

From: [lacsandquist](#)
To: [City Recorder](#)
Subject: FW: Opposing of UGB, Vote NO
Date: Monday, September 21, 2026 7:36:58 PM

Sent from my Galaxy

"Dear Molalla City Council,

My name is Casper OeDell, my mom owns farm property on Wilhoit Rd and Krupicka Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: my family bought this land with future plans of farming the land and having animals. This would disrupt our future and lives as we dream of them. There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer

dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Casper Oedell

From: [Julie Sandquist](#)
To: [City Recorder](#)
Subject: New development at or near Forest road and Warwick road , UGB area
Date: Tuesday, September 22, 2026 12:53:39 PM

We are across from potential UGB. My husband and I oppose this development. We believe ALL infrastructure should be in place prior to ground breaking. This includes sewer plant, water issues in place... where's the water coming from?. Also roads to Carry all the influx of new traffic, sidewalks in place for safety purposes. Let's Not put the cart ahead of the horse. This is going to effect future generations as well and existing property owners. We stand on No. Address @ 32640 S Molalla Avenue

From: [mary aubrey](#)
To: [City Recorder](#)
Subject: new houses/apartments
Date: Tuesday, September 22, 2026 12:09:35 PM

We just had water restrictions. The light in town can't even handle the traffic now? I sit thru 2 light cycles now to go from south molalla Ave to north what happens when you add 60 more homes pluse multiple apartments. No sidewalks for people to use to walk or ride a bike from warrick rd. Our schools are already behind in size. I think homes on 1/2 acre lot's for family's to invest in molalla is much better investments in our city. People vested in our townspeople who pay property tax ect.. please limit the amount of apartments and home in the warrick rd. Area.

Thank you

Mr. And Mrs. Sandquist

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Serie Moffatt](#)
To: [City Recorder](#)
Subject: Opposed urban Growth
Date: Monday, September 21, 2026 10:33:11 PM

To whom it may concern,

I am writing as a resident of the rural area outside Molalla, Oregon, to express my strong opposition to further urban growth and development that would expand into our rural lands.

I value the quiet, agricultural character of this community and the open spaces that define it. Additional urban expansion risks increasing traffic, straining local infrastructure and services, reducing farmland, and permanently changing the rural way of life that many of us chose when we moved here or have long called home.

Please take into consideration the preservation of this rural area so that my children and grandchildren can enjoy the same quiet country life we cherish today.

I urge you to prioritize policies that protect rural lands, maintain clear urban growth boundaries, and focus any needed development within existing city limits rather than outward expansion.

Thank you for considering the concerns of rural residents.

Sincerely,

Serienna Moffatt

From: [Lacey Marie Sandquist](#)
To: [City Recorder](#)
Subject: Opposing of UGB, Vote NO
Date: Monday, September 21, 2026 7:19:01 PM

"Dear Molalla City Council,

My name is Lacey Sandquist, and I own farm property on Wilhoit Rd and Krupicka Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Most of my family and friends did know about this happening. We have received no information since last year. And since that meeting we were notified and made comfortable about the changes to come. Since then, the information has changed and the projections have also changed. I feel like I was lied too and tricked. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Why would you pick one sub that no one wants, and one that we are majority on board for? Do your community members mean nothing? Why are you listening to people that do not live in the town. This is dis-heartning.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting

more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Lacey Sandquist

From: [motismom2](#)
To: [City Recorder](#)
Subject: Opposing of UGB, Vote NO
Date: Tuesday, September 22, 2026 8:13:36 AM

Sent from my Galaxy

"Dear Molalla City Council,

My name is Elizabeth OeDell, my mom owns farm property on Wilhoit Rd and Krupicka Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Elizabeth Oedell

From: [John Christiansen](#)
To: [City Recorder](#)
Subject: Proposed Urban Growth off Toliver Road
Date: Friday, September 18, 2026 6:24:10 PM

Molalla City Council,

It was just brought to our attention that the Molalla City Council is proposing an industrial development just west of our homes on Toliver Road West of 213.

Why wasn't this brought up to the home owners in this neighborhood?

We were told it was discussed that a data center was planned for this area and then when the County vetoed data centers for the time being, you are proposing a wood product industry.

I am concerned about the added traffic to our already busy street. Also, the impact such industry would have on our protected wetlands of Bear Creek that also has a good number of wildlife that runs in this area.

We as a neighborhood are concerned about how such industry in our area would impact the value of our homes.

One other concern is why do we need more wood related industry in our area? We have Saga Enterprises, Inc; Oregon Lumber Works; Pacific Timber Products, LLC; and a cabinet factory.

Thank you for considering the impact this proposal would have on our urban growth area.

Regards,
Sandy M. Christiansen
1740 Toliver Rd
Molalla, OR

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From: [rick.schaefer](#)
To: [City Recorder](#); [Community Planner](#)
Subject: Request to include 32044 S Ona Way in the Molalla Urban Growth Boundary
Date: Sunday, September 20, 2026 1:13:29 PM

Dear Mayor and City Councilors,

I am writing regarding the proposed expansion of the Molalla Urban Growth Boundary. I own approximately 10 acres at 32044 S Ona Way, Molalla, Oregon. Under the currently proposed boundary, my property will directly border the new Urban Growth Boundary on two sides.

Because of this, I respectfully ask the City Council to consider including my property in the proposed UGB expansion before the final boundary is adopted. Including this parcel appears to provide a logical extension of the proposed boundary rather than creating an isolated expansion.

My property is immediately adjacent to land already proposed for inclusion, and I am willing to have my property considered for future urban development as Molalla grows.

I understand that inclusion within the UGB is separate from annexation into the City and does not require immediate development. My request is simply to have the property included within the UGB so that it has the opportunity to be considered for annexation and appropriate urban development in the future.

Because major UGB expansions occur infrequently, I would appreciate the Council considering whether including this adjoining 10-acre parcel now would create a more logical long-term boundary and facilitate efficient future planning for roads, utilities, and other urban services.

Please include this letter in the record for the September 23, 2026 public hearing on the proposed Urban Growth Boundary expansion.

Thank you for your consideration.

Sincerely,

Rick Schaefer
32044 S Ona Way
Molalla, OR 97038

From: [Christina Farris](#)
To: [City Recorder](#)
Subject: Stop the urban growth boundaries!!
Date: Monday, September 21, 2026 10:56:21 PM

Dear City of Molalla,

I am writing to express my strong opposition to expanding the urban growth boundaries in Molalla.

As a member of a multi-generational family that grew up here, I care deeply about the future of our community. Expanding these boundaries threatens the vital farmland that built our small town and risks destroying the community character that makes Molalla special.

Our local infrastructure and resources are already stretched thin. Traffic continues to increase, and our local schools currently do not have adequate room for the children already living here. Furthermore, rapid growth has contributed to rising crime rates and soaring housing prices—making Molalla one of the most expensive places for housing in Oregon, rather than providing affordable options for local families.

I know I speak for many long-time residents and families who built this town when I say that this level of change and growth is not welcome. We need to preserve our small-town identity and halt this expansion before our community is permanently altered.

Please listen to the voices of the residents who built and sustain this town. I urge you to stop the expansion of the urban growth boundary now.

Thank you for listening to the families of Molalla.

Sincerely,

Christina Farris

From: jheberc@gmail.com
To: [City Recorder](#)
Subject: Sub area 12
Date: Tuesday, September 22, 2026 9:48:10 AM

I oppose the Sub area 12 being put in the UGB.

John and Sandy Christiansen

1740 Toliver Rd

Molalla, OR 97038

Sent from my iPhone

From: [Amanda Van Gundy](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Monday, September 21, 2026 4:04:36 PM

Dear Molalla City Council,

My name is Amanda Van Gundy, and I live in Molalla (630 Wedgewood Drive).

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote **NO** on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
2. **WRONG SUB AREA CHOSEN:** There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Amanda Van Gundy
Citizen of Molalla
630 Wedgewood Drive

From: [Julie Bauge](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Monday, September 21, 2026 7:44:44 PM

Dear Molalla City Council,

My name is Julie Bauge, and I live in Molalla with my husband, Chris Bauge (13434 S Warrick Rd).

I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
2. **WRONG SUB AREA CHOSEN:** I live on Warrick Rd. There are better suited sub areas to choose from than Sub Area 5. There are not enough roads in and out of that area to sustain a housing development. In addition we don't have enough water to provide a large number of homes. Actually this is true in all parts of Molalla. But if you have to choose, Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
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Please vote NO or postpone this vote until the City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Julie and Chris Bauge

13434 S Warrick Rd

This is a staff email account managed by molallari@molallari.k12.or.us. This email and any files transmitted with it are confidential. They are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

From: [Jennifer Kaufman](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Monday, September 21, 2026 9:34:09 PM

Dear Molalla City Council,

My name is Jennifer Kaufman and I live in the city of Molalla.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Jennifer Kaufman
104 Toliver Rd, Molalla, OR 97038

From: [Jeny Powell](#)
To: [City Recorder](#)
Cc: [Jeny Powell](#)
Subject: UGB Expansion - Please Vote NO
Date: Monday, September 21, 2026 8:14:08 PM

Dear Molalla City Council,

My name is Jeny Powell, and I live at 13755 s molalla forest road.

I am asking you to vote NO on the current UGB expansion proposal for the following reasons.

1. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied.

1. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse.

Please vote NO until these have been reviewed and resolved.

Thank you,
Jeny Powell

From: [Kait-Lynn Lantz](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:04:41 AM

Dear Molalla City Council,

My name is Kait-Lynn Hepler, and I live in Molalla with my family and come from multiple generations being raised here.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Kait-Lynn Hepler
16666 S Hwy 211

Molalla, OR 97038
503-522-5483

From: [Katie Strong](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Monday, September 21, 2026 4:12:46 PM

Dear Molalla City Council,

My name is Katie Strong, and I live in Molalla at 12976 S Dart Rd with my husband and 2 growing sons.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Katie & Rudy Strong

12976 S Dart Rd

From: hardyrsue@gmail.com
To: [City Recorder](#)
Cc: ["Suzanne Pearce"](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:15:33 AM

Dear Molalla City Council,

My name is Suzanne Pearce, and I live in Molalla. I have lived here nearly all my life, since 1967. I have lived both within the city limits and outside. This is my hometown. I currently live outside the city limits at 31875 S Hardy Rd, but what happens in Molalla impacts me. For over 30 years I commuted to work in the Hillsboro area because I did not want to live in the environment that had been created there. It is important to me that this town grows in a way that does not destroy the community. Please consider the decisions you make carefully.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come. Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Suzanne Pearce
38175 S Hardy Rd
Molalla OR 97038

From: [Veronica J](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 8:22:05 AM

Dear Molalla City Council,

My name is Veronica Johnson and I live just south of the city of Molalla in the Wilhoit area.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
2. **WRONG SUB AREA CHOSEN:** There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Veronica Johnson
35425 S Wilhoit Rd, Molalla, OR 97038

From: [Reece Elliott](#)
To: [City Recorder](#)
Subject: UGB Expansion VOTE NO
Date: Monday, September 21, 2026 5:47:25 PM

"Dear Molalla City Council,

My name is Reece Elliott, and I live in Molalla

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
2. **WRONG SUB AREA CHOSEN:** There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Reece Elliott 668 s Taylor ct

From: [Monica sandgren](#)
To: [City Recorder](#)
Subject: UGB expansion vote
Date: Monday, September 21, 2026 12:00:13 PM

September 21, 2026

Dear Molalla City Council,

My name is Monica Sandgren and I live in Molalla on S. Wilhoit Road.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote no on the current UGB expansion proposal, or postpone the vote until the next city council meeting on October 14 for the following reasons :

COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback due to the lack of genuine effort to collect feedback from relevant parties. We need more time as a community to make the right decision for Molalla, not just going off state laws that are a one size fits all approach.

WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than sub area 5. Sub area 13 for example, would be great for commuters to get to the freeways and be close enough to city infrastructure.

INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that It is inefficient from a cost perspective to expand the UGB to the south (specifically Sub Area 5).

INACCURATE POPULATION FORECAST: the current population forecast is very likely skewed high as you know. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse.

Please vote NO or postpone this vote until city council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Monica Sandgren
Monica Sandgren
36136 S Wilhoit Road
Molalla, OR 97038

From: [JA Lantz](#)
To: [City Recorder](#)
Subject: UGB Expansion-Please Vote NO
Date: Monday, September 21, 2026 1:09:04 PM

"Dear Molalla City Council,

My name is YOUR Eileen Lantz, and I live in Molalla (33061 S Wilhoit Rd)
Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

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3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right

decision.

Thank you,
Eileen Lantz (33061 S Wilhoit Rd)

From: [Darcy](#)
To: [City Recorder](#)
Subject: URBAN GROWTH BOUNDARY - Written Feedback for City Council
Date: Tuesday, September 22, 2026 9:32:10 AM

Dear Molalla City Council,

My name is Darcy Brady, and I am a resident of Molalla at 808 Alyssa Ct. My family and I purchased our home approximately 10 years ago, and one of the primary reasons we chose this property was its location adjacent to the beautiful wetland park. At the time of our purchase, we were told that the wetland area was protected and could not be developed.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons:

1. **COMMUNITY FEEDBACK:** The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.
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3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Darcy Brady
808 Alyssa Ct.
Molalla, OR. 97038

From: [Jessica Sandberg](#)
To: [City Recorder](#)
Subject: Urban Growth Boundary Expansion - Please vote no
Date: Tuesday, September 22, 2026 8:03:36 AM

Dear Molalla City Council,

My name is Jessica Sandberg, and I live at 13534 S. Warrick Rd. Molalla, OR 97038.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially) had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.
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4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until the City Council meeting on October 14th so the community has more time to help you make the right decision.

Thanks,

JESSICA SANDBERG



T 503-246-6433

W www.cascaderenovation.com

From: [Michelle McKinney](#)
To: [City Recorder](#)
Subject: Urban Growth Boundary Expansion - Please vote No
Date: Tuesday, September 22, 2026 8:57:00 AM

Dear Molalla City Council,

My name is Michelle McKinney/Lantz, and I live in Molalla at 32903 S. Wilhoit Rd. Molalla, OR 97038.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.
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3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
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Please vote NO or postpone this vote until City Council meeting on October 14 so

the community has more time to help you make the right decision.

Thank you,
Michelle McKinney/Lantz
32903 S. Wilhoit Rd.
Molalla, OR 97038



Northwoods Nursery, Inc.
28696 S. Cramer Rd
Molalla, OR 97038 USA
Ph: 503-651-3737 • FAX: 503-651-3882

September 22, 2026

Subject: Molalla City Council Testimony - UGB Expansion Plan

Dear Mayor Keyser and members of the Molalla City Council,

Northwoods Nursery is opposed to Molalla's current Urban Growth Boundary expansion plan because it will have negative impacts on our business including:

Congested Traffic Conditions

Northwoods Nursery depends on our local roads and highways to move our plants to customers and to receive supplies. Traffic on Hwy. 213 and Barnards Rd. is already overcrowded, and at times dangerous, to use from our location. Revising the expansion plan using the updated population forecast, which would reduce the projected population increase by approximately 40%, would minimize the increased traffic and the problems it will have for our business and other farms and businesses in our region.

Reduced Water Supplies

Along with other farms, local businesses and residents, we depend on the Molalla River aquifer for our water supply. A growth in population of the size planned for in the current UGB expansion plan could create water shortages, with severe negative consequences for businesses and farms like ours.

We ask that you use the revised population forecast to help mitigate these negative affects on our business and community.

Thank you in advance for your consideration,

Lorraine Gardner
Owner/General Manager
Northwoods Nursery, Inc.

From: [Corey Dickman](#)
To: [City Recorder](#)
Subject: FW: Molalla UGB Testimony
Date: Tuesday, September 22, 2026 1:25:12 PM
Attachments: [Molalla UGB Testimony.pdf](#)

Please find UGB testimony attached. I am an owner of Dickman Farms, Inc. which owns property located at 30695 S Hwy 213 Molalla, OR 97038. Please confirm receipt when convenient.

