding the proposed expansion.

Much of Newberg's economic development strategy relies upon urbanizing a large block of prime agricultural land to attract new industrial employment. According to the application, the largest component of the new employment on this converted land will be in the manufacturing sector, which continues to shrink, not grow. The city wants to bring this block of farmland into the UGB, even though there is no demonstrable need for this land until at least 2018, and any longer-term demand beyond that date is, at best, speculative.

This prime farmland is not undeveloped land waiting for urbanization. It is productive land that supports the leading industry in Yamhill County- agriculture. The agricultural industry is a primary driver of Newberg's economy.



Celebrating Thirty-five Years of Innovation

Newberg is located in Yamhill County within 2 or 3 miles of Marion County, Washington County, and Clackamas County. These four counties rank first, fourth, fifth, and eighth among all Oregon counties in gross farm and ranch sales with over \$1.5 *billion* in direct 2008 receipts. Area farmers provide thousands of jobs, many to Newberg residents, and indirectly support tens of thousands more.

The proposed expansion will harm the local economy by undercutting the land base that supports this leading industry. Once land is brought into a UGB, no one would tile a field, plant an orchard crop, or make any other long-term investments in agricultural production.

For these reasons, prime agricultural land is the last resort when expanding a UGB and there is a high burden to demonstrate that there is no alternative. This burden has not been met.

In summary, the UGB amendment application overestimates the amount of industrial land Newberg will need over the planning period and underestimates the capacity within the existing UGB to meet those needs.

A more compact UGB will reduce pressure on farmland and other rural lands outside the current UGB, reduce the cost of extending infrastructure beyond the edge of existing development, and reduce transportation costs for Newberg residents who work and shop in Newberg.

Moreover, the analysis within the application wrongly discounts alternative areas for expansion, like existing urban reserves and other areas with poorer soils. These alternative areas *can* accommodate much or even all of the city's need for additional employment land and therefore, by law, they must be included ahead of the prime agricultural land targeted by the city.

Many of these underlying defects in the assumptions, conclusions, and technical analysis have already been identified during the recent related City of Newberg proceedings that led to Newberg's adoption of the Revised Economic Opportunities Analysis (*EOA*). That flawed *EOA* forms the underlying justification for this UGB expansion. Because of its defects it is under appeal to the Land Use Board of Appeals (*LUBA*) and petitioners' brief is due June 11.

II. The Application Overestimates The Amount Of Industrial Land Needed Over The Planning Period.

The analysis in the "Industrial UGB Amendment Justification and Findings" (*Findings*) and in the *EOA* overestimates both the amount of employment growth that will require industrial land and the overall amount of industrial land needed over the planning period. Newberg estimates that it will need 183 gross buildable acres of industrial land from 2010 to 2030. Two points provide useful background in evaluating this proposal.

First, the city has a prior history of overestimating land needs that dates back to the city's original UGB, when the city overestimated overall land needs by approximately 50%. The city's original UGB was established in 1981. Newberg estimated that it contained enough land

to meet needs through 2000. Newberg later realized that the UGB actually contained sufficient land to meet needs through 2010.¹

Second, Newberg states that the estimated need for 183 gross buildable acres of industrial land from 2010 to 2030 represents a *reduction* from prior estimates.²

The city cites the Johnson-Gardner report *City of Newberg – Demand for Commercial and Industrial Land* as supporting this assertion.³ In fact, those prior estimates were for much *less* land for a much *longer* time period. That report states that for the 30 year period from 2004 to 2040 the demand for new industrial land would range from 49 acres under a “low growth scenario,” up to a maximum of 161 acres under a “high growth scenario, with a most likely total industrial land need of about 64 acres. The relevant table is reproduced below and attached to this testimony.

**NET NEW DEMAND FOR COMMERCIAL AND INDUSTRIAL LAND
NEWBERG, OREGON
2004-2025 & 2004-2040
MEDIUM, HIGH AND LOW GROWTH SCENARIOS**

Use	Net New Demand for Land (acres) By Scenario From 2004 Through:					
	Medium Growth		High Growth		Low Growth	
	2025	2040	2025	2040	2025	2040
Office	14.8	27.1	20.5	37.8	13.7	24.8
Industrial	34.7	63.8	85.6	161.4	27.0	49.3
Retail	96.2	178.3	167.4	310.7	76.8	135.2
Total	145.7	269.2	273.5	509.9	117.5	209.3

SOURCE: Johnson Gardner LLC

While these prior, much lower estimates of land need do not bind Newberg’s current efforts to justify much higher projections, they do provide useful perspective on both those new higher estimates of land need and on the city’s claim that 183 acres gross buildable acres represents a reduction from prior estimates.

A. The City is unrealistically projecting disproportionate job growth in declining industries.

Under Goal 9’s implementing rules, the estimate of the types and amounts of industrial and other employment uses must be based on “what is *likely* to occur in the planning area.” (OAR 660-009-015(4); emphasis added).

A key “target industry cluster” that Newberg, “expect[s] to expand” is manufacturing.⁴ “Expected” growth in manufacturing jobs account for over 2/3 of the city’s projected job growth in industrial zones and over 2/3 of the proposed UGB expansion.⁵ This is an aspirational

¹ Findings, p. 3

² Newberg bases this statement on various mathematical formulas and interpolations. Findings, pp. 6-7

³ Findings, p. 6

⁴ Findings, p. 1, and elsewhere. Also see EOA.

⁵ Findings, p. 18, Table 4

economic development strategy based on wishful thinking rather than on what is likely to occur based on national, regional, county, or local trends.

In the last two years, the local economy has shed thousands of jobs in the worst recession in decades. Manufacturing and other sectors that use industrial land have been particularly hard hit.

The most recent Oregon Employment Division (OED) long-range forecasts predict declines in manufacturing jobs as far out into the future as their predictions extend (2018) both statewide and for Regions 2, 3, and 15.⁶ OED long-range statewide and regional forecasts are available at: <http://www.qualityinfo.org/olmisj/PubReader?itemid=00003217>

- OED predicts that statewide, “**Manufacturing will likely rebound but is not expected to return to its employment level prior to the recent recession.**”⁷ Regionally it predicts a 1.7 % decline through 2018.⁸

In contrast, Newberg expects manufacturing jobs to grow by 22% between 2009 and 2020, from 2,201 jobs to 2,685 jobs.⁹ We see no evidence that this is likely to occur.

- OED predicts that regionally construction jobs will grow by only 2%.¹⁰

In contrast, Newberg projects construction jobs will grow by 79% between 2009 and 2020.¹¹ This is not likely to occur, either.

- Overall, OED predicts regional job growth of 6% from 2008 to 2018.¹²

In contrast, Newberg projects overall job growth to grow by 22% between 2009 and 2020.¹³ Newberg does not explain why it expects that local job growth will be nearly triple the regional job growth rate over a nearly identical time period.

B. The number of new jobs that are allocated land in several employment sectors exceeds the total number of projected new jobs in those sectors.

Many employment sectors utilize more than one type of land. For example, some jobs in the Information Sector will locate on industrial land while others will use office space in commercial zones. For these sectors, Newberg allocates some of the projected employment growth to industrial land and some to office space on commercial land.

There is not a problem with this approach so long as the number of jobs allocated to commercial and industrial land in these various sectors does not add up to more than 100% of the total job

⁶ Region 2 is Multnomah and Washington Counties, Region 3 is Marion, Yamhill, and Polk Counties, and Region 15 is Clackamas County.

⁷ See <http://www.olmis.org/olmisj/ArticleReader?itemid=00006783>

⁸ EOA, Table 12-13, p. 25

⁹ Findings, p. 18, Table 3

¹⁰ EOA, Table 12-13, p. 25

¹¹ Findings, p. 18, Table 3

¹² EOA, Table, 12-13, p. 25

¹³ Findings, p. 18, Table 3

projection for the sector. In this application, however, for several employment sectors the number of new jobs that are allocated land far exceeds the total number of projected new jobs.

In the “Other Services” sector, for example, instead of allocating 100% of the projected new jobs, the city allocates 133% of total projected new jobs. Table 12-14 of the *EOA* projects a total of 590 new jobs in the “Other Services” sector through 2030,¹⁴ but the city allocates a total of 785 new jobs in this sector to industrial and commercial space.

Table 12- 14: Projected Newberg Employment through 2040

Industry	2008	2009	2018	2020	2025	2030	2035	2040
Construction	642	390	656	700	798	892	1,005	1,125
Manufacturing	2,557	2,201	2,514	2,685	3,057	3,417	3,851	4,312
Wholesale Trade	97	73	106	113	129	144	162	181
Retail Trade	930	841	1,124	1,201	1,367	1,529	1,723	1,929
Transportation, Warehousing & Utilities	181	181	191	204	232	259	292	327
Information	54	45	56	60	68	76	86	96
Financial Activities	270	241	283	303	345	385	434	486
Professional & Business Services	437	321	474	507	577	645	727	814
Education & Health Services	2,766	3,285	3,147	3,361	3,827	4,278	4,821	5,398
Leisure & Hospitality	1,002	1,018	1,361	1,454	1,655	1,850	2,085	2,335
Other Services	413	409	434	463	528	590	665	744
Government	183	175	192	205	233	261	294	329
Total	9,533	9,180	10,536	11,255	12,815	14,325	16,145	18,077
Cumulative from 2009		-	1,357	2,075	3,636	5,145	6,965	8,897

Table 12-18 of the *EOA* allocates 549 new jobs in the “Other Services” sector to industrial space requiring industrial land.¹⁵

¹⁴ Table 12-14 is identical to Table 3 on page 18 of the *Findings*.

¹⁵ Table 12-18 is identical to Table 4 on page 18 of the *Findings*.

Table 12- 18: Industrial Space Utilizing Employment Projection through 2040

Industry	% Industrial Space Utilizing	2009	2018	2020	2025	2030	2035	2040
Construction	30%	117	197	210	239	267	301	337
Manufacturing	91%	2,003	2,287	2,443	2,782	3,110	3,505	3,924
Wholesale Trade	82%	60	87	93	105	118	133	149
Retail Trade	0%	-	-	-	-	-	-	-
Transportation, Warehousing & Utilities	93%	169	177	189	216	241	272	304
Information	88%	39	49	53	60	67	76	85
Financial Activities	0%	-	-	-	-	-	-	-
Professional & Business Services	18%	58	85	91	104	116	131	146
Education & Health Services	0%	-	-	-	-	-	-	-
Leisure & Hospitality	0%	-	-	-	-	-	-	-
Other Services	93%	380	403	431	491	549	618	692
Government	0% ¹⁷	-	-	-	-	-	-	-
Total		2,825	3,286	3,510	3,997	4,468	5,035	5,638
Cumulative from 2009		-	461	685	1,172	1,642	2,210	2,812

Table 12-25 of the *EOA* allocates 236 new jobs in the “Other Services” sector to office space requiring commercial land.

Table 12- 25: Office Space Utilizing Employment through 2040

Industry	% Office Space Utilizing	2009	2018	2020	2025	2030	2035	2040
Construction	2%	8	13	14	16	18	20	22
Manufacturing	5%	112	126	134	153	171	193	216
Wholesale Trade	5%	4	5	6	6	7	8	9
Retail Trade	5%	42	56	60	68	76	86	96
Transportation, Warehousing & Utilities	30%	54	57	61	70	78	88	98
Information	90%	40	50	54	61	69	77	87
Financial Activities	90%	217	255	273	310	347	391	438
Professional & Business Services	90%	289	427	456	519	580	654	732
Education & Health Services	40%	1,314	1,259	1,344	1,531	1,711	1,929	2,159
Leisure & Hospitality	40%	407	554	582	662	740	834	934
Other Services	40%	164	174	185	211	236	266	298
Government	35%	61	67	72	82	91	103	115
Total	28%	2,710	3,033	3,240	3,689	4,124	4,648	5,204
Cumulative from 2009		-	323	530	979	1,414	1,938	2,494

For the “Information” sector the city allocates 178% of total projected jobs. For the “Transportation, Warehousing & Utilities” sector the city allocates 123% of total projected jobs. For the “Professional & Business” sector the city allocates 108% of total projected jobs.

In these four sectors alone, “Other Services”, “Information, “Transportation, Warehousing & Utilities, and “Professional & Business”, the city double-counts some 366 jobs. These double-counted jobs equal 22% of the projected 1,642 new jobs needing industrial space through 2030.

III. Artificial Screens Mislabeled As “Required Site Suitability Characteristics” Incorrectly Reduce Capacity Within The UGB And Remove Land In Higher-Priority Areas Outside The UGB From Consideration.

Newberg estimates that it will need 183 gross buildable acres of industrial land from 2010 to 2030. Over half of this need, for 34 sites totaling 99 acres, is for sites averaging 5 acres and 1 acre in size, with 21 sites in the < 2-acre category and 13 sites in the 2-10 acre category.¹⁶ 63 acres, or half the purported industrial land deficit of 127 acres addressed by this UGB expansion, is for 22 sites in these small site categories.¹⁷

Some of the targeted users in these smaller site categories include wineries; professional services such as architecture, engineering, legal and financial services, etc; and creative services (advertising, public relations, film and video, web/internet content and design).¹⁸

The existing UGB has considerably more capacity to accommodate the need for industrial land, especially for these smaller sites than the application identifies. Much of this additional capacity is discounted because of artificial screens that are mislabeled as “required site suitability characteristics.” (*Findings* p. 26, Table 10 & *EOA* p. 46, Table 12-22).

These so-called “requirements” artificially reduce capacity within the UGB and also remove land that could accommodate the need for large sites in higher-priority areas outside the UGB from consideration. In many respects they appear to be reverse engineered so that the only suitable site is the large block of prime farmland that the city wants to develop as the South Industrial Area:

- “Required” grouping of 20 vacant acres with parcels 5 acres or larger

Even though over half the city’s industrial land need is for sites averaging 5 acres or less in size, in evaluating potential sites within the existing UGB, the city only, “inventoried buildable land with five or more acres in the UGB... where groups of parcels totaling at least 20 vacant acres could be found together.”¹⁹

¹⁶ *Findings*, p. 22, Table 7

¹⁷ *Findings*, p. 29, Table 11

¹⁸ *Findings*, p. 12, Table 2

¹⁹ *Findings*, p. 27

Without this artificial screen, the 22 small sites that account for at least half the expansion could potentially be accommodated within the existing UGB on land that the city never even considered.

- “Required” agglomeration of at least 100 new acres

The *Findings* and *EOA* contend that each and every one of the targeted industries for which the city is expanding the UGB, including wineries, professional business services, creative services, etc, require sites that are either “adjacent to existing industrial areas,” or on “an agglomeration of at least 100 new acres to facilitate agglomeration economies and minimize adverse impacts.”²⁰

According to the city’s own application, *none* of its targeted industries requires a site larger than 50 acres.²¹ To the best of our knowledge, *none* of the existing industries in Newberg that fall within the targeted industry clusters, including wineries, professional and business services, or Newberg’s largest manufacturers like A-dec, are located within an industrial area totaling at least 100 acres. Neither the *Findings* nor the *EOA* provide evidence that any of the targeted industries requires agglomeration of any size or kind.

- “Required” location within 1/8 mile of a major arterial or state highway

The *Findings* and *EOA* also contend that each and every one of the targeted industries for which the city is expanding the UGB require sites within 1/8 mile (660 feet) of a major arterial or state highway without travel through non-industrial properties. The only roadway classified as a major arterial in Newberg’s Transportation Systems Plan (TSP) is Highway 99W, which is also a state highway.

While some of the targeted industries may find it desirable to locate along Highway 99W, Highway 219 or Highway 240, many may not, and such proximity is clearly not required for these firms to be viable. Most of Newberg’s largest existing industrial users, all of whom are in the targeted industry clusters, are not located within 660 feet of a state highway or major arterial. These include, at a minimum, A-dec, SP Newsprint/White Birch, and Ushio. Traffic from many of them, including A-dec and Ushio, passes through non-industrial areas.

- Exclusion of sites adjacent to residential land

The application categorically excludes as unsuitable all sites that abut residential neighborhoods on more than 25% of the site perimeter unless buffers are present or planned. Neither the *EOA* nor the *Findings* explain why *all* the targeted industries require sites that are buffered from residential land. While such buffering may be desirable for certain industries, such as food processing or heavy manufacturing, it is not required or even necessarily desirable for many of the targeted industries, especially those in the “service” category.

In fact, some of Newberg’s largest existing industrial employers within the targeted industry clusters do abut residential neighborhoods, including A-dec, SP Newsprint/White Birch, and Ushio, as do many existing users in the targeted professional and creative services sectors.

²⁰ *Findings*, p. 26, Table 10 & *EOA*, Table 12-22, p. 46

²¹ *Findings*, pp. 19-20, Table 5

- “Required” connection to I-5 via Highway 219

The *Findings* and *EOA* also contend that each and every one of the targeted industries for which the city is expanding the UGB require sites that have a connection to I-5 via Highway 219.

Any site in Newberg can connect to I-5 via Highway 219. If the city contends that only sites with direct access to Highway 219 meet site requirements, this is unjustified. No rationale is provided as to why the targeted industries would require this. As noted above, Newberg’s largest manufacturers do not have direct access to Highway 219. For other targeted industries, such as wineries, professional services, etc, such a locational requirement seems even more tenuous.

- Topographical exclusions

The application categorically excludes as unsuitable all sites with slopes greater than 10% and all sites that do not have a developable area that is generally rectangular in shape.

Neither the *Findings* nor the *EOA* explain why *all* targeted industries require a flat, rectangular site nor why any specific targeted industry requires a flat, rectangular site. While such sites may be generally cheaper to develop and service, many of the targeted industries regularly use sites that do not have these characteristics. For example, many area wineries locate on sites with slopes greater than 10%, including Chehalem, A to Z, and August Cellars. The developable area of the SP/White Birch site and the Allen Systems/FMC Foodtec site are not “generally” rectangular in shape. The categorical exclusion is not justified.

- “Required” separation from agricultural land

The *Findings* and *EOA* contend that each and every one of the targeted industries for which the city is expanding the UGB, require sites that do not abut large tracts of agricultural land unless effective buffers are present or planned. The application does not explain why all or even any of targeted industries require sites that are buffered from agricultural land.

This “requirement” is particularly unsupportable for two reasons: First, it appears to circumvent the laws that protect agricultural land from urbanization by using compatibility with farm operations as an excuse to skip over higher-priority areas to expand the UGB onto prime farmland. Second, many of the targeted industries are by definition, compatible with land in agricultural zones, including wineries, nurseries, agricultural products, and food processing.

