MEMORANDUM **CITY OF SPRINGFIELD**

DATE OF WORK SESSION/PUBLIC HEARING: March 27, 2007

TO: Springfield Planning Commission **PLANNING COMMISSION TRANSMITTAL MEMORANDUM**

FROM: Gary M. Karp, Planner III

SUBJECT: Metro Plan Diagram Amendment - Case Number **LRP 2006-00027**
Springfield Zoning Map Amendment - Case Number **ZON 2006-00054**
Satre Associates, Applicant - Representing SC Springfield, LLC

ISSUE

Conduct a work session and a public hearing on the proposed Metro Plan diagram and Springfield Zoning Map amendments and decide whether to advise the City Council to approve, approve with conditions or deny these applications.

DISCUSSION

The subject site, formerly known as the "Pierce" property is located north of Marcola Road, west of 31st Street, east of Mohawk Marketplace Shopping Center and south of the EWEB bike path. The subject site is 100.3 acres in size. The current Metro Plan designations and zoning are: Campus Industrial, Medium Density Residential and Community Commercial. The applicant requests approval of a: Type II Metro Plan diagram amendment to change the Campus Industrial designated portion of the subject site (currently 56 acres) to Commercial/Nodal Development Area, Community Commercial and Medium Density Residential/Nodal Development Area; and amendment of the Springfield Zoning Map from Campus Industrial to Community Commercial, Mixed Use Commercial and Medium Density Residential. The applicant's intent is to obtain the proper Metro Plan designations and zoning to allow the construction of a phased mixed-use residential and commercial development with nodal attributes called the Villages at Marcola Meadows. These applications are the first step in the process to obtain development review approval. The next steps are Master Plan approval and then, individual Site Plan and Subdivision approval. The public will be noticed during each review process. These applications use similar criteria of approval and have been combined into one staff report for ease of review. Both applications are interrelated: the proposed Metro Plan diagram amendments must be approved in order for the Zoning Map amendments to be approved because the plan designation and zoning must be consistent. In making their decisions, the Planning Commission and the City Council should consider: If the City will be better served by converting Campus Industrial land to Commercial and Multi-family Residential; if Springfield's citizens, especially the neighbors, can be assured that a "quality" development will be constructed over time; and if the removal of the Campus Industrial designation can be absorbed or should be offset by a commensurate addition of Campus Industrial designation elsewhere in the City as an element of the upcoming commercial and industrial land supply demand analysis.

RECOMMENDATION

Staff recommends approval of the proposed Metro Plan diagram Springfield Zoning Map amendments, as conditioned, based on the attached findings.

ACTION REQUESTED

Advise the City Council, by motion and signature of the attached order and recommendation by the Planning Commission Chairperson, to approve these applications, as conditioned, at their public hearing on April 16, 2007.

ATTACHMENTS

Attachment 1: Staff Report, Findings and Order
Attachment 2: Maps Submitted by the Applicant
Attachment 3: Legal Description for the Zoning Map Amendment
Attachment 4: The Preliminary Plan Illustration (a rendering of the proposed Master Plan)
Attachment 5: ODOT Correspondence
Attachment 6: DLCD Correspondence
Attachment 7: TransPlan Proposed Nodal Development Area Map

ATTACHMENT 1
STAFF REPORT, FINDINGS AND ORDER
CITY OF SPRINGFIELD, DEVELOPMENT SERVICES DEPARTMENT

Applicant: **Satre Associates PC, Applicant, representing SC Springfield, LLC**	**Case Numbers:** **LRP 2006-00027** **ZON 2006-00054**
Requests: This is a consolidated staff report for amendments to the Metro Plan diagram and the Springfield Zoning Map. These applications involve two parcels under common ownership totaling 100.3 acres (Assessor's Map 17-02-30-00, Tax Lot 01800 and 17-03-25-11, Tax Lot 02300).	**Procedure Type:**
1. The Metro Plan Diagram Amendment proposes to change the Campus Industrial portion of the subject site to Commercial/Nodal Development Area, Community Commercial and Medium Density Residential/Nodal Development Area. The net effect on designated areas will be as shown below.	**Type IV – Metro Plan diagram amendment**

Existing and Proposed Plan Designations

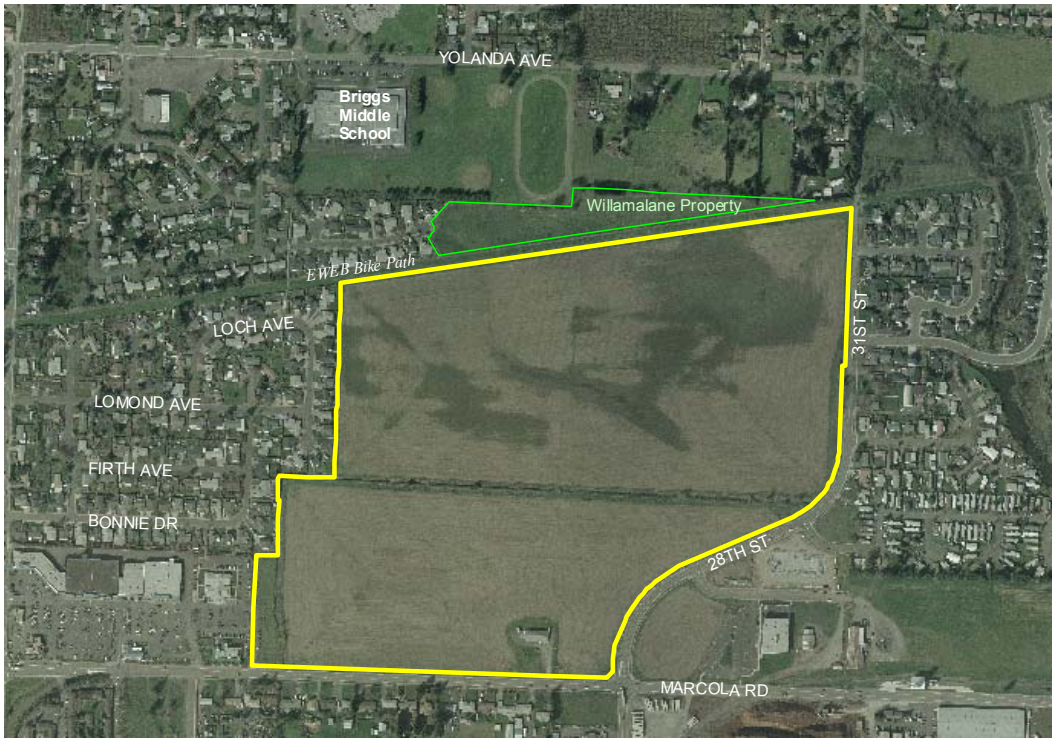
Plan Designation	Acres Existing	Acres Proposed	%Change
Medium Density Residential /ND	35.7	54.7	53%
Commercial	8.6	19.6	128%
Commercial /ND	0.0	26	n/a
Campus Industrial	56.0	0.0	-100%
Total	100.3	100.3	
/ND: Nodal Development Area Overlay	0.0	80.7	

2. Springfield Zoning Map Amendment Case Number ZON 2006-00054 proposes to change the zoning from Campus Industrial to Industrial to Community Commercial, Mixed Use Commercial and Medium Density Residential. The net effect on zoning will be as shown below.	**Quasi-judicial zone change raised to a Type IV procedure**

Existing and Proposed Zoning

Zoning District	Acres Existing	Acres Proposed	%Change
Medium Density Residential	35.7	54.7	53%
Community Commercial	8.6	19.6	128%
Mixed-Use Commercial	0.0	26.0	n/a
Campus Industrial	56.0	0.0	-100%
Total	100.3	100.3	

VICINITY MAP



I. EXECUTIVE SUMMARY

The applicant is proposing to amend the Metro Plan diagram from Campus Industrial (CI) to Commercial/Nodal Development Area (NDA), Community Commercial (CC) and Medium Density Residential (MDR)/NDA; and to amend the Springfield Zoning Map from CI to CC, Mixed Use Commercial (MUC) and MDR. Attachment 2 includes diagrams showing the current and proposed Metro Plan designations and zoning. These applications are the first steps towards implementing a comprehensive new development plan for the 100.3 acre site.

Future applications include a Master Plan for the entire site which will address phasing of development and the timing of infrastructure installation; individual Subdivision and Site Plan Review applications; and other applications, as necessary. The applicant cannot concurrently submit a Master Plan application because the Metro Plan designation and zoning must be in compliance. Compliance will not be achieved until these applications are approved. The applicant has included a "Preliminary Plan Illustration" (see Attachment 4) that is intended to be a depiction of the future Master Plan for use with these applications.

The "Pierce" property is listed in TransPlan as a potential nodal development area and was mentioned among the areas considered by the City Council for formal designation as a node. The applicant's Preliminary Plan Illustration includes elements consistent with nodal designation. The proposed development will include design elements that support pedestrian environments and encourage transit use, walking and bicycling; a transit stop which is within walking distance (generally ¼ mile) of anywhere in the node; mixed uses so that services are available within walking distance; public spaces, such as parks, public and private open space, and public facilities, that can be reached without driving; and a mix

of housing types and residential densities that achieve an overall net density of at lease 12 units per net acre.

In 2001, the City Council denied a Metro Plan amendment on the "Pierce" property to site a Home Depot. That application showed a "piece-meal" development proposal without a comprehensive development proposal for the entire property. There was an approved Conceptual Development Plan for the Campus Industrial portion of the subject site. However, that plan showed only proposed lot layouts and a street system. The applicant's proposal shows specific plans for the commercial and residential development that would replace the Campus Industrial designation and zoning.

The "Pierce" property has been marketed as an industrial site for many years. Various characteristics of the site as well as changing market forces have worked against the development of the site. The proximity of the Kingsford Charcoal plant and potential vibration from the nearby rail spur has discouraged high-tech development of the site. Market forces are affecting the types of development that are attracted to campus industrial sites. Of the many employers located in the City's other Campus Industrial site (Gateway), only one, Shorewood Packaging, is a manufacturing use.

The justification for converting the industrial portion of the subject site to commercial and residential uses are described in more detail in the body of this report. Additional information on the history of the site and changing market forces are also included.

Of the several criteria of approval that apply to these applications, compliance with: 1) State-wide Planning Goal 9, "Economic Development"; and 2) State-wide Planning Goal 12, "Transportation" are essential and therefore, are specifically discussed in this executive summary:

<u>Compliance with State-wide Planning Goal 9, "Economic Development".</u>

The Home Depot Metro Plan diagram amendment/zone change application (2001) proposed to change 7.79 acres from Campus Industrial to Community Commercial leaving approximately 48 acres of CI designated and zoned land. There was significant neighborhood opposition to the development but the request was denied by the City Council for the following reasons:

1) The reduction of the CI land use designation and the variety of high tech manufacturing sector family wage jobs that might be lost as a result; and the fact that the CI designation was one of the City's smallest inventories and could not easily replaced because the "high tech" industry demands large, constraint-free campus-like settings.

2) The apparent inconsistency of the Home Depot proposal with the intent of Policy 12 of the Economic Element of the Metro Plan, which states: ***"Discourage future Metropolitan Area General Plan amendments that would change development ready lands (sites defined as short-term in the metropolitan Industrial Lands Special Study, 1991) to non-industrial designations."***

3) The then recently adopted Springfield Commercial Lands Study conclusions were used as a substantial justification for the proposal. The fact that there was a shortage of vacant, developable commercial land in Springfield was not at question. However, the proposal to increase this supply, regardless of other relevant factors, was not sufficient reason to approve the proposal.

The issues cited above are still applicable and have been addressed by the applicant and staff's findings primarily under the responses to Goals 9, 10 and 12. There are also changes in circumstance pertaining especially to the lack of industrial development in the Campus Industrial District that should be considered. These changes are discussed under the response to Goal 9.

While there appears to be more demand for commercial than industrial development currently, this fact alone should not be the primary reason for the City Council to remove a "shovel ready" CI property in exchange for commercial development. The Planning Commission and the City Council should determine if the applicant and staff demonstrate that in order to comply with Statewide Planning Goal 9,

Metro Plan policies and adopted land inventories that Campus Industrial land should be converted to commercial and residential and that conditions that applied during the Home Depot review process in 2001 have changed. Staff contends these issues have been addressed in this staff report and recommends approval of these applications, with conditions. In making their decisions, the Planning Commission and the City Council should consider the impact of piece-meal conversions on the future availability of developable industrial land while using somewhat dated commercial and industrial land surveys.

Compliance with State-wide Planning Goal 12, "Transportation".

The applicant submitted information requesting a "trip cap" which can be implemented via a "Trip Monitoring Plan" to demonstrate compliance with Goal 12 and which argues in favor of mixed use development within a potential nodal development area.

1) The Oregon Transportation Planning Rule requires metropolitan areas with populations under one million to plan for a 5 percent per capita reduction in vehicle miles traveled (VMT) over the 20 year planning horizon. The revised TransPlan adopted by Springfield, Eugene and metro Lane County in 2001 allows for Nodal Development Areas as an alternative strategy to meet the VMT standard. The City Council selected and adopted the Nodal Development Area concept after reviewing a preliminary assessment of several potential Nodal Development Area sites in 2003 (7B in Riverbend; 8A in Glenwood; 8B in Downtown Springfield; 9A in Mohawk; and 9H and 9J in Natron). Last year, a previous Metro Plan diagram/Zoning Map amendment application initiated a portion of Proposed Nodal Development Area 9C at 30th and Main Streets. The TransPlan Potential Nodal Development Areas map shows that the subject site is within the boundary of Proposed Nodal Development Area 7C. Area 7C has not been "officially" approved by the City Council. Upon approval, these applications will add approximately 80 acres of MUC and MDR designated and zoned land to Springfield's "official" Nodal Development Areas.

2) The trip cap is an acceptable traffic capacity limitation tool allowed in the Transportation Planning Rule. The trip cap establishes a "worst case" scenario for trips generated by the current zoning for the entire site, in this case CI, MDR and CC. Trips generated by future MUC, MDR and CC uses cannot exceed the established trip cap. The response to the Goal 12 criterion was reviewed and accepted, as conditioned, by Gary McKenney, Springfield Transportation Planning Engineer and Ed Moore from the Oregon Department of Transportation's Springfield office (see Attachment 5).