Thanks,

Corey Dickman
Dickman Farms, Inc.
Willamette Valley Onion Co.
503-932-5512
corey@dickmanfarmsinc.com
www.dickmanfarmsinc.com

From: Corey Dickman
Sent: Tuesday, September 22, 2026 1:23 PM
To: Scott Keyser <skeyser@cityofmolalla.com>; evermillion@cityofmolalla.com; lchildress@cityofmolalla.com; tshankle@cityofmolalla.com; dgilmer@cityofmolalla.com; mbartholomew@cityofmolalla.com; kbisenius@cityofmolalla.com
Cc: Dan Zinder <dzinder@cityofmolalla.com>
Subject: Molalla UGB Testimony

Mayor Keyser, City Planning Staff, and Members of the City Council:

Attached is my written testimony regarding the proposed Molalla Urban Growth Boundary amendment and the consideration of Subarea 13.

Please include the attached testimony in the official record for the September 23 City Council hearing and distribute it to the Mayor, Council members, and appropriate planning staff.

My request is that the Council postpone adoption or hold the record open until the City provides a consistent, apples-to-apples comparison of the selected southern lands and a reasonably sized, phased portion of Subarea 13.

Please confirm receipt when convenient.

Thank you,

Corey Dickman

Dickman Farms, Inc.
30695 S. Highway 213
Molalla, Oregon 97038

Mayor Scott Keyser, City of Molalla Planning Division & Members of the Molalla City Council

City of Molalla

Request to Postpone Molalla UGB Amendment Adoption

Dear Mayor Scott Keyser, City of Molalla Planning Division & Members of the Molalla City Council:

I am asking the Council to postpone adoption of the proposed Urban Growth Boundary amendment for one straightforward reason: the present record does not provide an apples-to-apples comparison between the exact southern lands selected for expansion and a reasonably sized, phased portion of Subarea 13. That omission is especially important because City leadership previously stated that northern growth made greater practical and fiscal sense. Before Molalla commits to a boundary that will guide development for the next twenty years, the record should clearly explain what changed and demonstrate that the selected southern alternative is genuinely more practicable.

My name is Corey Dickman. I submit this testimony on behalf of Dickman Farms, Inc., owner of Tax Lot 5S 2E 06 02200 at 30695 S. Highway 213. The parcel contains 105.77 contiguous acres in Subarea 13, west of Highway 213 and northwest of Molalla. I want to disclose my interest plainly: my family farms the property commercially, and inclusion in the UGB could materially increase its value. Farming is also my livelihood, so I understand the importance of preserving productive agricultural land. I am not asking the Council to ignore Oregon's land-priority rules or to choose Subarea 13 merely because we own land there. I am asking for a complete comparison before Subarea 13 is excluded.

The concern I am raising did not originate with me. During the May 14, 2025 Council work session, while discussing Subareas 12 and 13, Mayor Keyser said, "We have property owners ... that want to be in it, but yet we have to go south. It just doesn't make sense." On June 11, 2025, Assistant City Manager Mac Corthell told the Council, "It makes no sense to go south from a fiscal perspective ... It makes all the sense in the world to go north." In July 2025, Mr. Corthell also reported a productive meeting with the Governor's Office concerning northern UGB expansion. These statements were not promises, and they do not replace the governing land-use criteria. They establish that northern growth was a serious alternative being pursued by City leadership for practical and fiscal reasons. The final record should explain what evidence caused that assessment to change.

The later Dyer analysis does not show that Subarea 13 is an obviously uneconomic or unworkable alternative. Dyer modeled 1,003 dwelling units in Subarea 13, exceeding the 929-unit demand used in its public-facilities analysis. The City's Appendix B separately calculates 1,680 units of gross Safe Harbor capacity. Subarea 13 therefore appears capable of meeting the residential need within one coherent area rather than through numerous smaller properties.

Dyer estimates Subarea 13's public infrastructure at \$214,163,597, or \$213,523 per dwelling using Dyer's 1,003-unit development layout. Calculated from the same individual subarea tables, that per-unit estimate is lower than seven of the eight southern subareas. This does not, by itself, prove that Subarea 13 is the least expensive choice. The City proposes portions of several southern subareas rather than developing each one in full, and shared facilities complicate the comparison. It does show that Subarea 13 cannot fairly be dismissed as plainly inferior on infrastructure cost.

The sewer analysis reinforces that point. Dyer states that Subarea 13 could function as an independent sewer basin, served by two pump stations and a pressure line along Toliver Road directly to the wastewater treatment plant headworks. According to Dyer, this approach would avoid capacity constraints in the existing Toliver and Bear Creek trunk mains. That is a material advantage and should be weighed against the extensions, replacements, and upsizing required elsewhere.

Development feasibility also involves more than a map designation. Dickman Farms controls 105.77 contiguous acres and is willing to participate in the City's long-term growth planning. Large parcels under willing ownership reduce the uncertainty involved in assembling numerous smaller properties with different owners and intentions. Owner willingness does not override Oregon's priority system, but it is relevant to whether land added to the UGB is likely to become available for housing during the planning period.

Transportation should be compared with the same care. The City's Goal 14 report states that, among the 3,849 Molalla residents who commute outside the city for work, 40 percent travel north toward Canby, Oregon City, or the Portland metropolitan area, while 2 percent travel south toward Salem. Northern growth would still generate substantial traffic, and Dyer did not include the potential cost of increasing capacity at the Toliver Road roundabout. Those concerns should be evaluated directly. The same analysis should also consider how a southern expansion would route northbound commuters through Molalla and what improvements that pattern would require.

The central comparison is still missing. Dyer cautions that the estimates for adjacent subareas cannot simply be added because that would double-count shared regional improvements. As a result, the record does not identify a combined, nonduplicative infrastructure cost or cost per dwelling for the exact southern parcels proposed for inclusion. Without those figures, the Council and public cannot determine whether the selected southern boundary is actually more economical than a phased Subarea 13 alternative using the same assumptions. Infrastructure cost also affects whether land can realistically reach the market and contribute to Molalla's housing supply.

I recognize that Subarea 13 is predominantly fourth-priority high-value farmland and that Oregon law generally requires suitable higher-priority land to be considered first. A preference for northern growth is not enough to overcome those rules. The priority rules, however, do not eliminate the need for complete findings on whether the higher-priority land can practically accommodate the need. ORS 197A.285 makes likely development during the planning period, facility and service costs, physical impediments, and the development history of similarly situated land relevant to that determination. Those considerations should be applied to the actual southern parcel configuration, not only to generalized subarea totals.

Before adopting the amendment, I respectfully ask the Council to continue the hearing or hold the record open and direct staff to provide:

1. A combined, nonduplicative infrastructure estimate and per-unit cost for the exact southern residential parcels proposed for inclusion.
2. An equivalent analysis of a reasonably sized, phased portion of Subarea 13 using the same acreage, dwelling-unit, density, timing, and cost assumptions.
3. Findings explaining how parcel assembly, owner willingness, physical constraints, service costs, and likely development during the planning period were evaluated.
4. A transportation comparison incorporating northbound commuting patterns and reasonably foreseeable improvements for each alternative, including any needed work at the Toliver Road roundabout.

If that completed comparison still supports the proposed southern boundary, the City will have a stronger and more defensible record. If it does not, Molalla should know before making a decision that will shape the community for decades.

Thank you for considering this request.

Respectfully,

Corey Dickman

Dickman Farms, Inc.

Owner, Tax Lot 5S 2E 06 02200

30695 S. Highway 213 Molalla, Oregon 97038

Principal sources

- City of Molalla City Council Work Session, May 14, 2025, official video at approximately 2:33:30.
- City of Molalla City Council Meeting, June 11, 2025, approved minutes and official video at approximately 2:00:07.
- City of Molalla City Council Work Session, July 23, 2025, approved minutes and official video.
- The Dyer Partnership Engineers and Planners, Inc., Urban Growth Boundary Goal 14 Public Facilities Review, July 2026.
- City of Molalla, September 23, 2026 City Council Agenda Packet, Goal 14 Analysis and appendices.
- Oregon Statewide Planning Goal 14; ORS 197A.285.

From: [Adriana Baldwin](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 1:20:05 PM

Dear Molalla City Council,

My name is Adriana Amaya, and I live in Molalla at 32891 s sawtell rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.
2. **WRONG SUB AREA CHOSEN:** There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.
3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.
4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Adriana Amaya, 32891 s sawtell rd molalla or 97038

From: [Adrienne Schweizer](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 2:08:27 PM

Dear Molalla City Council,

My name is Adrienne Barnes, and I live in Molalla at 13728 S Warrick Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

2. **WRONG SUB AREA CHOSEN:** There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. **INACCURATE POPULATION FORECAST:** The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Adrienne & Robert Barnes
13728 S Warrick Rd. Molalla OR 97038

From: [Kayla Kearn](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 3:27:19 PM

Dear Molalla City Council,

My name is Kayla Kearn, and I live in Molalla at 32721 S Krupicka Way, Molalla, OR 97038.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

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3. **INACCURATE ENGINEERING REPORT:** There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

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Please vote NO or postpone this vote until the City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Kayla Kearn

Christie Teets

From: Froi Otter <froiotter@yahoo.com>
Sent: Tuesday, September 22, 2026 4:13 PM
To: City Recorder
Subject: pristine Farm ground north and east Molalla

To City Council of Molalla

Good evening, this is Froi Otter from Warrick Rd.

I would like to voice my thoughts that as a community we need to save some of the best farm ground in the world. This soil lays North and East of City center. I do understand that we need additional housing in Molalla, but not at the expense of such beautiful soil.

I would like to see Molalla grow south. The soil south of Molalla is rocky and has great drainage and good to build on. There are no wet lands to worry about. The infrastructure is already moving toward the expansion south of Molalla. It looks like the stop light is being installed at the end of Ona Way Rd.

Sincerely,
Froi E. Otter

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Ava Wurdinger](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 6:59:14 PM

Dear Molalla City Council,

My name is Ava Conlee, and I live in Molalla on Ellis Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. **COMMUNITY FEEDBACK:** Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.
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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Ava Conlee, 34546 S Ellis Rd, Molalla Oregon

From: [Gretchen](#)
To: [City Recorder](#)
Subject: UGB 9/3 vote
Date: Tuesday, September 22, 2026 8:28:27 PM

Dear City Council,

Please vote "no" to expand the UGB under the proposed plan. The plan is oversized based on old and incorrect data.

Please redo the study with current and correct population projections.

Please do not expand the UGB beyond what Molalla is legally obligated to do.

Please do not include any industrial expansion.

Thank you,

Gretchen Gingerich
218 Hauser ct

Live in Love

From: [megan senior](#)
To: [City Recorder](#)
Subject: SUBJECT LINE: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:02:07 PM

Dear Molalla City Council,

My name is Megan Cole, and I live in Molalla @ 13577 S. Molalla Forest Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

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3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

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Please vote NO or postpone this vote until the City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Megan Cole

13577 S. Molalla Forest Rd.

From: [megan senior](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:06:32 PM

Dear mayor and city Council members,

My name is Megan Cole. My husband and I own property at 13577 S. Molalla Forest Road.

I'm here tonight to ask you to vote **no on Urban Growth Boundary Subdivision Five**.

I'm not here simply as a property owner. I'm here as someone whose livelihood depends on the land. I run a boarding facility, and we raise beef. The land surrounding us isn't just empty space waiting to be developed. It is working land. It provides a place for livestock, supports agriculture, provides wildlife habitat, and allows rural businesses like mine to operate.

For me, this is personal.

When urban development moves closer to working farms and ranches, the impacts don't stop at the property line. More homes mean more traffic, more noise, more people, more pressure on livestock operations, and more potential conflicts with the way agricultural businesses have operated for generations.

My boarding facility depends on having a safe, quiet, rural environment for horses and the people who care for them. My cattle operation depends on access to usable agricultural land. These aren't hobbies for me and my family. They are part of our livelihood.

Oregon's urban growth boundary system exists in part to create a clear transition between urban and rural land and to protect farm and forest lands from urban development. The state specifically recognizes that protecting working lands also helps preserve wildlife habitat and other rural values.

So I ask you to consider what we are giving up when we move that boundary.

Once agricultural land is converted to subdivisions, we don't get it back. Once wildlife habitat is fragmented and rural properties are surrounded by development, the character of that land changes permanently.

I understand that our community needs to grow. I understand that families need homes and that our city has to plan for the future. But growth should not come at the expense of the very farms, ranches, wildlife, and rural businesses that make this community what it is.

Please don't look at this land simply as acreage available for development. Look at it as working land that supports families, businesses, animals, and our local agricultural community. *For these reasons, sub area 5 is actually incompatible with the UGB Goal 14 laws.*

I respectfully ask you to think beyond the immediate development and consider the long-term consequences for those of us who live and work here.

I'm asking you to please continue working with the State and DLCD to ask if we can substitute Sub Area 5 with Sub Area 13 or another more compatible area with Goal 14 laws, because I believe 3J Consulting's interpretation of the very recent Dyer engineering report is inaccurate.

Please vote **no on Urban Growth Boundary Subdivision Five** and protect the working lands and rural livelihoods that are already contributing to our community.

Thank you for your time.
Megan Cole
13577 S. Molalla Forest Rd.

Molalla OR 97038

From: [Eric Cole](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:08:46 PM

Dear Molalla City Council,

My name is Eric Cole, and I live at 13577 S. Molalla Forest Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Eric Cole
13577 S. Molalla Forest Rd.
Molalla OR 97038

From: [Eric Cole](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Tuesday, September 22, 2026 9:16:11 PM

Dear City Council members,

My name is Eric Cole. My wife and I own property on Molalla Forest Road.

I'm here tonight to ask you to vote **no on Urban Growth Boundary Subdivision Five**.

Not only am I a property owner in this area, I am someone whose livelihood depends on the land. We run a boarding facility, and we raise livestock. The land surrounding us isn't just empty space waiting to be developed. It is working land. It provides a place for livestock, supports agriculture, provides wildlife habitat, and allows rural businesses like mine to operate.

For us, this is personal.

When urban development moves closer to working farms and ranches, the impacts don't stop at the property line. More homes mean more traffic, more noise, more people, more pressure on livestock operations, and more potential conflicts with the way agricultural businesses have operated for generations.

Our boarding facility depends on having a safe, quiet, rural environment for horses and the people who care for them. Our livestock operation depends on access to usable agricultural land. These aren't hobbies for me and my family. They are part of our livelihood.

Oregon's urban growth boundary system exists in part to create a clear transition between urban and rural land and to protect farm and forest lands from urban development. The state specifically recognizes that protecting working lands also helps preserve wildlife habitat and other rural values.

So I ask you to consider what we are giving up when we move that boundary. My family, like many others, is deeply rooted here.

Once agricultural land is converted to subdivisions, we don't get it back. Once wildlife habitat is fragmented and rural properties are surrounded by development, the character of that land changes permanently.

Growth should not come at the expense of the very farms, ranches, wildlife, and rural businesses that make this community what it is.

Please don't look at this land simply as acreage available for development. Look at it as working land that supports families, businesses, animals, and our local agricultural community. *For these reasons, sub area 5 is actually incompatible with the UGB Goal 14 laws.*

I respectfully ask you to think beyond the immediate development and consider the long-term consequences for those of us who live and work here.

I'm asking you to please continue working with the State and DLCD to ask if we can substitute Sub Area 5 with Sub Area 13 or another more compatible area with Goal 14 laws, because I believe 3J Consulting's interpretation of the very recent Dyer engineering report is inaccurate.

Please vote **no on Urban Growth Boundary Subdivision Five** and protect the working lands and rural livelihoods that are already contributing to our community.

Thank you for your time.

Eric Cole

13577 S. Molalla Forest Rd.
Molalla OR 97038

From: [Carol Johnson](#)
To: [City Recorder](#)
Subject: Vote no
Date: Tuesday, September 22, 2026 9:10:01 PM

Urban Growth Boundary

"Dear Molalla City Council,

My name is Carol Johnson, and I live in Molalla.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Carol Johnson
Sent from my iPhone

From: [Tosha Welch](#)
To: [City Recorder](#)
Subject: Urban Growth Boundary
Date: Tuesday, September 22, 2026 9:12:49 PM

My name is Tosha Welch,

I am writing because I am extremely disappointed to have only recently learned about the proposed Urban Growth Boundary (UGB) expansion—especially after learning that this process has been underway for years. I personally only learned about the current proposal recently through Facebook. As a resident, a parent, and an employee at one of our local clinics, I can tell you firsthand that a significant number of people in this community do not use computers or the internet and would not have a way to find this information.

That concerns me greatly. Not everyone is on Facebook, checks the City's website, or follows online government meetings and documents. There are many people in our community, particularly older residents—who have no idea that this process has been taking place or that the proposed direction has changed.

