



Economic Recovery Review Council

Lincoln County Regionally Significant Industrial Area: Staff Analysis

I. Executive Summary

Conclusion of Staff Analysis: Staffs' Recommendation to the ERRC

The Lincoln County nomination was received October 19th, 2015, The nomination included a letter from the Economic Development Alliance of Lincoln County (dated October 13, 2015), narrative supporting the nomination, property list, aerial maps of the nominated properties, resolution of Waldport City Council, support letters from Port of Newport, City of Newport, City of Toledo, City of Waldport, and property owners are included in the nomination. The nomination was determined to be complete by the ERRC Administrator and request for agency comments were sent to ERRC agency staff on November 2nd, to be included in the staff report for the Economic Recovery Review Council (ERRC) consideration of the nomination. The full RSIA Nomination is viewable at, <http://www.orinfrastructure.org/Infrastructure-Programs/Industrial-Development/RSIA/nominations/LincolnCounty.pdf>

Strength and Weaknesses

In the coastal regions, developable industrial land and transportation systems are a premium and compete with travel and tourism. The proposed nomination demonstrates a strong collaboration between three cities, county, port, and the regional economic development organization. The nomination demonstrates a strong commitment to traded sector job creation, and protection of “critical” sites for development.

Strengths:

- Local government partnership
- Five industrially zoned properties in five jurisdictions
- The expansion of hospital services and Marine Hatfield Science Center have been resulted in job growth opportunities and region’s ability to attract new businesses, including “Marine Technology”
- The Port of Newport provides increased business opportunities
- Nomination area served by Newport Municipal Airport: 2 runways; 5,400ft x 100ft and 3,000ft x 75ft, 7 day/week operation. Airport is undertaking a Master Plan Update
- The Eddyville Site has potential for rail service
- Cities in the nominated area have been awarded funding for planning and infrastructure
- The Avery Street Industrial Park is an Oregon Certified Site



Weaknesses & Concerns:

- Sewer, storm-water, and local capacities
- Wetlands determinations are needed, and there are expiring permits
- Some allowed uses on Eddyville Site not consistent with RSIA sites, including Farm and Forest use, commercial uses in the I-P zone, and conditionally approval for industrial uses.
- Some uses permitted on Mclean Point Site and Toledo Industrial Park sites are not well suited for RSIA designation
- Agencies are not aware of any comprehensive assessments on the Toledo and Waldport sites.
- Transportation systems and truck limits are limited due to geography, and most sites would require road and connection upgrades based on the demand from new business development on the nominated sites. The Waldport site is uniquely challenged due to geography, and transportation conflicts with residential and school zones would need to be addressed.
- Transportation services would be needed to accommodate workforce commuting.

RST: The Lincoln County RSIA application identified five properties in the county. Lincoln County has determined that the five sites are consistent with Lincoln County’s economic development goals. Providing a “regionally significant industrial area designation” to these five areas is also consistent with the goals contained within the 2015-2020 Comprehensive Economic Development Strategy adopted by the Cascades West Economic Development District, which includes Lincoln County:

- Create partnerships needed for regional collaboration
- Advance economic activities that increase access to and provide a range of employment opportunities
- Build on region’s entrepreneurial culture and assets through collaborative means
- Identify and leverage internal and external funding sources to fund projects that increase the resilience (diversity and redundancy) of infrastructure systems throughout the district
- Partner to connect workforce training, education, and entrance opportunities with workforce demand
- Enhance visibility of community assets and accessibility of basic services in rural areas

The application criteria for the five areas demonstrates that the RSIA designation is consistent with the South Valley/Mid-Coast Regional Solutions land use and economic development priorities, which include:

- Improve the readiness of industrial land
- Address uncertainty and permit streamlining on wetlands



- Support rural industrial development opportunities
- Encourage creation of quality industrial flex-space
- Increase number of certified industrial sites
- Support time to market initiatives

- i. Agency staff recommends approval;
 - a. Conditioned on the applicant’s restricting commercial uses and amending zone conditions on the nominated sites,
 - b. Jurisdictions will prioritize assessments with DEQ and DSL, and coordinate closely with ODOT staff on transportation planning issues identified in this report; and
 - c. That applicants continue to pursue certification of industrial sites included in the nomination.
- ii. The Program Administrator has reviewed and agrees with the staff findings and recommendation.