II STAFF/APPLICANT HISTORY

During the early stages of this development proposal, representatives of the current property owners (SC Springfield LLC who purchased it in 2006 from the Pierce Trust) had several meetings with City staff before applying for a Development Issues Meeting (ZON 2005-00028) in July, 2005. The owner's representatives had several additional meetings with City staff and subsequently hired Satre Associates to prepare the required land use applications. A Pre-Application Report (ZON 2006-00030), the prerequisite for the submittal of a Master Plan, was submitted in May 2006. Staff requested that application out of sequence to have "formalized development proposal" to comment on. Staff had a number of concerns about that proposal and contracted with Crandall Arambula (an urban design/planning firm in Portland which designed Hillsboro's Orenco Station development) for a peer review of the application, which occurred in July, 2006. Crandall Arambula listed 6 suggestions: 1) Relocate and redesign Main Street Retail; 2) Reconfigure the home improvement center site; 3) Include a park as a focus and active recreation amenity for new residential development; 4) Include an off-street pedestrian and bicycle trail system to provide safe and convenient access to "destinations" and "attractions" on and off the project site; 5) Make the residential street configuration pedestrian friendly; and 6) The residential buildings need a transition between the public and private realm. All but one of Crandall Arambula's suggestions (the reorientation of the home improvement center from east-west to north-south due to a 42" sanitary sewer line) has been incorporated into the Preliminary Plan Illustration (see Attachment 4). The Pre-Application Report application is on hold until these applications are approved. Satre Associates submitted these applications on September 29, 2006. These applications

were determined to be incomplete and staff met with Satre Associates on October 24, 2006 to discuss the completeness issue. The additional information was submitted on December 21, 2006 and the applications were determined to be complete for review on January 11, 2007.

Note: The Oregon Department of Land Conservation and Development (DLCD) is currently on record stating that home improvement centers should not be permitted in industrial districts because it would create "de facto mixed use districts". The applicant originally proposed that the approximately 14 acre home improvement center site be designated and zoned Light-Medium Industrial (LMI) based on a recent Planning Commission interpretation allowing this use in the City's LMI, Heavy Industrial (HI) and Special Heavy Industrial (SHI) zoning districts. This means a home improvement center can be sited only on property designated and zoned Commercial. However, due to its size, this use is not allowed in the Mixed Use Commercial District; it can go into the Community Commercial District. The proposed nodal development area will not include the home improvement center site.

The applications were further revised on February 28 to change the requested LMI designation and zoning to CC due to issues raised by DLCD. Finally staff met with DLCD representative Marguerite Nabeta and the applicant to review DLCD comments made on March 12, 2007 (see Attachment 6). Additional information has been added into this staff report (The Goal 9 response was revised dated March 17, 2007) and/or will be submitted prior to the public hearing.

III PROPERTY DESCRIPTION/LAND USE HISTORY

Property Description and Existing Conditions.

The subject site is located north of Marcola Road, west of 31st Street, east Mohawk Marketplace Shopping Center and south of the EWEB bike path and is 100.3 acres in size. The applicant has submitted the following information:

"Subject Site:

The subject site has been used for a variety of agricultural uses. It is currently vacant, with the exception of a small industrial building to the south of the subject site. The Springfield City Limits abuts the subject site on small portions on the west and northeast. Tax Lot 2300 is partially developed with a vacant industrial building. Tax Lot 2300 was platted in 1994 as Parcel 3 of land partition plat 94-P0491. A property line adjustment was recorded with Lane County in 1997 affecting the common boundary between Parcels 2 and 3 of Land Partition Plat 94-P0491 in so doing completing the current configuration of the subject site (City of Springfield file# 97-02-029). Tax Lot 1800 is vacant. A storm drainage facility runs through the center of the subject site running east to west. The storm drainage facility is proposed to be enhanced through the process of development of the subject site. The site is located outside of both the 100-year flood and 500-year flood areas (see Exhibit 7, FIRM Map 41039C1153F).

Additional detail on adjacent uses is as follows:

North. The property to the north of the subject site is separated by an EWEB utility corridor that also serves as a multi-use path. North of the EWEB corridor is property owned by Willamalane Park and Recreation District (Tax Lots 1500 and 2300), Briggs Middle School and Yolanda Elementary (Tax Lots 2200 and 3002) and single family residential properties. The properties to the immediate north are zoned Medium-Density Residential with Public Land and Open Space zoning on the School and part of the Willamalane and EWEB properties.

West. The property to the west is zoned and developed with low-density single-family residential dwellings.

Southwest. The property to the southwest is zoned Community Commercial and is developed with a variety of retail commercial uses including a grocery store and a bank.

South. The property to the south is zoned and developed with low-density single-family residential dwellings.

Southeast. To the southeast are properties that are zoned for Light-Medium Industrial (across North 28th Street) and Heavy Industrial (across Marcola Road). Several of these properties are currently developed with industrial uses.

East. To the east (across North 28th Street) are properties zoned and developed with low-density single-family residential dwellings…."

Land Use History.

Staff has prepared the following abbreviated land use history which is discussed here for two reasons: 1) It establishes the existing plan designation and zoning acreages; and 2) it lists the Home Depot applications which were denied, an issue that has a direct bearing on the proposed applications.

The "Pierce" property originally stretched from 19th Street to 31st Street and beyond to the base of Moe Mountain; and from Marcola Road to Briggs Middle School, north of the EWEB Bike Path. Since the "Pierce" property was annexed in 1975, there have been approximately 40 plan designation/zoning and development applications submitted to the City. However, only several of these applications are discussed for reasons cited above:

82-10-028 The initial Zone Change application established 15 acres of Community Commercial extending from the corner of 19th Street and Marcola Road eastward a distance of approximately 1350 feet; 48.7 acres of Medium Density Residential; 59.4 acres of Special Light Industrial (now Campus Industrial); and 25 acres of Light-Medium Industrial (located east of the subject site). There was 17.5 acres of Low Density Residential that was not rezoned. The City Council adopted Ordinance 5160 on June 6, 1983. Conditions of zoning approval included:

a) The dedication of land for a park of at least 5 acres in the vicinity of the EWEB Bike Path with access to a public street and the bike path.[1]

b) The creation of a new street to smooth the transition between 28th and 31st Streets.[2]

c) A "collector" street beginning opposite V Street for approximately 1900 feet and then turning south to connect with Marcola Road to serve as the boundary between the Campus Industrial and the Medium Density Residential zoning.[3]

[1] The last Campus Industrial Conceptual Development Plan (98-02-047) approved in 1999 stated that 8 acres were dedicated for park use in 1993. This park land, which remains undeveloped, is listed in Willamalane's Park and Recreation Comprehensive Plan as a proposed Neighborhood Park. See also the discussion under State-wide Planning Goal 8.

[2] The Pierce Trust dedicated the right-of-way and the 28th /31st Connector was constructed in 1993.

[3] The collector street (V Street to Marcola Road – TransPlan Chapter 3, Page 21) is shown on the TransPlan Federally Designated Roadway Functional Classification Map and as Project # 777 on the Financially Constrained Roadway Projects Map in Appendix A of TransPlan. See also the discussion under State-wide Planning Goal 12 concerning both this issue and Potential Nodal Development Area 7C.

95-02-036 This City initiated Metro Plan amendment and Zone Changes eliminated inconsistencies between the zoning approved by Ordinance 5160 and the updated 1987 Metro Plan diagram. Ordinance 5785 was adopted by the City Council on May 15, 1995. This application also:

a) Added 5 acres of Community Commercial zoning along Marcola Road, taken from the Medium Density Residential zoning;

b) Changed the Low Density Residential/Medium Density Residential zoning shown in Atlee Park North to Low Density Residential;

c) Showed the future park zoned entirely PLO; and

d) Did not change the Campus Industrial designation and zoning shown on Map 4, Area1 at this time (see 96-10-208).

Ordinance 5785 also required specific landscaped buffer areas applicable to all future development.

96-10-208 This City initiated Metro Plan Amendment and applicant initiated Zone Changes application eliminated additional zoning and plan diagram inconsistencies. The zone changes were from:

a) Community Commercial to Medium Density Residential for 1.28 acres (extending the residential zoning to the south) so that the northern boundary of the commercial zoning would be located within a 20 foot-wide sanitary sewer easement; and

b) Campus Industrial to Community Commercial for 1.28 acres (extending the commercial zoning east) to keep the commercial zoning at the same acreage. The zone changes were approved by the Planning Commission on February 19, 1997

The Metro Plan diagram amendment was from Heavy Industrial to Light-Medium Industrial for 11.5 acres located east of the 28th/31st Street connector and north of Marcola Road. Ordinance 5851 was approved by the City Council on April 7, 1997 (**Note:** these 11.5 acres is outside of the boundary of the subject property).

97-02-029 This Property Line Adjustment moved the common property line of Parcels 2 and 3 of Partition Plat 94-P0491 approximately 142 feet to the west to allow the existing drainage ditch to be entirely on Parcel 3. The survey was recorded at Lane County on April 3, 1997.

The current acreages are as follows: 1) Community Commercial 8.8 acres; 2) Campus Industrial 56 acres; and 3) Medium Density Residential 35.5 acres.

00-12-254 Metro Plan Amendment application. **Home Depot** requested a Metro Plan diagram amendment from Campus Industrial to Community Commercial for 7.79 acres. On June 18, 2001 the City Council voted 4-1 with one absent to deny the request. The approval of concurrent zone change and Site Plan Review applications was dependent upon the adoption of the Metro Plan diagram amendment. Since the City Council denied this application, those applications were denied also.

IV. APPLICATION TEAM

Owner/Applicant:
SC Springfield, LLC
5440 Louie Lane, Suite 102
Reno, Nevada 89511
Attn: Jeff Belle

The property owner has put together the following development team:

Project Developer:
The Martin Company
PO Box 1482
Albany, Oregon 97321
Attn: Bob Martin

Planner/Landscape Architect:
Satre Associates, P.C.
Planners, Landscape Architects and Environmental Specialists
132 East Broadway, Suite 536
Eugene, Oregon 97401
Attn: Richard M. Satre, ASLA, AICP

Architect:
Waterbury Shugar Architecture LLC
225 West 5th Avenue
Eugene, Oregon 97401
Attn: Richard Shugar, AIA

Civil Engineer/Surveyor:
K & D Engineering, Inc.
PO Box 725
Albany, Oregon 97321
Attn: Dan Watson, PE
Transportation Engineer:
Access Engineering, LLC
134 East 13th Avenue, Suite 2
Eugene, Oregon 97401
Attn: Mike Weishar, PE

V. PROPOSED DEVELOPMENT

The applicant states that: *"This PAPA, submitted concurrently with the zone change application, is in preparation for appropriate land use permit applications to construct a mixed-use residential, and commercial development as described herein. The appropriate land use permit applications include* [but are not limited to] *Master Plan Review and Traffic Impact Analysis Review.*

Although applications for Master Plan, Subdivision and Site Plan approvals would be premature at his time, elements of the anticipated Preliminary Plan Illustration are material to the current application. To provide specific information about the intended mixed-use development and its relevance to the current application, a Preliminary Plan Illustration has been submitted as [Attachment 4] *and as described below.*

... The Villages at Marcola Meadows is a proposed mixed-use development comprised of residential, office and retail villages. Referencing the dramatic wooded backdrop of the Coburg and Marcola hills to the north, and the large plane of valley floor meadow on site, Marcola Meadows has been conceived to blend in with this overall setting while creating a bridge and supportive transition in the scale and intensity of larger commercial uses to the south with quiet residential neighborhoods to the north. Within Marcola Meadows a suite of eight Villages will exist. Four residential villages comprised of single family homes, apartment homes, townhomes and an assisted living facility with senior cottages will occupy the northern extent of the site, buffering existing residential developments to the northwest, north, and northeast. One office village, consisting of professional offices, will occupy the southeast area. Three retail villages, general retail, neighborhood retail, main street retail will face 28th Street and Marcola Road. Each of the Villages is envisioned to be unique, yet part of the whole. The overall Meadows theme will appear throughout, with the use of meandering waterways, native plans and generous open space. Within each Village, Pacific Northwest design aesthetic will prevail, supported with the generous use of stone, wood and steel. Marcola Meadows will not only be a great place to call home, but an exciting place to shop; with specialty retail shops and unique dining venues. Stores will have welcoming front doors, large windows and high ceilings, all with natural materials and muted colors. It will be easy to get around, and to do so on foot. All streets will have wide sidewalks, many of them setback from vehicle traffic. The entire community will be connected with all-weather multi-use off street pathways. It will be convenient, and safe, to walk from one Village to the next. It will be a great place to be outdoors, with meadow-flavored open spaces, native plant communities, lighting, bridges, seating, and overlooks to support

walking and relaxing. It will be a healthy place; with ample use of oxygen-generating trees to cleanse the air, catch the wind and cool the temperature. It will be an environmental place, utilizing a network of bioswales, shallow seasonal ponds, and a meandering drainageway to capture and cleanse stormwater. In all, The Villages at Marcola Meadows will not only be a great addition to the community but a wise use of land and smart approach to design."

VI. TYPE OF METRO PLAN AMENDMENT/THE ZONING MAP AMENDMENT AS A TYPE IV REVIEW

1) This Metro Plan diagram amendment application involves the site-specific amendment of the Metro Plan diagram from Campus Industrial to Campus Industrial portion of the subject site (currently 56 acres) to Commercial/Nodal Development Area, Community Commercial and Medium Density Residential/Nodal Development Area. This Metro Plan amendment is a Type II amendment as defined in SDC Section 7.030 because it does not have "regional impact" by:

   "(a) Changing the urban growth or the jurisdictional boundary of the Metro Plan because the subject site is within the city limits;
   (b) Requiring an exception to a State-wide goal; and
   (c) Requiring a non-site specific amendment of the Metro Plan text."

   This Metro Plan amendment is a Type II amendment as defined in SDC Section 7.030 because it is a site specific diagram amendment; not a specific text amendment:

   "(a) Amendment of the Metro Plan diagram; and
   (b) Is a site specific text amendment."

2) SDC 12.020(1)(a)1. states***: "…Zoning Map amendments shall be reviewed as follows:***

(a) Legislative Zoning Map amendments involve broad public policy decisions that apply to other than an individual property owner, generally affecting a large area and/or require a concurrent Metro Plan diagram amendment as specified in Article 7 of this Code. Legislative Zoning Map amendments shall be reviewed using Type IV procedure.

1. Metro Plan diagram amendment determination. An amendment to the Metro Plan diagram shall be required if the proposed Zoning Map amendment is not consistent with the Metro Plan diagram. Both amendments may be processed concurrently."

The applicant has submitted the Zoning Map amendment application concurrently with the Type II Metro Plan diagram amendment application.

Type of Metro Plan Amendment Conclusion and Finding:

Springfield is the "home city" for this proposal because the subject site is located within the city limits and the application does not have regional impacts. Therefore, the consideration of the Metro Plan amendment request is the exclusive responsibility of the Springfield City Council. However, referrals have been sent to both the Eugene and Lane County Planning Directors as specified in SDC Section 7.050.