A major decision that will affect Molalla for generations should not be something residents discover through Facebook.

I am asking the City Council to vote NO on the current UGB expansion proposal or, at minimum, postpone the vote until the October 14 City Council meeting so the community has additional time to review the proposal and provide meaningful feedback.

1. Community Engagement Has Been Inadequate

The community engagement throughout this process has been confusing, with stops, starts, and pauses that have made it difficult for residents to follow.

Many community members have either given up trying to keep up with the process or have not been aware of opportunities to provide relevant feedback. Once the engineering report was completed, there appeared to be very little communication to the broader community during the following summer.

I also believe many residents were under the impression that the UGB expansion would move north, as had previously been discussed. Appropriate and widespread notification that the direction or preferred area had changed does not appear to have reached many residents.

If important information about a decision that will affect the entire community is primarily reaching residents online, then a portion of our community is being left out of the conversation.

This is a major decision that will affect Molalla for decades. The community deserves more time and better communication before such an important decision is made.

Please do not make this decision simply because the process has been ongoing for a long time. The length of the process should not outweigh the importance of getting the decision right.

2. I Believe There Are Better-Suited Areas Than Sub Area 5

I am concerned about the selection of Sub Area 5 as the proposed area for expansion.

For example, Sub Area 13 to the north appears to warrant additional consideration. Its location could potentially provide better access for commuters traveling toward the freeway while also being relatively close to existing city infrastructure.

Rather than simply accepting Sub Area 5 as the only viable option, I believe the City should continue working with the state to determine whether another area, including Sub Area 13, could be considered.

If there are legitimate ways to pursue a different sub area within the applicable state requirements, I believe the City should take the time to explore those options before moving forward.

3. The Engineering Report Deserves Further Review

I have concerns about portions of the engineering report and believe some of its assumptions, conclusions, and cost comparisons deserve additional scrutiny.

My understanding of the report is that the costs associated with expanding south into Sub Area 5 raise significant questions about whether that area is actually the most efficient choice from an infrastructure and financial perspective.

I believe the City should have an opportunity to thoroughly review those concerns and compare the costs and infrastructure implications of Sub Area 5 with alternatives such as Sub Area 13 before making a final decision.

If there are discrepancies or conflicting interpretations of the engineering findings, those issues should be resolved before the UGB expansion is approved.

4. I Am Concerned About the Population Forecast

I also have concerns about the population forecast being used to justify the size and location of the proposed expansion.

The City's housing-needs analysis projected a 2042 population of 15,660 and identified a need for approximately 1,996-2077 additional housing units. However, that analysis was based on information available during the earlier stages of this process. Since then, additional housing has already been built or has entered the development pipeline.

In fact, the City's current UGB materials indicate that 287 pipeline housing units have been completed since the last Housing Needs Analysis. That raises an important question for me: How have those recently completed units—and the population they are capable of accommodating—been accounted for in the City's current calculation of how much additional housing and land Molalla still needs?

If the original forecast and housing-needs calculation predated some of this recent development, I believe the City should clearly demonstrate that the current UGB proposal is based on updated information and that housing already built has not effectively been counted twice or otherwise overlooked in determining the remaining need.

I am not saying that the existence of these new housing units, by itself, proves that the population forecast is incorrect. I am asking the City to show the community

exactly how the forecast has been updated to account for the housing that has already been built and the development that is already in the pipeline.

If the projected population is higher than what ultimately materializes, Molalla could potentially commit significant resources to infrastructure and development that the community does not actually need.

I understand that obtaining another population forecast could cost taxpayer money. However, I believe that expense should be weighed against the potentially much greater long-term cost of making the wrong decision now.

Before expanding the UGB, I would like the City to consider whether the population projections should be independently reviewed or updated using the most current housing and population information available.

I am also concerned about whether our existing infrastructure can adequately support significant additional growth. If our current systems are already under strain, I want to understand how additional development would affect the residents who already live here.

I am not opposed to Molalla growing. However, I believe growth should be carefully planned and should benefit the long-term community. I would especially like to see consideration given to housing that supports long-term residents and families rather than simply maximizing the number of units that can be built.

5. Our Schools Need to Be Part of This Conversation

This is my biggest concern as a parent.

Since my children started school, I have watched classroom sizes in just one of the elementary schools increase significantly. We started with approximately 17–20 students in a classroom, and now many classrooms have 26 or more students, with some reportedly reaching up to 33.

As a parent, I am deeply concerned about what continued population growth could mean for our schools if educational capacity does not keep pace.

Teachers can only provide so much individual attention when classrooms become increasingly crowded. Larger class sizes can make it more difficult for children to receive the attention and support they need to learn and succeed. That ultimately affects the future.

Before approving substantial additional growth, I believe the City should have a clear understanding of how that growth will affect our schools, infrastructure, roads, water systems, emergency services, and other community resources.

Please Give Molalla More Time

I am asking the City Council to vote NO on the current UGB expansion proposal or postpone the vote until October 14.

This is not a decision that can easily be undone. Once the UGB is expanded and development follows, the consequences will affect Molalla for generations.

I believe residents deserve a meaningful opportunity to understand the proposal, review the information being used to support it, ask questions, and provide feedback before the City moves forward.

Please take the additional time to ensure that the decision being made is truly in the long-term best interest of Molalla and the people who already call this community home.

Please vote NO on the current proposal and/or postpone the decision until the next meeting on October 14 so the community has more time to participate in this important decision.

Thank you for your time and for your service to our community.

Sincerely,

Tosha Welch

Molalla Resident

Molalla Parent

Molalla Youth sports coach

Molalla frontline worker

From: [Gregory Kneeland](#)
To: [City Recorder](#)
Subject: Urban growth boundary
Date: Tuesday, September 22, 2026 9:17:17 PM

My name is Greg Kneeland,

I am writing because I am extremely disappointed to have only recently learned about the proposed Urban Growth Boundary (UGB) expansion—especially after learning that this process has been underway for years. I personally only learned about the current proposal recently through Facebook. As a resident, a parent, and a youth sports coach, I can tell you firsthand that a significant number of people in this community do not use computers or the internet and would not have a way to find this information.

That concerns me greatly. Not everyone is on Facebook, checks the City's website, or follows online government meetings and documents. There are many people in our community, particularly older residents—who have no idea that this process has been taking place or that the proposed direction has changed.

A major decision that will affect Molalla for generations should not be something residents discover through Facebook.

I am asking the City Council to vote NO on the current UGB expansion proposal or, at minimum, postpone the vote until the October 14 City Council meeting so the community has additional time to review the proposal and provide meaningful feedback.

1. Community Engagement Has Been Inadequate

The community engagement throughout this process has been confusing, with stops, starts, and pauses that have made it difficult for residents to follow.

Many community members have either given up trying to keep up with the process or have not been aware of opportunities to provide relevant feedback. Once the engineering report was completed, there appeared to be very little communication to the broader community during the following summer.

I also believe many residents were under the impression that the UGB expansion would move north, as had previously been discussed. Appropriate and widespread notification that the direction or preferred area had changed does not appear to have reached many residents.

If important information about a decision that will affect the entire community is primarily reaching residents online, then a portion of our community is being left out of the conversation.

This is a major decision that will affect Molalla for decades. The community deserves more time and better communication before such an important decision is made.

Please do not make this decision simply because the process has been ongoing for a long time. The length of the process should not outweigh the importance of getting the decision right.

2. I Believe There Are Better-Suited Areas Than Sub Area 5

I am concerned about the selection of Sub Area 5 as the proposed area for expansion.

For example, Sub Area 13 to the north appears to warrant additional consideration. Its location could potentially provide better access for commuters traveling toward the freeway while also being relatively close to existing city infrastructure.

Rather than simply accepting Sub Area 5 as the only viable option, I believe the City should continue working with the state to determine whether another area, including Sub Area 13, could be considered.

If there are legitimate ways to pursue a different sub area within the applicable state requirements, I believe the City should take the time to explore those options before moving forward.

3. The Engineering Report Deserves Further Review

I have concerns about portions of the engineering report and believe some of its assumptions, conclusions, and cost comparisons deserve additional scrutiny.

My understanding of the report is that the costs associated with expanding south into Sub Area 5 raise significant questions about whether that area is actually the most efficient choice from an infrastructure and financial perspective.

I believe the City should have an opportunity to thoroughly review those concerns and compare the costs and infrastructure implications of Sub Area 5 with alternatives such as Sub Area 13 before making a final decision.

If there are discrepancies or conflicting interpretations of the engineering findings, those issues should be resolved before the UGB expansion is approved.

4. I Am Concerned About the Population Forecast

I also have concerns about the population forecast being used to justify the size and location of the proposed expansion.

The City's housing-needs analysis projected a 2042 population of 15,660 and identified a need for approximately 1,996-2077 additional housing units. However, that analysis was based on information available during the earlier stages of this process. Since then, additional housing has already been built or has entered the development pipeline.

In fact, the City's current UGB materials indicate that 287 pipeline housing units have been completed since the last Housing Needs Analysis. That raises an important question for me: How have those recently completed units—and the population they are capable of accommodating—been accounted for in the City's current calculation of how much additional housing and land Molalla still needs?

If the original forecast and housing-needs calculation predated some of this recent development, I believe the City should clearly demonstrate that the current UGB proposal is based on updated information and that housing already built has not effectively been counted twice or otherwise overlooked in determining the remaining need.

I am not saying that the existence of these new housing units, by itself, proves that the population forecast is incorrect. I am asking the City to show the community

exactly how the forecast has been updated to account for the housing that has already been built and the development that is already in the pipeline.

If the projected population is higher than what ultimately materializes, Molalla could potentially commit significant resources to infrastructure and development that the community does not actually need.

I understand that obtaining another population forecast could cost taxpayer money. However, I believe that expense should be weighed against the potentially much greater long-term cost of making the wrong decision now.

Before expanding the UGB, I would like the City to consider whether the population projections should be independently reviewed or updated using the most current housing and population information available.

I am also concerned about whether our existing infrastructure can adequately support significant additional growth. If our current systems are already under strain, I want to understand how additional development would affect the residents who already live here.

I am not opposed to Molalla growing. However, I believe growth should be carefully planned and should benefit the long-term community. I would especially like to see consideration given to housing that supports long-term residents and families rather than simply maximizing the number of units that can be built.

5. Our Schools Need to Be Part of This Conversation

This is my biggest concern as a parent.

Since my children started school, I have watched classroom sizes in just one of the elementary schools increase significantly. We started with approximately 17–20 students in a classroom, and now many classrooms have 26 or more students, with some reportedly reaching up to 33.

As a parent, I am deeply concerned about what continued population growth could mean for our schools if educational capacity does not keep pace.

Teachers can only provide so much individual attention when classrooms become increasingly crowded. Larger class sizes can make it more difficult for children to receive the attention and support they need to learn and succeed. That ultimately affects the future.

Before approving substantial additional growth, I believe the City should have a clear understanding of how that growth will affect our schools, infrastructure, roads, water systems, emergency services, and other community resources.

Please Give Molalla More Time

I am asking the City Council to vote NO on the current UGB expansion proposal or postpone the vote until October 14.

This is not a decision that can easily be undone. Once the UGB is expanded and development follows, the consequences will affect Molalla for generations.

I believe residents deserve a meaningful opportunity to understand the proposal, review the information being used to support it, ask questions, and provide feedback before the City moves forward.

Please take the additional time to ensure that the decision being made is truly in the long-term best interest of Molalla and the people who already call this community home.

Please vote NO on the current proposal and/or postpone the decision until the next meeting on October 14 so the community has more time to participate in this important decision.

Thank you for your time and for your service to our community.

Sincerely,

Greg Kneeland
Molalla Resident
Molalla Parent
Molalla Youth sports coach

From: [Joan Derry](#)
To: [City Recorder](#)
Subject: Opposition to inclusion of sub area 12 in the proposed UGB
Date: Tuesday, September 22, 2026 9:24:47 PM

I am opposed to the Sub Area 12 being included in the UGB.
My name is Joan Derry (1840 Toliver Road).

I am strongly opposed to the proposed industrial development in this area and believe it deserves much greater scrutiny before moving forward.

This is not simply a question of bringing additional industry into the community. It is a question of whether we are willing to accept increased risks to our watershed, wetlands, roads, water supply, and the financial well-being of Molalla residents in order to accommodate development.

Protect Bear Creek and the Watershed

Industrial development in the proposed area would put the Bear Creek watershed at increased risk. Bear Creek and its extensive associated wetlands are part of a larger interconnected watershed. Bear Creek flows into the Pudding River, which feeds the Willamette River, which ultimately feeds the Columbia River.

These waterways and wetlands are valuable natural resources. They provide habitat, help manage water, and contribute to the health of the larger watershed.

This area needs restoration and protection—not increased industrial risk.

Once wetlands and watershed functions are damaged, they can be extremely difficult, and sometimes impossible, to restore. The community should not accept environmental degradation first and attempt to deal with the consequences later.

Toliver Road Cannot Handle Industrial Traffic

Toliver Road already has a serious traffic problem. Vehicles currently travel at excessively high speeds on a narrow road.

Adding heavy industrial traffic to this road would only make an existing problem worse.

Toliver Road was not designed or built to handle the volume and weight of heavy industrial vehicles that could accompany this type of development. Increased truck traffic means increased concerns about road damage, traffic safety, noise, and the safety of residents who live along and use this road.

The solution should not be to put industrial traffic on a road that is already inadequate for the traffic it currently carries.

If a proposed development requires substantial improvements to the road in order to operate safely, those improvements should not become another financial burden for the residents of Molalla.

Protect Molalla's Water Supply

Molalla depends on the Molalla River for its municipal water supply. That water supply should be treated as a critical community resource—not as an unlimited source of water for future industrial development.

The Molalla River already faces significant pressures from drought, changing climate conditions, low water levels, and water withdrawals. Low-flow conditions can affect both the community's ability to obtain water and the health of the river's ecosystem and wildlife habitat.

We should not approve new water-intensive industry without first demonstrating that our existing water supply can reliably support it, including during drought and low-flow conditions.

At a meeting, the possibility of a data center and its use of treated water was mentioned. My spouse and I are strongly opposed to a data center being developed here.

A data center or other water-intensive industry should not be allowed to compete with residents for a limited and increasingly stressed water resource.

Molalla Residents Should Not Subsidize New Industry

There is another issue that must be addressed directly: **Who is going to pay for this development?**

Molalla is not a wealthy community. Its residents already pay taxes and utility bills to support the community's infrastructure and services.

We cannot afford a situation where residents are expected to absorb increased taxes, utility costs, infrastructure costs, water costs, road costs, or other expenses created by new industrial development.

My spouse and I are opposed to any new industry that does not fully pay its own fair share of taxes and utility costs.

Residents should not be expected to subsidize private industry.

If a business requires additional roads, water infrastructure, wastewater capacity, utilities, emergency services, or other public infrastructure, those costs need to be clearly identified and addressed before approval—not passed on to the people who already live here.

Development Should Not Come at the Expense of the Community

Economic development is not automatically beneficial simply because it is called "development."

Development has consequences. The community has a right to know what those consequences will be and who will bear the costs.

Before any industrial development is approved in this area, there should be clear answers

regarding:

- The potential impacts on Bear Creek and its wetlands
- The potential impacts on the Pudding, Willamette, and Columbia River watersheds
- The amount of water the proposed industries would require
- The source of that water
- The impact of water use during drought and low-flow conditions
- The impact of wastewater and treated-water use
- The amount and type of traffic that would be added to Toliver Road
- The improvements required to make Toliver Road safe for industrial traffic
- Who will pay for those improvements
- The additional demand on city utilities and infrastructure
- The additional demand on police, fire, emergency, and other public services
- The full tax and utility contributions that would be made by the proposed businesses
- Whether any costs would ultimately be passed on to existing residents

Protect the People Who Already Live Here

Molalla residents should not have to sacrifice their environment, water security, road safety, or financial stability to accommodate industrial development.

We should not be asked to accept the risks while private industry receives the benefits.

Before moving forward, decision-makers need to demonstrate that the proposed development will protect our watershed, protect our water supply, address its own infrastructure needs, and pay its fair share of the costs it creates.

Bear Creek and its wetlands should be protected.

The Molalla River and our community's water supply should be protected.

Toliver Road and the safety of the people who use it should be protected.

And the taxpayers and utility customers of Molalla should not be left paying the bill for industrial development.