II. Site Description/Summary:

OBDD: No Comments

DLCD: No Comments

ODOT: No Comments

DEQ: **Eddyville Industrial Sites:** There are no collection systems or treatment plant in Eddyville. Industrial and domestic wastewater will be treated by on-site systems or by wastewater treatment system if sanitary district is formed.

Avery Street Industrial Park and McLean Point Sites: There are no City sewer lines to the Avery Street and McLean Point sites. If sewer is extended to the sites, the City of Newport will probably have treatment capacity to handle the additional wastewater. Part of the McLean Point Site was used for disposal of dredge material from the NOAA Fleet Homeport Project. A geotechnical survey map be needed if structures are placed on the former disposal site.

Toledo Industrial Park Sites

Sewer is available to the industrial park sites. The City of Toledo probably has capacity to treat wastewater generated for the industrial park sites; however, the City has wet weather issues to be fixed to help with winter flows.

Waldport Industrial Park Sites



There is no city sewer to the Waldport Industrial Park sites. The City of Waldport's wastewater treatment plant is nearing the end of its design life. A detailed evaluation would be needed to determine if the City has capacity to serve these sites.

DSL:

Eddyville Industrial Site: There are no wetland determination reports or removal-fill permits on file with DSL for this site. The Yaquina River is located within, or lies immediately adjacent to, several lots on this site. The river at this location is designated Essential Salmonid Habitat; as such, any amount of ground alteration activity below the ordinary high water elevation will require removal-fill authorization. It is recommended that an off-site wetland determination be requested from DSL prior to any ground alteration activity on this site.

Avery Street Industrial Park: Removal-Fill Permit 46373-RF issued in May 2011 for 0.74 acres wetland/waters fill. Authorized fill has been completed. Mitigation was provided via purchase of credits from DSL Tamara Quays in-lieu fee site. Any proposed additional wetland/waterway impact will require a new wetland delineation and removal-fill permit.

McLean Point Site: Wetland delineation WD2012-0269 was approved in January 2013 for most, but not all, of this site and expires January 2018. Identified removal-fill jurisdictional resources within the study area (partial site) are 0.049 acres of wetland and Yaquina Bay up to the highest measured tide elevation. This wetland and Yaquina Bay are designated Essential Salmonid Habitat; as such, any amount of ground alteration activity below the ordinary high water elevation will require removal-fill authorization. It is recommended that an off-site wetland determination be requested from DSL prior to any ground alteration activity within the area not covered by the approved wetland delineation report. It is also worth noting that DSL administers the state's ownership of the submerged lands of Yaquina Bay immediately adjacent to this site.

DSL Authorization 56824-GA was issued to Teevin Bros. in August 2014 for voluntary estuarine restoration activity on this site. Once completed, this restoration area will also be a removal-fill jurisdictional area and designated Essential Salmonid Habitat.

Toledo Industrial Park: There are no wetland determination reports or removal-fill permits on file with DSL for this site. Depot Slough is located immediately adjacent to this site. The slough at this location is designated Essential Salmonid Habitat; as such, any amount of ground alteration activity below the highest measured tide elevation will require removal-fill authorization. It is recommended that an off-site wetland determination be requested from DSL prior to any ground alteration activity on the site. It



is also worth noting that DSL administers the state’s ownership of the submerged lands of Depot Slough.

Waldport Industrial Site: DSL wetland determination WD2004-0637 was issued for this site in 2004 identifying Little Creek (removal-fill jurisdictional waterbody) and potentially jurisdictional wetlands. A wetland delineation is needed prior to ground alteration on this site. A wetland delineation report (WD2014-0082) was prepared for tax lot 1302 (only); approved by DSL in August 2014 and expiring August 2019. The delineation identifies 0.86 acres of removal-fill jurisdictional wetlands on this one tax lot. A potential removal-fill violation was additionally identified on this tax lot.

RST: See Executive Summary

III. Statutory Requirements:

(2) “Regionally significant industrial area” means an area planned and zoned for industrial use that: (a) Contains vacant sites, including brownfields, that are suitable for the location of new industrial uses or the expansion of existing industrial uses and that collectively can provide significant additional employment in the region;

OBDD: The area consists of five individual industrial sites, throughout the county. Aggregated, these sites contain 260 acres of vacant and underutilized sites zoned for industrial development. There is a mix of light, medium and heavy industrial zoned areas throughout the five areas. The County has submitted support letters from property owners and stakeholders from all five areas.

