



Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

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March 12, 2007

Mr. Gary Karp

City of Springfield

225 Fifth Street

Springfield, Oregon 97444



RE: Eugene/Springfield PAPA 001-07: Plan diagram amendment and PAPA 003-07
Springfield zone change) for 56 acres

Dear Gary,

Please submit this letter into the record of the proposed Metro Plan Amendment and zone change requested for the "Villages at Marcola Meadows" development. In addition, the department supports the recommendations to address Goal 12 and the transportation planning rule (TPR) provided to the city by the Ed W. Moore, ODOT on March 9, 2007 and enclosed. We would only request an additional condition of approval to be in compliance with Goal 12: that the commercial development provide connectivity with the existing, as well as new residential development.

We have read the application and while there appears to be compelling reasons to redesignate the property to Commercial, the evidence to date does not adequately balance nor answer the main question of continual shifting of one plan designation and resultant zone category that is in low supply to another and vice versa. We certainly advocate the continued efforts by the city to provide the type of analysis of current inventories that could then be adopted for use as the factual information for decision making and should better address the city's employment lands needs. We do see this proposal as potentially vulnerable for appeal however and, like you, not sure on how to resolve this point in time for the everyday actions of the city of Springfield. These are initial areas of concern that we are willing to work with the city to see if they can be resolved to assist in making a decision on this plan amendment. Please do call me to discuss the attached issues.

Sincerely,

Marguerite Nabeta, AICP

S. Willamette Valley Regional Representative

Enclosure

Cc: File

Ed W. Moore, ODOT



- 1. Key issue: Springfield is low on Campus Industrial land, yet the applicant proposes converting a large percentage of its short-term supply to commercial and residential uses meeting a need under those zoning categories. There are two ways to reach compliance with Goal 9: a quantitative analysis of the supply of needed sites in a land use category, or a qualitative analysis of the particular site as to its suitability for the zoned use.**
- 2. The applicant does not supply the cumulative actions to meet Commercial needs that have been occurring since the 2002 Commercial study. The applicant provides analysis from a data base that has not been adopted for land use purposes nor has it been coordinated with the state of Oregon. The state does not know nor has it been provided an opportunity to discuss the assumptions in the data base.**
- 3. The applicant provides general comments of a qualitative nature regarding the site including the existence of power lines and an irrigation ditch, and the site's proximity to residential and the Kingsford plant. However, no analysis or reasonable conclusions to justify redesignation are provided.**
- 4. Potential problem areas that need better or additional discussion:**
 - a. The subject site is included in the 2006 update of the Metropolitan Industrial Lands Inventory Report as one of the development-ready sites for short-term industrial use. It has been reserved as a development-ready industrial site since 1995. So far the application doesn't reconcile the borrowing from one plan element to assist with another.
 - b. Metro Plan's Economic Element Policy B12 discourages plan amendments that change development-ready industrial sites to non-industrial designations. The proposal is not consistent with OAR 660-009-0010(4) because it is not consistent with the city's own industrial conversion policies. The applicant does provide other counterbalancing policies but doesn't provide the discussion of how to weight the balancing.
 - c. According to the application, at least 155 acres of industrial land in Springfield have already been converted to residential or commercial use. Is this a large percentage of the remaining inventory or not? Should make a difference to decision makers and could inform a way to balance as suggested in "b" above.

- d. According to the application, both short-term and long-term supplies of Campus Industrial (CI) land are critically inadequate, and this application proposes converting 29% of that critically inadequate supply to commercial use.
- e. According to the application, Springfield's supply of CI land will be depleted by 2015.
- f. The fact that this site has not yet developed with any CI uses does not justify converting it to a regional commercial retail use and reducing the city's dwindling CI land supply even further – CI code was just revised 2 years ago to potentially assist in siting issues – we acknowledge that applicant does have market expert, Lane METRO discuss viability of site as better for commercial, but then how to balance it against loss of CI inventory?
- g. The city may not utilize for land use decision making but can consider the draft Jasper Natron Specific Development Plan designations in determining whether this application will negatively affect the CI land supply. The city may only use plans and plan policies that it has adopted.
- h. The 1999 Eugene Springfield Lands Study shows a surplus of all types of residential land. If this is still true in 2007, then the city may not convert CI land, which is in short supply, to a residential use. (Part of the proposal is to increase the amount of MDR land on the site.) The applicant doesn't discuss information from the city's monitoring program. Is the information available from the city for the applicant to use?
5. There is no discussion of why a regional large retail store (*e.g.*, a home improvement center) is an appropriate use in a MetroPlan Nodal Development Area (#7C). Several large retail stores, including another local large Home Improvement Center exist in close proximity to the site. They all function as regional retail providers. Typically commercial uses at a smaller-scale local or neighborhood commercial: grocery store, bank are utilized for nodal developments. That is not to say that a larger retail store couldn't serve that purpose but what role it will play in serving a nodal development (to take trips off of the transportation system), and provide connectivity to dense residential development should be discussed.
6. A large retail store such as a home improvement center is not, as described in the application, a "supportive transition in scale and intensity between residential

neighborhoods and larger commercial uses.” On the contrary, a home improvement center is the type of larger regional commercial use that is incompatible with a residential neighborhood. In the context of this site, it very well may be a transition between middle and high density residential and other heavy industrial uses. Perhaps worth discussing.

7. Mixed-use development is a desired type of development for a designated node, but this proposal is traditional development using the catch words of mixed-use. The different uses (commercial, residential, office) are segregated into different areas (“villages”) over a very large (100-acre) area. True mixed-use combines uses within buildings (vertical mixed-use), or at least locates buildings with different uses next to each other (horizontal mixed-use). A large regional one-story retail store like a home improvement center is generally not considered mixed-use or part of mixed-use, unless the building has upper floors of housing units.
8. Because they have not been adopted into the city’s comp plan, the September 2006 ECONorthwest Lane County Commercial and Industrial Land Supply Report and the economic growth predictions for the South Willamette Valley may not be used for this PAPA or other planning purposes. “Endorsement” is not sufficient; the city must adopt by ordinance. Without the required coordinated analysis the raw data base does not comply with Goal 9 Economic Development.
9. The proposal should state when the city adopted the 2001 Eugene-Springfield Metro Area Public Facilities and Services Plan, on which it relies.
10. The proposal does not appear to comply with the Goal 2 coordination requirement. There should be adequate findings regarding coordination with the City of Eugene because of the regional nature of the MetroPlan and the UGB.
 - a. Springfield should also coordinate with Eugene on this proposal because the Metropolitan Industrial Lands Inventory Report doesn’t segregate out a specific land need for the City of Springfield.
11. We do agree that the 1999 Eugene Springfield Lands Study may be too old to be useful, but until more contemporary work is completed the applicant must do comparative analysis