VII. PROCEDURAL REQUIREMENTS

Procedural requirements for: Metro Plan diagram amendments are described in SDC Article 7; Springfield Zoning Map amendments are described SDC Article 12; and notice requirements are described in SDC Article 14.

SDC Article 7 indicates that the City Council or a citizen can initiate Metro Plan diagram amendments. These amendments of are reviewed under a "Type IV" procedure and require public hearings before the Planning Commission and the City Council. Type IV procedures are detailed in SDC Section 3.100.

SDC Article 12 indicates that the Planning Director, Planning Commission, City Council or a citizen can initiate Zoning Map amendments. These amendments are reviewed under a "Type IV" procedure when combined with a Metro Plan diagram amendment and require public hearings before the Planning Commission and the City Council. Type IV procedures are detailed in SDC Section 3.100.

SDC Section 14.030(2) requires that legislative land use decisions be advertised in a newspaper of general circulation, providing information about the legislative action and the time, place and location of the hearing. In addition, notice is required to be mailed to all property owners and occupants within 300 feet of the subject site.

The applicant submitted applications that have similar criteria of approval. Where the applicant's submittal responds to a similar criterion is used in another application, staff will reference the location of that response. Where the applicant's submittal responds to a criterion that is not used in another application, staff will address that response as such.

Procedural Requirement Conclusion and Findings:

Satre Associates, representing SC Springfield, LLC has initiated these applications. The Metro Plan diagram is a Type IV review procedure and the quasi-judicial Zoning Map amendment has been raised from a Type III review procedure to a Type IV review procedure for concurrent review.

"Notice of Proposed Amendment" was mailed to the Department of Land Conservation and Development (DLCD) on February 8, 2007, alerting the agency of the City's intent to amend the Metro Plan diagram and Springfield Zoning Map. The notice was mailed more than 45 days in advance of the first evidentiary hearing as required by ORS 197.610. Due to the applicant's decision to change the originally proposed LMI designation and zoning to CC for the home improvement center portion of the subject site, revised documents reflecting these changes were mailed to DLCD on March 6, 2007.

Referral of the proposed Metro Plan amendment was sent to Eugene and Lane County on March 16, 2007 as specified in SDC Section 7.050.

Notice of the public hearings concerning these applications was mailed to property owners and residents within 300 feet of the subject site on March 15, 2007. Notice of the public hearings concerning these applications was published on March 16, 2007 in the Register Guard. These notices advertised both the hearing before the Springfield Planning Commission on March 27, 2007 and the City Council on April 16, 2007. The content of the notices followed the direction given in SDC Section 14.030(2) for legislative actions and the direction given in ORS 227.186.

Procedural requirements described in SDC Articles 7, 12 and 14 have been followed as well as notice requirements established by DLCD for legislative applications.

VIII. DECISION CRITERIA AND FINDINGS

The Metro Plan diagram and Zoning Map amendments have been combined into one staff report for ease of review. Both applications have criteria requiring consistency with State-wide Planning Goals and Metro Plan policies. Rather than repeat these criteria for each application, they will be addressed only once and then referenced where appropriate. Criteria that are different will be addressed separately; the end result will be that all applicable criteria will have been addressed and findings prepared.

IX. METRO PLAN AMENDMENT CRITERA AND FINDINGS

Article 7 describes the criteria to be used in approving a Type II Metro Plan amendment. SDC Section 7.070(3) states that **"*The following criteria shall be applied by the City Council in approving or denying a Metro Plan amendment application: (a) The amendment must be consistent with the relevant statewide planning goals adopted by the Land Conservation and Development***

Commission; and (b) Adoption of the amendment must not make the Metro Plan internally inconsistent."

SDC Section 7.070(3) ***"(a) The amendment must be consistent with the relevant statewide planning goals adopted by the Land Conservation and Development Commission; and"***

GOAL 1: CITIZEN INVOLVEMENT

"To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process."
Applicant's Submittal:

The City of Springfield has an acknowledged citizen involvement program and an acknowledged process expressed in the Springfield Development Code for securing citizen input on all proposed zone map amendments. It insures the opportunity for citizens to be involved in all phases of the planning process and sets out requirements for such involvement. The amendments proposed do not amend the acknowledged citizen involvement program. The process for adopting these amendments complies with the requirements of the citizen involvement provisions.

The Metro Plan contains an acknowledged citizen involvement program satisfying Goal 1. The citizen involvement program is in Metro Plan Chapter III, pp. III-K-1 to III-K-4. The proposed amendment complies with and does not affect or amend the citizen involvement element in the Metro Plan.

The Metro Plan diagram amendment is subject to the public notification and public hearing processes provided for Type IV application procedures as stipulated in SDC 3.100(1) through (7), which, along with the remainder of the Code and with State-wide Goals and state statutes, provide the provisions for citizen involvement.

The City's acknowledged program for citizen involvement, including public notice, public hearings at the level of the planning commission and city council, notification of decision and notification of the right of appeal, provides citizens the opportunity to review and make recommendations in written and oral testimony on the proposed amendments to the Metro Plan Diagram and on the proposed zone map amendment. These acknowledged citizen involvement provisions afford ample opportunity for citizen involvement consistent with Goal 1.

For the reasons cited, including the Metro Plan's and the City of Springfield's acknowledged programs for citizen involvement, the amendment is consistent with Goal 1."

Staff's Response:

Staff concurs with the applicant's submittal. Goal 1 requires a citizen involvement program. The applicant has described that program above and staff concurs with that discussion. Combined Metro Plan diagram and Zoning Map amendments require an initial public hearing before the Planning Commission and a legislative public hearing before the City Council. DLCD and neighborhood notice of these hearings, including local jurisdiction referral was provided as described in Section VI. (Procedural Proceedings) of this staff report.

In addition, the applicant held a neighborhood meeting on March 14, 2007. The applicant mailed notice of this meeting to: all property owners within 300 feet of the subject site (the same notice area as mandated to the City by the State); individuals on staff's interested persons list; and to affected public agencies. Approximately 40 people attended.

Staff Finding:

These applications comply with Goal 1 because they are being reviewed under an acknowledged citizen involvement program and public notice procedures were complied with.

GOAL 2: LAND USE PLANNING

"To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions."

Applicant's Submittal:

"Goal 2 requires that plans be coordinated with the plans of affected governmental units and that opportunities be provided for review and comment by affected governmental units. In order to comply with the Goal 2 coordination requirement, the City will be responsible for coordinating the adoption of this amendment by providing notice to all affected governmental units and responding in its findings to the legitimate concerns of affected governmental units. There are no Goal 2 Exceptions required.

The Eugene/Springfield Metro Area General Plan (Metro Plan), the Springfield Code, and the State-wide Planning Goals and applicable state statutes and administrative regulations, provide policies and criteria for the evaluation of plan amendments. Compliance with these measures assures an adequate factual base for approval of the amendment. As discussed elsewhere in this document, the amendment is consistent with the Metro Plan, the Springfield Code, and the State-wide Goals. Therefore, the amendment is consistent with Goal 2."

Staff's Response:

Staff concurs with the applicant's submittal. On August 23, 1982, DLCD acknowledged that the Metro Plan and the all implementing measures were found to be in compliance with the State-wide Planning Goals pursuant to ORS 197.245 and 197.250. This act established, for the Eugene-Springfield metropolitan area and for Springfield in particular, a land use planning process and policy framework for all decision and actions related to use of land and assurance for an actual factual base for such decisions and actions. The Metro Plan has been amended several times since 1982. The SDC was adopted in May 1986 and also has been amended several times. The SDC implements the policies and direction of the Metro Plan.

In addition, the Metro Plan and the SDC contain guidelines and regulations for amendments, including making a distinction between the "type" of Metro Plan amendment (either a "I" or a "II"), who may or must participate as decision-makers (home city, regional impact), and how each level of amendment is processed. These applications are being reviewed under a Type II Metro Plan amendment procedure. Notification of these applications has been sent to both Eugene and Lane County.

Furthermore, various adopted refinement plans and specific area plans, including TransPlan, provide more detailed direction for planning under the umbrella of the Metro Plan. TransPlan guides regional transportation system planning and development in the Eugene-Springfield area. TransPlan was last amended in December 2001 with the goal of reducing vehicle miles traveled. Consistent with this goal, the applicant is proposing to apply the Metro Plan ***"Nodal Development Area" land use designation to the subject. This land use designation emphasizes "… a mix of diverse and compatible land uses and public and private improvements designed to be pedestrian and transit oriented."*** The subject site is within TransPlan Potential Nodal Development Area 7C (See the response to Goal 12).

As the hearing process evolves from the Planning Commission to the City Council, the record of the hearings will include all testimony and factual evidence intended to support the decision.

Finally, the SDC requires affirmative findings in support of the applicable criteria in order to approve these applications. The application of the implementing zoning districts will be consistent with the Metro Plan diagram and any applicable Metro Plan text. Citations of Metro Plan compliance are included in this report under criterion SDC Section 7.070(3)(b).

<u>Staff Finding</u>:

These applications comply with Goal 2 because the SDC requires consistency between the State-wide Planning Goals, the acknowledged Metro Plan, adopted refinement plans and special area plans and consistency with the local jurisdiction's zoning.

GOAL 3: AGRICULTURAL LAND

"To preserve and maintain agricultural lands."

Goal 3 defines ***"agricultural lands"*** by stating, in part, that they: ***"…do not include land within acknowledged urban growth boundaries or land within acknowledged exceptions to Goals 3 or 4."***

<u>Applicant's Submittal:</u>

"This goal applies to lands that are designated Agricultural. This amendment is for property located within the city limits of Springfield and does not affect land designated for agricultural use. Therefore, Goal 3 is not applicable or relevant to the amendment."

<u>Staff's Response:</u>

Staff concurs with the applicant's submittal. The subject site is located within the city limits on land planned and zoned for urban use for over 30 years. The City does not have any agricultural zoning districts, either within its city limits or within the urban growth boundary.

<u>Staff Finding</u>:

Goal 3 does not apply to these applications because the subject site is within Springfield's city limits and the City does not have any agricultural lands.

GOAL 4: FOREST LANDS

"To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture."

<u>Applicant's Submittal:</u>

"This amendment is for property located within the city limits of Springfield and does not affect land designated for forest use. Therefore, Goal 4 is not applicable or relevant to the amendment."

<u>Staff's Response:</u>

Staff concurs with the applicant's submittal. The subject site is located within an acknowledged urban growth boundary. Goal 4 does not apply within urban growth boundaries.

<u>Staff Finding</u>:

Goal 4 does not apply to these applications because the subject site is within Springfield's city limits and the City does not have any forest lands.

GOAL 5: NATURAL RESOURCES, SCENIC AND HISTORIC AREAS, AND OPEN SPACES

"To protect natural resources and conserve scenic and historic areas and open spaces."

Applicant's Submittal:

"Pursuant of Goal 5, the City of Springfield has adopted the following documents:

- *Eugene-Springfield Metropolitan Area General Plan, revised 2004*
- *City of Springfield, Local and National Wetlands Inventory Map, December 2005*
- *City of Springfield Natural Resource Study, adopted, November 2005*

Oregon Administrative Rule 660-023-0250 establishes the applicability of Goal 5 rules to Post Acknowledgement Plan Amendments (PAPA), and specifies certain procedures and requirements for local governments to follow in the adoption or amendment of all plan or land use regulations pertaining to Goal 5 resources. The rule states:

"(3) Local governments are not required to apply Goal 5 in consideration of a PAPA unless the PAPA affects a Goal 5 resource. For purposes of this section, a PAPA would affect a Goal 5 resource only if:

(a) The PAPA creates or amends a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5;

(b) The PAPA allows new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list; or

(c) The PAPA amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area."

The following discussion will demonstrate that the proposed PAPA does not raise any issues that would require the City of Springfield to apply Goal 5.

Firstly addressing OAR 660-023-250(a): The changes sought by this application do not create or amend a resource list or any portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource on the subject site.

Secondly addressing OAR 660-023-250(b): The changes sought by this application will not allow new uses that could conflict with a significant Goal 5 resource site. There are no significant Goal 5 resources on the site itself. None of the various studies, inventories, refinement plans, and facilities plans list this specific site as a significant resource, apply a Goal 5 resource overlay, or otherwise regulate or limit the redevelopment of this site as a Goal 5 resource.

There is drainage ditch on the site that was inventoried and listed (M32) by the City of Springfield Natural Resource Study. It was classified as a Low Quality Wetland and did not meet the significance criteria of the Oregon Freshwater Wetland Assessment Methodology. The closest Goal 5 resource identified by the City of Springfield Natural Resource Study is the Irving Slough located approximately 550 feet to the east. It is listed as both a High Quality Riparian Resource Site (S20 and S21) and a Moderate Quality Wetland (M16b and M16c). However, the resource impact area, defined by the study, does not reach the subject site. Therefore, the uses allowed by the proposed PAPA will not conflict with a Goal 5 resource.

Lastly addressing OAR 660-023-250(c): The changes sought by this application do not amend the acknowledged City of Springfield Urban Growth Boundary. Therefore, with regard to this criterion, the City is not required to apply Goal 5.

Oregon Administrative Rule 660-023-0250 "Applicability" stipulates that local governments are required to apply Goal 5 when considering a Post Acknowledgment Plan Amendment if the amendment affects a Goal 5 resource. For the purposes of that rule, the section lists three circumstances (OAR 660-023-0250(3)(a), (b), and (c) quoted above) under which, and only under which, a Post Acknowledgment Plan Amendment would affect a Goal 5 resource. As evidenced above, none of the three circumstances are

raised by the proposed amendment, and therefore the amendment will not affect a Goal 5 resource. The City is not required to apply Goal 5 when considering the proposal. The City of Springfield can find that the action requested by this application is consistent with State-wide Planning Goal 5."

Staff's Response:

Staff concurs with the applicant's submittal. Goal 5 protection begins with an acknowledged inventory of Goal 5 resources and then proceeds through an economic, social, environmental and energy analysis to determine whether the resource should be protected from conflicting uses; limit conflicting uses; or allow conflicting uses fully (OAR 660-016-0010). The City has an acknowledged historic structures inventory, a local wetland inventory and recently adopted a natural resources inventory that considered uplands, wildlife habitat and riparian corridors. The subject site has been planned and zoned for intensive urban development and use prior to Metro Plan acknowledgement in 1982 (see Section II of this staff report, Property Description/Land Use History). The Department of State Lands and the Army Corps of Engineers have determined that the existing drainage ditch did not fall under either agency's jurisdiction during the review Home Depot applications in 2001, but that determination has expired. For the record, the existing drainage ditch and any potential wetland and/or riparian issues on other portions of the subject site must be addressed during the Master Plan application process (a condition of approval of these applications).