From the County’s analysis, there are a total of 47 tax lots available for development and all the industrial areas fall within the Lincoln County Enterprise Zone. One of the five sites is a Business Oregon certified shovel-ready site.

DLCD: All sites are planned and zoned for appropriate industrial development. Waldport has requested and is likely to receive TA funds for master planning its site which may include changes to zoning. RSIA status would preclude the city from degrading the industrial capacity of the applied zone.

Some sites include allowed uses that are not well suited to an RSIA site. The ERRC should consider a conditional approval for some of the sites described below. An appropriate condition could be to grant RSIA status once the local jurisdiction adopts an overlay zone or other equivalent means to restrict the site to appropriate industrial uses.



EDDYVILLE INDUSTRIAL SITE – LINCOLN COUNTY

Zoning: Planned Industrial, I-P

Farm use and forestry are permitted outright in this zone. These uses would expectedly serve as placeholder uses until such time that higher and better industrial uses would occur on-site. Farm and forest uses should not preempt industrial uses and activities on the site. Also, farm use and forestry should not be held up as being incompatible with industrial uses that may be proposed adjacent to these activities. All industrial (and other employment-type uses) listed in the I-P zone require conditional use approval.

Consideration should be given to move some conditionally permitted industrial uses to the outright permitted use category. The highlighted uses below appear to be the best fit for the RSIA designation (and, thus, the highest candidates to be reclassified as outright permitted uses to streamline the land use permitting process).

The I-P zone includes several uses (i.e., restaurant, bar, tavern, bank, theater/performing arts center, etc.) that are not well-suited for inclusion in an industrial site. Uses that include sales or storage operations should only be allowed if determined to be subordinate to repair or other services. Uses listed throughout this zone may need to be reworked.

- (a) A use involving manufacture, research, repair, assembly, processing, fabricating, packing, distribution, warehousing, wholesaling, mini-storage, or storage provided that the use does not create a public nuisance, noise, smoke, odor, or dust, or because it constitutes a fire, explosion, or other physical hazard.
- (b) Heliports and related uses.
- (c) Animal hospital.
- (d) Automobile, truck, or trailer sales, service, storage, rental, or repair.
- (e) Automobile speedway, race track.
- (f) Automobile wrecking yard, junk yard.
- (g) Boat launching or moorage facility, marina, boat charter service.
- (h) Boat or marine equipment sales, service, storage, rental, or repair.
- (i) Extraction and processing of rock, sand, gravel, or other earth product.
- (j) Feed or seed store.
- (k) Governmental structure or use of land.
- (L) Implement, machinery, heavy equipment sales, service, storage, rental or repair.
- (m) Lumber or building materials sales and storage.
- (n) Newspaper office, printing shop.
- (o) Plumbing, heating, electrical, or paint contractors storage, repair, or sales shop.
- (p) Public park, playground, golf course, or similar recreation area.
- (q) Public utility facility.



- (r) Radio or television transmitter or tower.
- (s) Restaurant, bar, or tavern.
- (t) Solid waste transfer station.
- (u) Solid waste debris site or facility complying with LCC 2.1035 (8). A conditional use permit issued pursuant to this paragraph shall be reviewed for compliance by the Planning Division every three years on or about each three year anniversary from the date of issuance. The compliance review shall include, but is not limited to, a site visit and a review of any complaints received. The Planning Division shall refer any non-compliance to the Commission for possible initiation of proceedings to revoke the conditional use permit in accordance with LCC 1.1605. Every conditional use permit issued pursuant to this paragraph shall contain the following statement: NOTICE: This conditional use permit is subject to a mandatory compliance review every three years from the date of issuance.
- (v) Tire sales, repair, retreading, or vulcanizing.
- (w) Signs, advertising.
- (x) Bank and similar lending institutions.
- (y) Theater/performing arts center.
- (z) Pilings, piers, docks, and similar in-water structures.

EVERY STREET INDUSTRIAL PARK - NEWPORT

Zoning: I-2 & I-3

MCLEAN POINT SITE – NEWPORT

Zoning: I-3 & W-1

Uses listed in the three zones that apply to the Avery Street and McLean Point sites are generally well suited for the RSIA designation. A few exceptions include:

- General retail sales (I-2 & I-3)
- Personal services (I-2)
- Entertainment (I-2)
- Self-service storage (I-2)
- Parking facility (I-2 & I-3)
- Daycare facility (I-2)
- Parking lots (W-1)
- Warehouses (W-1)

Consideration should be given to rework the I-2 and I-3 zoning districts to better align with RSIA priorities. Consideration should be given to amend the W-1 zone to permit



parking lots and warehouses only when determined to be incidental to water-dependent industrial uses and activities.

