



CITY OF JOHN DAY

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## MEMORANDUM

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**TO:** JOHN DAY CITY COUNCIL  
**FROM:** NICHOLAS GREEN, CITY MANAGER  
**SUBJECT:** INCENTIVIZING NEW HOME CONSTRUCTION IN JOHN DAY  
**DATE:** APRIL 21, 2017  
**CC:**

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### EXECUTIVE SUMMARY

The City of John Day has approved the development of five homes in the past ten years. Of these, three are site built homes and two are modular/manufactured. The lack of market rate housing has become a significant deterrent to population growth. Inadequate housing supply is discouraging potential residents from seeking employment in our area. Rental vacancy rates are also hovering around one percent, affecting temporary and seasonal workers who are unable to find clean, market-rate rentals. The net result is that our current housing situation is contributing to economic stagnation.

Increasing our supply of workforce housing will require the City to incentivize new home construction. However, this will require a solid understanding of both supply-side and demand side economics. On the supply-side, John Day is facing a profitability gap for new homebuilders. On the demand-side, our City has an affordability gap that prevents our residents from qualifying for new homes.

In order to build new homes and incentivize growth, we have to narrow both the profitability gap for builders and the affordability gap for homeowners. This will require the City to develop a formal housing and community development plan along with new policy tools to encourage housing development that will attract new residents to our community.

### THE JOHN DAY HOUSING MARKET

City Manager Green has conducted a preliminary assessment of the John Day housing market. Within city limits, 29 homes have sold since January 2016 (4.7% of the city's total residential housing market of 615 single-family homes).<sup>1</sup> The average home had the following features:

- 1,676 square feet (SF)
- 3 bedroom
- 2 bathroom
- Attached or detached single car garage
- 0.6 acre lot
- City water and sewer utilities
- Two sources of heat
- Sale price of \$141,407 (\$84/SF)
- Built in 1959 (58 years old)
- Listed for 266 days on market

Examining the average home reveals three factors that combine to create disincentives for new residents in John Day:

**Small home sizes.** At 1,676 SF, the average John Day home sold since 2016 is 791 SF (or 32%) smaller than the average single family home built in the western United States, which was 2,467 SF as of 2015.<sup>ii</sup> Our homes are smaller than what the average homebuyer is seeking.

**Aging housing stock.** The average John Day home, built in 1959, is two decades older than the average Oregon home, which was built in the 1970s.<sup>iii</sup> Furthermore, of the 29 homes sold in the past year, only five were built in the last three decades (the newest in 2007).

**Depressed market values.** While at face value low home prices are attractive to potential buyers, it can create a disincentive for new home construction if the cost of a new home significantly exceeds the real market value of the home upon completion. This is the case in John Day. The average sale price of a John Day home in 2016 of \$84/SF was 46% lower than the average price/SF for new home construction in the western United States, which was \$155/SF as of 2015.<sup>iv</sup> This cost-value disconnect discourages investments in new housing.

Making our housing stock more competitive will require a comprehensive housing analysis that considers property transactions both within the city and in the surrounding area. The City will also need to develop a new housing plan and policies that are both creative and sophisticated at incentivizing development. Finally, a robust financial econometrics model is needed to better understand the extent of the value gap for new construction.

**PREDICTING THE MARKET VALUE OF A NEW HOME IN JOHN DAY**

City Manager Green is developing a statistical model known as a hedonic pricing model to predict the market value of a newly constructed home in John Day. The model was designed using *Stata*, a data analysis and statistical software package, and was derived using attributes of homes sold in John Day and the surrounding area since January 2016. The preliminary results of the model are shown in Table 1.