Nothing in agricultural operations inherently renders adjacent sites unsuitable or unviable for industrial uses. In fact, of the various urban uses, industrial use is considered to be more compatible with agricultural uses and other urban uses, such as residential, are less compatible with agricultural uses.

- Exclusion of sites that could result in truck traffic through downtown

The application also categorically excludes as unsuitable any site that will result in truck traffic through downtown. While avoiding truck traffic through downtown is an understandable desire for Newberg, there are several problems with the use of this screen.

First, there is no definition here. Is one truck trip a day unacceptable, or does it take 50 trucks a day?

Second, by the city's own analysis, industrial employment won't rebound to pre-recession levels until 2018. There will be little need for additional industrial land until that time. By then, other truck freight options may well be in place, potentially including the Newberg-Dundee bypass. On the one hand, the city excludes land buildable under the code from the buildable lands inventory and skips over higher-priority land outside the UGB, based on possible inclusion in the bypass right-of-way. On the other hand, the city doesn't consider it as a transportation alternative that could route traffic around or away from downtown.

Third, avoidance of traffic through downtown is a preference of the city's not a requirement for the targeted industries. It is an understandable desire, but it is many of the targeted industries operate successfully in locations (including downtown locations), that generate very little truck traffic. Examples include professional services such as architecture, engineering, legal and financial services, etc, and creative services (advertising, public relations, film and video, web/internet content and design). Others, including two of the largest wineries in Oregon, Dobbies and Argyle, operate successfully in locations that generate traffic through Newberg.

Fourth, Highway 99W through downtown is classified in the Newberg TSP as a major arterial, intended to "serve truck movements."²² The Oregon Highway Plan (OHP) classifies Ore 99W as a freight route through the City of Newberg.²³ The categorical exclusion of any site that will result in truck traffic through downtown is inconsistent with these adopted and acknowledged plans.

Finally, this criterion has been misapplied in evaluation of specific sites. For example, for sites outside the UGB along North Valley Road, (Sites 1, 2, and 3) the findings summarily conclude "Truck traffic forced downtown to reach I-5/99W."²⁴ Instead, traffic from these sites would undoubtedly use the same general route as traffic from Ushio and A-dec: Aspen Way to Mountainview, to Springbrook.

For all these preceding reasons, the "Required Industrial Site Suitability Characteristics" have not been justified. The findings cite a letter dated December 1, 2009 from Tom Fox from OBDD, as support for these "requirements." In so doing they greatly exaggerate what Mr. Fox wrote. While the city did not include his letter in your packet, we have attached it to this testimony for your review.

First, what Mr. Fox reviewed and commented on was the site descriptions and sizes by targeted industry cluster in Tables 16-19 of the draft EOA. He did not review or comment on the list of "Required Industrial Site Suitability Characteristics." It is one thing to correlate a need for sites

²² Newberg TSP, p. 30

²³ Newberg TSP, p. 41

²⁴ Findings, pp.41, Table 12

in targeted industries to various size ranges, like < 2-acre, 2-10 acres, 10-30 acres, and 30-50 acres. It is quite another to find that all these various sites must be within an agglomeration of at least 100 new acres, with access to I-5 via Highway 219, on locations that do not abut residential or unbuffered agricultural land.

Second, what the letter from Mr. Fox at OBDD actually said was that the various site sizes were "viable." That is a far cry from saying they are requirements. Presumably other site sizes could also be viable.

As a result of these various screens, the only two boundary alternatives analyzed in the application, Area 8 and Area 10, are both comprised primarily of prime farmland, the lowest priority for inclusion in a UGB.

As the findings concede, the locational factors of Goal 14 "are used only to determine which suitable land of a particular priority should be included in the UGB. Thus, lower priority land cannot be included even though it may better meet the factors."²⁵

The four Goal 14 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; and
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

These are precisely the type of factors that were impermissibly used to screen out higher priority land:

"Agglomeration of at least 100 new acres to facilitate agglomeration economies...

"Compatibility (residential downtown and resource land)."

"Highway access without travel through non-industrial properties."²⁶

Higher priority land was screened out with these factors, including not only higher priority land in potential expansion areas, but also within the UGB itself. For example, even though over half the land need is for small sites, the findings summarily dismiss Site 1 within the UGB:

Application of Industrial Site Suitability Characteristics to Sites in the UGB
Below is a detailed discussion of the application of the site suitability criteria to non-industrial sites in the UGB.

Site I is at the intersection of North Valley Road and Chehalem Drive. This area includes 20 buildable acres. However, it is not adjacent to any existing industrial

²⁵ Findings, p. 46

²⁶ Findings, p. 26, Table 10

areas, and lacks the 100 acre agglomeration of parcels needed to create a new industrial area. The closest access would be to North College Street. This would require truck traffic to travel through commercial and residential areas to reach the I-5 corridor. It abuts residential areas on more than 25 percent of its perimeter. Thus, Site I is not suitable for redesignation as industrial.²⁷

Many other areas are summarily dismissed for similar reasons.

IV. CONCLUSION

The application overestimates the amount of industrial land Newberg will need over the planning period and underestimates the capacity within the existing UGB to meet those needs.

Moreover, the analysis within the application wrongly discounts alternative areas for expansion, like existing urban reserves and other areas with poorer soils. These alternative areas *can* accommodate much or possibly even all of the city's need for additional employment land, and therefore, by law, they must be included ahead of the prime agricultural land targeted by the city.

Because of its defects, the flawed *EOA* that forms the underlying justification for this UGB expansion is under appeal to LUBA. We recognize the considerable work that Newberg has undertaken to date. However, it makes more sense to await a ruling from LUBA prior to moving forward with additional work based on a plan that may well be remanded or reversed.

We hope these comments are helpful in achieving that outcome. Please include them in the official record of these proceedings and notify us of any decisions and/or future hearings in this matter.

Sincerely,



Mia Nelson
1000 Friends of Oregon
220 East 11th, Suite 5
Eugene, OR 97401
541.520.3763



Ilsa Perse
Friends of Yamhill County



Sid Friedman
1000 Friends of Oregon

Attachments:

1. City of Newberg – Demand for Commercial and Industrial Land, p. 4 (Johnson-Gardner)
2. Letter from Tom Fox, OBDD

Cc: DLCD
Oregon Department of Agriculture

²⁷ Findings, p. 27



David Beam, AICP
City of Newberg
Economic Development Planner
414 E. First Street
Newberg, OR 97132

December 1, 2009

David:

I have reviewed the site descriptions by targeted industry cluster (Tables 16 -19 of Newberg's draft Economic Opportunity Analysis). I concur that site sizes and characteristics would be viable for firms seeking sites in Oregon and for Newberg's targeted industries.

Given Newberg's location and current economic base, the City should be able to find success in expanding and attracting businesses of the identified targeted industry clusters, if development sites of the size and character identified in the EOA are made available.

A handwritten signature in black ink, appearing to read "Tom Fox", is written over a horizontal line.

Tom Fox
Business Development Officer
Business Oregon
Oregon Business Development Department



Again, the “High Growth Scenario” is best summarized as greater strength in Newberg’s manufacturing core, thus much greater overall demand for industrial and office space as a result. The baseline “Medium Growth Scenario” exhibits likely industrial and commercial land need in the neighborhood of 269 acres through 2040.

NET NEW DEMAND FOR COMMERCIAL AND INDUSTRIAL LAND
NEWBERG, OREGON
2004-2025 & 2004-2040
MEDIUM, HIGH AND LOW GROWTH SCENARIOS

Use	Net New Demand for Land (acres) By Scenario From 2004 Through:					
	Medium Growth		High Growth		Low Growth	
	2025	2040	2025	2040	2025	2040
Office	14.8	27.1	20.5	37.8	13.7	24.8
Industrial	34.7	63.8	85.6	161.4	27.0	49.3
Retail	96.2	178.3	167.4	310.7	76.8	135.2
Total	145.7	269.2	273.5	509.9	117.5	209.3

SOURCE: Johnson Gardner LLC

Need for retail drives the vast majority of commercial land demand under all three scenarios. Under the “Medium Growth Scenario,” retail drives the largest share (66%) followed closely under the “Low Growth Scenario” at 65% of need. Retail, though still the majority of demand, accounts for 61% of commercial and industrial land in the future with the “High Growth” assumption due to the significantly greater expected growth of manufacturing jobs under that scenario.

It is important to note that the above forecasts for industrial and commercial land need are net acreage required only for building and impervious surface space requirements. Roads, right-of-ways, parks and public facilities, among other things, necessary to serve projected land development has not been included. A gross-up factor of 25% is commonly utilized by jurisdictions for planning purposes to estimate gross land need, though that would be at the discretion of The City of Newberg given its specific planning requirements.

Testimony of Cheryl McCaffrey; 7425 Earlwood Rd.; Newberg, OR 97132; tel: 503 625-5486; email: camcons@onlinenw.com

RECEIVED

MAY 25 2010

Prepared May 25, 2010 for June 1 2010 hearing.

Re: City of Newberg Industrial Urban Growth Boundary (UGB) Expansion and Comprehensive Plan Map Amendment: Report and Findings. (Referred to as "this document.")

Agricultural land no longer created. I am concerned that this document proposes to convert valuable and productive agricultural land to uses that do not require this natural richness. Once the land is disturbed and built upon, it is forever gone from agricultural productivity. New agricultural land is not being made, but human populations continue to grow and need more food. We seem to consider the purpose of natural resources as being for exploitation for whatever we want, rather than as an asset to be wisely managed for their best use considering all wild and human uses. Forcing agriculture to more marginal land is a less sustainable use than leaving prime land in agricultural production.

Quality of Life. The document considers the quaint, small town atmosphere and the vineyards of the Newberg area as assets. The pastoral areas around Newberg are a tremendous part of the quality of life here. This quality of life attracts people to Oregon. The proposed industrial area is counter to these values. Driving through industry from rural beauty does not welcome one to Newberg, the heart of wine country.

Reduce agricultural acreage. This document evaluates many places within and outside the City of Newberg for industrial expansion. It identifies as requirements, criteria that may not really be essential for all types of targeted uses (e.g. agglomeration of at least 100 acres, within or contiguous to existing UGB). These criteria are then used to eliminate parcels other than the selected Area 8.

It seems that planners did not consider as a requirement, avoiding high-value farm land for industrial use. Other considerations, like "25 % of the site is bounded by residential areas", were stated as requirements. I think that further evaluation is warranted to place a high value on retaining agricultural land and to reconsider placing some of the identified uses into other areas that were eliminated from consideration.

Why contiguity? The document has predetermined that the amount of area "needed" for the identified uses must be contiguous and horizontal. Identified uses may be independent of each other and may not need to be contiguous. Some uses, may be better located near similar existing uses (e.g. airport-related industrial use may need facilities of Sportsman Airport; sports & recreation may be suitable near George Fox athletic fields), but these may not be contiguous. There is not a good reason why the proposed industrial uses need to be in one industrial area, especially where existing infrastructure can be merely expanded in other locations, not started from scratch as in Area 8. The clusters and uses identified are not all related. In fact, some of them, like "professional services", don't seem to fit in an industrial area. Some of these uses can be accommodated within the existing UGB, including adding a story to existing buildings. Some uses have little truck traffic so are less impactful to city or residential areas. These considerations have not been adequately evaluated.

Build Upward. It seems to be assumed that the 127 ac. of buildable land occupies horizontal area. Many of the identified uses are not ones that have to be at ground level or need to be on large blocks of land. Office uses could be located above functions using large equipment. If the uses were in 2-4 story

buildings, considerably fewer acres of land would be needed. Parking occupies vast acreage for commercial and industrial uses. Certainly parking can be done in vertical parking garages, thus reducing significantly the acreage needed.

By locating many of these facilities in areas other than along the St. Paul Highway, and by building vertically, land of lower agricultural or resource value can be occupied and less high value farm land destroyed.

Transportation. I am also concerned about transportation. It seems that this proposal depends on access to I-5 through Marion County. It could affect agricultural land there as well as in Yamhill County.

Although Newberg may want employees to live in Newberg, there's a good chance that they will locate elsewhere because of other family logistics and considerations. There will be an increase in use of Wilsonville Road (already referred to as "the Newberg Highway"), a very dangerous road, and Highway 99, already a transportation problem. The document inadequately considers other transportation options such as air, rail or river for goods and public transportation for workers. It seems that Newberg needs to resolve its transportation problems before expanding its boundaries.

Storm water. Another aspect not considered adequately is storm water. A storm event of 1 inch of rain falling on impermeable roofs & pavement on 127 acres would be over 10 acre feet of runoff (on 260 ac. over 21 acre feet). This could cause rapid acceleration of flood levels or could tax the capability of a water treatment facility. In 1996 when Portland was braced for the Willamette R to flood the city, unexpectedly, Tualatin got flooded. It made sense that this would happen given all the new development – industrial & residential – that was done upstream from the city. Without the sponge provided by farmland (holding rain water and releasing it slowly to the rivers.) landowners downstream from storm water discharge could be adversely impacted by the flooding caused by this land conversion. This merits further consideration. Reducing the amount of open land surface by multilevel structures would reduce this potential problem.

Future UGB expansion. I am also concerned about cumulative impacts from this expansion into the future. It seems that in 2008 an Urban Reserve Amendment was approved for residential development between Wilsonville Road and Highway 99 to meet projected housing needs. Now, the City is proposing additional employment opportunities and wants these employees to live and shop in Newberg. It seems that this is encouraging increased demand for housing. Will this stimulate another land grab from the county for yet another UGB expansion onto high value farmland?

It seems to me that it would be just fine for Newberg to say, "No, we like our quality of life, and don't want to be an industrial center. We'll increase employment opportunity for our projected residents, but we don't need to try to attract even more."

Robert B. Roholt
31150 NE Schaad Rd. Newberg, Or. 97132
Phone 503-538-6830 Email: rroholt@verizon.net

May 25, 2010

Newberg Urban Area
Management Commission (NUAMC)
co Jessica Nunley
Newberg City Hall
414 E. First Street
Newberg, OR. 97132

RECEIVED
MAY 25 2010

Re: Proposed South Industrial UGB Amendment, file #UGB -09-001

I am opposed to South Industrial Area UGB amendment as it is currently being presented because I believe it is not in the best interests of the City of Newberg and the unincorporated areas around Newberg.

I believe that the city has over estimated the need for new large parcel industrial land especially in the near term. We are in the midst of one of the largest economic downturns that our country has ever seen and we do not understand the ramifications of that downturn at this time. It is not prudent to expand the urban growth boundary until have clearer view of the future. If you drive through Newberg and other neighboring communities you will see many vacant or nearly vacant commercial and industrial structures like the Suntron facility on Brutscher St. in Newberg that need to be filled before ever thinking about removing prime farmland from production.

I am not saying that we do not need to grow but we need to maintain self control. This proposal is not an example of responsible growth, but a classic example of trying grab as much prime land as possible in the faint hope that developers can entice some industry to bring their business to Newberg. However, it could backfire, leaving an ugly scar on the area, and crippling two strong industries that we already have here, agriculture and tourism.

Finally, the analysis which presents the justifications for the amount and location of the industrial and commercial land are still under appeal with LUBA, and until those issues are resolved, it is imprudent for NUAMC to move this proposal forward.

Sincerely,



Robert B. Roholt

MAY 26 2010

Subject: NEWBERG UGB AMENDMENT

This information is for NUAMC Meeting to be held June 1, 2010 at 7:00 PM at the Newberg Public Safety Building, 401 East 3rd Street, Newberg, Oregon.

RE: WRITTEN COMMENTS SUBMITTED FOR File # UGB-09-001

From: Karen Russell
1408 Hoskins Street
Newberg, Oregon 97132
(503) 538 7220
Email: russ1408@gmail.com

Prescott Bluebird Recovery Project is a group endeavoring to keep the Western Bluebird off of the Endangered Species List. Hubert Prescott started this organization in 1973 when there were only 30 pairs of Western Bluebirds left in our area. When I speak of the Western Bluebird, I AM NOT SPEAKING ABOUT THE COMMON BLUE JAY (SCRUB JAY).

I am a Monitor/Bander with PBRP and have been involved for 11 years. Some members of the group have been involved over 30 years.

We work with, and report to the Federal Government all data and statistics we compile each year. The National Banding Lab supplies all of our bands, providing our statistics continue to warrant the need.

PBRP has been vigilant to their cause since 1973, and has managed to get the Western Bluebird to the SENSITIVE Category (One step above the ENDANGERED Category). It has taken 37 years to accomplish this.

Western Bluebirds were originally in the valley on agricultural land until the construction of homes and business facilities drove them into the surrounding mountains where the numbers began to decline. Bluebirds are GROUND FEEDERS for INSECTS. Their Normal Habitat

has always been large open areas of agricultural land. It has only been in recent years that Western Bluebirds are once again returning to surrounding agricultural land that is still available. Unfortunately, this includes the land presently designated for UGB EXPANSION. Initial expansion of this nature, eliminating valuable agricultural land, was the cause of near extinction of the Western Bluebird, as well as causing hardships on many families who made their living farming the land.

Western Bluebirds DO NOT MIGRATE. They stay year-around in the same 6 to 8 mile range from where they are hatched. Needless to say, FARMERS DO NOT MIGRATE. They need to maintain their valuable land year-around for THEIR OWN LIVELIHOOD, for the BENEFITS THEY NOW PROVIDE NEWBERG AND SURROUNDING AREA, as well as PREVENTING THE EXTINCTION OF THE WESTERN BLUEBIRD.

There have been many groups such as PBRP established across the USA. All have the same goal – to keep the beautiful Western Bluebirds, Mountain Bluebirds, and Eastern Bluebirds OFF THE ENDANGERED SPECIES LIST.

PLEASE help our cause by keeping all AGRICULTURAL LAND DESIGNATED AS FUTURE AGRICULTURAL LAND, and DO NOT INCLUDE IT IN THE EXPANSION OF THE UGB AMENDMENT.

Thank you for your consideration of our Project to save the Western Bluebird and the very valuable agricultural lands in our surrounding areas.

We truly must STOP and CONSIDER the things that will no longer be replaceable if this UGB Amendment takes place!!! PLEASE listen to the taxpayers, and do not make decisions based on personal gratification, as so many politicians do! Thank You!