TOLEDO INDUSTRIAL PARK – TOLEDO

Zoning: LI

Uses listed in the LI zone are generally well suited for the RSIA designation. A few exceptions include:

- Mini-storage
- Warehousing (note, warehousing is referenced in the purpose section of the zone)
- Commercial fishing gear storage
- Eating or drinking establishment

The LI zone is in pretty good shape. A few minor zone amendments to eliminate or scale-back the uses above should be considered.

ODOT: No Comment

DEQ: **Eddyville Industrial Sites:** DEQ is not aware of any comprehensive assessments in the area to determine whether there have been unmitigated releases or hazardous substances on the proposed sites. DEQ search its Environmental Cleanup Site Information (ECSI) and the leaking underground Storage Tank (LUST) Cleanup Site databases and found no other sites nearby with potential contamination.

McLean Point Site:

DEQ is not aware of any comprehensive assessments in the area to determine whether there have been unmitigated releases of hazardous substances on the proposed site. DEQ searched its ESCI and LUST databases and found one site that had contamination. A summary of the concerns are described as follows;

- International Terminal at Port Dock Road: The docks that made up the Port of Newport’s International Terminal were created by sinking WWII concrete ships. Contaminants in the two vessels and contaminated materials associated with them were removed, and confirmation testing showed either complete removal of contaminants or residual contaminants below levels of concern. Therefore, DEQ issued and No Further Action (NFA) letter on December 12, 2012. (See ESCI #1827 for more details)



Toledo Industrial Park Sites

DEQ is not aware of any comprehensive assessments in the area to determine whether there have been releases of hazardous substances on the proposed sites. DEQ searched its ESCI and LUST databases and found no other sites nearby with potential contamination.

Waldport Industrial Park Sites:

DEQ is not aware of any comprehensive assessments in the area to determine whether there have been unmitigated releases of hazardous substances on the proposed sites. DEQ searched its ESCI and LUST databases and found no other sites nearby with potential contamination.

Part of tax lot 13-11-31-Bo-00401-00 (235 SW Dahl Ave.) is a closed municipal landfill. The South Lincoln County Landfill was operated from 1972 to 1995. The landfill is capped and has a solid waste closure permit (#132) through 2024. If the landfill is redeveloped, the developer will need to coordinate with DEQ prior to construction.

DSL: No Comments

RST: See Executive Summary

Statutory Requirements (continued):

(III. (2)) (b) Has site characteristics that give the area significant competitive advantages that are difficult or impossible to replicate in the region;

OBDD: Lincoln County is a major recreation and tourist destination as well as a hub for commercial fishing and processing. In the last decade education and health services has had a significant job growth and has become a major driver of the local economy. The lack of family wage jobs and affordable housing has pushed the younger population inland toward Corvallis and Salem. However, with the expansion of the OSU Hatfield Marine Science Center, the hospital services, and the potential for development at these five industrial areas, increased job opportunities will become available.

These five sites are spread throughout Lincoln County and serve as the essential industrial areas for the Central Oregon Coast. The geographic location and individual assets of the sites could allow for specialization or the development of manufacturing hubs.

DLCD: No comment



ODOT: No comment

DEQ: No comment

DSL: No comment

RST: See Executive Summary

Statutory Requirements (continued):

(III. (2)) (c) Has superior access to transportation and freight infrastructure, including, but not limited to, rail, port, airport, multimodal freight or transshipment facilities, and other major transportation facilities or routes; and

OBDD: Lincoln County is connected to the I5 Corridor by OR Hwy 18 in Lincoln City, US Hwy 20 in Newport, and US Hwy 34 in Waldport. Hwy 18 and Hwy 20 are utilized as trucking routes and Hwy 20 is currently being upgraded to allow for increased freight use. US Hwy 101 connects all the major cities along the Central Coast and is currently a trucking route. Hwy 20 connects the multiple communities and offers access to four of the industrial areas included in this proposal.