We are asking our elected and appointed officials to put the long-term interests of the Molalla community ahead of pressure to approve additional industrial development. Once these resources are damaged and these costs are imposed, it may be too late to undo the consequences.

From: [Mark Derry](#)
To: [City Recorder](#)
Subject: Fw: Proposed inclusion of Sub Area 12 being included in the UGB
Date: Tuesday, September 22, 2026 9:32:21 PM

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From: Mark Derry <markwderry@gmail.com>
Sent: Tuesday, September 22, 2026 9:28 PM
To: recorder@cityofmolall.com <recorder@cityofmolall.com>
Subject: Proposed inclusion of Sub Area 12 being included in the UGB

I am opposed to the Sub Area 12 being included in the UGB.
My name is Mark Derry (1840 Toliver Road).

I am strongly opposed to the proposed industrial development in this area and believe it deserves much greater scrutiny before moving forward.

This is not simply a question of bringing additional industry into the community. It is a question of whether we are willing to accept increased risks to our watershed, wetlands, roads, water supply, and the financial well-being of Molalla residents in order to accommodate development.

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This area needs restoration and protection—not increased industrial risk.

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Toliver Road Cannot Handle Industrial Traffic

Toliver Road already has a serious traffic problem. Vehicles currently travel at excessively high speeds on a narrow road.

Adding heavy industrial traffic to this road would only make an existing problem

worse.

Toliver Road was not designed or built to handle the volume and weight of heavy industrial vehicles that could accompany this type of development. Increased truck traffic means increased concerns about road damage, traffic safety, noise, and the safety of residents who live along and use this road.

The solution should not be to put industrial traffic on a road that is already inadequate for the traffic it currently carries.

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The Molalla River already faces significant pressures from drought, changing climate conditions, low water levels, and water withdrawals. Low-flow conditions can affect both the community's ability to obtain water and the health of the river's ecosystem and wildlife habitat.

We should not approve new water-intensive industry without first demonstrating that our existing water supply can reliably support it, including during drought and low-flow conditions.

At a meeting, the possibility of a data center and its use of treated water was mentioned. My spouse and I are strongly opposed to a data center being developed here.

A data center or other water-intensive industry should not be allowed to compete with residents for a limited and increasingly stressed water resource.

Molalla Residents Should Not Subsidize New Industry

There is another issue that must be addressed directly: **Who is going to pay for this development?**

Molalla is not a wealthy community. Its residents already pay taxes and utility bills to support the community's infrastructure and services.

We cannot afford a situation where residents are expected to absorb increased taxes, utility costs, infrastructure costs, water costs, road costs, or other expenses created by new industrial development.

My spouse and I are opposed to any new industry that does not fully pay its own fair

share of taxes and utility costs.

Residents should not be expected to subsidize private industry.

If a business requires additional roads, water infrastructure, wastewater capacity, utilities, emergency services, or other public infrastructure, those costs need to be clearly identified and addressed before approval—not passed on to the people who already live here.

Development Should Not Come at the Expense of the Community

Economic development is not automatically beneficial simply because it is called "development."

Development has consequences. The community has a right to know what those consequences will be and who will bear the costs.

Before any industrial development is approved in this area, there should be clear answers regarding:

- The potential impacts on Bear Creek and its wetlands
- The potential impacts on the Pudding, Willamette, and Columbia River watersheds
- The amount of water the proposed industries would require
- The source of that water
- The impact of water use during drought and low-flow conditions
- The impact of wastewater and treated-water use
- The amount and type of traffic that would be added to Toliver Road
- The improvements required to make Toliver Road safe for industrial traffic
- Who will pay for those improvements
- The additional demand on city utilities and infrastructure
- The additional demand on police, fire, emergency, and other public services
- The full tax and utility contributions that would be made by the proposed businesses
- Whether any costs would ultimately be passed on to existing residents

Protect the People Who Already Live Here

Molalla residents should not have to sacrifice their environment, water security, road safety, or financial stability to accommodate industrial development.

We should not be asked to accept the risks while private industry receives the benefits.

Before moving forward, decision-makers need to demonstrate that the proposed development will protect our watershed, protect our water supply, address its own infrastructure needs, and pay its fair share of the costs it creates.

Bear Creek and its wetlands should be protected.

The Molalla River and our community's water supply should be protected.

Toliver Road residents and the safety of the people who use it should be protected. There are families on Toliver Road west of the traffic circle with very young children. The high traffic speeds that happen daily there are unsafe and dangerous. Any increase in traffic volume and large commercial vehicles puts those children in jeopardy of a fatal accident. Current low to near zero levels of police monitoring need to be noted and addressed. Speed limit signage needs to be changed and lowered, with strict enforcement.

And the taxpayers and utility customers of Molalla should not be left paying the bill for industrial development.

We are asking our elected and appointed officials to put the long-term interests of the Molalla community ahead of pressure to approve additional industrial development. Once these resources are damaged and these costs are imposed, it may be too late to undo the consequences

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From: [Melissa Schultz](#)
To: [City Recorder](#)
Subject: UBG Expansion- Please vote NO
Date: Wednesday, September 23, 2026 7:42:37 AM

Dear Members of the Molalla City Council,

My name is Melissa Schultz, and I am a resident living just outside the city limits.

Thank you for your ongoing time and effort navigating the Urban Growth Boundary (UGB) expansion process. I respectfully ask that you vote NO on the current UGB expansion proposal or postpone the vote until the October 14 City Council meeting for the following reasons:

1. **Community Feedback:** The engagement process has suffered from delays and limited communication. Following the completion of the engineering report last summer, outreach was minimal and primarily digital, leaving many residents—particularly those offline—uninformed about major changes to the plan. Additional time is needed to properly gather public input.
2. **Sub Area Selection:** Sub Area 5 is not the optimal choice. Alternatives such as Sub Area 13 to the north offer better access to major transit routes and existing city infrastructure. The Council should advocate for a solution that better fits our community rather than accepting Sub Area 5.
3. **Engineering Report Concerns:** The engineering report contains inaccuracies that warrant further review. Notably, the report indicates that expanding to the south (Sub Area 5) is less cost-effective than utilizing Sub Area 13.
4. **Population Forecasts:** The current population projections appear inflated. Re-evaluating these forecasts now will prevent unnecessary boundary expansion and overdevelopment, ultimately saving taxpayer funds in the long term.

Please vote NO or postpone this vote until the October 14 meeting to allow for further public review and deliberation.

Thank you for your time and consideration.

Sincerely,

Melissa Schultz
Molalla, Oregon

From: [Ron Higginbotham](#)
To: [City Recorder](#)
Subject: Public Comment in reference to Proposed UGB Expansion
Date: Wednesday, September 23, 2026 7:54:20 AM

My name is Ron Higginbotham, and I live with my wife (Nicole) on Toliver Rd west of HWY 213. We built our house there over 22 years ago.

I am writing to provide my formal request to ask the City Council to reject the Planning Commission's proposed UGB Expansion. The failure of the Planning Commission to use an available, accurate Population Forecast will have significant negative impacts on the plan. I understand the years of work that has been completed on this proposal; however, the citizens of Molalla should not be paying for a known inaccurate estimate. Additionally, this impacts everyone who drives in or through Molalla.

The current proposed plan also includes a VOLUNTARY industrial site expansion in subarea 12 located 500 feet from the nearest city residence and is even closer to homes on county property. This location borders Bear Creek. A quick search on the DEQ website shows at least 4 industrial and commercial sites that were fined in the last 9 years, with many of these fines due to runoff or dumping into Bear Creek. By adding another large site that touches the water way in no way protects it. This also does not include City itself being sued and fined for violating regulations regarding dumping effluent into the creek over multiple years. I believe where industry is currently located in Molalla deserves added scrutiny and where future development will be allowed should purposefully be directed away from water sources. Subarea 12 does not sufficiently provide a safeguard of this water way.

In conclusion, not using the most accurate data available is not acceptable. As an organization that is responsible to be good stewards of taxpayer money, you should be asking yourselves, "Does this help the current citizens if there is already sufficient capacity within today's boundaries, or will this place an undue burden on these same citizens?"

Ron Higginbotham
1820 Toliver Rd

From: [Nyxon Hopping](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Wednesday, September 23, 2026 8:24:41 AM

Dear Molalla City Council,

My name is Nyxon Hopping, and I live in Molalla (13577 S Molalla Forest Rd, Molalla OR.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

4. INACCURATE POPULATION FORECAST: The current population forecast is very likely skewed high. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse. Please ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. If you allow it, they will come.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Nyxon Hopping

13577 S Molalla Forest Rd, Molalla, OR

From: [Ron & Nicole Higginbotham](#)
To: [City Recorder](#)
Subject: Data Center Fact Sheet on the Current.pdf
Date: Wednesday, September 23, 2026 8:28:31 AM
Attachments: [Data Center Fact Sheet on the Current.pdf](#)

My name is Nicole Higginbotham, I am a city resident for 22+ years.

I am asking city council to vote No on the proposed Urban Growth Boundary. I am asking they remove Sub Area 12 from the plan as it is not required by the state to be included in the UGB.

After reading the E.O.A, and the possibility of adding land to the city to accommodate a land parcel for Data Centers. We live within 500 ft of the last house in our city neighborhood to Sub Area 12. The impact to our neighborhood would be devastating.

We also want Current accurate forecast numbers to be used for the UGB plan.

Please listen to your constituents on this very important issue. I will be asking for a moratorium on Data center in the City of Molalla.

Thank you

Nicole Highinbotham

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Jaren Dewald](#)
To: [City Recorder](#)
Subject: UGB
Date: Wednesday, September 23, 2026 8:40:56 AM

"Dear Molalla City Council,

My name is Jaren, and I live in Molalla off of Claim Road.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

3. INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that it IS inefficient from a cost perspective to expand the UGB to the south (specifically to Sub Area 5). Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13. Sub Area 13 is actually more cost effective than Sub Area 5.

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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Jaren

From: [Jackie Line](#)
To: [City Recorder](#)
Subject: UGB Expansion - Please Vote NO
Date: Wednesday, September 23, 2026 8:54:07 AM

Dear Molalla City Council,

My name is Jacklyn Line, and I live in Molalla at 816 Alyssa Ct.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote NO on the current UGB expansion proposal, or postpone the vote until the next City Council meeting on October 14 for the following reasons :

1. COMMUNITY FEEDBACK: Please don't make this decision out of haste and just wanting this to be over. The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback. Once the engineering report was done, there was very little online-only communication out to the community last summer. Many citizens assumed that the UGB would go to the North as you had hoped. Appropriate notification to citizens that the plan had changed did not occur. Anyone who is not online (older generations especially), had no way to know when the engineering report was completed and how the City was interpreting it. We need more time as a community to make the right decision for Molalla and get community feedback. Again, please don't make this decision out of haste and just wanting this to be over.

2. WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than Sub Area 5. Sub Area 13 to the North for example, would be great for commuters to get to the freeways and be close enough to existing city infrastructure. We should fight to push the state for a better suited Sub Area, not just succumb to one-size-fits-all state laws. Please vote NO so we can work with the state to find a way to swap Sub Area 5 and Sub Area 13.

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Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

Jacklyn Line 816 Alyssa Ct. Molalla OR

From: [Nancy Kylo](#)
To: [City Recorder](#)
Subject: UGB Expansion Considerations & Please Vote NO
Date: Wednesday, September 23, 2026 8:58:17 AM

Dear Molalla City Council,

My name is Nancy Kylo, and I live in Molalla at 32958 S. Wilhoit Road, Molalla, OR 97038.

Thank you for your time and efforts over the last few years navigating the UGB expansion. I respectfully ask that you **vote NO on the proposed UGB expansion as currently presented** and allow additional time for meaningful community input and further review of the alternatives. I understand that the City is working within state requirements for urban growth boundaries, but this decision will shape Molalla for decades. We should take the time necessary to ensure we make the right decision for our community. My concerns include the following:

1. INSUFFICIENT COMMUNITY ENGAGEMENT

The community engagement process has been confusing, with stops, starts, and pauses. Many residents have given up trying to follow along or provide meaningful feedback. After the engineering report was completed, there was limited communication to the broader community. Many residents were not aware that the direction of the proposal had changed. We need more time and better outreach to ensure the community understands the options before a final decision is made.

2. SUB AREA 5 MAY NOT BE THE BEST CHOICE

There are better-suited areas to consider. An example is **Sub Area 13 to the north**. It appears to have advantages over options to the south because of its proximity to existing city infrastructure and transportation connections. I understand the City must work within state requirements, but we should continue working with the state to find the best solution for Molalla rather than treating Sub Area 5 as the only viable option.

3. ENGINEERING ANALYSIS NEEDS FURTHER REVIEW

There are concerns related to the engineering report that deserve a closer look, particularly regarding the cost of extending infrastructure to different subareas. The analysis should clearly establish which areas can be served most efficiently and cost-effectively before the City commits to an expansion. If Sub Area 13 may be more cost-effective than Sub Area 5, that comparison should be fully evaluated.

4. POPULATION FORECAST SHOULD BE VALIDATED

The proposed UGB expansion is based in part on a long-term population forecast. If that forecast is higher than Molalla ultimately needs, we could end up expanding the UGB farther than necessary. This invites development that puts additional demands on our infrastructure and taxpayers. It may cost money to obtain a more accurate forecast, but that could be a much smaller cost than making the wrong decision now.

Please don't make this decision simply because this has been a long and difficult process and everyone wants it to be over. **A UGB decision is not something we**

should rush simply to meet a timeline. We have an opportunity to ensure the analysis is sound, the alternatives have been fully considered, and the community has had a meaningful opportunity to participate.

When I think about a plan, I want to ensure our community can support the cost of change associated with basic infrastructure. In addition, I also want to ensure our little town can support changes affecting schools, transportation, fire, and police. I want a future for Molalla that sets our community up for continued success. It was just a few years ago that we had the wildfires and the go-now evacuations. Maybe it's PTSD from that experience, but I want to ensure we grow at the right level with an expansion plan that helps our community thrive. I hate seeing any farmland go away for the sake of more apartments or homes.

Please vote NO and allow additional time to work with the state, review the alternatives, and get this decision right for Molalla.

Best regards,

Nancy Kylo

32958 S. Wilhoit Rd.
Molalla, OR
[\(503\)710-1799](tel:5037101799)

September 21, 2026

Dear Molalla City Council,

My name is Monica Sandgren and I live in Molalla on S. Wilhoit Road.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote no on the current UGB expansion proposal, or postpone the vote until the next city council meeting on October 14 for the following reasons :

COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback due to the lack of genuine effort to collect feedback from relevant parties. We need more time as a community to make the right decision for Molalla, not just going off state laws that are a one size fits all approach.

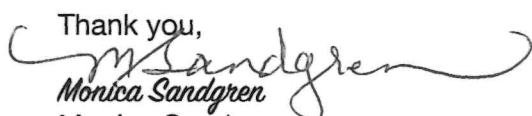
WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than sub area 5. Sub area 13 for example, would be great for commuters to get to the freeways and be close enough to city infrastructure.

INACCURATE ENGINEERING REPORT: There are flaws and inaccuracies in the engineering report that need to be carefully revisited and studied. The engineering report actually proves that It is inefficient from a cost perspective to expand the UGB to the south (specifically Sub Area 5).

INACCURATE POPULATION FORECAST: the current population forecast is very likely skewed high as you know. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse.

Please vote NO or postpone this vote until city council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,

*Monica Sandgren*

Monica Sandgren
36136 S Wilhoit Road
Molalla, OR 97038



September 21, 2026

Dear Molalla City Council,

My name is Barry Sandgren and I live in Molalla on S. Wilhoit Road.

Thank you for your time and efforts over the last few years navigating the UGB expansion. It is a confusing and cumbersome process for all. I am asking you to vote no on the current UGB expansion proposal, or postpone the vote until the next city council meeting on October 14 for the following reasons :

COMMUNITY FEEDBACK: The community engagement for this process has not gone well. It has been confusing with stops, starts, and pauses, and many community members have given up following along or trying to provide relevant feedback due to the lack of genuine effort to collect feedback from relevant parties. We need more time as a community to make the right decision for Molalla, not just going off state laws that are a one size fits all approach.

WRONG SUB AREA CHOSEN: There are better suited sub areas to choose from than sub area 5. Sub area 13 for example, would be great for commuters to get to the freeways and be close enough to city infrastructure.

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INACCURATE POPULATION FORECAST: the current population forecast is very likely skewed high as you know. Although we would need to spend taxpayer dollars to get a more accurate forecast, the wasted taxpayer dollars down the road if we make the wrong decision would be much worse.