Karen Russell

May 26, 2010

Newberg Urban Area Management Commission
Written Comments
File #UGB-09-001
Attn: Jessica Nunley
P.O. Box 970
Newberg, Oregon 97132

Yamhill County Planning Dept.
525 NE 5th Street
McMinnville, Oregon 97128-4601

Newberg's proposed UGB expansion for a 260 acre industrial zone south of the city would negatively impact farmland and the I-5 Donald/Aurora interchange. The City has naively stated this expanded industrial zone is the best choice they have because of its close proximity to I-5.

Have studies been done to determine the impact the increased traffic would have on 219, the bridge over the Willamette River, McKay/Yergen/Ehlen Road and the Donald/Aurora I-5 interchange?

I do not know how many industries 260 acres can accommodate. But their traffic route to I-5 could well necessitate widening the above mentioned roads and bridge. ODOT considers the Donald/Aurora I-5 interchange as not only the most dangerous but also beyond capacity at the current level of traffic. With all this in mind, are Newberg and the future industries willing to pay the costs of their impact on this 10 minute route to I-5? There is a thriving farm industry already situated all along this route to I-5. This land would be negatively impacted by increased traffic and road improvements for that traffic. Has any thought or consideration been given to locating the expanded manufacturing industrial zone close to the existing railroad tracks? The City claims it is expanding its UGB for the future. What kind of future is Newberg expecting? By all appearances Newberg is looking back to the future; relying on industries producing more roadway traffic. Given the environmental needs to reduce carbon emissions, why is Newberg proposing more truck and automobile traffic?

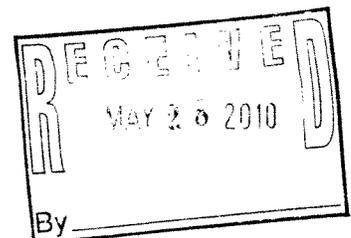
Why is Newberg claiming a 10 minute access to I-5 across Marion County farmland and NOT claiming a traffic pattern around the city to 99W on Rex Hill? What has happened to the rest of your Newberg-Dundee Bypass?

Oregon Land Use laws attempt to promote responsible growth. This expanded UGB, which relies on other governmental entities to take care of the impact, is totally irresponsible.

Sincerely,



Marcie Garritt
3961 Blanchet Avenue NE
P.O. Box 480
St. Paul, Oregon 97137



May 27,2010

Newberg Urban Area Management Commission
Written Comments
File #UGB-09-001
Attn: Jessica Nunley
PO Box 970
Newberg, OR 97132

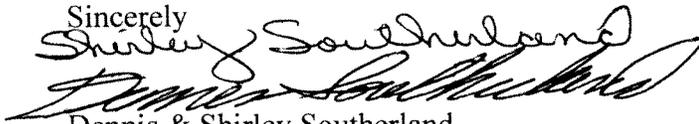
Yamhill County Planning Dept.
525 NE 5th Street
McMinnville, OR 97128-4601

Dear Sirs:

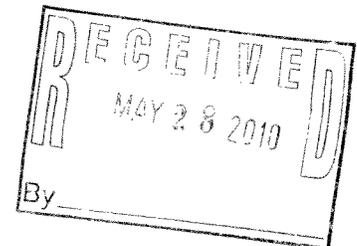
We live in St. Paul and we are writing on opposition to the Newberg Urban Growth Boundary amendment to include 260 acres south of the City into the Newberg UGB. This manufacturing area would force most of that truck traffic across the bridge and onto Marion county roads that are already heavily used with farming trucks and farming equipment necessary for this area and the last thing the St. Paul farming area needs is your added traffic. It would be a shame to build more roads on this wonderful farm land.

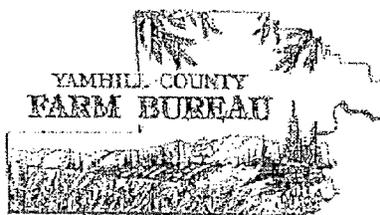
The bridge across the Willamette is a bottle neck. A half days work was missed because of a wreck on the bridge and the only way around is through Wilsonville or south across the Willamette at Salem. If you are planning twenty years into the future why aren't you building this close to a rail line that would lessen the impact on the roads and help solve the pollution problem. Our Marion County Commissioners do not support a new access highway across French Prairie.

Sincerely



Dennis & Shirley Southerland
3838 Blanchet Ave. NE
St. Paul, OR 97137





(503) 472-9123 • 1215 NORTH ADAMS STREET, SUITE C • McMINNVILLE, OREGON 97128

May 27, 2010

Newberg Planning Division
 PO Box 970
 Newberg OR 97132

MAY 28 2010

YAMHILL COUNTY PLANNING

Subject: Proposed Urban Growth Boundary Amendment

Dear Commissioners:

The City of Newberg proposes to expand its Urban Growth Boundary by approximately 260 acres along Highway 219 south towards the Willamette River. The land is proposed to be included for industrial uses. The Yamhill County Farm Bureau is opposed to the proposed UGB amendment.

We support the principle of land use planning for the purpose of protecting the resources and the agricultural environment and infrastructure needed for farmers and ranchers to produce food and fiber for current and future generations in a profitable manner. We are philosophically opposed to efforts to remove economically productive farm and forest land from farm and forest zones. (Farm Bureau Policy 3.010)

The city's main justification for inclusion of this land is to target manufacturing industries such as "semi-conductor/silicon" and "sports apparel." These industries, and manufacturing in general, are shrinking, not growing.

Agriculture is an industry, too. This land supports what is, by some measures, the leading industry in Yamhill County- Agriculture. In 2008 direct sales in the county were close to \$300 million dollars, supporting thousands of jobs. And agriculture is a growing industry, unlike manufacturing or high-tech.

Newberg's legitimate needs to accommodate job growth do not require such extensive blocks of large flat farmland. Over half the land Newberg says it needs are for firms that need sites with an average size of 1 to 5 acres. Yet Newberg claims that these firms "require" a location that is either adjacent to an existing industrial area or within "an agglomeration of at least 100 new acres."

The use of questionable criteria like the artificially large size requirements, the refusal to consider any area that abuts residential development on more than 25% of its perimeter, and a requirement for proximity to Highway 219 suggest that the city has reverse-engineered its studies so that the only possible location for the expansion is prime farmland between the city and the Willamette River.

Despite what the city claims, many of its "targeted industries," like wineries and professional services (legal and architectural firms) do not need large blocks of our best farmland.

In addition, Newberg has vacant plants like the recently -closed Suntron plant that should be refilled before green fields are developed.

We believe that UGB expansion is not an automatic right. Any boundary expansion on land protected under Goal 3 must not impair the agricultural environment and infrastructure needed to produce food and fiber for current and future generations. The expansion of a UGB should not occur on land(s):

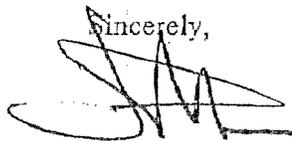
- That is predominantly irrigated or non irrigated soil classes I, II and irrigated class III and IV soils in western Oregon;
- Parcels that are predominantly soils that, if irrigated, are capable of producing the average of other irrigated land in the area;
- Any parcels that are predominantly soils capable of producing the average non irrigated yield for the county; and
- Any soils that the county determines to be necessary to support the agricultural community.

Exceptions should include parcels that are smaller than the applicable minimum lot size *and* at least 75% of its perimeter is contiguous to a UGB, urban reserve or exception area, or soils not listed in ORS 215.710. (Farm Bureau Policy 3.800)

The vast majority of the proposed expansion is prime, productive agricultural land. The remainder is within Rural Exception Areas or Urban Reserves. Consistent with our adopted policies, we are opposed to the inclusion of the agricultural land, with the exception of Tax Lot 3328 00800, a 4 acre parcel at the SE corner of Wilsonville and Adolf Rd. We do not oppose the inclusion of 3328 00800 or the inclusion of the land within exception areas and urban reserves.

Thank you for the opportunity to comment. Please carefully consider your decision.

Sincerely,



Jerry Mann
Yamhill County Farm Bureau President



May 28, 2010

Newberg Urban Area Management Council

City of Newberg Planning Department
 414 E. First Street
 Newberg OR 97132

Yamhill County Planning Department
 525 NE 4th Street
 McMinnville OR 97128

Re: Docket PA-01-10 (Newberg Urban Growth Boundary Amendment)

Dear Commissioners and Staff:

Thank you for the opportunity to comment on the proposed amendment to add approximately 260 acres to Newberg’s Urban Growth Boundary. We have already submitted comments earlier this week on the bulk of this proposal; these comments deal only with the methods used to compute future job and population growth. Please include this letter in the official record of these proceedings.

I. OAR 660-024-0040(9)(a)'s Safe Harbor Offers Cities An Either-Or Choice

State administrative rules provide two safe harbors that may be applied by a local government to determine its employment needs for purposes of a UGB amendment. OAR 660-024-0040(9)(a) provides that "[a] local government may estimate that the current number of jobs in the urban area will grow during the 20-year planning period at a rate equal to **either**:

- (A) The county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department; **or**
- (B) The population growth rate for the urban area in the adopted 20-year coordinated population forecast specified in OAR 660-024-0030." (emphasis added)

Note that these two options are provided as an either-or choice. However, Newberg claims to be pursuing both of these options simultaneously. From page 17 of the March 2010 *Industrial UGB Amendment Justification & Findings (Findings)*:

"Retail trade and leisure & hospitality employment was projected to grow according to Newberg population growth. This was done because the need for retail services typically grows along with population, and also because of Newberg’s strong potential for leisure & hospitality employment growth in its targeted industry cluster of wine/tourism. For



other industries, employment was projected to grow for the 2008-2018 period at the same rate as the projected six-county change drawn from the Oregon Employment Department. For employment projections beyond 2018, employment was projected to grow at the same rate as the projected population growth. This rate is in accordance with the safe harbor provision stated above, and allows Newberg to plan adequately for the 20-year planning horizon to 2030. Table 3 below depicts Newberg's projected employment through 2040 based on these methodologies."

A city may not use subsection (9)(a)(A) of the rule to compute job growth for 2008-2018, then switch to subsection (9)(a)(B) for the latter half of the 20-year planning period. Neither may a city use one safe harbor method for some industries, and the other method for the remaining industries. Instead, a city must choose one method and use it consistently.

Although Oregon Employment Department (OED) forecasts do not extend 20 years, this fact is anticipated by the rule. Subsection (9)(a) clearly states that the OED's shorter-term growth rate is to be extended for the entire 20-year planning period.

II. OAR 660-024-0040(9)(a) Can Only Provide A 20-Year Forecast

Newberg proposes an employment forecast extending 30 years, from 2010 to 2040. However, the safe harbors of OAR 660-024-0040(9)(a) cannot be used to create a forecast extending beyond the 20-year planning period.

III. OAR 660-024-0040(9)(a)(A) Requires Use Of Most Recent Job Numbers

The safe harbor rule specifies that the OED growth projection must be applied to "the current number of jobs in the urban area." In its *Revised Economic Opportunities Analysis (EOA)*, Newberg presents an employment estimate for 2009.¹ Newberg should use these current 2009 figures as the base when calculating its 20-year job growth. However, it is evident from an inspection of the projections that Newberg is instead extending its pre-recession 2008 job figures. For example, in Table 3 on page 18 of the *Findings*, the 2008 and 2009 construction jobs are 642 and 390, respectively. The next entry is for 2018, in which Newberg projects 656 jobs. That is a 2% increase from the 2008 figure, and a 68% increase from the 2009 figure. According to Table 12-13 on page 25 of the *EOA*, Newberg applied OED's 2.07% rate to construction job growth up to 2018. Therefore, it is apparent that Newberg extended the historical 2008 job totals, and not the current 2009 figures.

Since 2008, the local economy has shed thousands of jobs in the worst recession in decades. Manufacturing and other sectors that use industrial land in Newberg have been particularly hard hit. Under the rosiest scenarios, it will take years to refill existing vacant capacity. Had Newberg used the safe harbor methodology correctly, and applied the OED growth rates to 2009 employment figures, the result would be a much lower

¹ See *EOA*, Table 12-10, page 22, and associated text and footnotes.

overall forecast of employment growth in sectors that use industrial land, and a corresponding decrease in needed land.

IV. OAR 660-024-0040(9)(a)(B) Is Not Available To Newberg

Newberg cannot use the safe harbor method of OAR 660-024-0040(9)(a)(B) to create an employment forecast because it does not have the requisite "adopted 20-year coordinated population forecast specified in OAR 660-024-0030." Newberg is instead using a stand-alone forecast for Newberg only that was adopted into the *Newberg Comprehensive Plan* by Ordinance 2005-2626 on November 21, 2005. It is found in Table III-2 on page 61 of the *Plan* and in Tables 12-3 and 12-27 of the *EOA*, and is reproduced below:

Table III-2. Future Population Forecast – Newberg Urban Area

Year	Population Forecast
2000 ^b	18,438
2005	21,132
2010	24,497
2015	28,559
2020	33,683
2025	38,352
2030	42,870
2035	48,316
2040	54,097

Sources: Johnson Gardner, Barry Edmonston

OAR 660-024-0030(1)² requires Newberg's forecast to be "consistent with the coordinated county forecast", and that said county forecast be "a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036." The rule parallels ORS 195.036,³ which requires that Yamhill County adopt "a population forecast for the entire area within its boundary."

² **OAR 660-024-0030(1):** Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. Cities must adopt a 20-year population forecast for the urban area consistent with the coordinated county forecast, except that a metropolitan service district must adopt and maintain a 20-year population forecast for the area within its jurisdiction. In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.

³ **ORS 195.036 Area population forecast; coordination.** The coordinating body under ORS 195.025 (1) shall establish and maintain a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans, and shall coordinate the forecast with the local governments within its boundary.

The most recent countywide forecast was adopted as part the 1995 Transportation System Plan (TSP). Both the time period covered and the population numbers in Newberg's stand-alone forecast are inconsistent with this adopted and acknowledged countywide forecast, which remains in force today. The TSP's forecast table is reproduced below:

3.2.1 POPULATION FORECAST

The Portland State University (PSU) Center for Population Research estimates population for each city and county in Oregon. The population estimates for 2014 for Yamhill County are shown in Table 21. The population in the County was distributed between incorporated and unincorporated areas, and was further distributed among the exceptional growth areas and other areas as shown in Table 22.

TABLE 21 PROJECTED POPULATION OF YAMHILL COUNTY

Jurisdiction	Historical Growth Factors (1940 to 1994)	2014 Projections
Amity	1.95%	1,757
Carlton	1.00%	1,642
Dayton	2.72%	2,862
Dundee	5.76%	6,522
Lafayette	2.70%	2,334
McMinnville	3.01%	37,970
Newberg	3.75%	30,656
Sheridan	2.87%	8,122
Willamina	1.79%	2,502
Yamhill City	2.38%	1,448
Yamhill County (excluding cities)	1.20 %*	21,160
Yamhill County (includes cities)	2.40%	116,975

* not used in the analysis

Regarding consistency with the time period covered, the stand-alone Newberg forecast extends to 2040, decades farther than the coordinated countywide forecast, which has an end date of 2014. The foundational countywide forecast must include the same time period as the individual city forecast, in order for the two to be considered "consistent" under OAR 660-024-0030(1). This is plain to see by the safe harbor provision in OAR 660-024-0030(3), which provides a workaround to the normal requirements so long as the countywide forecast was adopted within the last 10 years.⁴ This safe harbor provision

⁴ **OAR 660-024-0030(3):** As a safe harbor, if a coordinated population forecast was adopted by a county within the previous 10 years but does not provide a 20-year forecast for an urban area at the time a city initiates an evaluation or amendment of the UGB, a city and county may adopt an updated forecast for the urban area consistent with this section. The updated forecast is deemed to comply with applicable goals and laws regarding population forecasts for purposes of the current UGB evaluation or amendment provided the forecast:

- (a) Is adopted by the city and county in accordance with the notice, procedures and requirements described in section (1) of this rule; and
- (b) Extends the current urban area forecast to a 20-year period commencing on the date determined under OAR 660-024-0040(2) by using the same growth trend for the urban area assumed in the county's current adopted forecast.

would not be necessary if it were possible to do as Newberg suggests, and use a city forecast that covers a much longer time period than the coordinated countywide forecast adopted in 1995.

Regarding consistency with the population numbers themselves, the TSP's coordinated countywide forecast projects a Newberg 2014 population of 30,656. This directly conflicts with Newberg's population projections, which provide a 2015 population of 28,559, thousands of people less than the county's acknowledged 2014 forecast for Newberg.

Regarding coordination, OAR 660-024-0030(1) states that "[i]n adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county." It does not appear that Yamhill County provided notice to other governments that it was adopting a new coordinated forecast, nor did the County ever hold a public hearing and subsequently adopt such a forecast. Under ORS 195.025, the Board of County Commissioners is the "coordinating body" and is the only entity capable of enacting a new coordinated forecast.

Since the coordinated countywide forecast does not cover the 2010-2030 planning period, it cannot be used as a basis for an employment forecast under OAR 660-024-0040(9)(a)(B). Further, because it was adopted more than 10 years ago, it cannot be extended under the safe harbor methods of OAR 660-024-0030(4)(a) or ORS 195.034(1).⁵ If the County updates its forecast, Newberg may go on from there and adopt a forecast that is consistent with the new countywide forecast. It could then use that forecast to pursue the safe harbor employment needs determination of OAR 660-024-0040(9)(a)(B).

In this case, however, instead of requesting that Yamhill County update its 1995 countywide forecast, Newberg ran the process backward, by adopting its own stand-alone forecast in 2005. Newberg then brought its forecast to the county after the fact for "coordination." This "coordination" apparently consists of a letter dated October 31, 2006 from the county's planning director accepting Newberg's forecast. Under ORS 195.025 the coordinating body of Yamhill County is the Board of Commissioners, and that authority cannot be delegated to staff. Per ORS 195.025(4), coordinating authority may only be delegated to a "voluntary association of local governments" as that term is defined in ORS 197.015(22).

We understand staff's position to be that since Yamhill County later co-adopted Newberg UGB amendments that happened to contain the stand-alone Newberg-only forecast numbers, that this validates the Newberg-only forecast as being in compliance with OAR

⁵ ORS 195.034 and OAR 660-024-0030(4) do not allow reliance on a forecast "adopted more than 10 years before the city initiates an evaluation or amendment of the city's urban growth boundary," and/or "does not provide a 20-year forecast for an urban area at the time a city initiates an evaluation or amendment of the UGB"

660-024-0030 and ORS 195.036, and any attempt to question this would be an impermissible collateral attack on the county's prior decision. This is incorrect.