Two of the sites offer rail access and two offer direct access to a port. That being said, all of the sites would be able to utilize the services of the ports and the Newport Airport.

DLCD: No comment

ODOT: The Lincoln County RSIA application contains a number of sites within the Lincoln County area. Each site has its own unique opportunities and challenges and these will be discussed below. Overall the Lincoln County sites are connected through US 101, US 20, or OR 18 which are all statewide significant highways that connect Lincoln County with other coastal counties and to the central Willamette Valley to the east.

Eddyville Site: The proposed site location currently has access to US 20. However, a new alignment for US 20 is under construction and will be open to traffic in 2016. The proposed site will not have direct site access to US 20. Access would be from the current US 20 alignment and connect to the new US 20 alignment west or east of Eddyville. The existing US 20 alignment will be transferred to Lincoln County when the new alignment opens for traffic. The geometrics along the existing US 20 alignment are not great for truck traffic currently, although trucks do use the route, but the size of trucks are limited. These limitations may still be in effect for portions of the existing alignment in the future. This does not mean trucks will not be able to access



the site, however, the types and configurations of the trucks to and from the site, could be limited. Finally, the connection points from the existing facility to the re-aligned US 20 may need to be upgraded depending upon the volume of truck traffic generated by the site to ensure safe and efficient movement to and from US 20.

Avery Street Industrial Park Site: Access to the site appears to be via Avery Street and 73rd Street to US 101. Depending upon traffic volumes for trucks and autos, there may be safety improvements needed at these intersections. Additionally, some improvements to Avery St. and 73rd St. may be needed to accommodate increased truck traffic.

McLean Point Site: This site is located along the old bay front section of Newport. Access to the McLean site would be via Bay Blvd. which is a local facility. Connections to US 20 likely would be from Moore Road or Benson Road. Each of these facilities has some obvious challenges given the vertical difference from the bay front to US 20. Some improvement to these local facilities may be needed to accommodate truck traffic to the site. Additionally, the intersections with US 20 may need some improvement as well to ensure trucks can access the highway safely.

Toledo Industrial Site: This site has access from US20 business route which is a locally owned and operated facility. US 20 Business connects to US 20 east and west of the City of Toledo. Both of these connections are designed to accommodate trucks generally, but may need to be reviewed as the site develops to ensure safety is maintained.

Waldport Industrial Park Site: The Waldport site does not abut directly to either US 101 or OR 34. Access to the site would be from Crestline Drive which is a local facility. The most likely connection points to state highways would be Crestline Dr. at OR 34 and Wakonda Beach Road at US 101. Both of these connection points are not designed to accommodate significant volumes of truck traffic and may need modifications to ensure safety at these connections. The local road system likewise may need enhancing to accommodate increased truck traffic.

As mentioned above, each of these sites likely will have some access challenges to ensure traffic to and from the site can get to the highway system safely and efficiently. However these should be able to be addressed during typical development actions. Once on the state highway system, these sites all connect to significant economic areas along the coast as well as good connections to the Willamette Valley and to I-5. Additionally, with all these sites in fairly close proximity they have good access to the Newport Airport that does provide some basic freight service and can serve private and corporate planes. Additionally each site is close to the Port of Newport for marine



access, with the McLean site with direct marine access. Marine access is important in this area given the Hatfield Marine Science center and the NOAA facilities that could relate to some of the industrial activities.

Not all of the sites are served by rail and some of the sites are likely to not be served by rail any time soon, if ever. While rail access and connection is not required for industrial sites, where it exists or can be provided, there is a benefit to providing another freight option to truck. The Eddyville site does have the potential for rail. It is suggested that the developers consider a spur track that could provide access to most of the site. The spur track then would connect to Toledo and then back to the Willamette Valley. The Toledo site is adjacent to the existing rail line. It might be possible to work with the rail operator to provide a spur track to provide access to this site as well.

Finally there is transit service in the area provided by the Lincoln County Transportation Service District. As these sites developed they should be encouraged to work with the transit provider to explore options for workers to access the sites or commute from neighboring communities to these industrial areas. Additionally, there is transit service between Newport and Corvallis.

DEQ: No comment

DSL: No comment

RST: See Executive Summary

Statutory Requirements (continued):

(III. (2)) (d) Is located in close proximity to labor markets.