Please vote NO or postpone this vote until city council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,



Barry Sandgren
36136 S Wilhoit Road
Molalla, OR 97038



From: [Molalla CPO](#)
To: [City Recorder](#)
Subject: Molalla CPO - Molalla City Council Comment - Sept. 23, 2026
Date: Wednesday, September 23, 2026 9:29:35 AM

Please see below for the comments from the Molalla CPO to be included in the record.

September 23, 2026

Dear Mayor and City Council members,

The Molalla Community Planning Organization (CPO) is in opposition to the current plan for Urban Growth Boundary expansion plan because of overstated population needs due to the use of the outdated 2020 population numbers. We understand that significant resources have been used to develop the existing plan, but we are concerned that moving forward on a plan that relies on outdated projections will commit the city to unbearably high infrastructure costs, driving up costs for all of the residents of Molalla and the surrounding areas.

We are also deeply concerned about the voluntary inclusion of large acreage of currently productive farmland for industrial zoning. There are potentially significant ecological impacts to wetlands and Bear Creek by expanding in this area. We are concerned about the potential for housing a data center on this land, an unpopular idea with residents inside and outside the city. A data center would provide few jobs and dramatically increase utility rates for Molalla residents.

As the Council moves towards adoption of the UGB expansion plan, we urge the Council to recognize that these final decisions acutely impact those living just outside current city limits. Rural residents in-scope for inclusion in the potential UGB expansion bear the heaviest burden of these changes yet have no direct democratic recourse with the city. They are part of the same financial and social ecosystem as the city. They fund the same schools, fire districts, and county services; they are stakeholders in Molalla's success. Yet, these planning decisions dictate their quality of life and financial futures without the benefit of their vote. We ask the City to use its discretion to limit the harms of aggressive over-expansion by considering the permanent social and agricultural impacts on families both inside and outside the city who have called this land home for generations. We believe that Molalla's future success lies in a balanced growth strategy that protects shared resources, promotes well-being for current residents, and meets genuine need for housing and job growth.

Thank you,

Jim Gilbert
President, Molalla Community Planning Organization

9/23/26: Urban Growth Boundary Feedback

Dear City Council and Mayor of Molalla,

Thank you for all the hours and hard work that has gone into this Urban Growth Boundary expansion process. I write this with respect and gratitude for your service. I know this has been a heavy burden everyone at the City for years. We all just want it to be over, however, I am pleading with you to not make this decision in haste and frustration and vote No on the existing UGB proposal, or delay the vote until Oct 14th. **We need more time as a community to process the new Dyer engineering report that was just shared only two months ago, with very little community-wide engagement.**

I know the City communicated with the DLCD and the State about the desire to not have to use Sub Area 5 exception lands last year. To my knowledge, the City has not tried to communicate or work with them again since the Dyer engineering report was completed this July. **We ask that the City please continue to work with DLCD and the State to push for releasing the requirement of using "Exception Lands" in Sub Area 5.** The engineering report has errors and can be interpreted in various ways. It does NOT have to be interpreted that Sub Area 5 is cost effective for expansion. *Sub Area 5 IS cost prohibitive and incompatible with Goal 14 Laws.*

Are you deciding your vote because you want this to be over, or because you are 100% confident this is the right direction? Have you deeply studied the Dyer engineering report yourself, or are you relying on Violet Brown's opinion?

My family owns fifth generation land, ~200 acres, on the backside of Sub Area 5 near Warrick. There are six Lantz families on our land, across three generations. I'm asking you to **please slow down** and realize that the decision made today will impact generations of people (my kids and future grandkids!). While it may not affect you directly, it affects many Molallans, very seriously. It affects their ability to sell land to retire, or it affects their ability to keep family farms for future generations not surrounded by incompatible density. **These are major life impacts that you have on your plate today.** This is not just adjusting a line on a map, this is a decision that affects families, their way of life, and their finances deeply, on the North and South parts of town.

Although this process has been going on for years, it has ONLY been two months since the Dyer engineering report was available to the public that changed the entire conversation. It was not appropriately communicated back out to the public that the report was ready for review. The July 20th Community Meeting basically stated there was nothing the City could do and the expansion "must go to the south" due to cost constraints. That is not the case.

I appreciate the intent of the UGB laws, but the process is incredibly flawed, and I strongly believe the ways **the laws are too strict and do not require enough public feedback** and input. **We CAN fight back as a City against these laws.** Please do not give up!

The process has been so confusing, I think that most of the community has just thrown their hands up and given up. I know that we all want this to be over and I know that this is a huge hassle, **but I am begging you to please continue to work with DLCD and the State again to request we do not have to use the "Exception Lands" in Sub Area 5. Please ask the DLCD/State again if we swap can Sub Area 5 for Sub Area 13, or another Northern Sub Area?** The North is closer to freeways, existing infrastructure, and have multiple land owners wanting to be incorporated. **Despite these norther parcels' "farm use" zoning, we CAN ask the State again for an exception to these laws.**

Per the land use attorneys I've spoken to, **the Dyer engineering report actually DOES support the UGB expanding North from a cost perspective. But the report was poorly completed with errors,** hence the possible interpretation that the UGB "should go South using Exception lands."

Over a year ago, we were told to pause and wait for the engineering report to be done, then the UGB process quietly popped back up this summer. **Only two months ago, somehow we as a community were supposed to figure out that this was back on the table to go to the South.** Unless you were checking Facebook and the City website, or attending all City meetings, how was the community supposed to know the report had been completed? What about the older generation that is technologically challenged? Did you send out another mailer or pass out flyers?

It is not right and honestly, it is un-American to be able to implement land laws with little guideline on public involvement and feedback timelines. **The UGB laws were written by liberal environmentalists, who, as we know commonly allow government overreach.** I am begging you to please consider your civic duty to represent the people by the oath you took to make the right decisions for your people. We need more time with the engineering report.

The 3J Consulting agency who is the driving advisor on our UGB process has a negative reputation for preying on small to medium size towns who do not have the financial means or community bandwidth as a working class demographic to push back on their recommendations. They take the State funded grant money and do a cookie-cutter UGB approach within the grant money's funded scope of work. They do not want to help navigate pushing back on DLCD and the State, because they cannot bill for those hours as there is no further funding. While I respect her intellect, professionalism, and knowledge, **one person, Violet Brown, should not have this much influence on decisions affecting thousands of people.** When asked how lots were chosen in Sub Area 5, Violet even admitted in the last Planning Commission meeting that she arbitrarily picked tax lot parcels off of Warrick Rd. until she reach the required amount of additional acres needed, and then stopped. She did not walk the neighborhood, or ask for any property's owners input. There is a landowner off Warrick who wants to be in the expansion and wasn't included. Can we at least help them? **Although not illegal, why would we as a town allow this? Because we "just want this to be over?"** We live in a democracy where we can push back on laws we don't agree with. *We can decide to make the feedback process better, even if not required.*

Please do not make this decision in haste, do your OWN research and interpretation of the Dyer engineering report. Open your heart and make this decision out of how much you care about this town. I am begging you to **please vote NO, or postpone the vote to October 14th**, so that we have more time to work together to interpret the engineering report and give a stronger voice to the people deeply and forever impacted by your vote.

With Respect and Gratitude for your service,

Paige and Lee Lantz

32951 S Wilhoit Rd, Molalla, OR 97038

503-318-6228 paige@lantz-construction.com

From: [mari ruiz](#)
To: [City Recorder](#)
Subject: NO to UGB
Date: Wednesday, September 23, 2026 10:18:20 AM

Dear Molalla City Council,

My name is Maricela Dewald, and I live in Molalla on S. Claim Rd.

Thank you for your time and efforts over the last few years navigating the UGB expansion. I (with many other Molalla citizens) am disappointed with the lack of communication, involvement, and response or consideration with the Molalla community and our input. It's hard to witness and accept the expansion in our small community, but I know it is most likely necessary within reason.

With that being said, I would hope that careful consideration and planning would go into the UGB and all other possible options. Expanding to the South seems unnecessary, considering there are other, and possibly better, suited options to the North that have better accommodations to transportation, highway access, and closer with easier access to larger city amenities and infrastructure (Oregon City and Canby). The current expansion for sub area 5 intrudes on many properties and landowners livelihood such as farmland. Sub Area 13 is actually more cost effective than Sub area 5. People move to a small town like Molalla for space, the quiet, the tight knit community, and their own piece of land for tranquility and peace.

I also ask to redo the population forecast so we are not expanding the UGB to be larger than actually necessary and inviting more development here than we should. I know with unquestionable certainty that single family homes with larger properties have much higher value than mass buildings such as apartment buildings. I have faith in my town, and I would hope that the best interest would be for Molalla and its loyal community, and not a result of money chasing and the complete disregard for the people who love and fight for this town. If you allow it, they will come.

I can assure you that taxpayers are entirely more willing and likely to invest and spend money on further review and investigation on a new engineering report. I believe it's in the best interest to re-evaluate the boundary areas and to be certain which sub area would be the best and most cost efficient option.

In summary, I feel the key points of consideration are; Community feedback, wrong sub area chosen, population forecast and engineering report.

Please vote NO or postpone this vote until City Council meeting on October 14 so the community has more time to help you make the right decision.

Thank you,
Maricela Dewald
S. Claim Rd. Molalla, OR

[Sent from Yahoo Mail for iPhone](#)

From: [Teresa Arnold](#)
To: [City Recorder](#)
Date: Wednesday, September 23, 2026 11:00:58 AM

No iam a home owner and I am against this data center. I looked for the place I am suppose to sign but cannot find it.

Teresa Arnold
31827 S Ona Way, Molalla, OR 97038

From: [Charlotte Bloebaum](#)
To: [Christie Teets](#)
Date: Wednesday, September 23, 2026 11:30:45 AM

I am in complete opposition to this Urban Growth Boundary - NO DATA CENTERS IN
MOLALLA@!

From: [Corwin DiMeo-Ediger](#)
To: [City Recorder](#)
Subject: Community Comment for the Molalla City Council - September 23, 2026 - RE: UGB Ordinance No. 2026-10
Date: Wednesday, September 23, 2026 11:42:14 AM
Attachments: [Corwin DiMeo-Ediger - Enumerated Objections to UGB Ordinance No. 2026-10 .PDF](#)
[Community Comment for the Molalla City Council - September 23, 2026.PDF](#)
[Tomasi-Bragar-Dubay- Opposition to Including Subarea 5 in the Urban Growth Boundary - UGB Ordinance No. 2026-10.PDF](#)

Hi Christie,

Please see attached for the following documents we would like included in the record:

- A letter signed by 102 members of the Rural South Molalla community jointly written in opposition to the proposed UGB Ordinance No. 2026-10
 - Community Comment for the Molalla City Council - September 23, 2026.PDF
- A copy of a letter also provided to the planning commission from the law firm Tomasi-Bragar-Dubay outlining the legal basis for opposition to the inclusion of Subarea 5 in the Urban Growth Boundary
 - Tomasi-Bragar-Dubay- Opposition to Including Subarea 5 in the Urban Growth Boundary - UGB Ordinance No. 2026-10.PDF
- A list of additional enumerated objections to UGB Ordinance No. 2026-10
 - Corwin DiMeo-Ediger - Enumerated Objections to UGB Ordinance No. 2026-10.PDF

Thank you very much,

Corwin DiMeo-Ediger

I. Statutory Need, Demographic Data, and Internal Capacity (Goal 14 & ORS 197.296)

- **Reliance on Flawed Population Projections:** The UGB expansion relies on an outdated pandemic era PSU Population Research Center (PRC) forecast projecting an increase of 5,432 residents by 2042. PSU PRC officially revised this downward in 2024 to a net increase of only 2,930 residents. While the City claims discretionary authority to proceed with the older invalid data, doing so exceeds what is legally reasonable and violates the legislative intent of that rule. The administrative allowance to retain adopted forecasts was designed to spare cities from having to restart lengthy planning processes over small, nominal variations in population, not to shield a staggering 46% discrepancy that fabricates a false need for a multi-million dollar land expansion.
- **Arbitrary Refusal of State Grant Funding:** DLCD offered flexibility to convert existing planning grants to update the demographic baseline. The City's refusal to correct flawed data constitutes an arbitrary administrative decision unsupported by substantial evidence.
- **Elimination of the Statutory Housing Deficit:** When the corrected 2024 PSU forecast is applied against internal city capacity (1,068 units accommodated via pipeline development, rezoning, and infill), the claimed housing deficit drops to a net surplus of 4 units.
- **Bad Faith Deferral of R-3 Zoning Capacity:** The City is concurrently passing Ordinance 2026-12 to increase internal R-3 zoning density (creating capacity for 304 new units), but intentionally deferring the mathematical inclusion of those units until after the UGB expansion is adopted. This violates the statutory requirement to demonstrate that land needs cannot reasonably be accommodated inside the existing boundary first. Regardless of the technical permissibility of this action, it contradicts the spirit and intent of the DLCD guidance.
- **Unexplained Acreage Padding:** The Goal 14 Analysis identifies a need for 116.15 acres of R-1 and 35.21 acres of R-2 (totaling 151.36 acres), but arbitrarily concludes 189.20 acres are needed. The document fails to provide any legal or technical basis for adding this extra 37.84 acres for infrastructure.
- **Methodological Distortion via Safe Harbor Density Inflation:** In the July 2026 analysis, the City switched to a flat "Safe Harbor" assumption of 7 dwelling units per acre. This mathematically inflates theoretical housing yields to dilute calculated per-unit infrastructure costs on spreadsheets, while ignoring the physical parcel shapes, steep topography, and access easements that prevent real-world buildout at that density.

II. Procedural Failures and Legal Misclassifications (OAR 660-024)

- **Misidentification of Land Priorities:** The Goal 14 Analysis falsely identifies rural exception lands as First Priority lands pursuant to OAR 660-024-0067. Urban Reserves are First Priority, and exception lands are considered Second Priority. Claiming an excess of first priority lands when there are no Urban Reserves in the study area misleads the public and the City's public bodies.

- **Failure to Evaluate All Land in the Study Area:** The Goal 14 consultant identified 21 Subareas. The Public Facilities Review analyzed northern Subareas 2 through 8 and 13 through 16 for relative infrastructure costs. However, the Goal 14 Analysis inexplicably chose to only analyze Subareas 3, 5, 7, 8, and 9 for residential use, reserving Subareas 10 through 21 exclusively for large parcel industrial use. This failure to adequately analyze all sites in the study area for residential use violates the statutory requirement to evaluate all land.
- **Late Stage Map Alterations:** Following the Dyer Partnership engineering report, the City significantly altered parcel maps and subarea boundaries on short notice, denying affected property owners and the public adequate time to review or respond.

III. Public Facilities, Fiscal Liability, and Transportation (Goals 11 & 12)

- **Unacceptable Engineering Error Rates:** The boundary map relies on "Class 5" conceptual estimates from the Dyer Partnership, which carry an error variable rate of +/- 30%, making them legally and financially insufficient for drawing definitive UGB lines.
- **The Measure 50 Perpetual Operating Deficit:** Under Oregon Measure 50, property tax revenue growth is capped at 3% annually. While developers pay one-time System Development Charges (SDCs) for initial connections, the perpetual operations and maintenance (O&M) for dedicated pump stations, storm lines, and rebuilt rural arterials create a permanent municipal deficit that forces existing taxpayers to subsidize the sprawl.
- **Downstream Wastewater Capacity Constraints:** Expanding south forces a mandatory 5,360-foot downstream replacement and upsizing of the South Bear Creek trunk main to the Wastewater Treatment Plant, creating an unbudgeted capital burden.
- **Non-Compliance with the Transportation Planning Rule (TPR):** The proposed expansion will generate substantial vehicular trips, significantly degrading state highways (OR 211, OR 213) and county collectors below adopted mobility standards without committed funding for necessary widenings.
- **Severe Conflict with Heavy Freight and Timber Transit:** South Molalla Avenue, Sawtell Road, Mathias Road, and Molalla Forest Road serve as primary routes for heavy timber transport (log trucks) and wide agricultural machinery. Injecting high-density commuter traffic onto un-shouldered, narrow rural roads creates severe hazards.

IV. Environmental and Agricultural Incompatibility (Goals 3, 5, & 6)

- **Threats to Municipal Drinking Water Supply (Goal 6):** The expansion footprint directly interfaces with the Bear Creek corridor, a major tributary to the Molalla River (the sole municipal drinking water source for Molalla). Urban runoff and increased impervious surfaces threaten source water quality.