As a threshold matter, under OAR 660-024-0030, the adopted forecast must be included in the comprehensive plan or in a document referenced by the plan. It is our understanding that the county may have included the Newberg forecast in findings to support its decision on the Newberg UGB amendments (and later on the now-remanded URA amendments), but has never included the forecast in its comprehensive plan or a document referenced by the plan.

Even if the forecast has been adopted into Yamhill County plan, ORS 195.036 pertains to adoption of a single countywide coordinated forecast containing companion forecasts for each urban area, not isolated city forecasts. Since the Newberg-only forecast is not the same forecast contemplated by ORS 195.036; compliance with that statute cannot be demonstrated. Counties can and do adopt and co-adopt other kinds of forecasts, besides the specific type of forecast described by ORS 195.036. For example, the county's TSP also contains forecasts relating to employment and traffic. And in this case, it appears the county at most co-adopted UGB amendments that happened to include a stand-alone Newberg-only population forecast.

As previously noted, the county has not updated its countywide forecast since 1995. If, as part of the county's earlier process with Newberg's UGB amendments, the county had adopted a new countywide forecast and that had been acknowledged, then it would be correct to say that countywide forecast had been deemed to comply with ORS 195.036, and could not now be called into question. But that is not what happened. All that happened is that Yamhill County co-adopted Newberg UGB amendments that contained a stand-alone Newberg-only forecast (or may have merely included the forecast in findings). Just because Newberg puts a table of numbers in a co-adopted UGB amendment, and calls it a forecast, that does not cause it to become a coordinated countywide forecast under ORS 195.036, thereby shielding it from scrutiny in all future decisions.

In *Oregon Shores Conservation Coalition v. Coos County*, 50 Or LUBA 444, 460 (2005), Coos County claimed that an unchallenged and acknowledged decision to include resource land in a urban unincorporated area, which required Goal 3 and 4 compliance, shielded the county from attacks in later proceedings regarding compliance with Goal 3 and 4. LUBA disagreed, and ruled that "[w]hile the acknowledgment process shields the county from certain collateral attacks on its acknowledged plan and ordinances, errors the county may have committed in that process do not obviate goal and rule requirements that govern subsequent post-acknowledgement plan decisions..."

We have the same situation here. Newberg's earlier UGB expansions were made in error, since they were not based on a forecast that was consistent with the coordinated countywide forecast. Clearly, those decisions cannot be challenged now. But those earlier errors do not cause the stand-alone Newberg-only forecast wrongly used in those decisions to become a coordinated countywide forecast under ORS 195.036, and cannot imbue the Newberg-only forecast with immunity from examination in the current

decision process. In other words, despite the earlier errors, the question of whether Newberg's proposed UGB evaluation meets OAR 660-024-0030(1)'s requirement that it be based on a forecast that is “consistent with the coordinated county forecast” must be answered anew in this process.

V. Retail Land Need Cannot Be Based on Population Growth Estimates

Newberg uses its employment forecast to calculate industrial and office land need. However, when calculating retail land need, a population growth method is used. It appears that Newberg has chosen to ignore the actual predicted retail job growth. A five-step methodology is provided on page 52 of the *EOA*:

1. Project future household growth.
2. Estimate Newberg per-household spending in a number of retail categories.
3. Project Newberg retail sales per retail category.
4. Project demand for retail space based on projected sales in each retail category.
5. Convert retail space demands into acreage needs for retail land.

Newberg cannot base any part of its decision on a projection of future household growth, because it does not have a population forecast that complies with OAR 660-024-0040(1)⁶. This rule requires all UGB evaluations or amendments to be based on a forecast that complies with the criteria in OAR 660-024-0030. For the reasons discussed in the previous section, the population forecast listed in the *EOA* does not comply with this standard.

Newberg does not have to base its estimate of retail land need on a population forecast. It could instead use a properly computed safe harbor jobs estimate that is based solely on an extension of the OED employment forecast. Retail land needs could be then estimated based on the projected retail job growth.

VI. Solutions.

We hope these comments are helpful in revising this proposal and that the final product is one we can support. Fortunately, it is quite easy for Newberg to resolve all of the above concerns with the following revisions:

- 1) Extract the annual growth rates for each industry from the OED regional forecast data presented in Table 12-13 on page 25 of the *EOA*.

⁶ **OAR 660-024-0040(1):** The UGB must be based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision.

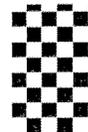
- 2) Apply the annual growth rates to the 2009 job totals presented in Table 12-10 on page 22 of the *EOA* to produce a revised employment forecast for Newberg.
- 3) Recalculate the industrial and office land needs using the revised employment forecast.
- 4) Revise the methodology for computing retail land need to utilize retail job growth, not population growth, as the underlying determinant of land need.

Sincerely,



Mia Nelson
1000 Friends of Oregon
220 East 11th, Suite 5
Eugene, OR 97401
541.653.8703

cc: Steve Oulman, DLCD Mid-Willamette Valley Regional Representative
Richard Whitman, DLCD Director
Darren Nichols, DLCD Community Services Division Manager
Gloria Gardiner, DLCD Urban Planning Specialist
Rob Hallyburton, DLCD Planning Services Division Manager
Bob Rindy, DLCD Senior Policy Analyst and Legislative Coordinator
Katy Coba, Department of Agriculture Director
Jim Johnson, Department of Agriculture Land Use Specialist



MARION COUNTY FARM BUREAU



3415 Commercial St., Suite 115 Salem, Oregon 97302

Telephone: (503) 399-6417

Fax: (503) 399-8082

Newberg Urban Area Management Commission
Yamhill County Planning Department
525 NE 4th Street
McMinnville OR 97128

May 28, 2010

Newberg Planning Division
PO Box 970
Newberg, OR 97132

Dear Commissioners:

Subject: Proposed Urban Growth Boundary Amendment

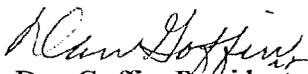
Marion County Farm Bureau joins with Yamhill County Farm Bureau in opposing the proposed UGB expansion amendment, which would expand the UGB by approximately 260 acres, the majority of which is prime, productive agricultural land. We do not support the principle of holding agricultural lands for future industrial and development purposes. Per our Farm Bureau Policy 3.010, we are opposed to efforts to remove economically productive farm and forestland from farm and forest zones.

The industries used to justify this expansion are industries that have, in many cities, 'gone away' in recent years. Agriculture is here to stay and is growing. The infrastructure for farming needs the large blocks of land, whereas the many firms and needs indicated by this proposed expansion only need one to five acres. At this time several industrial/business areas in Yamhill County are vacant and could be used to support the proposed business adventures instead of destroying necessary farmland.

Another important concern for Marion County farmers is the increased traffic from this proposed UGB expansion along Hwy 219 to the I-5 Interchange. Farmers along this stretch are already having problems with congestion and safety issues for farm implements and vehicles.

We have read the facts presented by Yamhill County Farm Bureau's letter and are in complete agreement. We consider this amendment to be biased toward destruction of the infrastructure of farming and ranching thereby weakening the number one industry in Yamhill County - Agriculture.

Sincerely,


Dan Goffin, President
Board of Directors



Marion County **OREGON**

PUBLIC WORKS

May 28, 2010

BOARD OF COMMISSIONERS
Sam Brentano
Janet Carlson
Patti Milne

Jessica Nunley
Newberg Planning Division
PO Box 970
Newberg, Oregon 97132

DIRECTOR
Bill Worcester, P.E.

ADMINISTRATION

Re: File No. UGB-09-001; Proposed Urban Growth Boundary Amendment

BUILDING INSPECTION

Jessica:

DOG CONTROL

EMERGENCY MANAGEMENT

ENGINEERING

ENVIRONMENTAL SERVICES

OPERATIONS

PARKS

PLANNING

SURVEY

Marion County is a neighboring jurisdiction that will be affected by growth in the proposed amendment area located along the southerly limits of the City of Newberg. As such, Marion County and the cities of Donald and St. Paul in the north county area have an interest in the proposed urban growth boundary amendment for industrial lands.

Ken Friday, Yamhill County Department of Planning and Development contacted me on Wednesday, May 26, 2010 of the proposed amendment and referred the notice of public hearing and related materials to me for possible Marion County comments on this matter. The amendment materials have been referred to other staff here at the county and to the cities of Donald and St. Paul. With the public hearing on the UGB amendment proposal set for June 1, 2010, Marion County will not have an opportunity to adequately review the proposal and submit formal comments into the hearing record. Therefore, Marion County is requesting the public hearing be continued and/or that the hearing record be left open, to allow the County and any other affected county jurisdictions to weigh in on the City's amendment proposal.

Marion County along with other interested groups participated last year in the City's South Industrial Area Collaborative Design Workshops master planning process. You may recall that during the process, Marion County expressed concerns as to potential transportation issues and impacts regarding added traffic on Highway 219 into Marion County and how these impacts were to be evaluated, analyzed and addressed in the planning process. County comments on the amendment proposal will likely echo these previous concerns pertaining to transportation issues.

The County appreciates the opportunity to provide these preliminary comments and asks for their inclusion in the hearing record at this time and for County notification of future hearing dates. If there are questions, please contact me at 503-588-5038.

Les Sasaki
Principal Planner
Marion County PW/Planning

cc: Ken Friday, Yamhill County



**Yamhill
Soil & Water**

Conservation District

*Providing Natural
Resource Leadership*

2200 SW 2nd Street
McMinnville, OR 97128
(503) 472-1474 x102
FAX (503) 472-2459
www.yamhillswcd.org

**TO: Yamhill County Department of Planning and Development
525 NE Fourth Street
McMinnville, OR 97128**

FROM: Yamhill Soil and Water Conservation District

SUBJECT: Docket PA-01-10 Newberg Urban Growth Boundary Amendment

The Yamhill Soil and Water Conservation District (YSWCD) Board of Directors has discussed Docket PA-01-10, Newberg's Urban Growth Boundary Amendment, and wishes to submit the following comments for your consideration:

The proposal relies on urbanizing a large block of prime agricultural land to attract new industrial development. According to the application, the largest component of the converted land will be in the manufacturing sector. As outlined in 1000 Friends of Oregon's report this market sector continues to shrink in size and that there is no demonstrable need for this land until at least 2018.

The area covered by the proposal is prime agricultural land. Bringing this area into the UGB does not preclude it being farmed for a period of time but farmers are reluctant to invest in land that is destined for development through tiling, planting of orchard crops, etc.. For this reason the UGB process discourages expansion onto prime agricultural land and there is a high burden to demonstrate that there is no alternative. The district does not believe that this burden has been met and that the proposal should not be accepted in its current form.

The district recommends denying PA-01-10 as it is written.

Comments respectfully submitted.

Tim D. Stieber
Executive Director, Yamhill SWCD

Lee M. Does
Dr. Amy L. Does
173 NE Renne Road
Newberg, Oregon 97132

1st June, 2010

Newberg Urban Area Management Commission
525 NE 4th Street
McMinnville, Oregon 97128

re: File #UGB-09-001

Dear NUMAC:

My wife and I farm at the base of Paret Mountain. We've been following Newberg's plans for expansion, and we believe the city has grossly overstated its land-use needs while seriously underestimating the value and importance of the agricultural land surrounding our town.

To begin, I'm frankly amazed that the city has the time and resources to expend on a UGB expansion while better than 10% of our population is currently unemployed. To date the city has expended untold thousands of taxpayer dollars on contracted attorneys, consultants, and numerous studies, all in an attempt to justify an expansion onto thousands of acres of protected farmland. The city has repeatedly cited studies that were published over six years ago, while conflicting but unbiased and reputable information was available for free from Oregon state economists.

A significant portion (Site #8) of the land the city is currently seeking is outside the existing URA, and includes some of the highest-grade soils in the Willamette river corridor. The EFU designation on these lands is intended to preserve the land for farming. Newberg is by law required to utilize its existing supply of lesser-quality lands before it can apply to move onto high-quality farmland. The city is attempting to justify its purported land needs by claiming that access to I-5 via Hwy 219 is an essential ingredient to attracting new business. Routing additional vehicles onto Hwy. 219 would move traffic out of sight of Newberg, but frustrated drivers would quickly stack up when they encountered the two-lane county roads and slow-moving farm vehicles in Marion County.

Newberg appears unwilling to consider existing low-quality lands to the north of town, including lands already within its URA, and has previously cited poor access and Hwy. 99 traffic detriments to locating a business in these areas. As a point of fact, A-Dec has been highly successful with its own location to the north of town, and no one seems to be complaining about truck or employee traffic generated by this employer. Likewise, Newberg is underestimating the impact of current and future turnover within its existing land base. With manufacturing jobs being outsourced to cheap labor overseas, more facilities like Suntron's recently closed Newberg plant are likely to be available in the future.

I'm a manager in a high-tech firm with about 50 employees. I'm paid to make responsible decisions based upon the most recent and reliable data available. Regarding the city's request, I'm going to ask that you consider the city's request in combination with the following documented facts:

- Manufacturing in Oregon has been/is predicted to continue losing jobs
- State economists predict job growth over the next eight years to be well below previous norms.
- Oregon's state budget is currently facing a nearly \$580 million-dollar shortfall
- Even if built, the 99W Bypass will do nothing to improve Newberg's access to Hwy. 5
- The tourism value of Newberg's wineries, orchards, and pastoral setting could prove to be our most valuable asset; the Allison was fully booked last fall while other businesses were struggling

Lastly, I'm sure I don't have to remind you that most of Oregon is rocks, mountains, or desert; and that the Willamette valley truly is the jewel of our state. No one here would ever condone paving the entire valley to make room for more houses and factories. Like a death of a thousand cuts, however, we risk losing our heritage a piece at a time all for the sake of creating the next shovel-ready parcel.

Sincerely,

Handwritten signatures of Lee M. Does and Amy L. Does, PhD.

Lee M. Does
Amy L. Does, PhD.

emailed to: Friday@co.yamhill.or.us
barton.brierley@ci.newberg.or.us

CITY OF NEWBERG / YAMHILL COUNTY
NEWBERG URBAN AREA MANGEMENT COMMISSION (NUAMC)

PUBLIC COMMENT REGISTRATION CARD

PLEASE STATE YOUR NAME PRIOR TO SPEAKING

(Agendas available at entrance)

Agenda Item No.: _____ FILE No.: UEB-09-001 Meeting Date: 6/1/10

If you wish to make ORAL COMMENTS at this meeting, or submit written comments, please **provide all of the information requested below**. The agenda item numbers and project names are printed on the agenda. If you are attending the meeting to observe, you do not need to fill out a Registration Card.

If you fail to complete this form, you may jeopardize your right or ability to appeal the decision made on the application in question.

NUAMC Meeting

Please check one (public hearings only):

- PROPONENT (For)
- OPPONENT (Against)
- UNDECIDED (Testify during either Proponent or Opponent testimony)
- WRITTEN COMMENT (oral testimony not required)

Date: 6/1/10

Submitted by: _____

File No: _____

Just moved to this property to be in the "country", not industrial. We wanted to retire here with peace and quiet (like it is now). Not industrial which brings noise and traffic and takes away the country feeling.

"If you don't raise an issue, either orally or in writing, you may be precluded from appealing"

Please print legibly:

Name Dale & Rhoda Paulison Phone Number 503-537-7089

Professional Standing (if representing someone) _____

Mailing Address (including Zip Code) 8830 NE St. Paul Hwy
Newberg, OR 97132

Email Address teapotfanatic@yahoo.com Rhoda R. Paulison
Signature

Please do not release my contact information in a public records request

THANK YOU FOR COMPLETING THIS! These cards help us spell your name correctly for the permanent record and assists the committee members in determining time limits if there are many residents present.

Date: 6/1/10

DATE: JUNE 1, 2010 Submitted by: _____
TO: NEWBERG URBAN AREA MANAGEMENT COMMISSION
ISSUE: NEWBERG URBAN GROWTH BOUNDARY AMENDMENT
REQUEST FOR INCLUSION OF AGRICULTURE LAND INTO INDUSTRIAL
USE.

FROM: SHIRLEY COOPER, A RESIDENT OF NEWBERG 503-538-9511

I LOOKED AT THIS ISSUE AS IN MY WORK IN THE COMMERCIAL LENDING FIELD. WITH LARGE BUSINESS FINANCIAL REQUESTS, WE LOOKED NOT ONLY AT WHAT WAS PRESENTED IN WRITTEN PROPOSALS, BUT WHAT WAS NOT INCLUDED. THIS WAS DONE IN ORDER TO GET CLUES FOR THE POTENTIAL RISK OF THE VENTURE.

THAT IS THE CASE HERE. THE FOCUS IN THIS PRESENTATION IS SO TARGETED ON ONE SPECIFIC INDUSTRIAL SITE THAT MANY FACTORS HAVE BEEN GLOSSED OVER OR NOT EVEN ADDRESSED. EMPHASIS HAS BEEN ON SCENARIOS THAT ARE NOT REALISTIC IN ORDER TO JUSTIFY THE INCLUSION FOR THE ADDTL ACREAGE INTO URBAN RESERVES. .

HERE A FEW ISSUES THAT I FEEL ARE IMPORTANT.....

1....THERE IS A DOWNPLAY OF EXISTING AVAILABLE SITES ALREADY WITHIN THE BOUNDARY THAT CAN FULFILL FUTURE INDUSTRIAL NEEDS FAR BEYOND THE FOCUS TIME FRAMES USED. REPTS TEND TO OVERPLAY POTENTIAL LAND CONFIGURATIONS ISSUES ON SOME OF THOSE SITES, W/O TAKING INTO CONSIDERATION MINIMAL WORK THAT W/ MAKE SOME OF THOSE SITES USABLE.

2....PRESENTATION DOES NOT ADDRESS TIMELY MARKET TRENDS, AND OVER ESTIMATES FUTURE NEED. OVERALL GROWTH W/ DEPEND ON OUTCOME OF PRESENT MARKET DOWNTURN, ESTIMATIONS OF THAT GROWTH IS DIFFICULT TO PREDICT AT THIS TIME W/DATED STATISTICS

3... TRAFFIC AND TRANSPORTATION ISSUES ALL ARE BASED ON MASSIVE AND EXPENSIVE PATTERN CHANGES FOR THE STREET/HWY/FEEDER & ARTERIAL IMPROVEMENTS AND DOES NOT ADDRESS THE UTIMATE ADVERSE AFFECTS UPON CONNECTING PROPERTIES NOR THE RESULTING OUTFALL OF THOSE CHANGES

.4...ONE OF THE MORE IMPORTANT ISSUES IS THE EXPECTATION AND PROBABILITY OF NEED FOR THE PROPOSED COMPLEX.