Staff Finding:

As conditioned, these applications comply with Goal 5 because it has been demonstrated that there are no inventoried resources on the subject site. However, the applicant shall obtain documentation stating that the existing drainage ditch is not a regulated wetland and confirm if there are any other wetland areas on the subject site.

Condition of Approval #1

The submittal and approval of a Master Plan application prior to any development on the subject site.

Note: The applicant has stated the property owner's intent to submit a Master Plan application. Rather than require a separate Memorandum of Understanding or similar document at this time, staff is highlighting potential development issues as part of these applications that must be addressed during the Master Plan approval process. The Metro Plan diagram and Zoning Map amendment applications are concurrent. SDC Section 12.040 gives the City authority to add conditions ***"…as may be reasonably necessary in order to allow the Zoning Map amendment to be granted."*** The Master Plan application process will require a public hearing and approval by the Planning Commission. This note applies to all of the additional conditions of approval.

Condition of Approval #2

Submittal of documentation from the Department of State Lands and/or the Army Corps of Engineers with the Master Plan application demonstrating the existing drainage ditch is not a regulated watercourse/ wetland, and if necessary, submittal of a wetland delineation for other wetlands that may be on the subject site.

GOAL 6: AIR, WATER AND LAND RESOURCES QUALITY OAR 660-015-0000(6)

"To maintain and improve the quality of the air, water and land resources of the state."

Applicant's Submittal:

"Nothing in the proposal or the character of the site or potential uses indicates a future development that would compromise air, water and land resources. Future development of the site will be in conformance with local, state and federal law including aspects of the Springfield Code. As indicated in findings

regarding Goal 11, incorporated herein by reference, options for accessing or providing the necessary urban services are available. Therefore, the amendment is consistent with Goal 6.

Goal 6 requires all waste and process discharges from existing and future development to be consistent with applicable state for federal environmental quality statutes. Specifically, it requires local governments to establish that there is a reasonable expectation that a proposed use will be in compliance with the applicable state and federal environmental quality standards (Friends of the Applegate v. Josephine County, 44 Or LUBA).

There are three federal environmental quality acts relevant to State-wide Planning Goal 6: Clean Water, Clean Air, and the Resource Conservation and Recovery Acts[1]. These acts are enforced by the Environmental Protection Agency (EPA) to maintain air, water, and land resource quality.
The EPA delegates authority to Oregon Department of Environmental Quality (DEQ) to enforce federal environmental statutes in the State of Oregon (i.e. Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act). The DEQ administers the federal statutes (acts) through the Oregon Administrative Rules (OAR), Oregon Revised Statutes (ORS), and Department programs.

The OARs regulate noise control, groundwater quality protection, solid waste, hazardous waste management, ambient air quality standards, and transportation conformity. The ORSs provide procedures for compliance with sewage treatment and disposal systems, solid waste management, reuse and recycling, hazardous waste and hazardous materials, noise control, and air and water quality standards. At the local level, the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) contains policies related to Goal 6 that maintain air, water and land resource quality in the metropolitan area and are as follows:

C.25 Springfield, Lane County, and Eugene shall consider downstream impacts when planning for urbanization, flood control, urban storm runoff, recreation, and water quality along the Willamette and McKenzie Rivers.

C.26 Local governments shall continue to monitor, to plan for, and to enforce applicable air and water quality standards and shall cooperate in meeting applicable federal, state, and local air and water quality standards.

C.27 Local governments shall continue to cooperate in developing and implementing programs necessary to meet air quality standards. This effort should include but not be limited to:

a. Review of all major public capital expenditure projects for potential air quality impacts.
b. Integration of air quality concerns into the comprehensive land use plan.
c. Active participation in developing and implementing additional controls, as needed.

Supplemental to the Metro Plan is the Central Lane Metropolitan Planning Organization Regional Transportation Plan (RTP). This plan is the federal Regional Transportation Plan for the Eugene-Springfield metropolitan area. A plan as such, must comply with the federal Transportation Equity Act for the 21st Century (TEA 21), National Ambient Air Quality Standards, and the State of Oregon Transportation Planning Rule (TPR). Additionally the RTP must demonstrate consideration for system preservation and efficiency, energy conservation, and congestion relief.

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[1] The Clean Water Act establishes the basic regulatory structure for regulating discharges of pollutants in the waters of the United States. The Clean Water Act is implemented through industry standards and requirements. The Clean Air Act regulates air emissions from area, stationary, and mobile sources. This Act sets maximum pollutant standards and directs states to develop state implementation plans (sips) applicable to appropriate industrial sources. Finally, the Resource Conservation and Recovery Act controls hazardous waste from the "cradle-to-grave", which includes the generation, transportation, treatment, storage, and disposal of hazardous waste. This act also sets forth a framework for the management of non-hazardous wastes.

The proposed Post Acknowledgement Plan Amendment (PAPA) does not amend any of the Regional Transportation Plan goals, objectives, or policies. Future land use planning applications (Conditional Use Permit and Site Plan) will conform to federal, state, and local regulations related to State-wide Planning Goal 6. Further, when land use approvals are procured, at that time the applicant will obtain the relevant air quality permits from the Lane Regional Air Protection Agency (LRAPA). Specifically, the applicant will obtain Air Contaminant Discharge Permits as needed and Indirect Source Construction Permits for the proposed parking facilities.

In the Eugene-Springfield metropolitan area, Lane County, Lane Council of Governments (Metropolitan Planning Organization), Lane Regional Air Pollution Agency, and the City of Eugene maintain compliance with DEQ regulations by the following:

- *Lane County provides residents with waste management services through a network of disposal sites. The County's waste reduction and recycling programs are managed to conserve resources and prevent waste.*

- *The Lane Council of Governments provides wastewater and stormwater systems, ground and surface water, drinking water source assessment, watershed assessment studies and planning and protection for the Eugene-Springfield Metropolitan Area. Additionally, the Lane Regional Air Pollution Agency regulates regional air quality in Lane County through regulations, programs and permits for residents and businesses.*

- *The City of Springfield Public Works Department maintains water quality in the city through metropolitan sewage stormwater treatment systems that are required to operate under specific guidelines set forth by the DEQ. The City of Springfield also has design standards for wastewater and stormwater collection systems in the City of Springfield Public Works, Standard Construction Specifications and the Engineering Design Standards & Procedures. The City of Springfield's Development Code has three articles relevant to Goal 6 that provide resource protection: Article 17 – DWP Drinking Water Protection Overlay District, Article 27 – FP Floodplain Overlay District, Article 32 – Public and Private Improvements.*

The proposed PAPA does not amend any of the Goal 6 related policies of the Metro Plan or the Regional Transportation Plan nor amend any regulations implementing those policies. As demonstrated in responses regarding Goal 11, incorporated herein by reference, these urban services are available.

Because the proposed PAPA does not authorize any specific development at this time, there can be no direct impact to air, water, or land resource quality. When development occurs on the subject site, all development will comply with all applicable local, state, and federal regulations that protect air, water and land resources. As indicated in findings regarding Goal 11, incorporated herein by reference, options for accessing or providing the necessary urban services are available. Therefore the proposed amendments are consistent with Goal 6.

In addition to the preceding facts, the evidence supports a reasonable expectation that future development resulting from the proposed PAPA will be consistent with Goal 6 requirements. Therefore, the City of Springfield can reasonably expect that future development under the proposed PAPA will comply with applicable state and federal environmental quality standards. The proposed PAPA is consistent with Goal 6.

Staff's Response:

Staff concurs with the applicant's submittal. The purpose of Goal 6 is to improve and maintain the quality of the air, water and land resources of the state.

The subject site is located within Potential Nodal Area 7C as shown on the on the Potential Nodal Development Area Map in TransPlan. The proposed development will implement mixed-use and nodal development standards intended to reduce automobile trip frequency and duration both on-site (between the proposed community commercial services in the south and the proposed medium density residential areas in the north of the subject site) and off-site (between the existing nearby residential development and existing industrial uses, to the east and south of the subject site). The proposed development will also allow higher density, transit supportive development that also provides opportunities for bicycle or pedestrian trips both internally and externally. For these reasons the proposed development will help maintain the air resources of the state and will not alter the environmental protections provided by the Metro Plan for airborne discharges.

The proposed MUC portion of the development will require compliance with mixed use design standards specified in SDC Article 40. The proposed MDR portion of the development area will require compliance with design standards for Multi-Family development (apartments) and for Cluster Development (single-family housing) in SDC Article 16. These design standards foster pedestrian safety and infill development.

Site drainage issues will be addressed during the Master Plan, Site Plan Review and Subdivision application review processes and thus will be subject to the development permitting and approval process of the SDC; various building safety codes and the Public Works Design Manual for on-site storm water management; and other applicable state and federal regulations.

Finally, the City has an adopted drinking water protection plan and overlay zone requiring observance of certain development standards and prohibitions of specific chemicals and chemical storage. The subject site must comply with the Drinking Water Protection Overlay District standards, regardless of plan designation or zoning. The "Pierce" wellhead protection area is proposed but has the same standing as if a well was already in place. The City's adopted wellhead protection map shows the proposed wellhead on the Willamalane Park and Recreation District property outside of the subject site, north of the EWEB Bike Path. Site specific drinking water protection issues are addressed during the application review process (SDC Articles 17 Drinking Water Protection Overlay District and Article 31 Site Plan Review). These regulations especially apply to the proposed home improvement center.

Staff Finding:

As conditioned, these applications comply with Goal 6 because the PAPA implements the Nodal Development Area Metro Plan designation and thereby TransPlan Potential Nodal Area 7C, and there are regulations currently in place concerning stormwater management and protecting the City's drinking water supply, 95 percent of which is from groundwater.

Condition of Approval #3:

Submittal of a Master Plan application that incorporates the relocation of the existing drainage ditch and conversion to a major water feature that will be an integral part of the proposed development area. The construction of the entire water feature must be completed as part of the Phase 1 development.*

* The applicant has stated that Phase 1 will include the home improvement center. This means that this and all other conditions referencing "Phase 1" must be incorporated into proposed Master Plan Phase 1 development.

Condition of Approval #4

Submittal of a Master Plan application that addresses compliance with the Drinking Water Overlay District standards in SDC Article 17 and how these regulations will be applied for each proposed phase.

GOAL 7: AREAS SUBJECT TO NATURAL HAZARDS

"To protect people and property from natural hazards."

Applicant's Submittal:

"Goal 7 requires that development subject to damage or that could result in loss of life not be planned or located in known areas of natural hazards and disasters without appropriate safeguards. The goal also requires that plans be based on an inventory of known areas of natural disaster hazards (floods, landslides, earthquakes, wildfires and other related hazards). The Multi-Hazard Mitigation Plan for the Eugene/Springfield Metropolitan Area (Metro Hazard Plan) that was adopted by the City of Springfield is a non-regulatory plan but provides an inventory of known hazards.

The Metro Hazard Plan does not identify any known hazards within the area of the subject site. Additionally, the subject site is outside of the 100 year and 500 year flood plains (Exhibit 7). There are no adopted or non-adopted maps that identify the subject site to be within a know hazards area. The proposed amendments do not affect any additional geographic area than the subject site, nor is any specific development proposed at this time. In due time, future development of the subject site will include a full analysis of hazard risk and mitigate the risk through appropriate construction. As such this amendment is in compliance with Goal 7"

Staff's Response:

Staff concurs with the applicant's submittal. Goal 7 is intended to minimize the risk of hazards to human health and the risk of loss of human life. Goal 7 also intends to minimize costs associated with redeveloping after a natural disaster by restricting development in areas that are prone to natural disasters and hazards. Two primary areas of concern involve development in the flood plain and on steep slopes. The subject site is flat and is not located within a floodway.

Staff Finding:

These applications comply with Goal 7 because it has been demonstrated that the subject site is not located within an inventoried hazard area.

GOAL 8: RECREATIONAL NEEDS

"To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts."

Applicant's Submittal:

"Regarding recreation, State-wide Planning Goal 8 states, 'The requirements for meeting such needs, now and in the future, shall be planned for by governmental agencies having responsibility for recreation area, facilities and opportunities:

1. *In coordination with private enterprise,*
2. *In appropriate proportions; and*
3. *In such quantity, quality and locations as is consistent with the availability of the resources to meet such requirements.'*

Pursuant to Goal 8 requirements, the City of Springfield and other local jurisdictions have developed the following relevant plan documents:

- *Eugene-Springfield Metropolitan Area General Plan (Metro Plan), Revised 2004*
- *Rivers to Ridges, Metropolitan Regional Parks and Open Space Study, 2003*
- *Lane County Parks Master Plan, 1980*
- *Willamalane 20-year Park and Recreation Comprehensive Plan, 2004*

The proposed Metro Plan Land Use Diagram amendment will not change the status of any recreation area, facility or opportunity that has been inventoried and designated by the Metro Plan or any other relevant facility plans regarding recreational needs. None of the various studies, inventories, and facilities plans have designated the subject site for parks and open space in an adopted inventory, declared it a significant resource, or slated this privately owned property for acquisition.

The Willamalane Park and Recreation District, responsible for parks and recreation planning in the City of Springfield, has developed the Willamalane 20-year Parks and Recreation Comprehensive Plan. The City of Springfield has adopted this plan as a refinement of the Metro Plan. The plan proposes a 5.5 acre community park on two undeveloped parcels north of the subject site, between Briggs Middle School and the EWEB utility easement (bike path), and owned by the Willamalane Parks and Recreation District. The Willamalane comprehensive plan refers to these parcels as 'the Pierce property,' donated in 1993 and elsewhere identified with adjacent parcels as the 'Yolanda/Briggs/Pierce School Park.' The plan observes that "there are opportunities to work with the School District and EWEB on future improvements to the Pierce property as a neighborhood park and a wayside for the EWEB Bike Path' (pg A-46-7).

The Willamalane 20-year Parks and Recreation Comprehensive Plan, 'Table 1: Neighborhood Parks' lists action items for neighborhood parks. Action 1.4 suggests, 'Investigate expansion of the park onto the vacant land to the south,' the subject site. However, such investigations, if they have been pursued, have led to no further defined action or policy. Action 1.5 suggests, 'pursue opportunities to improve the EWEB bicycle path and develop park facilities on adjacent land to help meet neighborhood park needs…). The Preliminary Plan Illustration for the subject site includes several pedestrian and bicycle connections to the EWEB path and the proposed parks to the north. The subject site itself will include extensive public open spaces. As a commenting agency, the Willamalane Parks and Recreation District will have, through the Preliminary Plan Illustration and site plan review processes, the opportunity to coordinate plans with future development.