OBDD: With a total population of 46,890, Lincoln County is has a unique labor market, both current and potential. The largest cities are Newport (10,095) and Lincoln City (8,400) with 42% of the county's population lives outside of the incorporated areas. Newport is the largest city on the Central Oregon Coast and is the locale for most of the economic activity. The county's labor force has declined by 2.8% from 2000 to 2014. This has caused an increase in unemployment to 8.0%. While many residents work within the county, there is a contingency of commuters that travel Hwy 20 daily for work at Oregon State University, the medical centers, and other higher wage positions in the mid-Valley

DLCD: No comment

ODOT: No comment



DEQ: No comment

DSL: No comment

RST: See Executive Summary

IV. ERRC Adopted Policy:

A. The ERRC intends to designate a variety of RSIA's determined to have the most potential for rapid job creation across the state.

OBDD: With the recent approved investment to expand the OSU Hatfield Marine Science Center, Lincoln County is positioned to develop spin off companies and other complementary industries. The labor market is available and ready for development in Lincoln County. These five industrial areas would offer a diverse set of assets and are ready for development. Development of these sites would allow for more direct freight routes along the coast.

DLCD: No Comment

ODOT: No Comment

DEQ: No Comment

DSL: No Comment

RST: With current trends in Marine Technology industries, the coast region could have immediate opportunities in marine technology and unmanned systems. Although the job growth would likely be smaller compared to other regions, the impact of these jobs would be very significant for the region while contributing to the state economy and stimulating related business development opportunities.

(IV) B. For each nominated RSIA, ERRC will consider information regarding the purpose of the designation, whether one, two or all the following:

a. Preservation

i. Protection from land use conversion to other than industrial zone

ii. Assurance of compatible neighboring and uses

iii. Preservation of assets for best industrial use e.g. transportation access, utilities, site characteristics



OBDD: Protection from land use conversion to other non-industrial uses could be considered a concern given the rise in secondary homes along the coast. Evidence of interest from non-industrial uses was not, however, provided to the department.

Land use conflicts should be minimal and would be primarily centered around existing residential directly adjacent to portions of the nominated area.

DLCD: No Comment

ODOT: No Comment

DEQ: No Comment

DSL: No Comment

RST: Based on the rapid demand for conversion and development of land for housing, the designation of the sites submitted would assist local governments in protecting these important industrial sites.

ERRC Adopted Policy (continued)

((IV) B.) b. Investment

i. Implementing a strategy of improvements for priority locations

ii. Targeting job growth in an area

OBDD: Multiple agency have awarded funds to cities within the designated area to use for planning and infrastructure improvements. The city of Waldport and the Ports of Newport and Toledo have all received funds to make improvements and plan improvements at the industrial areas.

DLCD: No Comment

ODOT: No Comment

DEQ: The ability to treat wastewater prior to development varies at the four proposed sites. DEQ can provide technical assistance to help the communities and developers plan and construct the necessary infrastructure to manage industrial and domestic wastewater. Also, financing for planning and construction may be available through low interest loans from DEQ's State Revolving Fund (SRF) Program.

DSL: No Comment



RST: Because there are limited existing industrial zoned properties and limited locations for future industrial sites, the proposed sites are critical assets to the region. The cities have made it a priority to service these sites for future development.

ERRC Adopted Policy (continued)

((IV) B.) c. Marketing Advantage

i. Assuring attention for certified sites

ii. Complimenting cooperation and partnership of local and state government

OBDD: The County supports the Economic Development Alliance of Lincoln County to focus on coordination of economic development efforts, including the marketing and promotion of industrial sites for job creation opportunities. The EDALC has worked closely with Business Oregon to certify the Avery Street Industrial Park and ensure that the site is ready for development. The EDALC has garnered support from stakeholders and property owners from each of the five areas and works closely with the South Valley-Mid Coast Regional Solutions Team. The individual cities and ports are actively pursuing and managing funds to plan for development at these sites.

DLCD: No Comment

ODOT: No Comment

DEQ: No Comment

DSL: No Comment

RST: The RDALC and local governments understand and are committed to traded sector employment opportunities as demonstrated by site certification and the submission of this nomination. Though retail and commercial business are an important part of the tourism economy of the region, the partners understand that traded sector industries are critical to growing and sustaining the economy by providing higher wage employment needed to provide opportunities for residents to remain in their communities.



V. Other Comments

OBDD: None

DLCD: None

ODOT: None

DEQ: None

DSL: None

RST: None