THERE W/B & IS VERY HIGH COMPETITION FOR USERS/TENANTS FROM ADJOINING CITIES & COUNTIES WITH ALREADY DEVELOPED INDUSTRIAL SITES. TO ADD TO THE COMPLEXITY OF ATTRACTING THE LISTED TARGETED INDUSTRIES IS THAT THESE EXISTING DEVELOPMENTS ARE USER READY, WITH READY TRAFFIC FUNNELS IN

PLACE. THOSE ARE NOW SHOWING HIGH VACANCIES THUS INCENTIVES TO ATTRACT USERS W/B HIGH. ADDED TO THAT... THERE ARE EXISTING SITES THAT HAVE BEEN PARTIALLY DEVELOPED, NOW ABANDONED WITH EQUIPMENT LEFT UNUSED IN PLACE. SHOULD THE CURRENT ECONOMIC STATUS REVERSE WITHIN THE TIME FRAMES GIVEN IN THE REPORTS, THOSE SITES W/B QUICKLY MADE AVAILABLE, GIVING EVEN MORE COMPETITION.

5....MANY OF THE LISTED TARGETED INDUSTRIES AND BUSINESSES WILL NOT LIKELY CHOOSE TO LOCATE WITHIN THE TYPE OF COMPLEX.. PLANNED...THE NECESSARY RATES TO SUSTAIN THE CONCEPT OF THIS HIGHLY STYLIZED COMPLEX, AS DETAILED IN THE REPORTS, WILL ECONOMICALLY EXCLUDE THOSE SMALLER BUSINESS

6. THERE IS NO NEED TO JEOPARDIZE THE FUTURE OF THE NOW THRIVING EXSISTING FARM INDUSTRY FOR THE SPECULATION OF OBTAINING OTHER INDUSTRIES. EXTENSION INTO THIS AGRI, FARM AND WETLAND AREAS IS BEYOND WHAT IS NECESSARY TO ACCOMMODATE ANY REALISTIC FUTURE NEEDS. THERE IS SUFFICIENT USABLE AND VACANT PROPERTIES WITHIN THE AREA.TO ACCOMADATE GROWTH FOR MANY FUTURE YEARS W/O DISTURBING THESE AREAS.

THE COST OF THE PROPOSED SITE PLAN. IS AN ISSUE I ADDRESSED BEFORE CITY COUNCIL MONTHS AGO— THAT IS THE IMMENSE COST FACTOR FOR THE PLAN. THE TAX BASE OF OUR AREA W/B GREATLY AFFECTED FOR MANY YEARS IN THE FUTURE BY THE HUGE DEVELOPMENT COSTS THAT W/B NECESSARY.

Not suitable
I MAINTAIN THIS PLAN IS NOT APPROPRIATE FOR THE SIZE AND BUDGET OF THIS CITY. THIS IS A HIGH RISK VENTURE THAT CAN HAVE ADVERSE AFFECTS ON OUR COMMUNITY FOR MANY YEARS TO COME.

I RESPECTFULLY ASK THIS COMMISSION TO REFLECT ON REAL FACTS BEFORE ADDING THIS PRIME LAND TO URBAN RESERVES.

THANK YOU, SHIRLEY COOPER

NUAMC Meeting

Date: 6/1/10

Submitted by: _____

File no: _____

June 1, 2010
NUMAC Meeting
Re: proposed South Industrial UGB Amendment
Docket # PA-61-10

Council Members,

Thank you for taking the time this evening to listen to my testimony. I am concerned with the expansion of this Urban Growth Boundary onto our most productive farmland.

I understand that the manufacturing industry may bring jobs to the area. There are definitely people that see a benefit to the paving over of good agricultural soil with concrete structures. Although jobs may be provided to some in the area there is also a flip side to this way of thinking.

The agricultural land being considered is not vacant land. This land is itself an industry, the land provides jobs and supports the community. Families within Newberg and its surrounding communities will be harmed by your decisions to include this agricultural land into the UGB.

I currently am employed by one of the local farms. Being the city girl that I am I did not realize all that was involved in the field of agriculture. The land not only provides food sources for communities and people around the world, it supports local businesses. If you would just bear with me for one moment I would like to read you a list of those businesses within our area that have been supported by one farm in the last year. Please understand that all these businesses will lose valuable family financial support and jobs with the loss of farmland.

I am sure you will recognize some of the businesses I am about to mention;

- Terminex
- Newberg Hardware
- Pro Build
- Farmers Toilet
- GK Machine
- Select Computer
- Allied Waste
- Newberg Graphic
- Cedar Canyon
- US Bank
- West Coast Bank
- Van Well
- Ag West Supply
- Oak mead Farms
- Industrial Aviation Spray
- Online NW
- Crop Production Services
- George Packing Company
- OSU
- Genex Co-op
- Ram Steel

Farm Plan
Melted Metal Works
Western Ag Improvement
Tire Factory
Dave Myhrum Cattle Services
OVS
Capital Press
Bear Electric
NAPA Auto Parts
GW Hardware
Personnel Concepts
Schneider Equipment
Veterinary Services of Oregon
Waltz's Rebuilt
Brim
Western Industrial
International Ag Labs
Earth 2o
Newberg Fire & Med
Goodwin Pumps
Premier Ag
Wilco
IWSI
Chehalem Valley Orchard Equipment
Simplot
Prograss
Willamette Valley Helicopters
Taylor Motorcycle
Crabtree Rock
Martin Gutters and Roofing
Newberg Ford
McGuire Bearing
DeJong Products

This is only one farm supporting many jobs, thank you for listening.

Vicki Shepherd
30230 NE Benjamin Rd
Newberg, OR 97132



Marion County **OREGON**

PUBLIC WORKS

June 8, 2010

BOARD OF COMMISSIONERS

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Patti Milne

DIRECTOR
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ADMINISTRATION

BUILDING INSPECTION

DOG CONTROL

EMERGENCY MANAGEMENT

ENGINEERING

ENVIRONMENTAL SERVICES

OPERATIONS

PARKS

PLANNING

SURVEY

Jessica Nunley
Newberg Planning Division
P.O. Box 970
Newberg, OR 97132

RE: File No. UGB-09-01; Proposed Urban Growth Boundary Amendment

Marion County appreciates the City of Newberg leaving the record open from the June 1, 2010 public hearing on the proposed urban growth boundary amendment, thereby allowing the County additional time to review and submit comments on the proposal. As a neighboring jurisdiction, Marion County along with cities in the north county area will be affected by proposed industrial growth in the amendment area due to the existing transportation system that serves this area of Marion County, Yamhill County and the City of Newberg.

Marion County is very concerned about the potential traffic impacts of the amendment proposal on the road system in north Marion County. The County's comments focus on the findings contained in the amendment report pertaining to conformance with the statewide statutory and rule requirements regarding transportation planning.

The proposed UGB expansion for industrial lands on the south end of the City of Newberg presents a unique transportation situation. The City and its local transportation system is located in Yamhill County and is part of the Yamhill County transportation system. However, the City's location in proximity to the Yamhill and Marion County boundary will result in future truck traffic from the proposed industrial expansion area, accessing I-5 via Highway 219 through north Marion County. Neither the City of Newberg nor Yamhill County have control over or manage transportation system planning for this transportation impact.

The City's findings report (page 74) indicates that the south study area is the most appropriate place for future industrial development. It is the area with the fewest potential impacts on the existing transportation system. Development is not likely to result in increased big truck traffic through downtown due to access to I-5 via Highway 219 or future use of the 99W bypass route. The area has good existing access to I-5 via Highway 219. Finally, the location adjacent to existing industrial zoned and developed properties with traffic in the area already

industrial in nature and with no new conflicts with existing residential traffic. Though these findings indicate that few impacts would occur to the local (city) transportation system, the findings acknowledge that the resultant big truck traffic will be directed to those routes providing access to I-5 and Highway 99W, that is Highway 219 through north Marion County. The findings report should address the potential for impacts to the regional transportation system of which Marion County and cities in north Marion County are a major part with regard to routes providing access to I-5.

Statewide Planning Goal 12-Transportation provides planning guidelines wherein transportation studies and plans should be revised in coordination with local and regional plans. The City's findings report (page 73) acknowledges Marion County participation in the South Industrial Area Master Plan process and that more study will be done in the future to determine potential impacts to the local and regional transportation system. The City in its findings report should also identify Marion County, the cities in north Marion County and its roads as part of the regional transportation system that will be affected by the additional traffic generated by potential industrial development in the proposed expansion area. In addition, the findings should indicate that the transportation study to determine potential impacts should occur in coordination with affected jurisdictions that include Marion County and the cities of Donald and St. Paul.

The findings should include conformance with Marion County transportation system plan goals and policies as part of the transportation planning analysis to support the proposed plan amendment. The City's findings report addresses conformance of the amendment proposal with the transportation planning goals and policies of the City of Newberg and Yamhill County plans. However, the Marion County transportation system will likewise have an important role in addressing the traffic needs generated by development in the proposed expansion area,

In accordance with OAR 660-012-0060(1), it is normally expected that a transportation study will be performed as part of the UGB expansion proposal. As was noted in the findings report, this need not be applied under the provisions of OAR 660-024-0020(1)(d), which states:

“(d) The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary.”

In this case, the current zoning on the properties proposed for inclusion in the UGB is Agricultural Forest. The anticipated comprehensive plan designations for this area would be “Industrial” and “Public/Quasi Public.” The proposed comprehensive plan designation is clearly intended to allow development that would generate more trips than the current zoning. At a minimum, Marion County would need assurances that no development will be allowed to occur in this area without first annexing to the city and obtaining the appropriate zone change.

The County requests that a traffic analysis be conducted for the entire South Industrial master planned area prior to the initiation of any zone change in the proposed UGB expansion area. Marion County Public Works requests to be included in the scoping and review of all traffic analyses for this area. The traffic analysis should include the regional impacts including impacts to roads in Marion County. Waiting to address the transportation issues until the time of individual or phases of the industrial area zone change and annexation will not identify bigger issues, especially as this process can occur in very small phases that do not, individually, warrant any mitigation requirements.

The County has identified several areas that may not be adequate to handle the additional traffic from development in the proposed City of Newberg South Industrial expansion area. The transportation study should include, but not limited to, impacts in the following areas:

- The Fargo/I-5 Interchange area, including the ramp intersections and the Ehlen Road/Bents Road intersection.
- The Woodburn/I-5 interchange area
- Highway 219/McKay Road intersection
- Ehlen Road/McKay Road/Yergen Road corridor
- River Road and French Prairie corridors
- Roads in the City of Donald
- Roads in the City of St. Paul
- Highway 219 (Length limited and has safety issues, several high SPIS locations)

The essential point that Marion County would like to make is that the City of Newberg along with Yamhill County need to coordinate with Marion County as part of the regional transportation system providing service to jurisdictions in this planning area. The coordination needs to involve the study and analysis of transportation system impacts and mitigation measures.

Thank you for the opportunity to comment on the proposed expansion of the City of Newberg urban growth boundary. If you have any questions, please contact either Karen Odenthal at 503-588-5036 or Les Sasaki at 503-588-5038.

Karen Odenthal
Transportation Planner
Public Works/Transportation

Les Sasaki
Principal Planner
Public Works/Planning

cc: Ken Friday, Yamhill County
Steve Oulman, DLCD
Dan Fricke, ODOT
Janet Lane, City of Donald
Lorrie Biggs, City of St. Paul
Marion County Board of Commissioners



534 SW Third Avenue, Suite 300 • Portland, OR 97204 • (503) 497-1000 • fax (503) 226-0073 • www.1000friends.org
Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389
Willamette Valley Office • 220 East 11th Avenue, Suite 5 • Eugene, OR 97401 • (541) 653-8703 • fax (503) 575-2416
Central Oregon Office • 115 NW Oregon Ave #21 • Bend, OR 97701 • (541) 719-8221 • fax (866) 394-3089

June 9, 2010

Newberg Urban Area Management Council

City of Newberg Planning Department
414 E. First Street
Newberg OR 97132

Yamhill County Planning Department
525 NE 4th Street
McMinnville OR 97128

Re: Docket PA-01-10 (Newberg Urban Growth Boundary Amendment)

Dear Commissioners and Staff:

Thank you for the opportunity to provide additional comment on the proposed amendment to add approximately 260 acres to Newberg's Urban Growth Boundary. Most of the land is prime agricultural land (Class I and II soils) that is actively farmed. The land is located southeast of the city along Highway 219 towards the Willamette River bridge to St. Paul. The land is proposed to be included for industrial uses.

1000 Friends of Oregon and Friends of Yamhill County previously submitted testimony and in that testimony we outlined several concerns. We have additional follow-up comments on one of those concerns, the overall forecast of employment that will use industrial land.

“Other Services”

The “Other Services” sector accounts for the second largest total number of new jobs allocated to industrial land in the application and the *EOA*- second only to manufacturing.

Our previous testimony detailed how the number of projected new jobs in the “Other Services” sector that are allocated to industrial land and to commercial land far exceeds the total number of projected new jobs for that sector. (Other sectors in which new jobs are double-counted include “Information, “Transportation, Warehousing & Utilities,” and “Professional & Business”).¹

This is not the only problem with the way the city projects land need for new jobs in the “Other Services” sector.

First, the “Other Services” sector consists primarily of businesses that do *not* use industrial land, i.e. “personal and laundry services” such as hair salons, dog groomers,

¹ All told, the city double-counts some 366 jobs, equal to 22% of all the new jobs projected to need industrial space through 2030.



dry cleaners, etc. and “membership associations and organizations” such as churches, advocacy groups, and business associations like the Chamber of Commerce.² A smaller part of the sector includes some, but not all, of the employment related to “Repair and Maintenance,” like automotive maintenance and furniture repair.

As the attached information from the Oregon Employment Department shows, most employment in this sector is in businesses that use small sites and generally prefer a downtown or other non-industrial location. The application does not explain why the vast majority of jobs in this sector (93%) are allocated to industrial land.

Second, neither the overall sector nor the businesses within it are among Newberg’s targeted industries. The application; (a) does not explain why businesses in this sector require sites with the extremely narrow characteristics identified as “required” for its targeted industries;³ and (b) does not explain why it is providing new industrial land for uses that are not among the targeted industries.

As the attached Google maps document, almost all the existing Newberg businesses within the “Other Services” sector do *not* use industrial land, with the exception of a few automotive shops. In fact, many are located in downtown locations or on other small sites, often in a portion of a small building on a small lot.

There is no justification for the assumption that almost all the new jobs in this sector will require industrial land, let alone industrial parcels of at least 5 acres in size in an agglomeration of at least 100 new acres, etc.

We hope these additional comments are helpful. Please include them in the official record of these proceedings and notify us of any decisions and/or future hearings in this matter.

Sincerely,



Mia Nelson
1000 Friends of Oregon
220 East 11th, Suite 5
Eugene, OR 97401

/S/

Ilsa Perse
Friends of Yamhill County



Sid Friedman
1000 Friends of Oregon

² See attachments: OED Industry Employment Forecast, 2008-2018, p. 20; e-mail from Nick Beleiciks, Senior Economic Analyst, Oregon Employment Department; and Industry Subsector Definitions and Details from OED website.

³ Nor does the application explain why *each* of its various targeted industries requires sites with the *same identical* characteristics. As explained in previous testimony, these artificial screens masquerading as “requirements” appear to be reverse engineered so that the only suitable site is the large block of prime farmland that the city wants to develop as the South Industrial Area.

Attachments:

1. E-mail from Nick Beleiciks, Senior Economic Analyst, Oregon Employment Department
2. OED Industry Employment Forecast, 2008-2018, p. 20
3. Industry Subsector Definitions and Details from OED website.
4. Google Map Locations of “Other Services” sector businesses within Newberg

Cc: DLCD
Oregon Department of Agriculture

From: Sid <Sid@friends.org>
Subject: [Fwd: Re: employment sectors]
Date: June 7, 2010 10:45:43 AM PDT
To: mia Nelson <mia@friends.org>
1 Attachment, 39.5 KB

----- Original Message -----

Subject:Re: employment sectors
Date:Mon, 07 Jun 2010 10:42:54 -0700
From:Nick J BELEICIKS <nick.j.beleiciks@state.or.us>
To:Sid <Sid@friends.org>
CC:Mark M MILLER <mark.m.miller@state.or.us>, Patrick S OCONNOR <patrick.s.oconnor@state.or.us>
References:<4C094ADE.8020002@friends.org> <8A8CF693A3BB294DB354A999D49CF81808CBCB72@exchnode01.ad.state.or.us> <4C0ABF4F.6070705@friends.org> <4C0CB943.1659.0046.0@gw.emp.state.or.us> <4C0D1DA8.90005@friends.org>

Hi Sid,

You are right on track in understanding what types of businesses make up those two industries (although landscaping services are actually in Administrative and support services - Services to buildings and dwellings, not Repair and maintenance). But there are additional businesses in those industries, so I attached an Excel file with tables that contain the sub-industries and the number of establishments, employment levels, and payroll of those detailed industries. There is more information about the industries on our website www.QualityInfo.org. You can click on the links in the Excel file or go there directly using these links.

Repair and maintenance: <http://www.qualityinfo.org/olmisj/CEP?action=industry&indtype=N&indcode=50J818110000&areacode=01000000>

Personal and laundry services: <http://www.qualityinfo.org/olmisj/CEP?action=industry&indtype=N&indcode=50J818120000&areacode=01000000>

Membership associations and organizations: <http://www.qualityinfo.org/olmisj/CEP?action=industry&indtype=N&indcode=50J818130000&areacode=01000000>

I hope this helps. Please let me know if you need anything else.

Thanks,
Nick B.

Nick Beleiciks
Senior Economic Analyst
Workforce and Economic Research
Oregon Employment Department
Phone: (503) 947-1267
www.QualityInfo.org

>>> Sid <Sid@friends.org> 6/7/2010 9:26 AM >>>
Thanks!