Rivers to Ridges, Metropolitan Regional Parks and Open Space Study does not identify the subject site as a resource. The study maps the EWEB bicycle path that borders the northern boundary of the subject site as an element of the area's 'Major Public Parks and Open Space.' However, this bicycle path is outside the boundaries of the subject site.

No part of the subject site is designated by the Metro Plan as Parks and Open Space. The Willamalane 20-year Park and Recreation Comprehensive Plan does not identify the subject site as an 'existing park and recreation resource'. No acknowledged plan declares it a significant resource or slates this privately owned property for acquisition. Therefore, the proposed PAPA is consistent with State-wide Planning Goal 8.

Staff's Response:

Staff generally concurs with the applicant's submittal. Willamalane Parks and Recreation District is the local agency responsible for park planning within Springfield's city limits and Urban Growth Boundary. Willamalane's Comprehensive Plan (WCP) was adopted by the City as the acknowledged Goal 8 comprehensive planning element on November 14, 2004. There are no existing or proposed parks within the boundary of the subject site. However, as the applicant has stated above, the WCP shows a future neighborhood park, north of the EWEB bicycle path.

Chapter 4 of the WCO contains strategies and actions for parks and open space.

A3. under Parks and Open Space states: ***"Work with the City to encourage the private provision of quality parks, urban plazas, trails, linear parks, rooftop open space, and other amenities in private developments, where consistent with the goals and standards of this Plan."*** (P. 23)

On the Preliminary Plan Illustration, the applicant shows a proposed private park that will serve the residents of this development. Off-street pedestrian walkways are also shown along the proposed water feature that will cross the subject site from east to west.

The applicant states: "*None of the various studies, inventories, and facilities plans have designated the subject site for parks and open space in an adopted inventory, declared it a significant resource, or slated this privately owned property for acquisition."* [and] "*No acknowledged plan declares it a significant resource or slates this privately owned property for acquisition."*

The applicant also states: *"The plan proposes a 5.5 acre community park on two undeveloped parcels north of the subject site, between Briggs Middle School and the EWEB utility easement (bike path), and owned by the Willamalane Parks and Recreation District. The Willamalane comprehensive plan refers to these parcels as 'the Pierce property,' donated in 1993 and elsewhere identified with adjacent parcels as the 'Yolanda/Briggs/Pierce School Park.' The plan observes that "there are opportunities to work with the School District and EWEB on future improvements to the Pierce property as a neighborhood park and a wayside for the EWEB Bike Path"*

Staff would like to clarify the applicant's statements above by citing the following sections of the WCP.

A20. under Neighborhood Parks states: ***"Develop partnerships with public agencies, developers, and property owners to help meet neighborhood park needs in served, as well as unserved areas."*** (P.29)

Table 1: Neighborhood Parks lists:

"Project 1.3 Yolanda/Briggs/Pierce School Park – Work with SD 19 to develop and develop a school/park master plan for the Pierce property and adjacent Briggs and Yolanda school grounds that provides for coordinated development and optimizes outdoor recreational facilities." (P.40)

"Project 1.4 Pierce property Expansion – Investigate expansion of the park onto the vacant land to the south." (P.40)

During the approval process for these applications, staff is requesting that the applicant begin a dialogue by discussing the proposed development with representatives from Willamalane and whether there can be coordination to achieve park development north of the subject property in conjunction with Marcola Meadows development.

In addition, when Marcola Meadows residential and Willamalane park development occurs, residents will need to cross the EWEB facility to utilize the park/recreation facilities. The EWEB right-of-way is approximately 60 feet-wide and the existing bike/pedestrian path, within that right-of-way is approximately 10 feet-wide. The Preliminary Plan Illustration shows pedestrian connections from the subject site to the bike/pedestrian path. As part of the Master Plan and other required land use applications, the applicant will be required to obtain the necessary easements from EWEB to allow residents of the proposed development to cross their facility.

These applications can be conditioned to fully comply with Goal 8.

Staff Finding:

As conditioned, these applications comply with Goal 8 because in addition to private on-site open space, there are nearby park facilities that can serve future residential development.

Condition of Approval #5:

Submittal of a Master Plan application that addresses the relationship of the proposed development to Willamalane's future park on the north side of the EWEB Bike Path and an explanation of any coordination efforts with Willamalane concerning the timing and development of the future park.

Condition of Approval #6

Submittal of a Master Plan application that addresses coordination with EWEB to determine if any easements are required in order to cross the EWEB Bike Path to access the future park.

GOAL 9: ECONOMIC DEVELOPMENT

"To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens."

Note: These applications were submitted to the City on September 29, 2006. The applicant is using existing, adopted land inventories and supplemental land use information to make the case for Goal 9 and related Goals (10) and (12).

Applicant's Submittal

"Response:
Statewide Planning Goal 9 – Economy of the State, requires communities to inventory, plan, and zone enough commercial and industrial land to support the diversification and improvement of the economy. Pursuant to this, the City of Springfield has adopted the following documents:

Eugene-Springfield Metropolitan Area General Plan (Metro Plan), Revised 2004
Springfield Commercial Lands Study, February 2000
Metropolitan Industrial Lands Special Study:
Metropolitan Industrial Lands Inventory Report, July 1993
Metropolitan Industrial Lands Policy Report, July 1993

Also relevant to this discussion are studies regarding other statewide planning goals. These other documents include:

Springfield Natural Resource Study Report, October 2005
Eugene-Springfield Residential Lands Study, 1999

The Metropolitan Industrial Lands Special Study (MILSS) commenced in 1989 and produced two documents, the Metropolitan Industrial Lands Inventory Report (MILIR) and the Metropolitan Industrial Lands Policy Report (MILPR). In 1995, the Springfield Commercial Lands Study (SCLS) was initiated. The City of Springfield adopted the study in 2000 and the Oregon Department of Land Conservation and Development (DLCD) acknowledged the SCLS as a periodic review task. The study looked only at lands within Springfield's urban growth boundary and did not make changes to either the Metro Plan or the Springfield Development Code. However, as an area specific periodic review task, it updates the "Economic Element" of the Metro Plan and includes findings, policies and implementation strategies regarding the supply of commercial lands.

Because the proposed amendment would shift land from Industrial to Commercial and Residential, the two additional documents listed above are relevant. Findings of the Eugene-Springfield Residential Lands Study were incorporated into the Metro Plan along with other periodic review amendments in the 2004 Update. The Springfield Natural Resource Study Report (SNRS) updated inventories of Residential, Commercial, and Industrial lands, and was acknowledged by the DLCD in December 2006.

Oregon Administrative Rule (OAR) 660-009-000 et seq. (Division 9) establishes the applicability of Goal 9 rules to Post Acknowledgement Plan Amendments (PAPA), and specifies certain procedures and requirements for local governments to follow in the adoption or amendment of all plan or land use regulations pertaining to Goal 9. In OAR-660-009-0010(4) the rule discusses procedures relevant to this application and states:

'Notwithstanding paragraph(2),[660-009-0010(2)], a jurisdiction which changes its plan designations of lands in excess of two acres to or from commercial or industrial use, pursuant to OAR 660-Division 18 (a post acknowledgement plan amendment), must address all applicable planning requirements; and:

(a) Demonstrate that the proposed amendment is consistent with the parts of its acknowledged comprehensive plan which address the requirements of this division; or
(b) Amend its comprehensive plan to explain the proposed amendment, pursuant to OAR 660-009-0015 through 660-009-0025; or
(c) Adopt a combination of the above, consistent with the requirements of this division.'

The plan designation changes anticipated by the proposed PAPA will remove 56.0 acres of Campus Industrial designation. In its stead, the supply of land with Commercial designation will increase 37.0 acres and the remaining 19.0 acres will receive a Medium Density Residential designation. Additionally, 26.0 acres of the Commercial land will also have a Nodal Development Area overlay designation. [See Attachment 2]. *The following facts will demonstrate that the proposed amendment is consistent with the most recent economic opportunities analysis and with the sections of the acknowledged Metro Plan which address the requirements of Division 9.*

The Metropolitan Industrial Lands Inventory Report (MILPR) estimated that the industrial land supply at the beginning of the planning period (study year) was about 3,600 acres within the Metro UGB. The Campus Industrial[2] share of all vacant unconstrained industrial land was 27% (derived from Table 5 of the MILIR, p. 47). About 709 acres of the Metropolitan study year industrial land supply was within the Springfield portion of the UGB (MILPR, Table 5, p. 47). The MILPR does not estimate demand within the Springfield UGB alone, nor does it segregate the estimated demand for Campus Industrial land in the Metro area. The subject site was included in the list of short-term sites for new industry (MILPR, p. 20 and p. 45, Subregion 7, Site 5). The study further estimated that the projected 20-year demand for industrial land for the Metro UGB would be between 650 and 1,172 acres, one-fifth to one-third of the supply (MILPR, p. 7). In response to this study, the Metro Plan was amended deleting a finding that the supply was not adequate to meet the projected growth in the commercial and light manufacturing segments of the economy (MILPR, p. 11).

The MILPR reported that in the study year there were 255 acres of the Campus Industrial land in the Springfield UGB. Unfortunately, there are no estimates of the depletion of Campus Industrial land in the adopted and acknowledged studies. If we apply the same 23% and 42% low and high depletion rates seen in the overall Industrial supply, we derive a range of 148 to 196 acres of CI land in Springfield at the end of the planning period.

The 2004 Metro Plan update estimated the supply of Medium Density Residential land in the study year to be 828 acres, and projected the consumption of 589 acres during the planning period, leaving a plan year (2015) inventory of 239 acres. The Springfield Commercial Lands Study (SCLS) updated plan year estimates of Springfield's Commercial land inventory (within the UGB). It projected a significant deficit of buildable land by 2015 if the historic rate of consumption continued.

The inventories of all three general categories of land were studied by the Springfield Natural Resource Study Report to gauge the impact of setting aside Goal 5 lands within the Springfield UGB. The 2005 study modified earlier inventory estimates by including plan amendments approved since the original studies and considering the maximum possible impact of Goal 5 protection measures. These modified estimates are the basis of Tables 2, 9, 10, 11, and 12. The exception is the inventory of Medium Density Residential land which was not reported separately by the SNRS. These tables analyze the impact of the proposed PAPA on the adopted and acknowledged inventories of lands. The estimates most specific to the situation are used.

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[2] The *MILSS* uses the term "Special Light" which has since been changed to "Campus Industrial." In this report we will use the later term "Campus Industrial".

Table 2: Proposed Impact on Projected Plan Year Land Inventories

General Use	UBG	Plan Yr	Acres Inventory	PAPA Δ	Total	Δ%	Source
Med. Density Res.	Metro	2015	239	19	258	8%	*Metro Plan*
Commercial	Springfield	2015	-172	37	-135	22%	*SNRS*
Industrial (high est.)	Metro	2010	2,122	-56	2,066	-3%	*SNRS*
Industrial (low est.)	Metro	2010	1,600	-56	1,544	-4%	*SNRS*

All three categories of land are important. Equilibrium between them is mutually beneficial and essential to the overall economic and social health of the community. The table above shows that the proposed PAPA has a relatively insignificant affect on the supply of Industrial land. The proportion of gain for MDR land is twice the loss of industrial land, and the projected deficit of Commercial land is reduced 22%.

Deciding to reduce the supply of CI land is not an easy choice, a matter of robbing Peter to pay Paul. Nonetheless, if we posit that providing land for the industrial sector is essential to our economy, we must also acknowledge that manufacturers considering new sites will consider only areas that provide the commercial support they require. They also look closely at housing costs for their employees and managers. There is synergy between Residential, Industrial and Commercial land uses and a balance should be maintained. Policies in the Metro Plan, weighed carefully, support the proposed PAPA.
COMPREHENSIVE PLAN POLICIES
The Metro Plan has the following policies directly relevant to the proposed PAPA:

Economic Element Policy #B.6
'Increase the amount of undeveloped land zoned for light industrial and commercial uses correlating the effective supply in terms of suitability and availability with the projections of demand.'

Economic Element Policy #B.12
'Discourage future Metro Plan amendments that would change development-ready industrial lands (sites defined as short-term in the metropolitan Industrial Lands Special Study, 1991) to non-industrial designations.'

Clearly, these two policies often will be in conflict. With a limited supply of urbanizable land, increasing the amount of undeveloped commercial land will frequently be at the expense of the inventory of industrial land. The Metro Plan addresses the issue of conflict between policies:

'The respective jurisdictions recognize that there are apparent conflicts and inconsistencies between and among some goals and policies. When making decisions based on the Metro Plan, not all of the goals and policies can be met to the same degree in every instance. Use of the Metro Plan requires a balancing of its various components on a case-by-case basis, as well as a selection of those goals, objectives, and policies most pertinent to the issue at hand.'

The Springfield Commercial Lands Study, the most recent economic opportunities analysis regarding land supply, contains the following key policies:

'Policy 1-A: Maintain a mixed supply of large and small commercial sites through strategies such as rezoning or annexation to serve Springfield's future population.'

'Policy 1-B: Ensure that an adequate amount of commercial land is designated in the undeveloped identified nodes such as Jasper/Natron and McKenzie/Gateway, to accommodate a portion of the demand for commercial acreage, and to implement the policies and objectives of the TransPlan.'

'Policy 1-C: Maintain at least a five-year supply of commercial land within the Urban Growth Boundary (UGB) that is currently served or readily serviceable with a range of urban public facilities and services.'

'Policy 3-A: Redesignate and rezone portions of industrial land or residential land within identified Employment Center, Neighborhood Center, or Commercial Center nodes to Mixed-Use Commercial to achieve the objectives of TransPlan, Transportation Planning Rule 12, and to incorporate higher intensity development in conjunction with residential and employment opportunities.'

CONVERSION TO COMMERCIAL DESIGNATIONS
A projection of a Commercial land inventory deficit within the planning period is unacceptable under the rules of Statewide Planning Goal 9. The necessity of replenishing the inventory is not debatable. Nonetheless, the issue of trading Industrial land, in this case Campus Industrial, for Commercial land needs to be examined carefully. Because meeting all land use policies perfectly and completely is impossible, their priority must be considered. Metro Plan Economic Element "Policy #B.6" is imperative and provides clearer guidance than "Policy #B.12," which merely discourages. The policies of the Springfield Commercial Lands Study, particularly "Policy 3-A," clearly trump "Policy #B.12" when considering the proposed PAPA. The proposed PAPA places the Nodal Development Area overlay designation on most of the site, addressing "Policy 1-B," and "Policy 3-A."