*Table 1. Average home real market value (RMV) compared to predicted market value for new site-built homes in John Day*

2016-17 RMV (existing home; 3 bed;2 ba;1 gar; city util; 58 yrs old)	Predicted Market Value (new home)			
	1500 SF	1676 SF	2000 SF	2467 SF
\$141,407 (\$84/SF)	\$245,400 (\$164/SF)	\$254,000 (\$152/SF)	\$270,000 (\$135/SF)	\$293,000 (\$119/SF)

Under current market conditions, the predicted market price for a new, 1676 SF home similar in features to the average John Day home is \$254,000 (\$152/SF). Compared to the average RMV for the 29 homes sold in 2016, this results in a price difference of \$112,593 (\$51/SF) between the predicted value of a new home and the RMV of the average John Day home.

This gap is significant for several reasons. From the perspective of public agencies' current and future revenue streams, it equates to roughly \$1,800 in annual property tax revenue (15.9374 mill rate \* \$112K) per home. From the perspective of homebuyers, the \$112K is the additional cost of their mortgage to buy the same home new versus 58 years old. For builders, it is the barrier they must overcome to sell a spec home in John Day to a future homebuyer.

### **AN ILLUSTRATION**

A simple illustration can be used to help connect the dots on our current housing market.

Let us suppose a job seeker is offered a position of employment by the local hospital. This young rural professional (*Yurpl*) is excited about the prospect of getting out of the city and moving to a quaint frontier community in eastern Oregon. The *Yurpl* had a successful interview and is offered the position. However, as they are searching for a home they run into a stumbling block – there are no rentals!

Willing to commit to the location and the position anyway, they decide to press forward and purchase a home in John Day, because there are plenty of homes on the market from which to choose. However, the *Yurpl's* spouse (being a city slicker) is hesitant to buy a 58-year-old home that could require a lot of maintenance. In addition, most of the homes available are over one third smaller than what they came from, and those that are the right size seem too overpriced.

Sensing some future spousal conflict, the *Yurpl* suggests that they move to the county, where they can buy a nice, new manufactured home on a two acre lot! Perhaps in their spare time they will take up ranching or raise chickens?

The *Yurpl's* spouse is considering this option, and in the meantime, the talented staff at the local hospital are actively soliciting any leads they can find on available rentals so they do not lose the opportunity of attracting this young family to their community. Meanwhile, the City suggests that for only \$7,056 in system development fees, an additional \$32,000 to purchase a lot, and a wish and a prayer that they can find a builder who isn't booked solid for the next two years, this young couple could build a new home in John Day!

### **COMMUNITY BENEFITS OF A ROBUST HOUSING MARKET**

This illustration is intended to be comical, but it is also surprisingly accurate. The City could be playing a larger role in incentivizing (rather than discouraging) new home construction, as one-step toward removing barriers to population growth.

In addition to the direct tax benefits of new housing, there are a number of indirect benefits to having a robust and healthy housing market. Building new, market rate homes creates naturally affordable housing in a city by replenishing the local housing stock. Having a wider range of

housing options across a broader price range also has a stabilizing effect on the market, eliminating some of the uncertainty about return on investment for both homebuilders and buyers. Finally, because John Day has a local retail economy, many of our local businesses should see an increase in gross revenue that is directly proportional to our growth rate – a 10% increase in population will roughly correspond to a 10% increase in sales.

## **NARROWING THE GAP**

If the hedonic pricing model proves to be accurate, a new 2,000 square foot home built in John Day would sell for approximately \$270,000 (\$135/SF). If the cost of construction were \$150/SF, this means the profitability gap for new home construction would be \$30,000. However, that average price to build does not include the “hidden” costs of construction. System development charges, building permit fees, land development fees and the land purchase price all contribute to the cost. After including these charges, the final price for a 2000 SF home could easily exceed \$170/SF – increasing the gap to \$60,000.

There are several options available to help narrow the gap. These include:

- Consumer preference for a new home
- Reducing regulatory hurdles to increase efficiency in home construction
- Providing services to reduce land development costs (i.e. street improvements)
- Cash incentives to new home buyers
- Economies of scale by building multiple homes simultaneously
- Tax incentives such as local improvement districts that collateralize the cost of land development over time

Choosing the right combination of policy tools will be important to strike a balance between new growth and preserving our local, small town heritage. Ineffective tools will likely lead to failure and voter disapproval. Some have even questioned the wisdom of public sector engagement before we have developed our strategy or tested it in the market (Exhibit A).