Mark M MILLER wrote:

> Hi, Sid!
>
> I'm going to quickly pass this on to Nick Beleiciks who built the
> forecasts. He'll be able to explain what is (and isn't) included.
>
>>> Sid <Sid@friends.org> 6/5/2010 2:19 PM >>>
> Art,
>
> Thanks for passing this on to Mark. Best of luck all your new endeavors.
>
> Sid
>
> AYRE Art * BAM Analyst wrote:
> > Hello Sid,
> >
> > I'm no longer with the Employment Department. I will copy Mark Miller at
> > the Employment Department on this reply and ask him to have someone in
> > the department's Research section reply to your request.
> >
> > Best wishes,
> > - Art
> >

> -----Original Message-----

> > From: Sid [<mailto:Sid@friends.org>]
> > Sent: Friday, June 04, 2010 11:50 AM
> > To: art.ayre@state.or.us
> > Cc: mia@friends.org >> Mia Nelson
> > Subject: employment sectors
> >
> > Hi Art,
> >

> > The OED employment forecasts include a sector called "other services."
> > These aren't broken down for Region 3, but statewide it breaks down into
> >
> > "repair & maintenance," personal & laundry services", and "membership
> > associations and organizations, which is the largest category.
> >
> > I think I understand repair and maintenance, (jiffy lube and yard
> > maintenance?) but I'm not sure about the other two. Is personal &
> > laundry services" barbers, dog groomers, dry cleaners and the like?
> > What about membership organizations, Is that mostly churches, plus the
> > Elks and Kiwanis?
> >
> > Thanks.
> >
> > Sid Friedman
> >
> >



[Employment...xls \(39.5 KB\)](#)

Industry Employment Forecast, 2008-2018 (Continued)

	2008	2018	Change	% Change
Information	36,100	37,000	900	2%
Publishing industries, except internet	6,700	6,300	-400	-6%
Newspaper, book, and directory publishers	6,400	5,900	-500	-8%
Software publishers	9,300	10,200	900	10%
Telecommunications	8,100	7,800	-300	-4%
Financial activities	101,300	105,100	3,800	4%
Finance and insurance	60,800	64,400	3,600	6%
Credit intermediation and related activities	28,700	30,500	1,800	6%
Insurance carriers and related activities	26,800	28,500	1,700	6%
Real estate and rental and leasing	40,600	40,700	100	0%
Real estate	33,000	33,000	0	0%
Professional and business services	197,100	224,700	27,600	14%
Professional and technical services	73,300	88,000	14,700	20%
Legal services	12,300	14,200	1,900	15%
Architectural and engineering services	15,100	17,300	2,200	15%
Computer systems design and related services	9,900	12,000	2,100	21%
Management of companies and enterprises	32,000	35,000	3,000	9%
Administrative and waste services	91,800	101,700	9,900	11%
Administrative and support services	86,300	95,900	9,600	11%
Employment services	36,200	39,100	2,900	8%
Business support services	14,600	16,100	1,500	10%
Services to buildings and dwellings	21,000	24,100	3,100	15%
Educational and health services	219,500	269,300	49,800	23%
Educational services	29,700	32,300	2,600	9%
Health care and social assistance	189,800	237,000	47,200	25%
Ambulatory health care services	67,600	86,200	18,600	28%
Hospitals	52,800	64,600	11,800	22%
Nursing and residential care facilities	40,000	50,500	10,500	26%
Social assistance	29,400	35,700	6,300	21%
Leisure and hospitality	173,100	194,600	21,500	12%
Arts, entertainment, and recreation	23,200	26,400	3,200	14%
Amusement, gambling, and recreation	17,400	19,900	2,500	14%
Accommodation and food services	149,900	168,200	18,300	12%
Accommodation	22,100	24,800	2,700	12%
Food services and drinking places	127,800	143,500	15,700	12%
Full-service restaurants	62,800	69,700	6,900	11%
Limited-service eating places	54,300	61,900	7,600	14%
Other services	60,500	65,400	4,900	8%
Repair and maintenance	17,200	19,200	2,000	12%
Personal and laundry services	13,500	14,800	1,300	10%
Membership associations and organizations	29,100	30,600	1,500	5%
Religious organizations	17,100	18,100	1,000	6%
Government	296,000	319,800	23,800	8%
Federal government	29,500	29,000	-500	-2%
State government	77,000	83,100	6,100	8%
State education	28,400	29,300	900	3%
Local government	189,500	207,700	18,200	10%
Indian tribal	8,600	9,800	1,200	14%
Local education	99,100	104,400	5,300	5%

Note: Industry and occupational employment totals are not equal due to rounding.

Farm employment is included in natural resources and mining.

Previous industry projections were limited to nonfarm employment.

Industry Detail 2009 Annual Data					
NAICS	Industry	Units	Emplymt	Payroll	Avg Pay
811	<u>Repair and maintenance</u>	2,974	15,335	\$575,553,300	\$37,532
81111	<u>Automotive mechanical and electrical rep</u>	1,221	5,122	\$171,210,718	\$33,427
81112	<u>Automotive body, interior, and glass repair</u>	553	3,554	\$137,768,789	\$38,764
81119	<u>Other automotive repair and maintenance</u>	324	2,455	\$52,492,885	\$21,382
81121	<u>Electronic equipment repair and maintenance</u>	229	818	\$37,814,344	\$46,228
81131	<u>Commercial machinery repair and maintenance</u>	381	2,447	\$150,021,453	\$61,308
81141	<u>Home and garden equip. and appliance repair</u>	58	346	\$11,681,755	\$33,762
81142	<u>Reupholstery and furniture repair</u>	65	136	\$3,073,495	\$22,599
81143	<u>Footwear and leather goods repair</u>	10	20	\$393,348	\$19,667
81149	<u>Other household goods repair and maintenance</u>	133	438	\$11,096,513	\$25,335

Industry Detail 2009 Annual Data					
NAICS	Industry	Units	Emplymt	Payroll	Avg Pay
812	<u>Personal and laundry services</u>	1,836	12,681	\$272,842,736	\$21,516
81211	<u>Hair, nail, and skin care services</u>	852	4,645	\$85,564,032	\$18,421
81219	<u>Other personal care services</u>	177	1,316	\$17,272,543	\$13,125
81221	<u>Funeral homes and funeral services</u>	106	753	\$23,792,356	\$31,597
81222	<u>Cemeteries and crematories</u>	53	264	\$8,450,444	\$32,009
81231	<u>Coin-operated laundries and drycleaners</u>	54	202	\$3,839,359	\$19,007
81232	<u>Drycleaning and laundry services</u>	224	1,178	\$20,637,829	\$17,519
81233	<u>Linen and uniform supply</u>	41	1,715	\$59,106,510	\$34,464
81291	<u>Pet care, except veterinary, services</u>	212	1,092	\$19,617,738	\$17,965
81292	<u>Photofinishing</u>	28	361	\$11,612,097	\$32,166
81293	<u>Parking lots and garages</u>	24	1,022	\$19,632,991	\$19,210
81299	<u>All other personal services</u>	67	134	\$3,316,837	\$24,753

Industry Detail 2009 Annual Data					
NAICS	Industry	Units	Emplymt	Payroll	Avg Pay
813	<u>Membership associations and organization</u>	4,891	28,330	\$710,817,979	\$25,091
81311	<u>Religious organizations</u>	2,911	16,741	\$330,898,976	\$19,766
81321	<u>Grantmaking and giving services</u>	255	1,317	\$67,113,147	\$50,959
81331	<u>Social advocacy organizations</u>	499	2,837	\$101,324,724	\$35,715
81341	<u>Civic and social organizations</u>	303	2,887	\$42,421,013	\$14,694
81391	<u>Business associations</u>	330	1,331	\$64,250,749	\$48,273
81392	<u>Professional organizations</u>	94	463	\$20,868,924	\$45,073
81393	<u>Labor unions and similar labor organizations</u>	269	1,892	\$63,226,719	\$33,418
81394	<u>Political organizations</u>	71	185	\$4,864,041	\$26,292
81399	<u>Other similar organizations</u>	161	677	\$15,849,686	\$23,412

NAICS 811 - Repair and maintenance
Ownership: Private Sector
Oregon Statewide

Industry Definition

Industries in the Repair and Maintenance subsector restore machinery, equipment, and other products to working order. These establishments also typically provide general or routine maintenance (i.e., servicing) on such products to ensure they work efficiently and to prevent breakdown and unnecessary repairs. The NAICS structure for this subsector brings together most types of repair and maintenance establishments and categorizes them based on production processes (i.e., on the type of repair and maintenance activity performed, and the necessary skills, expertise, and processes that are found in different repair and maintenance establishments). This NAICS classification does not delineate between repair services provided to businesses versus those that serve households. Although some industries primarily serve either businesses or households, separation by class of customer is limited by the fact that many establishments serve both. Establishments repairing computers and consumer electronics products are two examples of such overlap. The Repair and Maintenance subsector does not include all establishments that do repair and maintenance. For example, a substantial amount of repair is done by establishments that also manufacture machinery, equipment, and other goods. These establishments are included in the Manufacturing sector in NAICS. In addition, repair of transportation equipment is often provided by or based at transportation facilities, such as airports, seaports, and these activities are included in the Transportation and Warehousing sector. A particularly unique situation exists with repair of buildings. Plumbing, electrical installation and repair, painting and decorating, and other construction-related establishments are often involved in performing installation or other work on new construction as well as providing repair services on existing structures. While some specialize in repair, it is difficult to distinguish between the two types and all have been included in the Construction sector. Excluded from this subsector are establishments primarily engaged in rebuilding or remanufacturing machinery and equipment. These are classified in Sector 31-33, Manufacturing. Also excluded are retail establishments that provide after-sale services and repair. These are classified in Sector 44-45, Retail Trade.

NAICS 812 - Personal and laundry services
Ownership: Private Sector
Oregon Statewide

Industry Definition

Industries in the Personal and Laundry Services subsector group establishments that provide personal and laundry services to individuals, households, and businesses. Services performed include: personal care services; death care services; laundry and drycleaning services; and a wide range of other personal services, such as pet care (except veterinary) services, photofinishing services, temporary parking services, and dating services. The Personal and Laundry Services subsector is by no means all-inclusive of the services that could be termed personal services (i.e., those provided to individuals rather than businesses). There are many other subsectors, as well as sectors, that provide services to persons. Establishments providing legal, accounting, tax preparation, architectural, portrait photography, and similar professional services are classified in Sector 54, Professional, Scientific, and Technical Services; those providing job placement, travel arrangement, home security, interior and exterior house cleaning, exterminating, lawn and garden care, and similar support services are classified in Sector 56, Administrative and Support, Waste Management and Remediation Services; those providing health and social services are classified in Sector 62, Health Care and Social Assistance; those providing amusement and recreation services are classified in Sector 71, Arts, Entertainment and Recreation; those providing educational instruction are classified in Sector 61, Educational Services; those providing repair services are classified in Subsector 811, Repair and Maintenance; and those providing spiritual, civic, and advocacy services are classified in Subsector 813, Religious, Grantmaking, Civic, Professional, and Similar Organizations.

NAICS 813 - Membership associations and organization
Ownership: Private Sector
Oregon Statewide

Industry Definition

Industries in the Religious, Grantmaking, Civic, Professional, and Similar Organizations subsector group establishments that organize and promote religious activities; support various causes through grantmaking; advocate various social and political causes; and promote and defend the interests of their members. The industry groups within the subsector are defined in terms of their activities, such as establishments that provide funding for specific causes or for a variety of charitable causes; establishments that advocate and actively promote causes and beliefs for the public good; and establishments that have an active membership structure to promote causes and represent the interests of their members. Establishments in this subsector may publish newsletters, books, and periodicals, for distribution to their membership.

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A French Twist - [more info](#)
2316 Portland Road, Newberg, OR - (503) 538-9993
Category: Beauty Salon

B Great Clips - [more info](#)
901 Brutscher Street, Newberg, OR - (503) 538-6943
Category: Beauty Salon

C Attitudes Hair Salon - [more info](#)
 2205 Portland Road, Newberg, OR - (503) 537-0444
3 reviews
"My stylist, Tracey, is no longer there but I always enjoyed my time ..."

D Polish A Salon - [more info](#)
 507 East 1st Street, Newberg, OR - (503) 554-9754
1 review
"What a great experience. These girls are awesome! From the time you walk in ..."

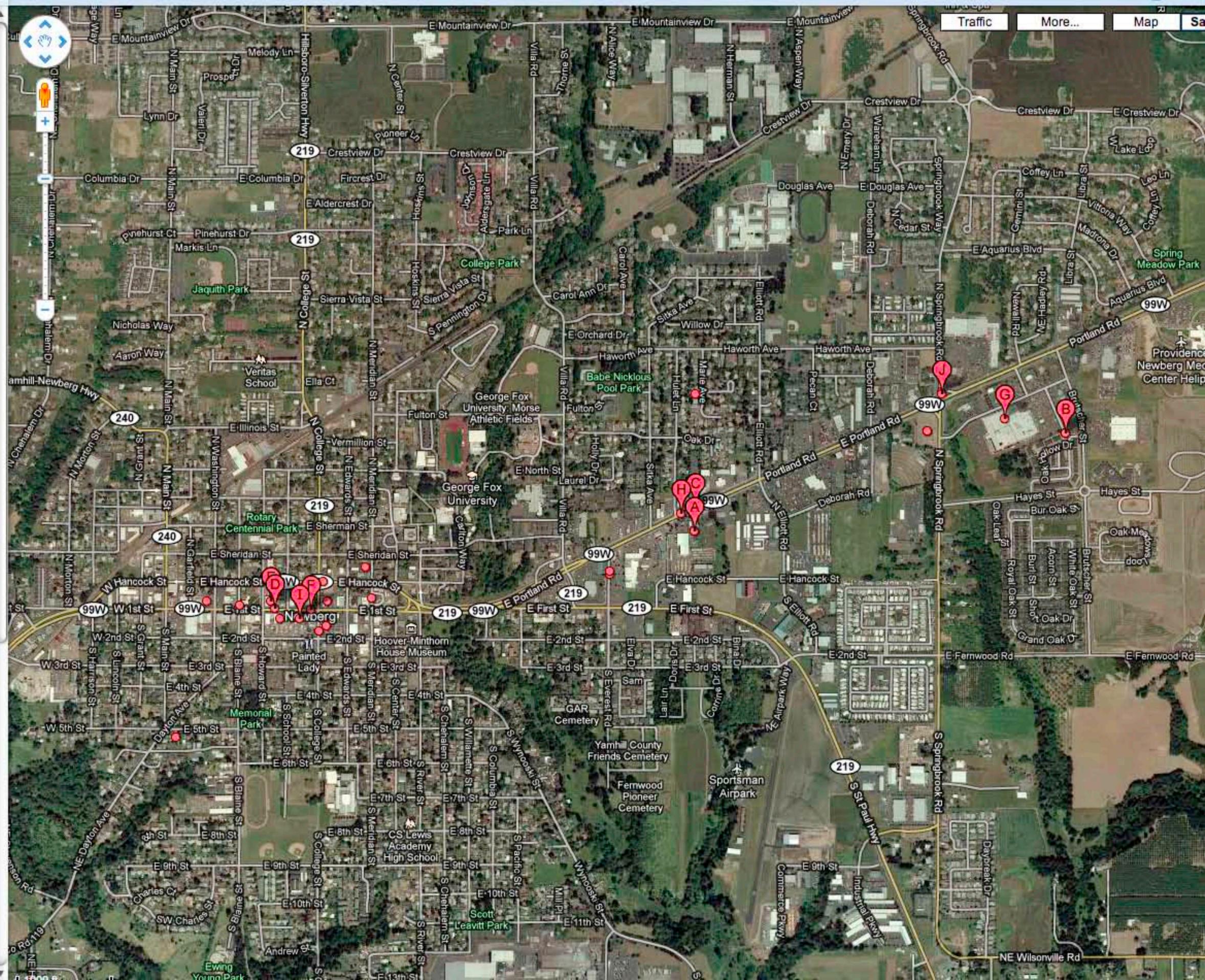
E Down II Details - [more info](#)
503 East 1st Street, Newberg, OR - (503) 538-6901
Category: Beauty Salon
2 reviews
"She was able to save my hair and I left with the best cut, style and ..."

F Allure Hair Design - [more info](#)
621 East 1st Street, Newberg, OR - (503) 538-3355
Category: Beauty Salon
3 reviews
"I cannot tell you how great Lori is! I have very short hair and she does the ..."

G Perfect Look Salon - [more info](#)
3300 Portland Road, Newberg, OR - (503) 538-5920
1 review
"Standard walk-in salon. Decent prices, pretty good cuts, friendly staff. ..."

H A Ray of Sun - [more info](#)
2115 Portland Road, Newberg, OR - (503) 538-7861
Category: Beauty Salon
3 reviews
"The staff here is so friendly, helpful and full of information, you can tell ..."

I La Terrasse Salon - [more info](#)
606 East 1st Street, Newberg, OR - (503) 537-1179
1 review
"I would highly recommend Lauren King for any hair





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A Chamber of Commerce - more info »

415 East Sheridan Street, Newberg, OR - (503) 538-2014

B Sherwood Area Chamber-Commerce - more info »



16065 Southwest Railroad Street, Sherwood, OR - (503) 625-7800

C Mc Minnville Chamber-Commerce - more info »

417 Northwest Adams Street, McMinnville, OR - (503) 472-6196

D Chamber of Commerce - more info »

124 West Lincoln Street, Woodburn, OR - (503) 982-8221

E Tualatin Chamber of Commerce - more info »

18791 Southwest Martinazzi Avenue, Tualatin, OR - (503) 692-0780

1 review

"I've been a member of the Chamber for several years and have been rewarded ..."