The Land Conservation and Development Commission (LCDC) recently reported to the Governor on the conversion of industrial land to non industrial land. The report was concerned with maintaining an adequate local supply of industrial land and preventing conversions of prime industrial land to non-industrial uses. Their report was titled "Promoting Prosperity: Protecting Prime Industrial Land for Job Growth." It made the following observation:

'The issue of conversion of industrial lands is linked directly to the goal of providing an adequate supply of industrial and other employment land for a variety of economic activities. Untimely or undesirable conversion of industrial lands, particularly conversion of strategic sites with unique market features, can interfere with accomplishing the goal of providing adequate land development opportunities for economic growth and job creation.' *(p.11)*

'The GMELS' *[Greater Metropolitan Employment Lands Study]* ***Phase 1 findings reinforce the committee's assertion that traditional industrial areas, including those featuring heavy manufacturing, warehouse/distribution, industrial service and waste management activities should be protected from encroachment by incompatible non-industrial uses by placing these areas in so-called industrial sanctuaries.'*** *(p. 19)*

However, the report also observed,

'To better understand the concept of 'employment lands,' the committee examined the Phase I findings of the Greater Metropolitan Employment Lands Study (GMELS). The study is based on an assessment of the need for a broad category of employment lands within the greater Portland metropolitan region. Committee members concurred with a major finding of GMELS that the line between industrial and non-industrial use is becoming increasingly blurred in the new economy because many traded-sector and industrial activities are now carried out in office and tech-flex settings. The latter type of industrial uses is perfectly compatible with other employment activities and, thus, can be accommodated in mixed-use zoning districts that include retail, office, institutional and/or light industrial and even residential uses.' *(p. 18)*

'New and emerging industrial uses: These are high-tech, biotech, some manufacturing and research and development and are often located in office and tech-flex settings. They are most productive when adjacent to similar companies and their non-industrial suppliers, lenders and support systems. Suitable locations for these activities include many mixed-use zones, as long as their scale, design and operational characteristics are compatible with surrounding uses.' *(p. 20)*

Although the conversion of CI land to other designations may seem to have a negative effect on the potential for economic development, the net effect is very positive when considering the benefits of

adding to the extremely scarce supply of commercial land. As the DLCD report to the Governor points out, high-tech research and development firms are most productive when non-industrial suppliers and supporting services are available to them. Additionally, Commercial land is suitable for many high-wage, economic export employers. New and growing sectors of the economy blur the line between commercial and industrial land use.

SITE SPECIFIC ISSUES

The Campus Industrial portion of the site has been reserved as development ready land since 1995. It was designated as Special Light Industrial (the precursor of Campus Industrial) for years before that. Despite the dwindling supply of CI land, not one industrial development has been proposed for it. The reasons it has not yet been developed are complex. However, the site is not ideal with regard to the qualities that the CI designation is intended to foster and preserve. To attract the desired industries, the zone imposes performance standards to reduce conflicts with adjacent zoning districts and negative impacts between sites within the CI district itself. From the Metro Plan, ***'The activities of such firms are enclosed within attractive exteriors and have minimal environmental impacts, such as noise, pollution, and vibration, on other users and on surrounding areas.'***

However, the site and surrounding areas are already subject to some of these impacts, which may partially explain why the site has not yet been developed with CI uses. The City's pre-application report ***lists 'air pollutants from surrounding heavy industrial uses, overhead electrical lines and nearby rail lines which cause problems for certain types of high technological industries. Several high tech firms had considered the Pierce Property for a potential location, and all found it unsuitable because of these problems.'***

Lane Metro Partnership confirms this information. The agency provides economic development and business information for Eugene, Springfield and Lane County, and maintains a computerized inventory of vacant industrial land and buildings. They report that while numerous inquires about the subject site are received from businesses considering it as a location for new facilities, there are common objections. These include the site being too close to established residential areas for industrial uses, and too close to the Kingsford charcoal plant for high-end office or research facilities. Operating Permit 204402, issued by the Lane Regional Air Pollution Authority, allows the Kingsford plant to emit up to 1,075 tons of particulate and gaseous pollutants per year.

COMPETING SITES

Long after the subject site was zoned for industrial use, the McKenzie-Gateway Corporate Park became available. It has drawn light-industrial and high-tech uses while the subject site has remained fallow. Companies building or acquiring facilities there have included Sony, Symantec, and Shorewood Packaging. However, the Gateway Park has undergone significant pressure from the pent-up demand for Commercial property. Most of the Sony facility has been converted to office use. Symantec focuses on a customer service call center rather than research and development. In 2004, the City revised CI regulations to further limit types of commercial uses and limit their coverage to 40% of gross acreage. Gateway gross acreage in commercial use is now nearly 30%. While the market place has clearly indicated the superiority of Gateway over the subject site as a location for Campus Industrial development, the shortage of Commercial land threatens the remaining buildable land at the more desirable location. Though conversion of the subject site would reduce the inventory of CI land, it would take some of the commercial development pressure off Gateway. This would help reserve Gateway for industrial development, thus sacrificing a marginal resource to foster more productive use of a superior one.

COMPARING WAGES

How might the conversion of the subject site's CI land to Commercial affect the ability of Springfield to attract jobs that provide a family wage? We begin by asking what a family wage is in Springfield. Although there is no precise definition of "family wage," the term came into use during the Industrial Revolution when work was separated from home to a degree not seen before. The concern was that the breadwinner earn enough to allow the spouse to stay home tending the house and children. It became a somewhat controversial term, some commentators assigning sexist overtones to it. Data in the following

tables create a statistical context for the discussion. If "family wage" can be defined as the gross income needed to cover typical expenses of the average family, the tables below estimate these figures in Springfield and Oregon.

Table 3: Springfield, Oregon Average Household and Family Size

	Number of Individuals
Average Household	2.55
Average Family	3.03

Source: U.S. Census Bureau, Census 2000 Summary File 3

Table 4: Springfield, Oregon Typical 2004 Family Expenses

Source	Two Adults, One Child	Two Adults, Two Children
Poverty in America[1]	$34,905	$43,862
E. P. I.[2]	$36,408	$41,748

1: Poverty in America Project, Penn State University
2: Economic Policy Institute
Figures are for typical expenses. Figures for One Adult and Two Children are within approximately one percent of Two Parent, One child expenses.

The table below gives U. S. Census data regarding the median incomes of individuals and households. Note that the family household income is significantly higher than the highest individual median income. Data about the proportion of two-income households or the average wage of principle breadwinners is not available. Heads of family households may be making significantly more than the average or many households may have two incomes. Some combination of the two is likely. Regardless, it indicates caution should be used when making assumptions about family wages.

Table 5: Springfield and Oregon Median Incomes

	Oregon	Springfield, Oregon
Family Households	$55,196	$43,539
Non-family households	$29,209	$23,734
All Households	$46,393	$37,452
Male full-time, year-round workers	$41,485	$35,118
Female full-time, year-round workers	$30,591	$25,524

Source: U.S. Census Bureau, Census 2000 Summary File 3, adjusted to 2004 Consumer Price Index

To assess impact of the PAPA on family wage jobs, we can estimate the average wage of employment in the relevant land use designations. The table below uses information from the Lane County Council of Governments and the Oregon Labor Market Information Service to correlate the estimated number of people employed by each industry sector within a plan designation, and the Lane County average pay within each sector, to derive an estimated average pay for employment in a land use designation.

Table 6: Plan Designation Average Wage

Industry	**Commercial** Employment		**Comm. Mixed Use** Employment		Average Pay
Construction	676	2%	107	4%	$37,751.00
Manufacturing	779	2%	99	4%	$38,057.21
Trans., Comm., and Utilities	767	2%	128	5%	$35,090.20
Wholesale Trade	585	2%	68	3%	$40,622.86
Retail Trade	8,890	25%	332	13%	$19,309.19
Finance, Insurance and Real Estate	2,455	7%	342	13%	$34,737.05
Services	20,348	57%	1,252	48%	$27,340.14
Government	1,218	3%	279	11%	$37,239.00
Total	35,718	100%	2,607	100%	
Weighted Average Pay	**$25,732.13**		**$30,905.80**		

Source of wage data: OLMIS Lane County 2000 industry sector average adjusted for 2004 Consumer Price Index except the figure for Government which is from 2004.
Source of industry sector employment by plan designation: LCOG - 2004.

To better understand the impact of the PAPA on conditions in Springfield, the next table provides an overview of the types of businesses and the approximate number of employees currently located in the Gateway area (the only other CI zone in Springfield with significant development. Most of the businesses listed in the table would be allowed within the proposed PAPA redesignations.

Table 7: Types of Businesses and Approximate Employees for Gateway Development

Gateway Businesses	Address	Type	Approximate Number of Employees
Royal Caribbean Cruise Lines	1000 Royal Caribbean Way (3900 Sports Way)	Travel sales call center	250-500
Symantec	555 International Way	Computer Support Call Center, Comp. Tech	1200
PacificSource Health Plans	110 International Way	Health Insurance Headquarters	275
Oregon Medical Laboratories/ Oregon Veterinary Laboratory	123 International Way	Medical Laboratories	300
Sacred Heart Medical Center Foundation	123 International Way	Financial services	260
Sacred Heart Medical Center Materials Management		Materials (Supply handlers)	30
Shorewood Packaging Inc	500 International Way	Manufacture: paperboard packaging products	60
Global Industries	950 International Way	Wholesale distribution: automotive parts and accessories	10 – 19
Grand Slam USA	921 International Way	Indoor recreation: Batting cages, basketball, etc.	1 – 4
McKenzie Athletics	909 International Way	Uniforms: screen printing and embroidery	10 – 19
Pacific Office Automation	911 International Way	Copier sales and copying services	20 – 49
Rex Myers Transfer	915 International Way	Moving and storage	5 – 9
FedEx	700 International Way	Couriers and messengers	20 – 49
Learning Tree	100 International Way	Child Day Care	N/A
Planned Businesses [A]			
Professional Credit Service		Collection Agency	177
McKenzie Leasing and Finance		Heavy equipment leasing	13

Source: Information gathered from Dex, Lane Metro Partnership, and GLMIS info and links.
A: Professional Credit Service and McKenzie Leasing and Finance purchased 7 acres in Gateway and will move headquarters there. Source: The Register Guard – Tuesday, November 14, 2006.

Table 8 below shows the estimated wages for employment typical of the businesses in the above table. Comparing this data with Table 6 indicates that the average pay for employment in the designations proposed by the PAPA are similar to the average pay in Springfield's developed CI designated lands.

Table 8: Employment and Wage Estimates for Springfield CI Businesses: 50 or more employees

	Employment		
Occupation	**Number**	**Percent**	**Average Pay**
Bill and account collectors	177	6.40%	$30,060.00
Billing and Posting Clerks	535	19.30%	$26,956.00
Computer Support Specialist	1,200	43.30%	$34,874.00
Medical and Clinical Laboratory Technicians	300	10.80%	$27,083.00
Miscellaneous Manufacturing	60	2.20%	$32,292.00
Travel Customer Service Representative	500	18.00%	$22,880.00
Total employees	2,772	100%	-
Weighted Average Pay	**-**	**-**	**$29,975.94**

Source: Wage data for Lane County 2004 from OLMIS website except Travel Customer Service Rep starting pay published in Portland Business Journal - November 18, 2004.
Source: Employment data from Lane Metro Partner ship and from infoUSA website.

COMPREHENSIVE PLAN RESIDENTIAL POLICIES
Residential Land Use and Housing Element
Residential Density #A.10
'Promote higher residential density inside the UGB that utilizes existing infrastructure, improves the efficiency of public services and facilities, and conserves rural resource lands outside the UGB.'

Residential Land Use and Housing Element
Residential Density #A.11
'Generally locate higher density residential development near employment or commercial services, in proximity to major transportation systems or within transportation-efficient nodes.'

Residential Land Use and Housing Element
Residential Density #A.12
'Coordinate higher density residential development with the provision of adequate infrastructure and services, open space, and other urban amenities'.

These residential policies make clear the importance of higher density residential development to the future of the Eugene-Springfield Metropolitan area. Yet here again, there is an apparent conflict between policies, namely Policy 3-A of the SCL and the residential policies of the Metro Plan just cited. As the following analysis will show, splitting the converted Industrial land between Residential and Commercial in the proportion proposed is entirely appropriate.

While the inventory of Springfield Commercial land will be entirely depleted by the end of the planning period and the priority of creating more is obvious, Metro Area surpluses are projected for both Industrial and Residential. The case for reapportioning these inventories must be made. To illustrate the need for an adjustment of the inventories, the following table looks at the relative rates of inventory depletion over the planning periods studied.

Table 9: Projected Depletions of Land Inventories During the Planning Period.

General Use	Acres Study Yr.	Δ	Plan Yr.	Δ%	Source
Med. Density Res.	828	-589	239	-71%	*Metro Plan*
All Res. (low est.)	5,830	-4,565	1,265	-78%	*SNRS*
All Res. (high est.)	5,830	-5,637	193	-97%	*SNRS*
Industrial (low est.)	3,604	-1,482	2,122	-41%	*SNRS*
Industrial (high est.)	3,604	-2,004	1,600	-56%	*SNRS*

The table above shows that, over the planning period, the inventory of Medium Density Residential land is being depleted at a far faster rate than Industrial land. (Note that the Metro Plan did not subtract reductions of Goal 5 inventories the SNRS subtracted from the broader inventories.) Sacrificing a small portion of Industrial land to replenish the more rapidly diminishing inventories is justifiable and prudent.
To illustrate the point further, the following table compares the final plan year inventories of Industrial and Residential land. The two planning periods end five years apart, so the inventories are not simultaneous. However, the comparison is still instructive. Commercial land was left out of the table because the Springfield plan year inventory is negative. All combinations of high and low estimates are calculated.

Table 10: Combined Plan Year Inventory Estimates

Total acreage		Residential (low)	Residential (high)
		193	1265
Industrial (low est.)	1600	1,793	2,865
Industrial (high est.)	2122	2,315	3,387

Table 11: Relative Proportions of Total Plan Year Land Inventory

	Res L/Ind H	Res L/Ind L	Res H/Ind H	Res H/Ind L
Residential	8.34%	10.80%	37.40%	44.20%
Industrial	91.70%	89.20%	62.70%	55.90%

BALANCING INVENTORIES
To evaluate the wisdom of shifting lands from one general use to another, we must establish a viable ratio between them. The projected inventories of Industrial and Residential land can be analyzed by finding a ratio of jobs to households, and then relating the number of dwellings supported by the Residential inventory with the jobs supported by the Industrial Inventory. According to the U. S. Census Bureau's 2000 Census, the median earnings of employed individuals in the Eugene-Springfield Metropolitan Area are approximately $30,000. From the same source, the average household income is approximately $45,000. This gives us a rule of thumb ratio of 1.5 jobs per household. The Metro Plan target density is 6 dwelling units per gross acre. Therefore, the corresponding numbers of jobs needed to support the high and low estimates of plan year Residential inventory are 11,385 and 1737.
The Department of Land Conservation and Development, in their publication "Industrial and Other Employment Lands Analysis Guidebook" recommends using ratios from 6.4 to 9.6 when estimating jobs per gross acre of Industrial land. Using the Industrial land inventory high and low estimates, the table below compares the resulting numbers of jobs with the Residential inventory.