To mitigate these potentially negative effects, the City may need to experiment with a range of options and alternatives that could be adjusted to achieve the growth targets we establish. A *Test-Validate-Scale* model is appropriate for evaluating the impact of new policies and incentives. This type of approach would allow the City to test its policies at a small scale and make refinements before expanding to a larger scale.

## **HOUSING & COMMUNITY DEVELOPMENT PLAN**

The City will need a housing and community development plan in addition to the new policies. City Manager Green conducted a preliminary land inventory analysis for the city and its urban growth boundary (Exhibit B). John Day currently has 1164 acres of undeveloped property within city limits and the urban growth boundary. Of this, 376 acres (or 32%) is zoned Residential and is currently within city limits, with 29 acres readily buildable and an additional 129 acres that could be developed into housing – bringing the total buildable area to approximately 158 acres.

A comprehensive housing plan will allow the City to identify quick wins, near-term and long-term areas for housing investment.

- *Quick wins* are lots that are already developed and are currently for sale, or are owned by investors willing to build on them. These lots will only require policy incentives in order to encourage development.
- *Near-term investments* are lots and land that could be developed as extensions to existing neighborhoods that have utility infrastructure and street improvements in place, or lots within the UGB that could be annexed.
- *Long-term investments* are those that will require greater coordination between the city, land developers, builders and prospective homebuyers.

## RECOMMENDATIONS

This is the most complex policy change the City is likely to undertake. The Council does not need to make a decision with regard to the future housing plan or incentives at this time. Rather, Council should discuss and debate whether the prospective return on investment and need for new housing warrants public sector intervention. Council should also discuss the outcomes they would like to see for the community and the pace at which they would like to achieve them.

The financial return on investment to all public agencies for a new household is approximately \$10,000 per year. For 100 new households, the annual revenue increase is close to \$1M. This ROI results from a combination of tax policies and is protected by law.<sup>v</sup> It would also create a more robust tax base for future investment and service provisioning. However, the benefits do not accrue to all agencies in equal proportion. If the benefits are distributed across multiple agencies, the risks should also be syndicated.

The City should avoid intervening in areas where we lack expertise or intervention will not lead to the outcomes we desire. We are not a mortgage lender. We are not a homebuilder. Our future policies should not extend to these areas. However, we can provide financial incentives, relieve regulatory hurdles and otherwise encourage land developers, builders and buyers to add to our housing capacity as a key component of our *Strategy for Growth*.

Creating innovative and effective policy tools; using a test-validate-scale approach to evaluate new policies; leveraging sophisticated financial forecasting and econometric modeling techniques to quantify the risks and rewards of investing; and syndicating risk across multiple agencies are areas the City should continue to explore and are well within our area of expertise.

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<sup>i</sup> Number of single family homes based on residential water/sewer accounts active at the end of 2016

<sup>ii</sup> U.S. Census Bureau Annual 2015 Characteristics of New Housing

<sup>iii</sup> <https://www.zillow.com/blog/age-of-homes-181636/>

<sup>iv</sup> U.S. Census Bureau Annual 2015 Characteristics of New Housing

<sup>v</sup> See memo *A Day in the Taxing Life*, providing in council packet

**EXHIBIT A. Letter and article from former City Councilor Louis Provencher, included at his request**

City of John Day, Oregon  
Attn: Nick Green, City Manager  
Ron Lundbom, Mayor  
City Councilors  
450 East Main Street  
John Day, OR 97845

April 14, 2017

RE: City's Strategy for Financing and Incentive for Home Owners

Dear City Manager Nick Green, Mayor Ron Lundbom and City Councilors,

I have heard, as well as read in the March 2017 City of John Day Newsletter that the City will be looking at options to provide financing and incentives for home repair and improvements for the City's current homeowners. I have also been lead to believe this will include providing financial assistance for those purchasing or building a new home.