V. Specific Objections to the Inclusion of Subarea 5

- **General Impracticability:** Subarea 5 should be excluded from the study area because it is physically isolated and legally impracticable to provide necessary public facilities or services to the land within the planning period.
- **Factor 1 Failure (Efficient Accommodation):** Subarea 5's adjacency to the city limits is negated because the adjacent parcel is the former Floragon and Dansons Mill Site. This 16-acre southern boundary operates under a DEQ Conditional No Further Action determination and is severely restricted due to PCP contamination. The City cannot route streets, sidewalks, or utility trenches through this toxic parcel. Furthermore, there are no pedestrian accommodations on Molalla Forest Road, and proposed inclusion subareas to the east and west are inefficient due to wetlands and conservation easements.
- **Factor 2 Failure (Orderly and Economic Public Facilities):** Subarea 5 is one of the most expensive options available to the City. The Public Facilities Review estimates \$343,514 per unit in public infrastructure. Even using the City's artificially lowered Safe Harbor estimate of \$205,409 per unit, the costs remain prohibitive. The exorbitant \$80.7 million standalone infrastructure bill will not connect to or serve other developments, representing a massive one-time cost.
- **Factor 3 Failure (ESEE Consequences):** The Goal 14 Analysis claims expanding Subarea 5 is generally positive for residential use, directly contradicting its own transportation analysis stating the roads are more conducive to industrial use. The analysis also completely ignores the environmental and health hazards of placing dense residential housing next to the contaminated mill site.
- **Factor 4 Failure (Agricultural and Forest Compatibility):** Subarea 5 contains two areas of high value crops, including tree crops other than Christmas trees. The plan fails to adequately assess the impacts of residential encroachment on farming operations, including increased traffic, conflicts with water availability, introduction of weeds and pests, damage to crops, trespassing, litter, and vandalism.

Community comment for the Molalla City Council - September 23, 2026

RE: UGB Ordinance No. 2026-10

This comment is being submitted on behalf of 102 individual community members who have co-signed this letter in opposition to the current UGB expansion plan.

Mayor and Members of the City Council,

This letter was written as a joint effort on behalf of the many concerned residents, farmers, ranchers, and generational landowners who live South of town within or near Subarea 5 of the proposed UGB amendment. It has been co-signed by 102 individuals who oppose this expansion plan.

We are speaking to you today as a united rural community that has existed since settlers first stopped in Molalla. Our community currently protects a large section of the Bear Creek watershed, contains apple trees planted by pioneers who arrived on the Oregon Trail, holds countless functioning farms and ranches, and includes homesteads that have been in the same families for generations. Today, however, our community is facing destruction by an expansion plan that is both incomplete and legally, financially, and procedurally flawed. We are asking you to stop this by delaying your vote until the next City Council meeting on October 14th so that all credible legal concerns can be fully adjudicated.

Let us start by stating plainly that Subarea 5, which sits south of the city near the intersection of South Molalla Avenue and the Molalla Forest Road, is fundamentally incompatible with Oregon planning rules and meets the criteria for total exclusion. This subarea was not drawn to serve the needs of the present or future residents of Molalla, it will not solve the housing crisis, nor will it grow the city sustainably. It is an astronomically expensive tract of unnecessary and deeply destructive sprawl, drawn to benefit a single developer.

Subarea 5 is a gerrymandered island with no practical connection to the existing city boundary in any direction. It is blocked on all sides by administrative or environmental boundaries and by a poisonous, largely unremediated DEQ site that contains dangerous levels of dioxins. The boundary for Subarea 5 also deliberately excludes the surrounding generational landowners, cutting out anyone who hoped to benefit from the UGB while forcing all of us to absorb the devastating fallout of an expansion we did not vote for and do not want.

Because Subarea 5 is physically blocked from the city grid, it requires a staggering minimum \$80 million standalone infrastructure bill. These costs are dramatically and uniquely magnified because they cannot be shared with any adjacent development due to the area's isolation. The safe harbor housing density math applied during the planning process also dramatically skews the likely yield and cost of actual housing units that can be built here. A full accounting of these constraints drives the real world infrastructure cost to an estimated \$343,514 per unit in Subarea 5. The existing taxpayers of Molalla will

be permanently subsidizing the operational deficits of a dedicated sewage lift station and miles of rebuilt rural roads just to service one developer's personal project.

The City is also justifying this outward sprawl by exploiting a mathematical loophole. Tonight, you are considering Ordinance 2026-12 to increase internal R-3 zoning density to 40 units per acre which would add space for over 300 new housing units inside the existing city boundary. DLCD requires this specifically to ensure that cities build inward and upward before expanding outward. However, the City is using the safe harbor formula of just 7 units per acre to avoid updating its expansion spreadsheets. This allows the City to pass a paper upzone to check a state compliance box without shrinking the UGB expansion footprint by a single acre. While technically permissible, this bad faith math violates the clear spirit and intent of Oregon planning laws and the DLCD guidance. If the nearly 300 units gained from this rezoning were honestly accounted for (regardless of future anticipated zoning type), it would eliminate almost the entire mathematical need to bring Subarea 5 into the UGB.

The public is also broadly unaware of the current state of the UGB plan because this sequential planning process has been deeply abnormal and unnecessarily expedited during its final phases. Material changes were made to the boundary map at the eleventh hour following the outcome of the Dyer Partnership engineering study and it is not clear if other options, including substitutions of impracticable lands, have even been explored with DLCD. Community members who attended meetings and did their research throughout the process are now finding out that the plan laid out months ago has been abandoned and reworked into something unrecognizable. The City has a duty to provide more time for feedback because of how dramatic and sweeping these late stage changes were.

Subarea 5 is physically, economically, and socially impracticable. You have a clear legal basis to explore its removal with DLCD and select more suitable land. This legal basis is validated by comprehensive third party legal analysis which has been attached to this letter as part of the evidentiary record. There are viable alternatives available right now, such as a nearly one-for-one land swap utilizing the Burghardt property in Subarea 13. Swapping Subarea 5 for the Burghardt tracts would actually serve the needs of current and future residents, protect the fiscal interests of the taxpayers, would add large donated parkspace to the city, and allow for clean sustainable development without destroying an established rural community.

We want to emphasize a final point regarding your timeline. The City Council has absolutely no legal or administrative obligation to pass this plan today. You have discretion to hit pause. DLCD will not punish you or intervene with your city processes unless you fully disengage from the sequential planning process. They have demonstrated throughout this cycle that they are flexible, understanding, and want the best outcome for the future of Molalla. We understand there is pressure to pass this quickly to ensure the City does not have to comply with incoming, stricter state planning rules. However, rushing a flawed plan tonight will actually imperil your timeline even further.

Continuing as planned with Subarea 5, despite understanding these clear and credible legal issues, opens this entire expansion to continued objection and appeal. A flawed plan will not save you time. It will be delayed, appealed, and remanded. Delaying this vote to the next City Council meeting on October 14 to

review these issues may avoid additional objections, give impacted community members time to review and comment on the plan, and will help ensure that the wider, corrected plan can actually pass the subsequent administrative steps with the County and DLCD.

This is almost certainly the most meaningful and impactful vote you will ever make as a Council, and the wrong decision tonight will be catastrophic. If passed as drawn, this deeply flawed map will destroy the quality of life and futures for dozens of generational families.

Please listen to the community, review the proven legal analysis from multiple objective third party attorneys, and delay this vote to the October 14th meeting so we can get this right the first time.

Thank you,

Co-signed by 102 community members standing united in opposition to this plan:

Aaron Fanning - 32610 S Molalla Ave

Abel, Marcos (sr) & Markos (jr) Gonzalez - Molalla

Adrienne & Robert Barnes - 13728 S Warrick Rd

Anthony, Jackie & Patricia Salazar, Francisco Cortes - Molalla

Bethany & David Remington - 33020 S Dickey Prairie Rd

Brian & Ashley Bentley - 38236 S Hardy Rd

Carine M. Goldin - 32880 S Sawtell Rd

Carl & Amy Beyer - 35995 S Wilhoit Rd

Carol J Black - 304 E Park Place

Carol Mccallister - 13798 S Warrick Rd

Chad & Nikki Brinkman - 30398 S Molalla Ave

Cintia Reynaga & Polo Miron - 32652 S Krupicka Way

Corwin & Jerylyn DiMeo - 32302 S Rachel Larkin Rd

Dale & Mary Phipps - 32622 S Molalla Ave

Darci Brown - 12364 S Dart Rd

Darcy Brady - 808 Alyssa Ct

Darrel & Mary Sandquist - 32588 S Molalla Ave

Debra Schlitt - 522 E 3rd St

Dennis & Deb Freshour - 14100 S Molalla Forest Rd

Derek Freshour - 32868 S Sawtell Rd

Don & Laurie Meng - 34064 S Dickey Prairie Rd

Duane Brooks - 13450 S Warrick Rd

Eileen & John Lantz - 33061 S Wilhoit Rd

Eric, Megan & Jenner Cole, Nyxon Hopping - 13577 S Molalla Forest Rd

Florencio Larrea - 32628 S Molalla Ave

Garret, Lance & Lizmar Burbank - Molalla

Gary Chorum - 32607 Krupicka Way

Hector & Amanda Herrera - 708 E 8th St

James & Kimberly Fenstermacher - 748 E 8th St

Jessica & Eric Sandberg - 13534 S Warrick Rd

Josh & Cecilia Johnson - 12205 S Maple Grove

Juan & Lupe Reynaga - 33768 S Wilhoit Rd

Kait-Lynn & Rayce Hepler - 16666 S Hwy 211

Kelsey & Mike Huey - 502 Mathias Rd

Kory Drexel White - 40732 S Sawtell Rd

Lacey & Chad Sandquist - 313 Christopher Ct

Lacey Greif & Aron Greif - 32300 S Rachel Larkin Rd

Lynn, Debbie, Wade, & Olivia Lantz - 32845 S Wilhoit Rd

Marvel & Russell "Dan" Dement - 12312 S Quinn Rd

Michelle & Mason Lantz - 32903 S Wilhoit Rd

Mike & Tammy Emmert - 32220 S Hwy 213

Mitch & Millie Coleman - 15450 S Feyrer Park Rd

Monica & Barry Sandgren - 36136 S Wilhoit Rd

Nancy Kylo & Roberta Pitman - 32958 S Wilhoit Rd

Paige & Lee Lantz - 32951 S Wilhoit Rd

Philip & Adriana Amaya - 32891 S Sawtell Rd

Rhonda & Paul Imholt - 40501 S Sawtell Rd

Robert & Lynda Simon - 32620 S Molalla Ave

Sam Russell & Tammy Jolma - 34486 S Sawtell Rd

Sandy Jones - 16497 S Novak Rd

Scott Dale - 36545 S Wilhoit Rd

Spencer Wood & Whitney Walch - 32651 S Molalla Ave

Stephanie Kraxberger - 32600 S Krupicka Way

Suzanne Pearce - 31875 S Hardy Rd

Veronica Johnson & Family - 35425 S Wilhoit Rd

Wade Veelle - 332233 S Bud Smith Rd



Jennifer M. Bragar
Attorney

Admitted in Oregon, Washington,
and California

jbragar@tomasilegal.com

121 SW Morrison Street, Suite 1850
Portland, Oregon 97204

Tel 503-894-9900

Fax 971-544-7236

www.tomasilegal.com

September 1, 2026

BY EMAIL (recorder@cityofmolalla.com)

City of Molalla Planning Commission
Molalla Civic Center
315 Kennel Ave.
Molalla, OR 97038

Re: Opposition to Including Subarea 5 in the Urban Growth Boundary

Dear Chair Eaglebear and Commissioners,

This office represents Corwin and Jerylyn DiMeo who live at 32302 S Rachel Larkin Rd. This letter responds to the proposed Urban Growth Boundary ("UGB") Amendment on the public hearing agenda before the Planning Commission on September 2, 2026. Mr. Dimeo submits this letter requesting a common sense modification of that proposed expansion. Please include this letter in the record for the above-referenced file to exclude Subarea 5 from consideration for expansion of housing and to avoid a multi-year legal battle over the UGB expansion.

I. Misidentification of Exception Lands as Priority 1.

Throughout the UGB Goal 14 Analysis (the "Goal 14 Analysis"), the Goal 14 Analysis misidentifies exception lands as First Priority lands pursuant to OAR 660-024-0067. Urban Reserves are First Priority lands and exception lands are considered Second Priority. While, the Goal 14 Analysis explains that there are no Urban Reserves, a lack of Urban Reserves does not warrant this further misidentification. Misidentifying the priority of lands confuses the public and the City's public bodies. The Goal 14 Analysis provides that there is an "excess of first priority lands." This is untrue. There are no First Priority Lands within the study area.

II. Failure to analyze and compare the northern Subareas identified in the UGB Goal 14 Public Facilities Review (the "Public Facilities Review") for residential uses.

In the Goal 14 Analysis, the consultant identified 21 Subareas for analysis within the study area. The companion Public Facilities Review used these Subareas to analyze and compare the relative costs of providing necessary public facilities. The Public Facilities Review analyzed Subareas 2-8 and 13-16 and presented cost estimates for including each of those Subareas in the UGB expansion. However, the Goal 14 Analysis chose to only analyze Subareas 3, 5, 7, 8, and 9 for residential uses and Subareas 10-21 for large parcel industrial uses only.

This failure in the analysis to adequately analyze all sites in the study area for residential use fails the statutory requirement to evaluate all land in the study area. As explained below, residential uses are cost prohibitive in Subarea 5 and cannot be reasonably accommodated or provided based on their physical constraints. In any event, all Subareas must be considered for housing in order to create a complete record for public review, before consideration for approval.

III. Subarea 5 should be excluded from the study area because it is impracticable to provide necessary public facilities or services to the land.

Land may be excluded from the study area that is impracticable to provide necessary public facilities or services to the land. Compared to other similarly situated lands within the study area, Subarea 5 is unlikely to be developed based on the likely cost of the facilities and services. Residential land cannot be reasonably accommodated in Subarea 5 due to its physical isolation from the city and existing services based on its location near the old mill site and the impracticability of providing services to the land within the planning period. The relative cost of providing services as compared to other subareas is high compared to the relative costs of the northern subareas as identified in the Public Facilities Review.

IV. The Goal 14 analysis of locational factors of Subarea 5 lacks sufficient detail; and an accurate application of the Factors shows that Subarea 5 should not be included in the UGB.

The Goal 14 Analysis fails to accurately describe and analyze the location factors in its consideration of Subarea 5. This results in an inaccurate analysis of the locational factors to Subarea 5. Therefore, Subarea 5 should not be included in any expansion of the City's UGB.

A. Factor 1: Efficient Accommodation of Need

The Goal 14 Analysis reviews the subareas according to the 1) proximity to existing UGB, 2) parcel size, and 3) amount of buildable land. Under the proximity to the existing UGB, the Goal 14 Analysis identifies multiple benefits to adjacent land, that the subarea leverages prior infrastructure investments, provides access to current services and amenities, supports downtown businesses, reduced vehicle miles travelled (VMT), increases housing choice and promotes affordability, and preserves agricultural land.

The Goal 14 Analysis identifies that Subarea 5 is adjacent to the city's limits, but fails to properly weigh the fact that that Subarea 5 does not provide any of the identified benefits. The Goal 14 Analysis does not consider or analyze that the adjacent property in city limits is the former Floragon and Dansons Mill Site. The 16 acre southern boundary of this site operates under a DEQ Conditional No Further Action determination and is severely restricted from development due to PCP contamination. The City will be unable to route streets, sidewalks, or utility trenches through this parcel due to contamination. While this subarea is adjacent to the existing UGB, it is functionally separate from all the benefits listed under Locational Factor 1. Subarea 5 does not leverage the prior infrastructure, cannot provide access to current services and amenities, will not support downtown businesses, or reduce VMT. Residents in Subarea 5 cannot take a direct path to the business corridor of the city through its adjacent portion. As explained in the Public Facilities Review, there are no proximate facilities for utilities that can be leveraged.

In its sparse analysis under Location Factor 1, the Goal 14 Analysis merely states that it abuts S Molalla Ave and S Warrick Road, but utterly fails to explain the disadvantages of its location. There mere conclusion that because it is adjacent that it is an efficient accommodation, fails to consider the realities of the existing land use that actually account for the accommodation of the residential need. There are no pedestrian accommodations on Molalla Forest Road and investments into creating them will be very high.