Table 12: Jobs Supported by Projected Plan Year Land Inventories

	Acres	du/ac	job/du	job/acre	jobs
Residential (low est.)	193	6	1.5		1737
Industrial (low est.)	1600			6.4 to 9.6	10,240 to 15,360
Residential (high est.)	1265	6	1.5		11385
Industrial (high est.)	2122			6.4 to 9.6	13,380 to 20,371

In the slowest growth projection, the inventories are not in equilibrium. If consumption of land supplies is on the high side, and inventories are low, there is a gross disparity. We should also remember that when inventories get extremely low, such as less than 200 acres of buildable land in a metropolitan area of this size, the supply curve shifts up as people begin to hoard and price gouge in anticipation of greater shortages. Clearly, for the health of the Metro economy, these inventories should be adjusted. New employers will not locate in the area if there is no housing for themselves or their employees. Shifting land from Industrial designations to Residential designations is justified.

Conclusion:
Adopted and acknowledged inventories indicate that well before the year 2015, Springfield's inventory of Commercial land will be severely, if not completely, depleted. Metro Plan Policy #B.6 directs the City to correlate the effective supply of economic lands in terms of suitability and availability with the projections of demand. While the inventory of CI land may be small, OAR - Division 9 (Economy) does not prohibit converting industrial land to another category of employment land, or to another Goal inventory, as long as a local government maintains an adequate supply. OAR 660-009-0025(2) states, "The total acreage of land designated in each site category shall ***at least*** *equal the projected land needs for each category during the 20-year planning period." [Emphasis added.] In this situation, the need for Commercial Land will not be met by the end of the planning period, and the inventory of Residential land lags far behind Industrial, yet the acknowledged inventories indicate a Campus Industrial inventory surplus. An adjustment is warranted to maintain equilibrium and support other Metro Plan policies encouraging increased residential densities and supporting Nodal Development areas.*

There is a synergistic relationship between the three general categories of land use that requires balance between them in order to sustain economic diversity. The proposed redesignation of Campus Industrial land to Commercial, Commercial Mixed-Use, and Medium Density Residential development will support the diversification and improvement of the economy. It is consistent with the priorities established by adopted and acknowledged policies. Therefore, the amendment is consistent with statewide planning Goal 9."

3) Staff Response

Staff concurs with the applicant's submittal. However, the DLCD memo dated March 12, 2007 stated that both quantitative and qualitative data should be considered in the Goal 9 response.

Quantitative Data.

Note: The Lane County Industrial-Commercial Buildable Lands Study (CIBL). The applicant referenced CIBL in the February 28, 2007 version of the response to Goal 9. This revised response dated March 17, 2007 no longer references CIBL. However, the DLCD memo dated March 12, 2007 (see Attachment 6) raised a concern about using data that was not adopted by the local jurisdictions and/or fully reviewed by DLCD. Staff agreed and is adding the following CIBL background that was included in staff's presentation to the City Council in November 2006:

"State law requires each city's comprehensive plan to include an inventory of industrial and other employment land suitable, available and necessary for economic development opportunities for a 20 year period. The Metro Plan satisfied this inventory at acknowledgment in 1982 and the cited studies were adopted as specified above, but the lack of a contemporary database of conditions and status led the Metro area elected officials and Lane Metro Partnership to co-sponsor an evaluation of the metro area supply. The report included a newly developed database of current conditions and offered an array of data sets that are useful for government and the private sector in considering appropriate development sites for a particular use. That being said, it is important to note that ECONorthwest's report is not the complete inventory required by law, nor is it a policy document. The requirements for commercial and industrial buildable lands inventories include the supply, a demand analysis (not included in this report) and provisions to match projected demand with an adequate supply. While this report made no assertions or assumptions that the supply included in this database is adequate, the report did identify additional work necessary to get to

that point and includes a list of policy options for additional consideration, including an endorsement of the complete buildable lands inventory as specified in Oregon Administrative Rules."

In November 2006, staff stated that while there may be additional options or variations on these options, staff agreed with the suggestion by ECONorthwest that creating a complete inventory is the most logical next step to take. The current status of the CIBL report is that staff has prepared an "Issue Paper" for the City Council's consideration. As of the date of this report, the fate of the Issue Paper is unknown. Any acreage reference by the applicant to the CIBL study should be not considered as part of these applications.

The primary data sources used by the applicant are the Springfield Commercial Lands Study, February 2000 and the Metropolitan Industrial Lands Special Study: Metropolitan Industrial Lands Inventory Report, July 1993 and the Metropolitan Industrial Lands Policy Report, July 1993. These are the same reports used during the review process for Home Depot in 2001. The applicant has provided additional information pertaining to the Natural Resource Study, adopted by the City in 2005 and a discussion on the conversion of CI lands to residential. In addition to these discussions, staff raises the following issues:

a) The up-to-date land inventory in the Gateway CI District.

Since the amendment of Article 21, Campus Industrial District, staff has been keeping track of the available vacant Campus Industrial land in the Gateway CI District. The Gateway CI District has about 275 total acres and as of March 13, there are still 116 acres that are vacant.

b) Current Market Forces.

Explanation language under State-wide Planning Goal 9 states: ***"Comprehensive plans and policies shall contribute to a stable and healthy economy in all regions of the state. Such plans shall be based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability and cost; labor market factors; educational and technical training programs; availability of key public facilities; necessary support facilities; current market forces; location relative to markets; availability of renewable and non-renewable resources; availability of land; and pollution control requirements."***

The "current market forces" do not include light industrial development in the CI District is a trend since the late '90's. This trend is placing pressure on the Gateway CI District and is the reason why staff amended SDC Article 21 to create the 60/40 split (see the discussed under "qualitative" below).

c) The Jasper-Natron Area.

The applicant cites the draft Jasper Natron Specific Development Plan which proposes to add about 20 acres of Commercial and 118 acres of CI land to Springfield's long-term supply by the year 2015. While this plan has not been adopted, the Lane County Commissioners recently voted to keep the Eugene-Springfield Highway extension project alive and the City will begin the adoption process for this plan within the year.

Qualitative Data.

a) Background Discussion on Special Light/Campus Industrial Designations/Zoning.

The original intent of the "Special Light Industrial" (SLI) land use designation and zoning was to allow "high tech" industrial users that paid "family wages" and had a minimum "employee-per-acre" base. The history of this land use designation goes back at least 35 years to the metro area's first "general plan", "The 1990 Plan", adopted in 1972. That Plan stated: ***"Local planning policies should be developed which will create an appropriate environment for industrial and research parks"*** (Ref. P. 32).

In 1982, when DLCD acknowledged the Metro Plan, both the Metro Plan designation and the zoning district were called SLI. The Metro Plan SLI designation stated: ***"This is a specialized concept developed to deal with relatively large (projected employment of at least 500 per firm) light industrial firms, such as manufacturers of semi-conductors, medical and dental supplies, photographic equipment, computers and other electronic equipment, and large-scale research and development complexes. The activities involved are generally characterized by highly skilled and technical labor and are located indoors. Often, precision is of such importance that air pollutants, noise and vibration associated with heavy industry are not compatible. These industries are often located in campus-type industrial parks and are generally involved in the manufacture or assembly of final products of small unit size or research-type development in an office-based atmosphere… There are generally no effluents or other emissions to create problems…. Heavy transport is not important…. Supporting office-based commercial development shall be considered an appropriate use when planned to complement the primary intent of special light industrial development."***

In 1994, the Metro Plan SLI designation was changed to today's Campus Industrial (CI). The current Metro Plan CI designation states: ***"The primary objective of this designation is to provide opportunities for diversification of the local economy through siting of light industrial firms in a campus-like setting. The activities of such firms are enclosed within attractive exteriors and have minimal environmental impacts, such as noise, pollution and vibration, on other users and surrounding areas. Large-scale light industrial uses, including regional distribution centers and research and development complexes, are the primary focus of this designation. Provision is also made for small- and medium-scale industrial uses within the context of industrial business parks which will maintain the campus-like setting with minimal environmental impacts. Complementary uses such as corporate office headquarters and supporting commercial establishments serving primary uses may also be sited on a limited basis. Conceptual development planning, industrial park standards and site review processes shall be applied to ensure adequate circulation, compatibility of uses and availability of large sites for light industrial firms…."*** (Ref. P. II-G-6). The primary difference between the SLI and CI land use designations is there no longer is a reference to a specific employment threshold or specific types of light industrial uses.

The Springfield Development Code was adopted in May 1986 and included Article 21, Special Light Industrial District. In 1994, this Article was amended and renamed the CI District, consistent with the Metro Plan designation change cited above. The CI District is primarily an industrial zone that allows the siting of light industrial manufacturing and to a lesser extent, office/commercial uses. In 2004, the City Council approved a number of amendments to Article 21, the Campus Industrial District. One of these amendments placed a 40 percent limitation on the siting of permitted office/commercial (business park) uses to keep the "industrial" integrity of the district against the demand for business park uses because this zoning district is primarily an industrial district. The limitation was established because in the Gateway CI District, there has been a great demand to site office/ commercial uses. Currently, the 30 percent threshold has been reached in the Gateway CI District and staff has recently discussed this issue with the Planning Commission. For the record, the applicant's Table 7 shows the current development trends in the Gateway CI: business parks with no light industrial development since Shorewood Packaging, Inc. in 1997. Shorewood Packaging is the only industrial use shown on the applicant's Table 7.

The current SDC Article 21 CI District purpose statement conforms with the current Metro Plan designation statement: ***"The CI District is intended to fully implement the Metro Plan Campus Industrial Designation and any applicable refinement plans. The CI District provides opportunities for diversification of the local economy by offering prime sites in a campus environment for large-scale light manufacturing firms emphasizing modern technology and employing skilled workers in family wage jobs. The term "campus" includes innovative building design, enhanced landscapes, large open spaces and substantial pedestrian amenities. Small- and medium scale light manufacturing may and supporting commercial/ office uses shall be located within a business park, provided that combined business parks do not exceed 40 percent of the gross acreage of a CI District. Business parks may include several buildings with multiple stories and a mix of uses.***

Supporting retail uses such as banks, restaurants and day care facilities shall primarily serve the employees in the CI District, not the general public. All uses in the CI District shall meet siting and operational performance standards to minimize impacts within the CI District and surrounding areas. Permitted uses, including the storage of materials and vehicles necessary for the operation of the use, shall occur entirely within enclosed buildings."

Today, there are two CI land use designations and zoning districts in Springfield: Gateway, in northwest Springfield; and the subject site west of 31st Street and north of Marcola Road. The Gateway CI site is regulated by the Gateway Refinement Plan, adopted by the City Council in 1992. A portion of the Gateway CI area has been developed with both light industrial manufacturing uses and business parks. The Gateway CI District has approximately 275 total acres, of which approximately 116 are vacant. The 56 acre "Pierce" CI site is not within an adopted refinement plan area and has not been developed to date.

b) Suitability of the Subject Site for CI Development.

Under "Suitability", the applicant cited staff's concerns about the subject site's appropriateness for CI development. Staff would like to expand on this point. In a memo dated October 14, 1981 the Metropolitan Planning Team discussed the proposed amendments to the adopted August 1980 Metropolitan Plan diagram. Item 28 stated: ***"Reconsider land use designations on the 'Pierce Property'. The Industrial Study Task Force Final Report, L-COG, April 1981, recommended about 50 acres of this property be designated 'special light industrial' (SLI). The Task Force concluded the North Gateway SLI site could not have sanitary sewers extended in the near future. The 'Pierce Property' has city services and would provide Springfield with an immediately available site. This SLI Site provides opportunities for combining industrial, commercial and medium density residential uses in a balanced scheme." The memo went on to state: "Problems associated with the site include air pollutants from surrounding heavy industrial uses and overhead electrical lines and nearby rail lines which cause problems for certain types of high technological industries. Several 'high tech' firms have considered the 'Pierce Property' for a potential location, and all have found it unsuitable because of these problems. Another problem with the site is opposition to industrial use from neighborhood residents."*** However, in the end, approximately 60 acres of land was designated and zoned SLI/CI). There have been a number of land use applications attempting to receive development approval on the subject site over the years, but not one has been for Special Light Industrial (the previous name of the CI designation/zone) or CI development.

c) Implementation of Potential Nodal Development Area 7C.

This issue, which will allow for a mix of residential and commercial development is discussed in more detail in the Goal 12 response under this criterion and in the response to criterion 7.030(3)(b).

4) Staff Conclusion:

Under Quantitative Data:

This staff report demonstrates that there is a shortage of suitable commercial sites within the Springfield UGB to meet the long-term demand for commercial land, as indicated by the SCLS.

This shortfall can result in greater competition, and can impede the potential for healthy economic development, as businesses and retail are forced to locate outside Springfield due to a lack of suitable sites. The deficit of commercial lands does not conform to State-wide Planning Goal 9 which requires jurisdictions to maintain an adequate supply of commercially zoned lands to meet projected demand for commercial land through the planning period. The SCLS also notes that size and location further limit the supply of buildable land. Goal 9 requires not only enough net buildable acres but also sites of varied "***sizes, types, locations and service levels."*** In order to foster economic growth and commercial development is it essential that the City maintain a diverse supply of buildable commercial land in various

sizes and locations. The CAC found in the SCLS that there is a need for a supply of both larger and smaller sites to provide choice, diversity and economy in the marketplace. Given the current shortage of larger sites, rezoning or annexation may be necessary for this to occur. The proposal would improve the supply of vacant commercial land through rezoning consistent with the CAC's recommendation.

This staff report demonstrates that there is still a surplus of industrial lands, including CI lands in the Gateway area.

Staff agrees with the applicant's contention that there is a demonstrated shortage of developable commercial land and a surplus of industrial land and that these applications are consistent with applicable Metro Plan policies and current commercial and industrial land inventories.

Given these facts and the requirement that the City maintain an adequate supply of commercial land as well as industrial land; the situational changes cited in a)-c), above; and if the two questions raised at the beginning of this staff report can be answered in the affirmative – will the City be better served by the proposed development and will the City be assured that the quality development as proposed will be constructed over time, then both the Planning Commission and the City Council should consider that the applicant has complied with Goal 9.

This staff report demonstrates there will be a shortage of Medium Density Residential lands near the end of the life of the Eugene-Springfield Residential Lands Study.