I can understand the City's involvement in providing incentives for current and new business willing to establish in the City of John Day. Can also understand providing some system development incentives for those building new homes however, I do not agree with providing taxpayer financing for these individuals and businesses.

Financial lending should be left to the experts and established lending institutions such as the 4 located in the City of John Day. The City doesn't need to be in competition with these lending institutions. It must also be remembered that these lending institutions support many activities and projects in our community.

The City doesn't have the skills, knowledge and personnel to manage a financial lending program. Who will ensure the funds are spent in accordance to contract? Yes, a lien(s) can be put on the property however this still puts the residents at risk for financial loss and future cost. Just look at our property tax collection where an annual average of 11% goes uncollected with minimal follow-up to collect. In addition there are 108 property tax collection exemptions (League of Oregon Cities) in the state of Oregon that amount to over twice what is currently collected (Can be a double edge sword.) – How much financial loss is acceptable? Does this small/rural City really want to get in this position with a financial and incentive program?

People must stop expecting instant gratification and expecting someone else such as local, county, state, and federal governments to pay the cost and take all the financial risk. We have to get back to individual responsibility and self-reliance. We all must learn to live within our means and that includes the City.

The City of John Day having a downward trend in population and with difficulties in attaching new business must be extremely careful in the amount of financial risk its residents are exposed to. It is recognized that the City of John Day is the hub of Grant County and provides leadership and guidance to other Grant County cities and towns. City of John Day residents cannot nor should they be responsible for or take all the financial risk for curing all the economic ills affecting Grant County.

**Please ensure this letter is included as part of the record for all discussions regarding**

Sincerely,



Louis E. Provencher  
P.O. Box 25  
211 NW 4th  
John Day, OR 97845  
Tel: (541) 575-2543



**PENDLETON**

# Housing developer seeks change in loan deal with city

By ANTONIO SIERRA  
*East Oregonian*

The developer behind Pendleton's most significant recent housing initiative is asking the city to restructure his loan agreement.

At a Pendleton City Council workshop Tuesday, city manager Robb Corbett presented the financial history of the project and the developer's proposal.

To assist developer Saj Jivanjee in building the Pendleton Heights subdivision off of Tutuilla Road, the city fronted the costs of more than \$1 million in infrastructure improvements to the area.

In exchange, Jivanjee agreed to pay back most of the infrastructure costs. As enforcement measures, the city placed liens on Jivanjee's properties and created a stipulation in the agreement that allowed the city to retake the land if it went undeveloped.

The first phase — 32 townhouses — is already complete and has \$320,000 in liens.

The last phase was supposed to be an additional 32 townhouses, but Jivanjee decided to change it to a 100-unit apartment complex to better recoup his investment. This phase has \$480,000 in liens.

Jivanjee is now asking the city if he can pay the city \$100,000 and add the lien amount from the first phase to the last phase.

This would benefit Jivanjee twofold — a lower debt-to-revenue ratio on the first phase would allow him to apply for long-term financing. It would also make it easier for him to pay the remaining \$700,000 in liens on the final phase because the apartment complex will generate more revenue.

Corbett said Jivanjee plans to start road work on the second phase at the end of the month and begin construction of

# State records: Doctor Montwheeler was fake

By LES ZAITZ  
*The Malheur Enterprise*



Montwheeler

State doctors suspected nearly 20 years ago that Anthony W. Montwheeler was feigning mental illness to avoid prison, newly disclosed records show.

The records, a portion of state files on Montwheeler, give no indication that officials acted on that suspicion

until Montwheeler admitted his two years ago.

Montwheeler, 49, told doctors he hoped his ploy would get him and out of the Oregon State Hospital six months, sparing him at least years in prison.