Further, there is no additional connectivity that would benefit from any extension of services to this subarea. The Goal 14 Analysis does not analyze Subarea 6 to the south, the proposed inclusion of subareas to the east and west are inefficient for further residential development due to wetlands and conservation easements. While proximate, Subarea 5 is far from efficient.

Finally, it is unclear how affordability or housing choice would be achieved in Subarea 5. The exorbitant costs for infrastructure are going to be passed through to prospective purchasers of housing or face higher rental rates. Who would choose to live next to a toxic site as compared to other subareas? The current analysis fails to address these issues.

B. Factor 2: Orderly and Economic Provision of Public Facilities and Services is not achieved in Subarea 5.

The Goal 14 Analysis reviews the provision of public services to the subareas according to water, sewer, transportation, and stormwater. The Goal 14 Analysis of the locational factors for Subarea 5 fails to accurately identify the extraordinary high costs of servicing this area due to the lack of nearby utilities.

The relative financial cost of different possible expansion areas is a relevant criterion. A cursory review of the costs of expanding into Subarea 5 shows that it is one of the most expensive options available to the City. At an additional estimated cost of **\$343,514 per unit** for public infrastructure, the costs are prohibitive. While the Goal 14 Analysis estimated that the per unit cost was \$205,409 based on the Safe Harbor assumption of seven (7) dwelling units per acre rather than the costs identified in the Public Facilities Review, this cost remains significantly higher than the costs identified in all other subareas except Subareas 2 and 3. This high cost to serve Subarea 5 for residential purposes must be put in context with the potential to yield housing units. With a high cost per unit, the development of housing is unlikely to occur. This proposed expansion is starting to look a lot like the failure of the former City of Damascus.

The development of public facilities and services to serve Subarea 5 is unlikely to serve other developments. Unlike those properties along Ona Way, the addition of services to Subarea 5 will not connect to other properties in future developments and will be a significant one-time cost.

///

C. The Factor 3: Environmental, Economic, Social & Energy ("ESEE") Consequences conclusions make no sense given the underlying data relevant to Subarea 5.

The Goal 14 Analysis reviews the subareas according to 1) the cost of land/transportation/facilities/utilities/services, parcel size, and development potential; 2) the ease of access to services and amenities; 3) environmental hazard risks and Goal 5 resources; and 4) energy costs.

The Goal 14 Analysis's conclusions under this factor that expanding to Subarea 5 would be generally positive for residential use and not industrial use contradicts the analysis under transportation that the roads are more conducive to industrial use. The analysis also concludes that the proximity of the subarea to the Urban Growth Boundary when compared to other subareas again fails to consider the practical impediment of the industrial property to the north which effectively cuts off Subarea 5 from downtown relative to the other subareas which are not so restricted.

Subarea 5 represents a significantly higher cost to incorporate into the City and the lowest ease of access to services and amenities. The proximity of the residences to the environmental contamination of the old mill site is unexplored in the Goal 14 Analysis. Based on the foregoing, the ESEE analysis is incomplete at best and cannot support inclusion of Subarea 5.

D. Factor 4: Agricultural & Forest Compatibility

The Goal 14 Analysis reviews the subareas according to 1) increased traffic, 2) conflicts with water availability and delivery, 4) flooding, 5) introduction of weeds and pests, 6) damage to crops or livestock; 7) trespassing, 8) litter, and 9) vandalism.

Subarea 5 contains two areas of high value crops that will be disrupted by residential development. It is the only subarea in the south considered that has tree crop other than Christmas trees. Increasing residential density necessarily increases conflicts to agricultural use and introducing this conflicting use has not been fully assessed. Extensive case law supports that increasing costs and changing the farming process should be considered before approving development near high-value farmland and protecting farmland for farm use is protected under Goal 3. Introducing housing will increase traffic, use valuable water resources that have not been assessed, increase litter and the possibility of trespassing as development encroaches on farm activity. The impacts to farming have not been adequately assessed.

Based on an accurate analysis of the locational factors, Subarea 5 is a sub-optimal choice for inclusion into the UGB for 393 homes.

V. The Goal 14 Analysis fails to explain the need for 189.20 acres for residential land and infrastructure.

In the Land Need section, the Goal 14 Analysis states that there is a need for 813 R1 units resulting in 116.15 acres and 246 R2 units resulting in 35.21 acres, and then concludes that the total needed is 189.20 acres, including land for infrastructure. The two provided amounts of

TOMASI BRAGAR DuBAY

September 1, 2026

Page 5

116.15 acres and 35.21 acres totals 151.36 acres. The Goal 14 Analysis then concludes that there is an additional 37.84 acres needed. If the Goal 14 Analysis calculates that this proposed residential land needs the additional 37.48 acres for infrastructure to support that residential land, it must provide some basis or explanation for that conclusion.

CONCLUSION

The Dimeos strongly urge the City to reconsider including the Subarea 5 parcels into the UGB. The City's Goal 14 Analysis lacks a complete assessment of the significant disadvantages and hurdles of relying on Subarea 5 to reliably provide homes within the forecasted time frame. In reality Subarea 5's location near a significant industrial site and distance from any pedestrian or utility facilities negates all benefits to its location. The costs to develop Subarea 5 are prohibitively expensive and provide a logical basis to consider lower priority lands elsewhere in the study area that are far more likely to bring housing in the near future.

Sincerely,



Jennifer M. Bragar

cc: client (by email)

From: [Catherine O](#)
To: [Christie Teets](#)
Subject: Urban Growth Boundary- Sub Area 12
Date: Wednesday, September 23, 2026 12:00:52 PM

Hello,

I strongly oppose the urban growth boundary. Please do this right thing for Molalla and its future.

Thanks,

Catherine O'Neal
Community Member

From: [Sarah Oliver](#)
To: [City Recorder](#)
Subject: Ona way
Date: Wednesday, September 23, 2026 12:11:23 PM

Good Morning,

I just wanted to voice our objection to the boundary expansion on Ona Way. The neighbors and I have chatted in detail about this proposed map. 4 out of 5 of us are not interested in developing our lands into housing. The only neighbor interested, has 10 acres but he is also the farthest property from the boundary line. Most of us either have newer buildings, are retired or are close to owning our homes. To be developed and have to purchase land from 2-6 acres, at a 10 fold rate at this stage makes no sense. Sure a developer would buy us out at a few million, but to buy land in our area and have to move father out. In this economy this doesn't make sense the way the city is doing this.

Sent from my iPhone

From: [Shellie McBee](#)
To: [City Recorder](#)
Cc: shelliemcbee413@aol.com
Subject: UBG
Date: Wednesday, September 23, 2026 1:34:11 PM

Date: 09/22/2026

Attention: City Council / Planning Commission]
C/O Molalla City Hall/Planning Department]
Molalla, OR

Subject: Public Comment in Opposition to the Proposed Urban Growth Boundary Expansion (zone 5)

Dear Honorable Mayor, Councilors, and Commissioners,
I am writing as a resident of Molalla Oregon 97038.

Would like to to formally state my strong opposition to the proposed expansion of the Urban Growth Boundary (UGB) currently under consideration.

As our community plans for the future, we must prioritize sustainable, fiscally responsible development. Expanding the UGB at this time is counterproductive to those goals for several key reasons:

1 Sufficient Existing Land Supply: Based on current land use inventories, our city has ample vacant, underutilized, and buildable land already within the existing boundary. We should focus on infill development, redevelopment of commercial corridors, and higher-density zoning inside our current borders before expanding outward.

2 Fiscal Burden on Taxpayers: Extending urban services—such as water lines, sewer systems, paved roads, police, and fire protection—to outlying areas is incredibly expensive. Sprawl strains municipal budgets and often forces current taxpayers to subsidize the infrastructure costs for new, far-flung developments.

3 Destruction of Resource Lands: The proposed expansion threatens valuable [agricultural land / forest land / open space / wildlife habitats] that define our region's character and support our local economy. Once these natural resources are paved over, they are gone forever.

4 Traffic and Environmental Impact: Outward expansion fosters automobile dependency. This boundary change will inevitably lead to increased traffic congestion on our local roads, longer commute times, and higher greenhouse gas emissions, directly contradicting our city's environmental goals.

Instead of expanding outward, I urge the Molalla City Council / Planning Commission] to invest in the vibrant neighborhoods we already have and reject this boundary expansion.

Thank you for your time, your service, and your careful consideration of the long-term health of Molalla Oregon.

In addition, UBG would have a devastating Impact to our infrastructure's. Would have negative impact to Molalla's School system.

Sincerely,
Shellie McBee
11621 s Thomas Road
Molalla, OR 97038
shelliemcbee413@gmail.com
503.970.9160

Sent from my iPhone

From: [Jeanie](#)
To: [City Recorder](#)
Subject: Opposition to Urban Growth Boundary
Date: Wednesday, September 23, 2026 1:43:55 PM

Date: 09/22/2026

Attention: City Council / Planning Commission]
C/O Molalla City Hall/Planning Department]
Molalla, OR

Subject: Public Comment in Opposition to the Proposed Urban Growth Boundary Expansion (zone 5)

Dear Honorable Mayor, Councilors, and Commissioners,
I am writing as a property owner of Molalla Oregon 97038.

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Sincerely,

Jeanie Schuldt
11621 s Thomas Road
Molalla, OR 97038
Jeanie.Schuldt83@gmail.com

From: [BRAD SCHULDT](#)
To: [City Recorder](#)
Subject: Expansion Urban Growth Boundary
Date: Wednesday, September 23, 2026 1:48:28 PM

Date: 09/22/2026

Attention: City Council / Planning Commission]
C/O Molalla City Hall/Planning Department]
Molalla, OR

Subject: Public Comment in Opposition to the Proposed Urban Growth Boundary Expansion (zone 5)

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Sincerely,

Brad Schuldt
11621 s Thomas Road
Molalla, OR 97038
BJSchuldt@aol.com

Sent from my iPhone

From: [John Sutherland](#)
To: [City Recorder](#)
Subject: Urban planning meeting
Date: Wednesday, September 23, 2026 2:17:55 PM

Date: 09/22/2026

Attention: City Council / Planning Commission]
C/O Molalla City Hall/Planning Department]
Molalla, OR

Recorder@cityofmolalla.com

Subject: Public Comment in Opposition to the Proposed Urban Growth Boundary Expansion (zone 5)

Dear Honorable Mayor, Councilors, and Commissioners,
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In addition, UBG would have a devastating Impact to our infrastructure's. Would have negative impact to Molalla's School system.

Sincerely,
John Sutherland
815 Toliver Road
Molalla, OR 97038
Sutherlandsall@aol.com
503-679-1745

From: [Mary Booth](#)
To: [City Recorder](#)
Subject: City Council planning commission/urban growth meeting
Date: Wednesday, September 23, 2026 2:19:34 PM

Date: 09/22/2026

Attention: City Council / Planning Commission]
C/O Molalla City Hall/Planning Department]
Molalla, OR

Recorder@cityofmolalla.com

Subject: Public Comment in Opposition to the Proposed Urban Growth Boundary Expansion (zone 5)

Dear Honorable Mayor, Councilors, and Commissioners,
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In addition, UBG would have a devastating Impact to our infrastructure's. Would have negative impact to Molalla's School system.

Sincerely,
Mary Sutherland
815 Toliver Road
Molalla, OR 97038
Sinfulmary@ aol.com
503-720-5719

Eric R. Davenport
30637 S Hwy 213: Molalla, OR 97038
503/806-2177: ericrdavenport@gmail.com

September 21, 2026

The Honorable Scott Keyser, Mayor
And Members of the Molalla City Council

RE: Urban Growth Boundary (UGB) Expansion

Thank you to each of you for the time and commitment you make to our community, and similarly to the staff of the City of Molalla for the work they do. The UGB issue is complex, large in scale and of great gravity to our citizenry and your decisions on how to move forward is of significance.

The following are my “take-aways” in assessing the publicly available data from reports and testimony of expanding to the south involving Subareas 3, 5, 7, 8, and 9, compared to expanding north to Subarea 13.

Subarea 13 has the capacity to meet all the UGB expansion goals with least impact and greatest benefit for Molalla citizens and the City of Molalla in terms of costs and livability.

Based on data from the Dyer Partnership report the following points are compelling for expanding the UGB using Subarea 13.

1. It will potentially save Molalla residents **\$100,000,000** in development costs.
2. It will potentially reduce the cost of a new home in the expanded UGB area by **\$100,000**.
3. It will **decrease future Public Utility budgets** by using new construction versus retrofitting old and undersized infrastructure.
4. By planning community growth better aligned with existing commuter flows will **improve downtown traffic congestion, reduce the cost to redesign city traffic patterns** and generally **increase the livability and quality of life in Molalla**.

The Dyer Partnership report findings are based on Association for the Advancement of Cost Engineering (AACE) Class 5 estimates having an expected accuracy range of +/- 30%. These estimates are used when project “knowns” range from 0% to 2%.

In light of these facts an expansion into Subarea 13 may be advised.

Respectfully,

Eric R. Davenport

cc: City Planning Staff

Attachments: Findings of Fact, Proposed Summary Comparison, Subarea Summary

Findings of Fact

September 2026

Topic: City of Molalla Urban Growth Boundary (UGB) Expansion

Purpose: The following are discussion points taken from the Dyer Partnership engineering report, and publicly published or given testimony at hearings involving expansion of the Urban Growth Boundary (UGB). This document is intended as supporting materials for the letter sent on September 22, 2026, to the Mayor and City Council on this topic.

Background: The City of Molalla by way of its various entities, i.e., City Council, Planning Commission, administration and technical staff, and consulting firm 3J Consulting are proposing UGB expansion to the south of the current city limits of Molalla.

Materials developed to date by the city and presented to community divide analyzed areas into subareas. City of Molalla staff recommend subareas identified for inclusion in the city's southern UGB expansion include in whole or part, Subareas 3, 5, 7, 8 and 9, and 12.

An alternative to this is an expansion into Subarea 13, which has characteristics necessary to meet needed housing and commercial use goals, has infrastructure advantages and is in better proximity to the majority of existing traffic patterns when compared to the recommendations of city staff.

The balance of this paper examines the impacts of expanding the UGB to Subarea 13 compared to the city's southerly recommendation. Subarea 13 meets or exceeds the housing unit space requirements for UGB expansion within this single subarea. (Reference Planning Commission packet for September 2, 2026, page 139, paragraph 1, or page 139, Step 3 Findings: North Region (Subareas 13-16), Subarea 13, of the Dyer Partnership report page 54.)

1. What are the potential development and housing costs to Molalla?

It has been said in public meetings and published reports that, ***"It was determined that costs moving to the north or moving to the south are very similar."*** (Reference Planning Commission Meeting Minutes – August 5, 2026, General Business, ACTION: B. UGB Expansion Update – Draft Cost Analysis and Proposed Expansion Map, page 5 of the Planning Commission packet for the meeting of September 2, 2026.)

Breakout numbers of the discussion that follows are found attached to this paper and show a different picture. In reality, using the engineer's numbers *it costs \$100,000,000 more to expand the UGB to the south, than to the north (when comparing to Subarea 13).*

Based on the Dyer Partnership report, page 73, Tables 20 and 21, “Summaries of the Expenses to expand South and North,” (reference pages 158 and 159 of the Planning Commission Meeting Packet for September 2, 2026), comparing the total Construction and Non-Construction Costs for expanding to the South into Subareas 3, 5, 7, 8 and 9, as having a cost of \$315,328,316, compared to expanding to the North into Subarea 13 with a cost of \$214,163,597. Using the engineer’s numbers it is 32% more costly to move to the South, than to the North.

The impact of this difference in development cost is the resulting cost of homes in the UGB expansion area to Molalla families. Based on Dyer Partnership calculations, development costs for homes built in the Subareas south of Molalla are estimated at nearly \$100,000 more than if the same homes were to be built in Subarea 13.

Again, to this reviewer, the cost to expand south compared to north does not appear to be similar.

2. How confident are we in Dyer Partnership report numbers?

Expanding the UGB is a big move for the citizens of Molalla, and the residents and businesses in the immediate area. These kinds of decisions require the best information available to avoid making unwitting errors.

