

September 9, 2015

Eugene Hearings Official
C/o City of Eugene
Planning and Development Department
Planning Division
99 West 10th Avenue
Eugene, OR 97401

Re: LaurelRidge Zone Change (City File Z 15-5)
Applicant's Post-Hearing Testimony

Dear Eugene Hearings Official,

Please accept this letter as applicant's additional testimony for the submittal period closing on September 9, 2015. We are responding to new evidence submitted by the Laurel Hill Valley Citizens (LHVC) on September 2, 2015.

In the LHVC explanation regarding their illustration titled "LHVC Sheet 9/2/15-05" we would like to point out the following:

1. LHVC did not use the subject property's boundary survey. It should be no surprise that the tax lot maps align with each other. After all, LHVC is aligning one tax lot map with another tax lot map. Again, the challenge before us isn't to align tax lot maps, it is to align the Metro Plan diagram with the subject property and there is no better way to do that than using a boundary survey of the subject property.
2. LHVC did not document the source of the tax lot maps, nor their methodology in creating Sheet 9/2/15-05.
3. LHVC asserts that tax lot maps are based entirely on field-surveyed data. As a licensed Landscape Architect, with 38 years experience, one who utilizes tax lot maps on a regular basis, I can say with confidence that tax lot maps are notoriously not accurate. When comparing one tax lot map to another tax lot map, as LHVC did here, yes, they should align. But when attempting to align a tax lot map with an actual field-surveyed tax lot boundary survey, it is common for the tax lot map to be inaccurate. A tax lot (map, illustration, drawing or otherwise) is only accurate when based on field-surveyed data upon the completion of a boundary survey or the recording of an approved property partition or subdivision.
4. Tax lot maps used here may be aligned with the Metro Plan Diagram but there is no evidence that they are aligned with the real-world location of the subject property.
5. And again, tax lot maps are not part of the adopted Metro Plan Diagram and cannot be used as a referent.

In advance, thank you for your consideration of this material.

Sincerely,

Richard M. Satre

Richard M. Satre, AICP, ASLA, CSI
Principal, Schirmer Satre Group