Instead, he remained under jurisdiction of the state Psychology Security Review Board, including years in custody at the state hospital

**PENDLETON**



Pastor Chris Clemons shows members of the Pendleton High School Community Day Gregg, Abby Rinehart and Emily Rinehart an approved collection system for a new Warming Station on Tuesday in Pendleton.



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Corbett said Jivanjee plans to start road work on the second phase at the end of the month and begin construction of the apartment complex toward the end of summer. The project will be done in 20-unit increments, with Jivanjee paying back the debt as each stage is completed.

Corbett said Jivanjee approached the city about changing the terms of the deal.

"Saj has made a number of proposals over the months that have not been as attractive as this one," said Mayor John Turner, without elaborating.

Some councilors seemed wary of accepting Jivanjee's proposal, but councilor Scott Fairley said the city needed to move ahead with the deal considering that increasing the city's housing inventory is one of the council's priorities.

The council took no action by the end of the meeting, but Corbett said he would present an amended contract for council consideration at a future meeting.

Contact Antonio Sierra at [asierra@astoregonian.com](mailto:asierra@astoregonian.com) or 541-966-0836.



Pastor Chris Clemons shows members of the Pendleton High School CommunityCare Club, Abby Rinehart and Emily Rinehart, an environmental education system for a local Warming Station on Tuesday in Pendleton.

# Students learn about

Club offers glimpse into world of nonprofits

By KATHY ANEY  
East Oregonian

Eight Pendleton High School students are trying out the role of philanthropist.

Giving is fun, they are learning, but it's also a multifac-

eted and sometimes emotional endeavor.

The team, all members of the school's CommunityCare club, have a goal of money to spend in their community. The club — essentially a very fund-

with world of nonprofit philanthropy. The student club, which was started by Harold and Helen G. CARE Foundation with a total \$7,500.

Club members, all aged to just last fall by Jill Gregg, admit they're only a fuzzy idea about foundations actually do.

"I feel like if more people were aware that there is such a problem in our community, they'd be more w-

— Abby Rinehart, CommunityCare club president



Lindsay helped  
billion-doll

BY GEORGE PLAVEN



## Exhibit B. Preliminary land assessment and inventory for John Day and its urban growth boundary

### Land Assessment

Table 1. Undeveloped Land Area and Percent Composition by Zoning

Land Area (Ac.)	Residential	Commercial	Industrial	Total
City	376	2	163	541
UGB	600	0	23	623
<b>Total</b>	<b>976</b>	<b>2</b>	<b>186</b>	<b>1164</b>
% Composition	Residential	Commercial	Industrial	Total
City	32%	0.2%	14%	46%
UGB	52%	0%	2%	54%
<b>Total</b>	<b>84%</b>	<b>0.2%</b>	<b>16%</b>	<b>100%</b>

Table 2. Undeveloped Land Area and Percent Composition by Terrain

Land Area (Ac.)	Level	Sloped	Mixed	Total
City	99	238	204	541
UGB	61	501	61	623
<b>Total</b>	<b>160</b>	<b>739</b>	<b>265</b>	<b>1164</b>
% Composition	Level	Sloped	Mixed	Total
City	9%	20%	18%	46%
UGB	5%	43%	5%	54%
<b>Total</b>	<b>14%</b>	<b>63%</b>	<b>23%</b>	<b>100%</b>