The decision on the part of the city to change during the 2026 winter months from expanding the UGB to the north of Molalla, and instead to grow the UGB to the south was based in part on cost data submitted in a report by Dyer Partnership, Engineers and Planners. As previously noted, the findings of this report are being characterized as showing that UGB growth in either direction, north or south, as being “similar” in costs.

It is important to note the Dyer Partnership report findings are considered Class 5 estimates as defined by the Association for the Advancement of Cost Engineering (AACE) and have an expected accuracy range of +/- 30 percent. (Reference Planning Commission packet for September 2, 2026, page 86, paragraph 7, or page 1, Introduction, paragraph 7, of the Dyer Partnership report.) That means any given number, by rule, may be as much as 60% off target.

Further, to quote the AACE ... (Class 5) “estimates are typically developed when project definition ranges from 0% to 2% complete – essentially when little more than a project concept, location, and general capacity or scope exists.” (Reference AACE Class 5, possessionplanning.com)

And still another cautionary note is, as stated in the Dyer Report, the cost estimates “... were developed using unit costs from public capital improvement projects. The costs for private developers may vary from public costs.”

3. Should Molalla spend money retrofitting old and undersized utilities, or opt for new construction?

Investment in utilities is foundational to any UGB expansion plan. Cost containment ensues from efficient design and quality decision-making. Opportunistic use of existing facilities needs careful consideration. Retrofitting existing facilities may seem to make sense on the surface, but is often more expensive and less productive than new construction that employs current technologies and avoids the vacation and removal of existing infrastructure. These and other concerns are spoken to in the Dyer report.

For example, the Dyer report points out on page 3, Step 1: High Level Screening and Demand Calculation, paragraphs 4 and 5, referring to subarea plans, states:

“Options to evaluate the utility service requirements were to connect each subarea to the nearest available utility lines or to plan new regional trunk mains.

The nearest water and sewer mains are located at the edges of City Limits and are predominantly comprised of small diameter subdivision piping. Connection to these lines would require upsizing a significant amount of the existing systems to provide capacity.”

Compliant with this finding is, for the most part, limited to Subarea 13 where only a small portion of this area has existing facility, i.e., sewer, water, streets, and storm drains. This point is expanded on in paragraph 6, wherein the consultants point out the following:

“Planning for new regional trunk mains is preferred with long-range planning. Providing a cohesive system structure is recommended to ensure adequate capacity for the development area while minimizing impacts to existing developments.”

In the case of Subarea 13, the predominance of development would require new construction to serve the area with sewer.

The report, page 8, paragraph 2, points out that, *“Beginning at the WWTP, the 21-inch trunk main located on the WWTP site has a design capacity of 6.0 Million Gallons per Day (MGD) and is at capacity. Upsizing will be required.”*

The report continues on page 8, paragraphs 3 and 5, and continuing on to page 9, noting:

“Toliver Basin has a 12-inch trunk main that runs westerly down Toliver Avenue, turns into a 15-inch trunk main heading south into the WWTP site, then joins into the 21-inch trunk main. The 15-inch trunk main is expected to require upsizing to serve any additional areas.”

“North Bear Creek Basin collects flows from the residential areas along Meadowlawn Place and conveys flows south along OR 213 through a 12-inch trunk main. South Bear Creek

Basin generally collects flows from OR 211 and S Molalla Avenue and conveys flows northwesterly alongside Bear Creek through a 15-inch trunk main to OR 213. These two trunk mains join into a single 15-inch trunk main at OR 213 then flow west into the 21-inch trunk main at the WWTP”

Given the noted constraints in other studied subareas in both South and North Regions, the Dyer report significantly notes on page 50, paragraph 2 under Sanitary Sewer, that Subarea 13 minimizes impacts of retrofitting the sanitary sewer system with new construction, stating:

Subarea 13 can be readily isolated into a new independent basin. Two pump stations will be required. The pressure line out of Subarea 13 can be routed down Toliver Road into the WWTP and directly into headworks. All capacity problems in the existing trunk mains would be avoided.

Similarly, water service within the North Region is a challenging proposition as noted on page 50 of the report, paragraph 1 under Water, which states:

“System connectivity to the North Region is poor. The best water availability is to Subarea 16, which has five (5) water stubs for future connection.”

By default, Subarea 13 does not have connectivity issues as there are few if any existing in the area and will require mostly new construction extending water lines throughout the developed area. Eliminating the need for vacating and extracting existing services before adequate water lines could be installed is a significant gain by minimizing public life-style disruption, as well as project expense and construction time.

All subareas, regardless of the region, will require at least some reconfiguring of existing traffic patterns. However, in the case of Subarea 13, the area is large enough so traffic circulation design will more readily accommodate flows within the subarea. The Dyer report speaks to this on page 54, paragraph 4 under Transportation, noting:

“The internal circulation in Subarea 13 was laid out to avoid creating a cutoff route for highway traffic to avoid the roundabout. Highway traffic routinely traveling through residential neighborhoods is unwanted and has a high potential of occurring if travel times through Subarea 13 were faster than the roundabout. Through routes have been provided for circulation but are deliberately divided up by intersections and curves to discourage highway cutoff usage.”

Subarea 13 has an additional advantage of potentially reactivating the N Molalla Forest Road which could serve to lessen traffic flows on OR 213 as well as providing access to commercial and industrial developments in Subarea 13 should such development be found to benefit the community. The Dyer report speaks to this potential on page 54, paragraph 5 under Transportation:

“The former N Molalla Forest Road roadbed still exists and is proposed for re-establishment into a public street. If approved, ODOT may require channelization devices to limit this intersection to right turns only due to the proximity to the OR 213 roundabout.”

To summarize, Molalla will be best served by an expanded UGB boundary that ensures adequate and affordable homes for our residents, job potentials for this and future generations, and an overall feel and livability promoting civic pride.

Of the subareas under consideration, singularly or in combination, Subarea 13 meets the objectives of:

- Size necessary for present and future housing, commercial and industrial development.
- Topography, comparatively speaking, minimizing utility infrastructure development costs, e.g., direct access to the new Waste Water Treatment Plant over presently city-owned land, with limited, if any, retrofitting to existing utility in lines.
- Proportionately less loss of EFU designated land when compared to other subareas.
- Less wetland impacts when compared with other subareas.
- Opportunities for internal transportation systems on the west side of OR Hwy 213 with existing egress points and an opportunity to eliminate some points of entry to single use properties over time.
- Beltline transportation options for commercial vehicles using the Molalla Forest Road roadbed.
- Minimal disruption of existing subdivision living conditions associated with the building out of utility infrastructure.

4. What happens to traffic in downtown Molalla, and what about commuters?

Development of the size and scope being considered by UGB expansion to the south of Molalla will impose considerable hardship on our community.

At fully matured the UGB expansion area will realize over 900 new homes in Molalla. Should it come to pass that these homes are built south of Molalla that will push many hundreds of cars daily through the middle of town. Clearly alternative routing of commuter vehicles will need to occur which raises a multitude of questions and issues.

Addressing these issues is beyond the scope of this discussion, other than to say that the following list of traffic related issues associated with a southerly UGB expansion would be largely mitigated or even eliminated if Subarea 13 would be selected for UGB expansion:

- Expense of redesigned downtown traffic flows to accommodate commuter traffic loads.
- Extended drive times for those commuting to jobs north of Molalla.
- Expense of constructing a feeder road to Hwy 213 south of town that would typically be outside of a developer's costs of subdivision development, and because of the "cobbled" collective of properties in the south subareas raises the question of who and when will investors pay?
- General congestion of the downtown corridor may actually serve to have commuters shop in the towns where they work rather than returning to Molalla businesses where they will need to contend with egress challenges (congestion).
- Increased traffic by its very nature increases safety concerns for school age children and our older populations.
- The above list collectively may serve to discourage housing development in Molalla due to diminished livability conditions.

Managing traffic is a major consideration in deciding where to expand Molalla's UGB and to relegate it to anything, but a major issue point could be a significant mistake.

In Summary

The following are compelling reasons for consideration of Subarea 13 as the UGB expansion area of choice leading to greater livability, management of public funds, serviceability over time and improved control of future budget concerns. The primary points to note are:

1. Potentially saving **\$100,000,000** in development costs.
2. Potentially reducing the cost of new Molalla housing in the expanded UGB area by **\$100,000** per house.
3. Minimize the risk of decisions based on a report using critical data having only a 0% to 2% known data confidence level.
4. Minimize decisions that admittedly have a potential accuracy spread of +/-30%, a 60% potential error window.
5. Pursue infrastructure growth in a manner using new construction which will more economically and serviceability-wise benefit Molalla's citizens far into the future.
6. Eliminate unnecessary traffic congestion and commuter times for Molalla residents.
7. Wisely use land available in our community.

System	South Region Subareas							
	2	3	4	5	6	7	8	9
General Construction	\$7,107,262	\$6,455,774	\$12,487,812	\$11,369,896	\$8,279,964	\$10,715,943	\$7,683,637	\$8,188,095
Transportation	\$16,786,896	\$15,004,039	\$33,042,988	\$30,938,779	\$19,780,684	\$29,558,334	\$21,291,111	\$21,153,297
Sanitary Sewer	\$5,813,610	\$6,522,080	\$8,917,810	\$7,073,180	\$1,075,000	\$6,639,350	\$5,211,720	\$6,313,650
Water	\$2,749,180	\$2,009,930	\$5,264,165	\$5,053,585	\$3,781,425	\$4,263,095	\$3,235,200	\$4,118,765
Stormwater	\$4,726,045	\$3,359,630	\$5,743,145	\$4,183,785	\$4,492,140	\$3,688,650	\$2,779,190	\$3,219,850
Environmental	\$167,936	\$575,701	\$71,516	\$1,133,206	\$15,220	\$1,450,327	\$179,108	\$37,397
Construction Subtotal	\$37,350,928	\$33,927,155	\$65,627,436	\$59,752,431	\$43,513,853	\$56,315,699	\$40,379,966	\$43,031,055
Non-Construction Costs	\$13,132,825	\$11,934,504	\$23,029,603	\$20,973,351	\$15,289,849	\$19,770,495	\$14,192,988	\$15,120,869
Total	\$50,483,753	\$45,861,659	\$88,657,039	\$80,725,782	\$58,803,702	\$76,086,193	\$54,572,954	\$58,151,924
Low Range -30%	\$35,338,627	\$32,103,161	\$62,059,927	\$56,508,048	\$41,162,591	\$53,260,335	\$38,201,068	\$40,706,347
High Range +30%	\$65,628,879	\$59,620,157	\$115,254,150	\$104,943,517	\$76,444,812	\$98,912,051	\$70,944,840	\$75,597,501
Units per Subarea	116	106	289	235	215	266	171	318
Cost per Unit	\$435,205	\$432,657	\$306,772	\$343,514	\$273,506	\$286,038	\$319,140	\$182,868

Note: Care must be taken in assessing total costs for various combinations of subareas. Direct addition of adjacent subareas would result in double counting the regional facility costs.

System	North Region Subareas			
	13	14	15	16
General Construction	\$30,178,045	\$7,136,328	\$6,124,615	\$4,599,338
Transportation ¹	\$85,113,527	\$18,105,367	\$16,601,871	\$9,933,498
Sanitary Sewer	\$17,746,260	\$5,240,670	\$4,720,530	\$5,055,820
Water	\$14,193,590	\$4,327,080	\$2,799,250	\$2,778,515
Stormwater	\$10,758,895	\$2,479,750	\$1,754,995	\$1,703,820
Environmental	\$604,940	\$214,485	\$185,546	\$100,000
Construction Subtotal	\$158,595,257	\$37,503,679	\$32,186,808	\$24,170,991
Non-Construction Costs	\$55,568,340	\$13,186,288	\$11,325,383	\$8,519,847
Total	\$214,163,597	\$50,689,967	\$43,512,190	\$32,690,838
Low Range -30%	\$149,914,518	\$35,482,977	\$30,458,533	\$22,883,587
High Range +30%	\$278,412,676	\$65,896,957	\$56,565,847	\$42,498,090
Units per Subarea	1,003	245	151	148
Cost per Unit	\$213,523	\$206,898	\$288,160	\$220,884

¹Capacity increase of the existing Toliver Road roundabout may be required. This will require a determination by ODOT. Potential costs are not well understood and are excluded.

Note: Care must be taken in assessing total costs for various combinations of subareas. Direct addition of adjacent subareas would result in double counting the regional facility costs.

Comparative Analysis of Molalla UGB Expansion: South Region v North Region

SOUTH REGION

Subarea	3	5	7	8	9	Total	
Total*	\$ 45,791,463	\$ 80,725,782	\$ 76,086,193	\$ 54,572,954	\$ 58,151,924	\$ 315,328,316	Par
L/R -30%	\$ 32,054,024	\$ 56,508,047	\$ 53,260,335	\$ 38,201,068	\$ 40,706,347	\$ 220,729,821	
H/R +30%	\$ 59,528,902	\$ 104,943,517	\$ 98,912,051	\$ 70,944,840	\$ 75,597,501	\$ 409,926,811	
Units/Subarea	\$ 106	\$ 235	\$ 266	\$ 171	\$ 318	\$ 1,096	Meets Target
Cost/Unit	\$ 431,995	\$ 343,514	\$ 286,038	\$ 319,140	\$ 182,868	\$ 312,711	Avg

*Construction & Non-Construction Costs

NORTH REGION

Subarea	13	Total	
Total*	\$ 214,163,597	\$ 214,163,597	Par
L/R -30%	\$ 149,914,518	\$ 149,914,518	
H/R +30%	\$ 278,412,676	\$ 278,412,676	
Units/Subarea	1003	1003	Meets Target
Cost/Unit	\$ 213,523	\$ 213,523	Avg

*Construction & Non-Construction Costs

Impact of S Reg v Subarea 13

\$ 315,328,316	Recomm. UGB
\$ 214,163,597	Subarea 13
\$ 101,164,719	Difference

Per House Impact - 929 Units

\$ 312,843	South Region
\$ 213,523	Subarea 13
\$ 99,320	Difference

Findings

- 1 Using "Par" it will cost \$101.2 million more to expand to the South than to the North.
- 2 Using "Par" will cost 32.08% more to expand to the South than to Area 13.
- 3 The Dyer Report has a 60% Error rate potential (-30% to +30%)
- 4 South Worst Case, South +30%, North -30%, Cost Difference Potential is \$260.23 Million Difference (More)
- 5 Going South Best Case, South -30%, North +30%, Cost Difference Potential is (\$57.56) Million (Less)
- 6 Selection of Subarea 13 makes use of Subarea 12 Not Needed (retaining 78+ acres in EFU)
- 7 Subarea 13, lower average home development cost, \$99,320, 31.7% lower compared to the South Region.

Source: Appendix B - Cost Estimates (Planning Commission Meeting Packet version)

Page 140 from the Commission's Packet Copy

Chart 1 - Preliminary Project Estimate/Region Summaries

Public Testimony to the Molalla City Council
September 23, 2026 – Urban Growth Boundary Hearing

Good evening, Mayor and Councilors.

My name is Kattie Riggs, and I live at **13377 South Warrick Road**. Thank you for allowing me the opportunity to speak tonight regarding the City's proposed Urban Growth Boundary expansion.

First, I want to commend the City Council for the thoughtful and fiscally responsible way you have approached this process.

I recognize that the City had to make decisions about whether to invest additional taxpayer dollars into updating existing Housing Needs Analysis data or move forward using the information the City already had available. While that existing data may not be as precise or current as it could be, I believe using the available analysis was a **fiscally responsible decision**.

The amount of additional time, consultant expense, staff resources, and taxpayer dollars that could have been required to go back and update all of the underlying data would have been significant. I appreciate the Council recognizing that there is a point where additional analysis may cost more than the benefit it provides.

I also want to commend the Council and City staff for holding information sessions and town hall meetings throughout this process. Providing opportunities for residents to ask questions, understand the proposal, and offer public input is an important part of responsible local government.

Ultimately, you are the elected officials responsible for balancing two important things: **what is fiscally responsible for the City and what is in the public interest**. I appreciate the effort you have made to do both.

With that said, I am asking the Council to consider one relatively small change to the proposed UGB: **including two properties—13377 South Warrick Road and 32372 South Rachel Larkin Road**.

These two properties were included in the City's consideration earlier in the process and were removed in July. When speaking before the Planning Commission earlier this month, it appeared they were going to amend the expansion to include them but when it finally came to taking the vote I believe they may have forgotten to make that amendment. It was discussed and even staff said they didn't see any issues in including them since the line is drawn right at these two abutting properties.