F Sherwood Chamber of Commerce - more info »



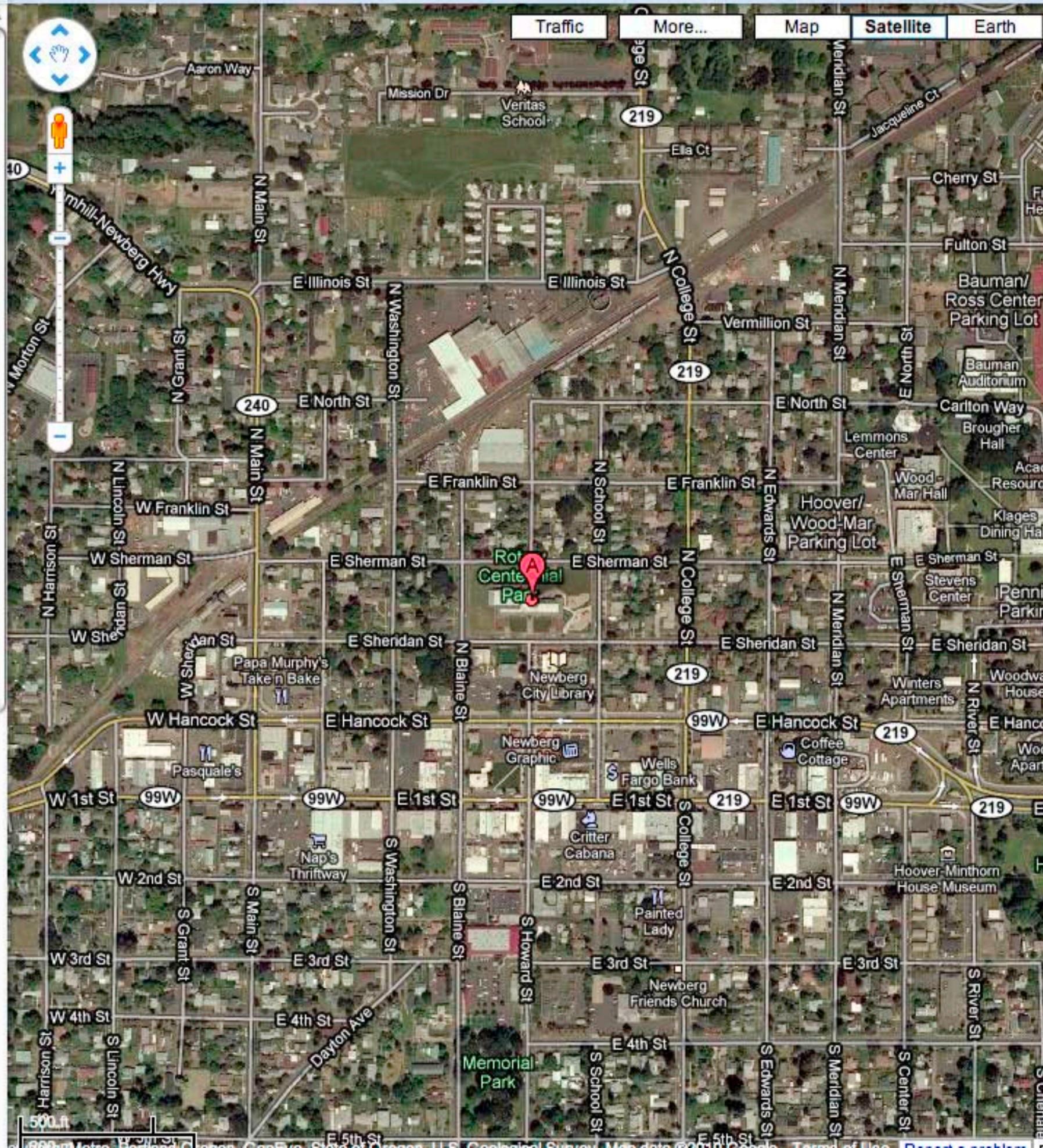
22595 Southwest Pine Street, Sherwood, OR - (503) 625-6751

1 review

"in how they've created monthly networking events with interesting ..."

G Wilsonville Chamber of Commerce: Visitor Center - more info »

29600 Southwest Park Place, Wilsonville, OR - (503) 682-3314



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churches

- A Newberg Friends Church** [- more info »](#)

 307 South College Street, Newberg, OR - (503) 538-8381
 Category: Churches
- B Church of the Nazarene** [- more info »](#)
 23177 NE Old Yamhill Rd, Newberg, OR - (503) 538-2570
 Category: Churches
- C Newberg Christian Church** [- more info »](#)
 2315 Villa Road, Newberg, OR - (503) 538-3104
 Category: Churches
 6 reviews
 "Pastor David Case is a very down to earth person and very inspiring to ..."
- D Newberg Foursquare Church** [- more info »](#)
 115 West 3rd Street, Newberg, OR - (503) 538-6525
 Category: Churches
- E Zion Lutheran Church Preschool** [- more info »](#)
 301 South River Street, Newberg, OR - (503) 538-1344
 Category: Churches
- F Church of Christ** [- more info »](#)
 2503 Haworth Avenue, Newberg, OR - (503) 538-4789
 Category: Churches
 1 review
 "Conservative worship and setting, but really great structured kids ..."
- G First United Methodist Church** [- more info »](#)
 1205 Deborah Road, Newberg, OR - (503) 538-5404
 Category: Churches
- H Northside Community Church** [- more info »](#)
 1800 Hoskins Street, Newberg, OR - (503) 538-0440
 Category: Churches
- I Seventh-day Adventist Church** [- more info »](#)
 530 Edgewood Drive, Newberg, OR - (503) 538-2622
 Category: Churches
- J St Peter Catholic Church** [- more info »](#)
 2315 North Main Street, Newberg, OR - (503) 538-4312
 Category: Churches

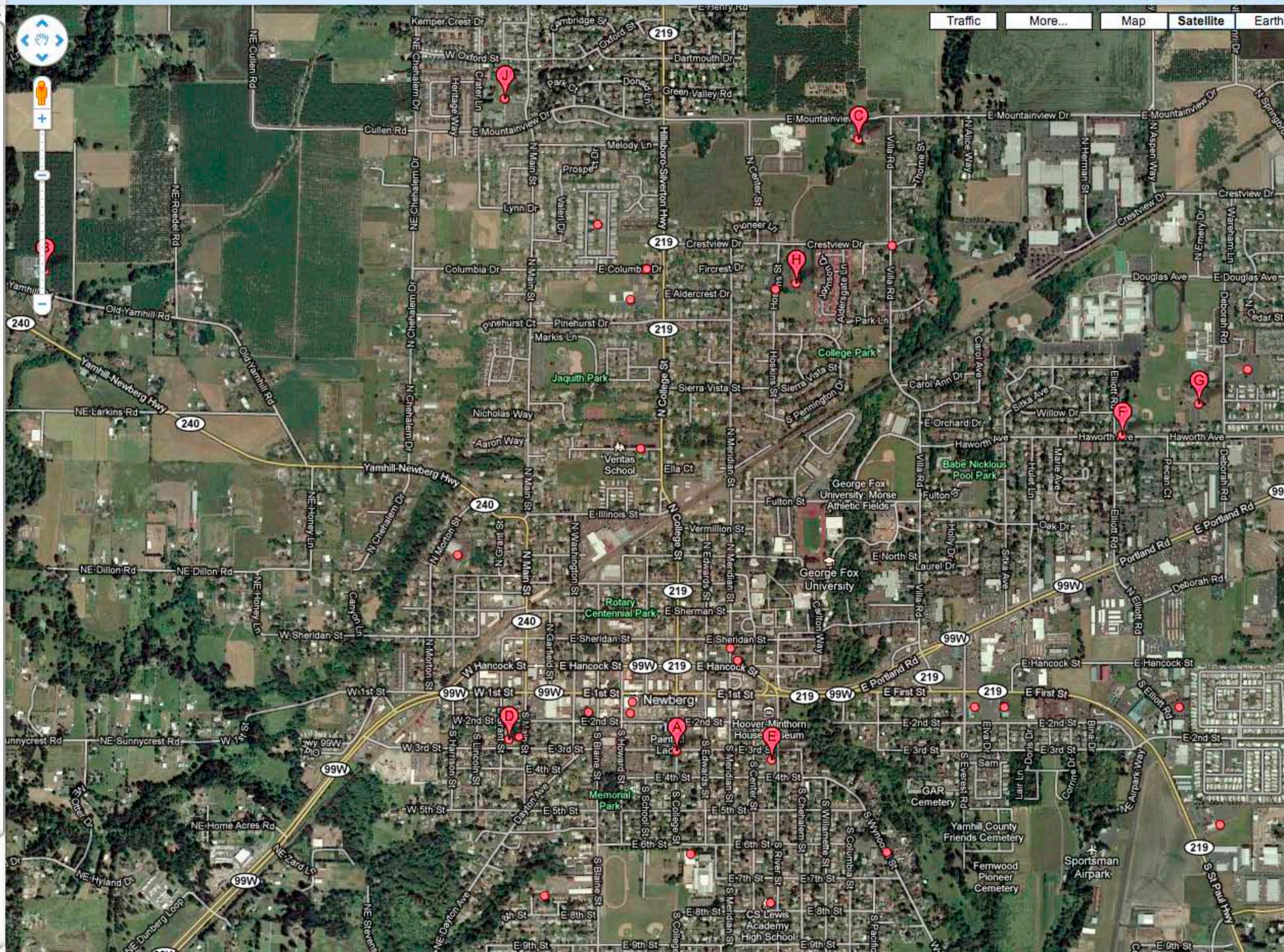
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SouthLake Church

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Fraternal Organizations

- A** [Masonic Lodge](#) - more info »
402 East Sheridan Street, Newberg, OR - (503) 538-2488
Category: Fraternal Organizations
- B** [Associated Student Community](#) - more info »
420 North Meridian Street, Newberg, OR - (503) 554-3001
Category: Fraternal Organizations

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[Masonic Warning:](#)
Do Not Join The Freemasons
Until You've Seen This...
www.SecretsofMasons.com

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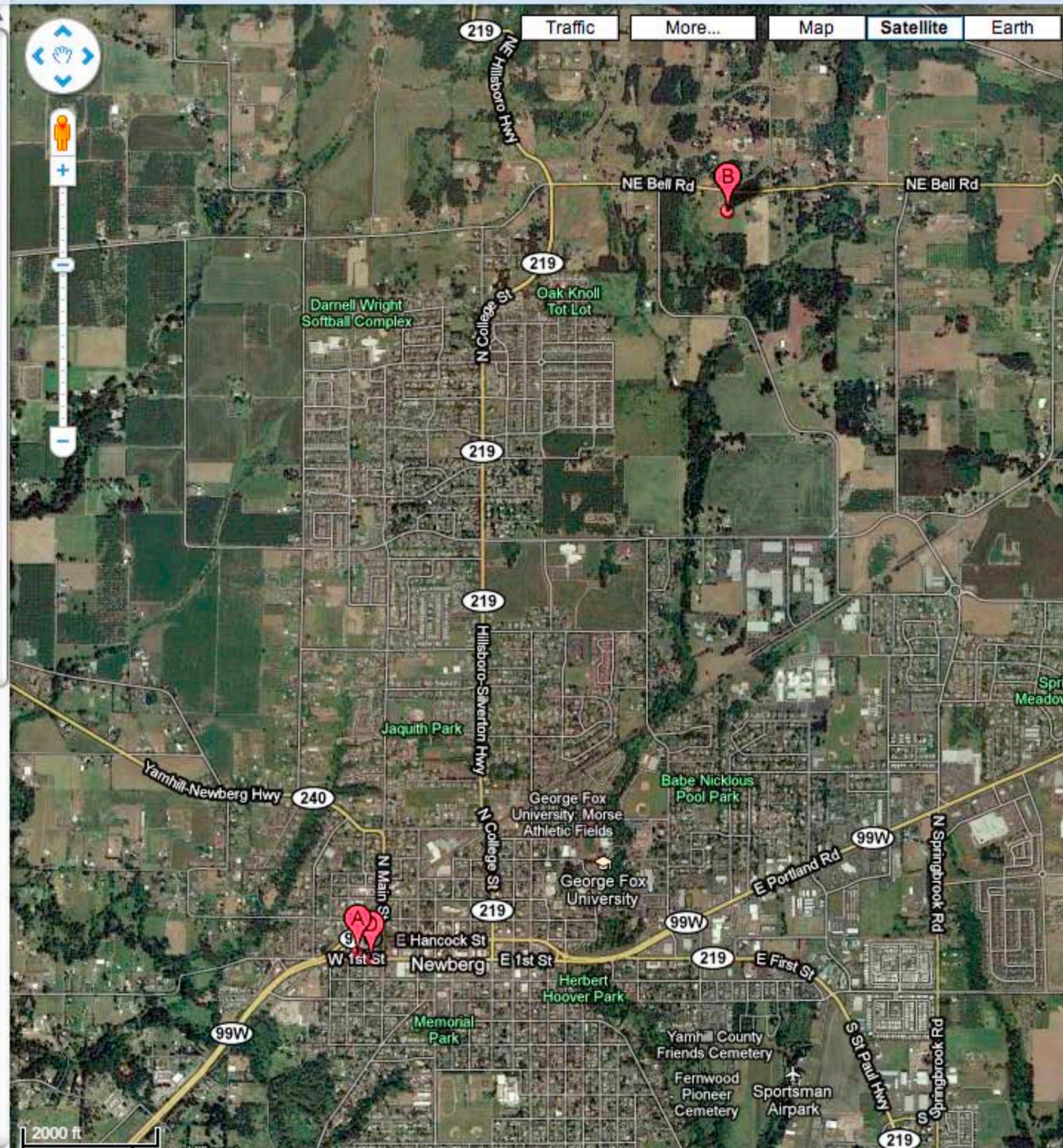


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- A** [Correa Ramon Furniture Refinishing & Repair](#) - more info »
 211 West 1st Street, Newberg, OR - (503) 538-3532
- B** [Senz Richard & Rhoda](#) - more info »
 27100 Northeast Bell Road, Newberg, OR - (503) 538-4079
 Category: Reupholstery & Furniture Repair
- C** [Northwest Upholstery Co](#) - more info »
 27100 Northeast Bell Road, Newberg, OR - (503) 538-4079
 Category: Reupholstery & Furniture Repair
- D** [R B Upholstery](#) - more info »
 118 West 1st Street, Newberg, OR - (503) 538-9186
 Category: Reupholstery & Furniture Repair
- E** [R & B Upholstery: Shop:](#) - more info »
 1087 Southwest Falcon Crest Drive, Dundee, OR - (503) 538-9186
 Category: Reupholstery & Furniture Repair
- F** [Furniture Medic](#) - more info »
 38830 Southwest Hartley Road, Gaston, OR - (503) 985-3171
 1 review
- G** [Cabinet Cures](#) - more info »
 10745 Southwest Olds Place, Sherwood, OR - (503) 598-4696
 Category: Furniture Repair Shop
 1 review
 "They refinished my kitchen cabinets; the workmanship is excellent, I ..."
- H** [Calico Corners](#) - more info »
 9120 Southwest Hall Boulevard, Tigard, OR - (503) 624-7218
 Category: Reupholstery & Furniture Repair
 2 reviews



hair near Newberg, OR

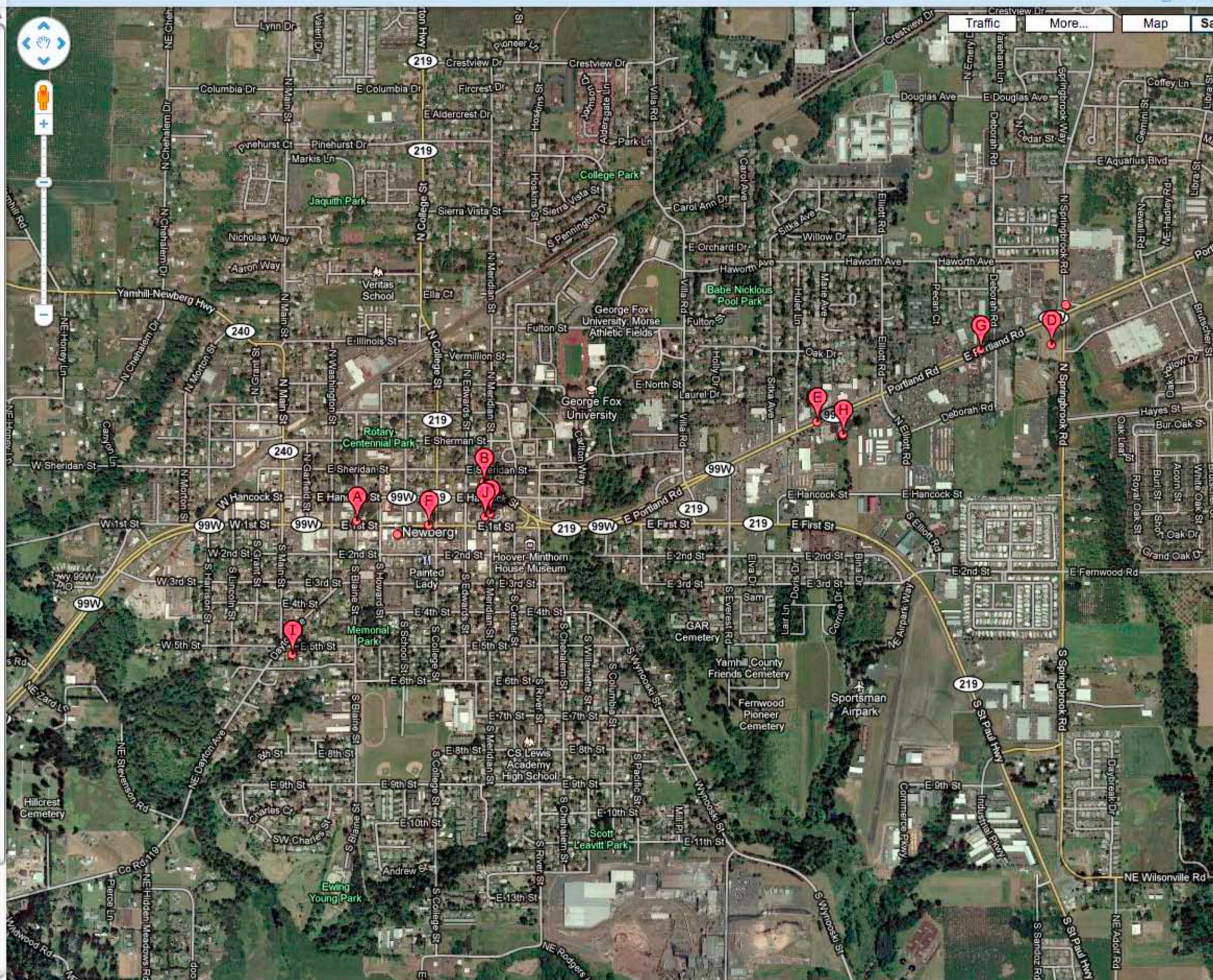
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- A Snootyfox Hair Designs** - more info »
 112 North Blaine Street, Newberg, OR - (503) 538-7452
- B Mode Du Jour** - more info »
 207 North Meridian Street, Newberg, OR - (503) 538-8323
 Category: Hair Salon
- C Shear Expressins** - more info »
 107 North Meridian Street, Newberg, OR - (503) 538-6520
 Category: Services - Hair Removal
- D The Ultimate Tan & Spa** - more info »