### Land Inventory

Tax	Lot	Area	Zoning	Acres	Location	Geography
13S31E	200	Northeast City Limits	RG	129.00000000	City	Sloped/Level
13S31E	1027	Patterson Bridge Rd	RG/GI	74.82000000	City	Sloped/Level
13S31E	2302	Industrial Park Rd	SR	60.92028000	UGB	Sloped/Level
13S31E	2700	Eastern City Limits	RG/SR	49.88762000	UGB	Sloped
13S31E	2703	Eastern City Limits	RG	80.00000000	City	Sloped
13S31E22	400	Patterson Bridge Rd	SR	26.62000000	UGB	Sloped
13S31E22	401	Patterson Bridge Rd	SR	4.29000000	UGB	Sloped
13S31E22A	300	Ironwood Estates	RG	15.16496000	City	Level
13S31E22A	400	Ironwood Estates	RG	15.56221473	City	Sloped
13S31E22A	2200	Ironwood Estates	RG	1.14419088	City	Level
13S31E22A	2300	Ironwood Estates	RG	0.99758512	City	Level
13S31E22A	2800	Ironwood Estates	RG	0.62241117	City	Level
13S31E22A	3100	Ironwood Estates	RG	0.99404919	City	Level
13S31E22A	3300	Ironwood Estates	RG	0.97828446	City	Sloped

13S31E22A	3400	Ironwood Estates	RG	0.86143925	City	Sloped
13S31E22A	3500	Ironwood Estates	RG	0.81514251	City	Sloped
13S31E22A	4000	Ironwood Estates	RG	0.89265041	City	Sloped
13S31E22A	4200	Ironwood Estates	RG	0.65055249	City	Sloped
13S31E22A	5000	Ironwood Estates	RG	4.35837021	City	Sloped
13S31E22C	1600	Patterson Bridge Rd	GI	13.25359657	City	Level
13S31E22D	100	Riverside Home Park	GC		City	Level
13S31E22D	304	S. Hwy 26	GI	2.91700500	UGB	Level
13S31E22D	305	S. Hwy 26	GI	20.47246000	UGB	Level
13S31E22DD	100	Riverside Home Park	GC		City	Level
13S31E23AC	201	Charolais Heights	RG	0.90819600	City	Level
13S31E23CB	507	Bridge St.	RG	0.51000000	City	Level
13S31E23CB	508	Bridge St.	RG	0.28000000	City	Level
13S31E23CB	1400	N. Canton	RL	6.71000000	City	Level
13S31E23CB	1403	N. Canton	RL	0.45000000	City	Level
13S31E23CB	1407	Riverside Home Park	GC		City	Level
13S31E25BB	800	Hillcrest Rd	RG	0.96000000	City	Level
13S31E25BB	3100	Hillcrest Rd	RG	1.83000000	City	Sloped
13S31E26	2900	SE UGB	SR	10.00000000	UGB	Sloped
13S31E26	2901	SE UGB	SR	20.00000000	UGB	Sloped
13S31E26	3000	SE UGB	SR	8.17000000	UGB	Sloped
13S31E26	3100	SE UGB	SR	7.70000000	UGB	Sloped
13S31E26	3104	Airport Rd	RG	34.48000000	City	Sloped
13S31E26	3105	Airport Rd	RG	8.91000000	City	Sloped
13S31E26	3111	SW 4th Ave	RG	4.49000000	City	Sloped
13S31E26	3500	4-K Overlook	SR	5.01000000	UGB	Sloped
13S31E26	3501	4-K Overlook	SR	5.00000000	UGB	Sloped
13S31E26	3600	4-K Overlook	SR	5.62000000	UGB	Sloped
13S31E26	3700	4-K Overlook	SR	5.00000000	UGB	Sloped
13S31E26	3701	4-K Overlook	SR	5.01000000	UGB	Sloped
13S31E26	3800	4-K Overlook	SR	5.00000000	UGB	Sloped
13S31E26	3801	4-K Overlook	SR	5.01000000	UGB	Sloped
13S31E26	4100	Ferguson Rd	RG	5.30000000	City	Sloped
13S31E26AB	8100	Ferguson Rd	RL	1.12000000	City	Sloped
13S31E26AC	100	Ferguson Rd	RG	24.94000000	City	Sloped
13S31E26AC	300	Ferguson Rd	RG	1.83000000	City	Sloped
13S31E26BA	3000	Downtown	D	0.33178181	City	Level
13S31E26BA	3700	Downtown	D	0.12327716	City	Level
13S31E26BA	3900	Downtown	D	0.33747400	City	Level
13S31E26BA	10800	Downtown	GC	1.61736700	City	Level
13S31E26BB	1000	SW 4th Ave	RG	2.84000000	City	Sloped
13S31E26BB	1400	SW 4th Ave	RG/SR	12.93000000	UGB	Sloped
13S31E26BB	1503	SW 4th Ave	SR	1.50000000	UGB	Sloped
13S31E26BB	1505	SW 4th Ave	SR	5.41000000	UGB	Sloped