 705 North Springbrook Road, Newberg, OR - (503) 537-9800
 Category: Hair Salon
 2 reviews
 "I was a customer of this business for over a year and experienced average ..."
- E Attitudes Hair Salon** - more info »

 2205 Portland Road, Newberg, OR - (503) 537-0444
 3 reviews
 "My stylist, Tracey, is no longer there but I always enjoyed my time ..."
- F Allure Hair Design** - more info »
 621 East 1st Street, Newberg, OR - (503) 538-3355
 3 reviews
 "I cannot tell you how great Lori is! I have very short hair and she does the ..."
- G Barber House** - more info »
 2915 Portland Road, Newberg, OR - (503) 538-6775
 Category: Hair
- H Bubba's Barber Shop** - more info »
 2418 Portland Road, Newberg, OR - (503) 538-6565
 Category: Hair
- I 5th & Mane Hair Design** - more info »
 102 East 5th Street, Newberg, OR - (503) 538-9163
 2 reviews
 "I trust her opinion and judgement completely! She does a great job ..."
- J Sam's Barber Shop** - more info »
 809 East 1st Street, Newberg, OR - (503) 538-9692
 Category: Hair



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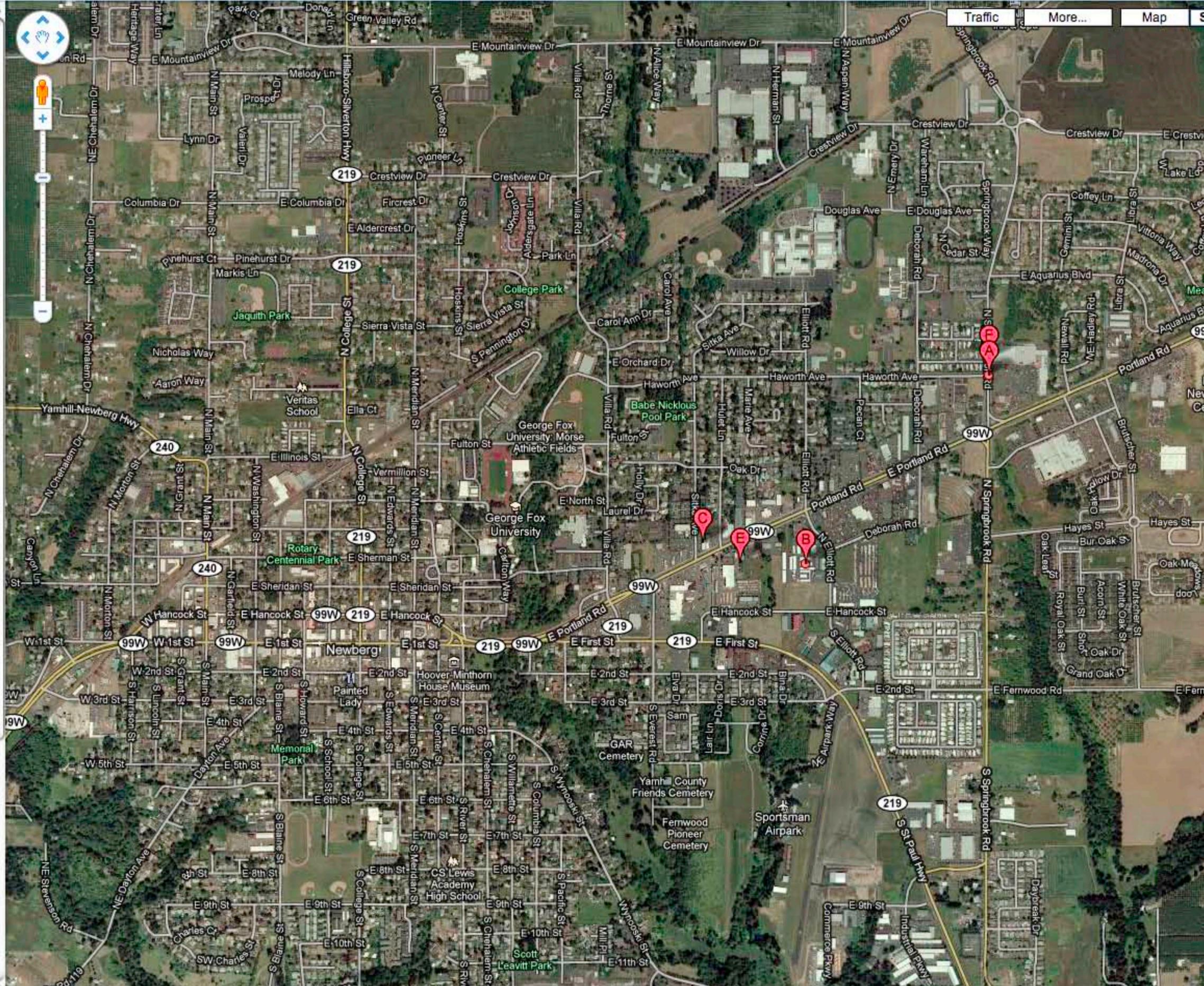
laundry services near Newberg, OR

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Local Laundry Services

Laundry services - dry cleaners, same day, pick up services. yellowpages.com

- A** [Boyce Associates LLC](#) - more info »
1100 North Springbrook Road, Newberg, OR - (503) 537-2683
Category: Laundries-Self Service
- B** [Wash-N-Dry](#) - more info »
315 North Elliott Road, Newberg, OR - (503) 538-9696
- C** [Sunshine Cleaners](#) - more info »
400 Sitka Avenue, Newberg, OR - (503) 538-2621
Category: Cleaning Services
3 reviews
"We have used this place for years. They are all very kind -never a problem. ..."
- D** [Washington Automated Inc](#) - more info »
27501 Southwest 95th Avenue, Wilsonville, OR - (503) 570-3350
Category: Laundry Equipment Sales & Service
- E** [Newberg One Hour Dry Cleaning](#) - more info »
2316 Portland Road, Newberg, OR - (503) 538-2196
Category: Cleaning Services
1 review
"we parked in the parking lot and were going to the restaurant next door and ..."
- F** [Spring Cleaner](#) - more info »
1106 North Springbrook Road, Newberg, OR - (503) 554-0423
Category: Cleaning Services
- G** [Pacific Laundry Services](#) - more info »
14991 Southwest Tualatin Sherwood Road, Sherwood, OR - (503) 925-9760
- H** [King City Coin Laundry](#) - more info »
 15785 Southwest 116th Avenue, King City, OR - (503) 670-7443
1 review
"Very clean, great variety of machines, extremely friendly service when ..."
- I** [ABC Enterprises Inc](#) - more info »
30788 Southwest Kensington Drive, Wilsonville, OR - (503) 582-8238
Category: Laundry Equipment Repairing & Service
- J** [Canterbury Coin Laundry](#) - more info »
14305 Southwest Pacific Highway, Tigard, OR - (503) 620-5395



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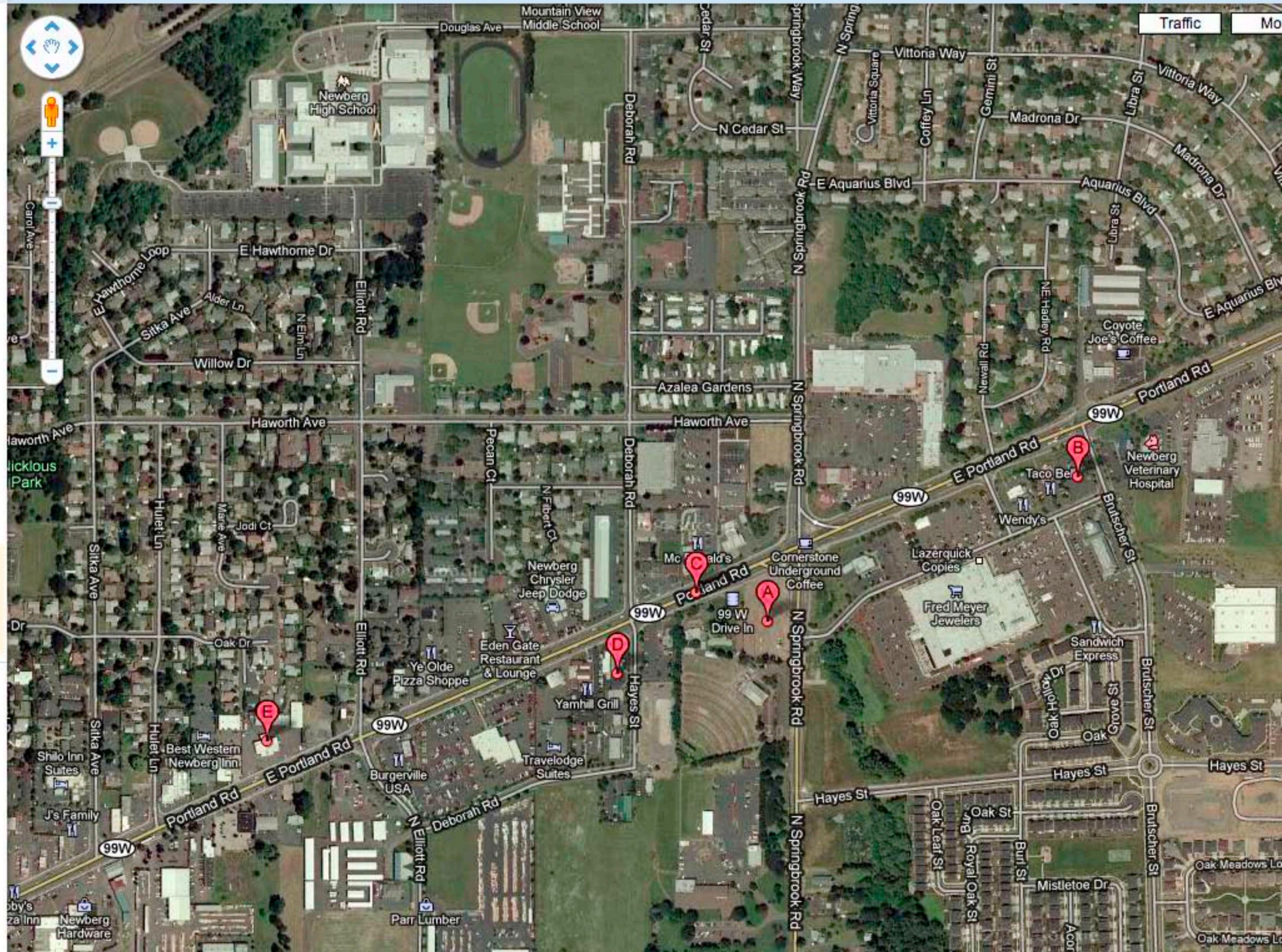
- A Meineke Car Care Center** - more info »
 705 North Springbrook Road, Newberg, OR - (503) 537-9592
- B Jiffy Lube** - more info »
 3440 Portland Road, Newberg, OR - (503) 538-2681
 18 reviews
 "These guys are liars and thief's, they try and sell you things that are not ..."
- C Jiffy Lube** - more info »
 3240 Portland Road, Newberg, OR - (503) 538-2681
- D Xpress Lube** - more info »
 701 Deborah Road, Newberg, OR - (503) 538-9016
- E Tire Factory Newberg** - more info »
 2305 Portland Road, Newberg, OR - (503) 538-2104

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nails

- A** [Lovely Nails](#) - more info »
 1010 North Springbrook Road, Newberg, OR - (503) 554-1612
 2 reviews
 "I love this place! A great price for a full service pedi: massage chair, ..."
- B** [Nails By Cheryl](#) - more info »
 2316 Portland Road, Newberg, OR - (503) 538-0934
 1 review
 "She has one of the nicest salons you will find. Her shop is a top notch ..."
- C** [A Ray of Sun](#) - more info »
 2115 Portland Road, Newberg, OR - (503) 538-7861
 3 reviews
 "The staff here is so friendly, helpful and full of information, you can tell ..."
- D** [Pro Nails](#) - more info »
 2203 Portland Road, Newberg, OR - (503) 554-9406
- E** [Luxury Nails](#) - more info »
 705 North Springbrook Road, Newberg, OR - (503) 554-5600
- F** [Polish A Salon](#) - more info »

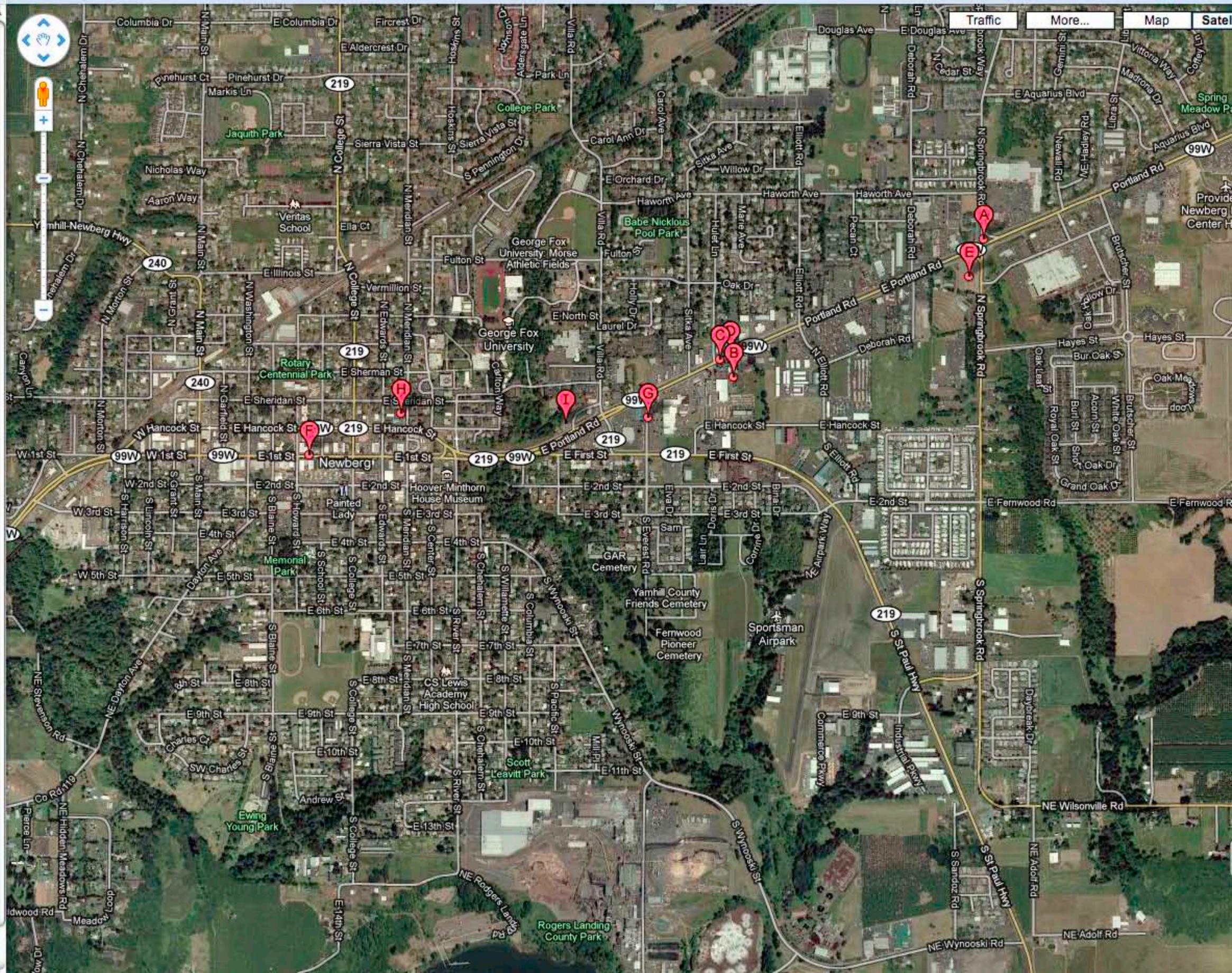
 507 East 1st Street, Newberg, OR - (503) 554-9754
 1 review
 "What a great experience. These girls are awesome! From the time you walk in ..."
- G** [NW Tan & Nail Co](#) - more info »
 Ste B, 122 North Everest Road, Newberg, OR - (503) 538-2900
- H** [Mode Du Jour](#) - more info »
 207 North Meridian Street, Newberg, OR - (503) 538-8323
- I** [N w Tan & Nail Co](#) - more info »
 1505 Portland Road, Newberg, OR - (503) 538-2900
 Place closed

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repair

- A Mountainside Auto Service Inc.** - more info »
 3215 Northeast Wynooski Road, Newberg, OR - (503) 537-4085
 Category: Auto Repair Shop
 1 review
 "It is nice to be able to count on them. They do good work at a fair ..."
- B Meineke Of Newberg** - more info »
 705 North Springbrook Road, Newberg, OR - (503) 537-9592
 Category: Auto Repair Shop
- C Bob's Garage** - more info »
 1040 Industrial Parkway, Newberg, OR - (503) 554-8427
 Category: Auto Repair Shop
 1 review
 "I appreciate that since I know nearly as much about cars as my ..."
- D Precision Automotive Inc** - more info »
 701 Deborah Road, Newberg, OR - (503) 538-2601
 Category: Auto Repair Shop
 1 review
 "I have taken a few vehicles in over the past few years and have always been ..."
- E Volvos & More** - more info »
 2201 East 2nd Street, Newberg, OR - (503) 538-8146
 Category: Auto Repair Shop
 3 reviews
 "Two of the three developed problems that showed themselves by the car no ..."
- F Doran Automotive Inc.** - more info »
 901 North Meridian Street, Newberg, OR - (503) 538-7488
 Category: Auto Repair Shop
 1 review
 "I've been going here for years, and they've never led me in the wrong ..."
- G Steve's Auto Services** - more info »
 112 North Meridian Street, Newberg, OR - (503) 554-1778
 Category: Auto Repair Shop
 1 review
 "I've had my Subaru and my VW beetle serviced at Steve's for a couple of ..."
- H Newberg Transmission** - more info »
 1150 Industrial Parkway, Newberg, OR - (503) 538-2980
 Category: Auto Repair
- I Performance Auto Services** - more info »
 509 West 1st Street, Newberg, OR - (503) 538-1124
 Category: Auto Repair Shop