13S31E26BD	101	SE Hwy 395	RG	5.00000000	City	Sloped
13S31E27	100	Phillips Lane	SR	54.00000000	UGB	Sloped
13S31E27	700	Phillips Lane	SR	5.67000000	UGB	Sloped
13S31E27	701	Industrial Park Rd	SR	7.21000000	UGB	Sloped
13S31E27	702	Industrial Park Rd	SR	7.61000000	UGB	Sloped
13S31E27	703	Phillips Lane	SR	1.10000000	UGB	Sloped
13S31E27	704	Phillips Lane	SR	1.10000000	UGB	Sloped
13S31E27	705	Phillips Lane	SR	1.20000000	UGB	Sloped
13S31E27	707	Phillips Lane	SR	1.10000000	UGB	Sloped
13S31E27	708	Phillips Lane	SR	1.10000000	UGB	Sloped
13S31E27	900	Phillips Lane	SR	11.91000000	UGB	Sloped
13S31E27	1000	Phillips Lane	SR	7.35000000	UGB	Sloped
13S31E27	1200	Industrial Park Rd	RG	23.00000000	City	Sloped
13S31E27	1202	Industrial Park Rd	SR	2.86000000	UGB	Sloped
13S31E27	1203	Industrial Park Rd	AIP	20.03000000	City	Sloped
13S31E27	1206	Industrial Park Rd	SR	17.00000000	UGB	Sloped
13S31E27	1207	Industrial Park Rd	SR	5.00000000	UGB	Sloped
13S31E27	1208	Industrial Park Rd	SR	5.92000000	UGB	Sloped
13S31E27	1300	Industrial Park Rd	SR	74.89000000	UGB	Sloped
13S31E27D	2900	Industrial Park Rd	AIP	54.51000000	City	Level
13S31E28	300	West Bench Rd	SR	11.29000000	UGB	Sloped
13S31E28	400	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	401	West Bench Rd	SR	2.00000000	UGB	Sloped
13S31E28	402	West Bench Rd	SR	2.32000000	UGB	Sloped
13S31E28	403	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	404	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	405	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	406	West Bench Rd	SR	1.75000000	UGB	Sloped
13S31E28	407	West Bench Rd	SR	2.23000000	UGB	Sloped
13S31E28	408	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	409	West Bench Rd	SR	2.10000000	UGB	Sloped
13S31E28	410	West Bench Rd	SR	1.01000000	UGB	Sloped
13S31E28	1400	Bumpy Rd	SR	14.68207446	UGB	Sloped
13S31E28	1700	Bumpy Rd	SR	4.72677262	UGB	Sloped
13S31E28	2000	La Costa Dr	SR	37.74000000	UGB	Level
13S31E29	301	Luce Creek Rd	SR	2.00000000	UGB	Sloped
13S31E29	401	Luce Creek Rd	SR	2.41000000	UGB	Sloped
13S31E29	402	Luce Creek Rd	SR	3.77000000	UGB	Sloped
13S31E29A	1202	La Costa Dr	SR	1.82555603	UGB	Sloped
13S31E29A	1203	La Costa Dr	SR	1.80645660	UGB	Sloped
13S31E29A	2000	La Costa Dr	SR	5.73000000	UGB	Sloped
13S31E29A	2400	La Costa Dr	SR	5.15000000	UGB	Sloped
13S32E	400	Eastern City Limits	SR	38.90000000	UGB	Sloped