Under Quantitative Data:

There are changed conditions pertaining to the history and current land utilization in the CI District, especially in the Gateway area.

The original concerns by the Metro Plan team about the suitability of the "Pierce" property for SLI/CI development, which apparently has had some impact on why such development has not occurred over time on a "shovel ready" industrial site.

The fact that the subject site is still under single ownership and upon approval of these applications, a Master Plan will be required to guide development on the subject property over time. This mix of commercial and residential development will also implement Proposed Nodal Development Area 7C.

Finally, the CI District contains design standards that are intended to achieve a "campus-like" environment. The applicant proposes to remove the CI designation and zoning, replacing it with the following zoning districts: Community Commercial, Mixed Use Commercial and Medium Density Residential. The Mixed Use Commercial and the Medium Density Residential zoning districts have design standards. The Community Commercial District does not. The proposed home improvement center will be sited in the Staff is concerned about the aesthetic appearance of the proposed home improvement center. Staff has seen photos of an existing home improvement center in Scottsdale, Arizona. The front of the building is broken up so that one gets away from the image of one continuous, long, tilt-up wall. Staff wants the same or similar design for Springfield. A condition of approval is added to assure that this issue shall be addressed at the Master Plan review/approval process.

5) Staff Finding:

As conditioned, these applications comply with Goal 9 primarily because given the lack of an up-to-date commercial/industrial lands study, there is a demonstrated shortage of developable commercial land and a surplus of industrial land and that these applications are consistent with applicable Metro Plan policies and there is a demonstrated lack of demand for the types of industrial uses once envisioned for the Campus Industrial District.

Condition of Approval #7

Submittal of a Master Plan application that shows the proposed home improvement center building design similar to the existing building in Scottsdale, Arizona or a building design that complies with the current building design standards in SDC Article 21.

GOAL 10: HOUSING

"To provide for the housing needs of citizens of the state."

Applicant's Submittal:

"Goal 10 requires buildable lands for residential use to be inventoried and requires plans to encourage the availability of adequate numbers of needed housing units at price ranges and rent levels commensurate with the financial capabilities of Oregon households. Oregon Administrative Rule 660 Division 8 defines standards for compliance with Goal 10. OAR 660-008-0010 requires that:

'Sufficient buildable land shall be designated on the comprehensive plan map to satisfy housing needs by type and density range as determined in the housing needs projection. The local buildable lands inventory must document the amount of buildable land in each residential plan designation.'

Approval of the applicant's proposed PAPA changing approximately 19 acres from Campus Industrial to Medium Density Residential on the Metro Plan diagram and zoning map, requires compliance with statewide planning Goal 10, Housing (OAR 660, Division 8). (The total acreage of Medium Density Residential land is proposed to increase from 35.7 to 54.7 acres). The Post Acknowledgement Plan Amendment (PAPA) is consistent with the parts of the Metro Plan which address the requirements of Goal 10.

The Eugene-Springfield Residential Lands Study (RLS) was completed in 1999 as a technical document informing policy changes to the Metro Plan as part of the area's periodic review requirements. The RLS was acknowledged by the state Land Conservation and Development Commission as being consistent with Goal 10. The purpose of the RLS was to compare residential land needs with available land supply. The analysis does not require buildout of particular densities or numbers of units on specific sites or within the metro area as a whole.

The RLS contains a detailed site inventory in the Technical Analysis, which is summarized below (Table 13) as it pertains to the subject site.

Table 13: Residential Land Study Site Inventory: Marcola Meadows Property

Site (Subarea 18)	Total Acres	Unbuildable Acres	Constrained	Buildable Acres
2	37.1	0.4	0.0	36.7

Source: Residential Lands and Housing Study Draft Inventory Document, 1999 page 64.

Of the subject site's total buildable residential gross acreage that was included in the inventory, all 37.1 acres is designated for Medium Density Residential development. The RLS assumes that 32% of residential lands will be developed with non-residential uses, including public and civic uses, roads, etc. Subtracting this 32% leaves 25.2 net acres that one can reasonably assume was considered available for development in the RLS.

Density Assumptions
The RLS does not specify an assumed average density in the MDR designation. Rather, it outlines the range of allowable densities (14.28 to 28.56 units per net acre) which coincide with the gross density range described in the Metro Plan (10 through 20 units per gross acre). It also describes the assumed

distribution of housing types within each residential designation (page 21) and the assumed density by housing type (page 22).

The RLS also contains data summarizing actual built densities in the metro area. However, only limited data was available, and built densities were assumed based upon data from years 1986, 1992, and 1994. Using these three years, the data show built densities between 21 and 23 units per net acre for multi-family development (RLS Technical Analysis, p.21). No longer-term trend analysis is available.

These figures reflect built density for multi-family projects only, not all development built in the MDR designation. Since single family houses and duplexes are allowed in MDR, the average density across the designation is likely significantly lower. While average density figures have not been calculated for MDR areas due to the difficulty of obtaining the data, single family development occurred at roughly 4 units per acre and duplex development at 10 units per acre during the same years (RLS Technical Analysis, Page 21).

Surplus of Residential Land
There is documented a net surplus of residential land to serve metro housing needs through 2015, for all residential land categories combined, and medium density residential land in particular. The comparison of residential land supply and demand is shown in Table 14 below:

Table 14: Comparison of Residential Land Supply and Demand, In Acres

	Medium Density Residential	All Residential
Supply	828	5,802
Demand	589	4,564
Surplus	239	1,238

Source: RLS Technical Analysis, 1999, page 52.

The supply figures also do not include mixed use and commercial designations that can accommodate residential development. In addition to calculating supply and demand in acres, the RLS considered the supply and demand for housing units. This comparison also shows a net surplus across all residentially designated land, and within the MDR designation in particular, as shown in Table 15 below:

Table 15: Comparison of Residential Land Supply and Demand, In Units

	Medium Density Residential	All Residential
Supply	13,078	48,519
Demand	9,432	40,406
Surplus	3,646	7,913

Source: RLS Technical Analysis, 1999, page 53.

If the assumed surplus of medium density units (3,646) is divided by the assumed number of surplus medium density acres (239), the derived density for MDR land is 15.25 units per net acre. This is not, however, an adopted density assumption.

The RLS does not specify how to determine expected density or number of units on a particular site. One source of expectation is the McKenzie Gateway MDR site Conceptual Development Plan, which accommodates a total of 1,195 units across 185 acres, at an average density of 11 units per acre, in its preferred alternative (Scenario E). Alternatively, one can estimate the amount of expected development on the site by extrapolating assumptions contained within the Residential Lands Study itself.
In fact, the applicant's proposal retains a surplus in the residential housing inventory, while increasing the intensity of residential development. This strategy supports nodal development and fulfills the requirements of Goal 10 by accommodating a quantity of units that can be reasonably defended given the adopted findings, analysis, and policies contained in the RLS.

Densities will in fact be increased over what would otherwise likely be built. The Residential Lands Study concluded that through the planning horizon (2015), the area would have a surplus of land in all types of

residential land use categories. The study was adopted and incorporated into the Metro Plan in 1999, and was acknowledged by LCDC as meeting the area's Goal 10 requirements. Specifically, the RLS concluded that there was a surplus of 239 acres and 3,646 units in the MDR category (Metro Plan, pages III-A-3 and II-A-4).

In addition, the applicant's proposal is supported by applicable Metro Plan housing policies, including those in the residential land supply and demand, residential density, and design and mixed use areas, as outlined in the ***Metro Plan Specific Elements*** *section.*

OAR - Division 8 does not prohibit creating additional residential land after a local government has established an adequate supply. Therefore, for the purposes of Division 8, it is not necessary to establish a maximum acreage or to justify the designation of residential land in excess of projected land needs. The Residential Lands and Housing Study estimates of the long term projected land needs, and the determination that there is an adequate inventory, served to demonstrate that the minimum needs had been met. They did not establish a maximum and did not freeze the residential land supply.

If the proposed PAPA sought an exception from a State-wide planning goal, there would be a greater burden of justification for the expansion of residential lands. The exacting standards for taking a Goal 2, Part II exception would apply; the evidence would have to establish that "Areas which do not require a new exception cannot reasonably accommodate the use." However, pursuant to OAR 660-004-0010(2), such an exception is not required in this case. Determining the extent of the Goal 10 land supply is merely a matter of policy for the local jurisdiction.

In summary, our analysis finds that the applicant's plan amendment proposal meets the requirements of State-wide planning Goal 10, supports applicable adopted policies, and furthers the objectives of nodal development."

Staff's Response:

Staff concurs with the applicant's submittal. The Metro Plan diagram amendment application proposes to change the subject site from Campus Industrial to Medium Density/Nodal Development Area and amend the Springfield Zoning Map from Campus Industrial to Medium Density Residential. Goal 10 requires that local jurisdiction adopt a housing study that contains an inventory of buildable lands; and that the ***"…housing elements of a comprehensive plan should, at a minimum, include: (1) a comparison of the distribution of the existing population by income with the distribution of available housing units by cost; (2) a determination of vacancy rates, both overall and at varying rent ranges and cost levels; (3) a determination of expected housing demand at varying rent ranges and cost levels; (4) allowance for a variety of densities and types of residences in each community; and (5) an inventory of sound housing in urban areas including units capable of being rehabilitated."*** The Eugene-Springfield Metropolitan Residential Lands and Housing Study, Policy Recommendations Report (1999) contains this information and the Metro Plan was amended accordingly. Staff concurs with the applicant's submittal, above.

Staff will address the following issues:

Adequate Supply of Buildable Land. ***"Provide an adequate supply of buildable residential land within the UGB for the 20-year planning period at the time of Periodic Review."*** Ref. "Key Policies", Page 3 of the Report. The twenty-year period ends in 2015. The applicant shows a surplus of MDR land in the inventory that covers the life of the study. This is further supported by Finding 4. ***"There is sufficient buildable residential land within the UGB to meet the future housing needs of the projected population. In fact, the 1992 residential buildable land supply exceeds the 1992-2015 residential demand in all residential categories. Assuming land is consumed evenly over the period, by 1999, there will be at least a 20-year supply of residential land remaining inside the UGB."*** Ref. "Residential Land Supply and Demand", Page 13 of the Report. The applicant also states that **"*OAR - Division 8 does not prohibit creating additional residential land after a local government has established an adequate supply.*"** The applicant proposes to change approximately 18 acres from

Campus Industrial to Medium Density Residential. The discussion justifying the reduction of CI land is contained in the response to Goal 9.

Note: The City has recently initiated a Residential Lands Study. However, until that study has been adopted by the City, the current study showing a surplus a MDR residential buildable land is still in effect.

Develop Land within the UGB First**. "…*Promote higher residential density inside the UGB that utilizes existing infrastructure, improves the efficiency of public services and facilities, and conserve rural resource lands outside the UGB*…."** Ref. "Key Policies", Page 3 of the Report. Currently, the existing 37 plus acres of MDR zoned and designated land is one of the largest multiple-family sites in the City. The property is centrally located and can be served by existing public facilities.

Utilizing Landscaping and Architectural Design Standards. **"…*Reduce impacts of higher density residential and mixed use development on surrounding uses by considering site, landscape and architectural design standards or guidelines in local zoning and development regulations*…."** Ref. "Key Policies", Page 4 of the Report. A major component of the proposed development is the "water feature" incorporating the existing drainage ditch which is intended to be relocated. This will form a "natural" boundary between the proposed MDR and commercial development, the majority of which will be mixed use. The proposed residential development will consist of single family cluster subdivision, town houses and apartments as well as elderly housing. The SDC contains specific design standards for these uses. The SDC also contains specific design standards for MUC. Finally due to the loss of CI land, land proposed to be zoned CC will be conditioned to meet CI and/or MUE design standards as part of this application.

Density.

The applicant states: "…*This strategy supports nodal development and fulfills the requirements of Goal 10 by accommodating a quantity of units that can be reasonably defended given the adopted findings, analysis, and policies contained in the RLS*…." The residential density issue is addressed in more detail under the response to Goal 12. However, the applicant is proposing to apply the Nodal Development Area Metro Plan diagram designation to properties zoned MDR and MUC in order to implement "Proposed" Nodal Development Area 7C. Transportation policies require a minimum residential density of 12 dwelling units per net acre (the number of dwelling units per acre of land in residential use, excluding dedicated streets, parks, sidewalks, and public facilities). SDC Section 16.010(2) states the required MDR density is 10-20 dwelling units per net acre. Implementing the node will guarantee that the minimum residential density for Marcola Meadows will be at least 12 dwelling units per acre. It should be stated that the MUC zoning district allows residential development to occur, however, to date, the applicant has not stated if residential development will occur in the MUC. If the applicant chooses this option in the future, the same 12 dwelling unit per acre standard must be met. For the record, housing is not allocated to mixed use designated land due to State Administrative Rules.

Finally, the City has residential building permit information that demonstrates that multi-family developments are currently occurring at 11.67 dwelling units per acre which is close to the 12 dwelling unit per acre requirement for implementation of Nodal Development Area designations.

Housing Density and Housing Mix

Springfield Housing Types and Density Based on Building Permit Data-- July 1999-October 2006												
Housing Type	**1999**	**2000**	**2001**	**2002**	**2003**	**2004**	**2005**	**2006**	**Total Dwelling Units**	**Housing Type by %**	**Total Acres**	**Dwelling Units Per Acre**
Conventional Single Family	30	209	121	252	230	155	144	116	**1257**	52.4%	227.6	
Manufactured Home	9	38	46	45	31	26	31	27	253	10.5%	56.2	
Total Single Family									**1510**	**62.9%**	**283.8**	**5.32**
Duplex*	22	30	16	14	18	38	38	17	**193**	**8.0%**	**30.9**	**6.25**
Tri-Plex	0	3	6	0	6	6	6	3	**30**	1.2%	1.2	25
Four-Plex	0	4	0	4	84	12	140	56	**300**	12.5%	31.9	9.41
Apartment 5+	0	40	6	200	0	122	0	0	**368**	15.3%	16.3	15.12
Total Multi-Family Units Excluding Duplexes									**698**	**29.1%**	**49.3**	**11.67**
Total Units	61	324	195	515	369	359	359	219	**2401**	**100.0%**	**364.1**	**6.60**

*Duplexes may be built in both various residential zoning districts. About 57% of all duplexes are found in LDR zoning districts. Some 36% are found in MDR zones and 5% in Public Land and Open Space districts (Lane County Housing Authority).

See also the applicant's response to Goal 9 under Comprehensive Plan Residential Policies.

Staff Finding:

These applications comply with Goal 10 because they address the "Eugene-Springfield Metropolitan Residential Lands and Housing Study, Policy Recommendations Report (1999)" which was adopted by DLCD and incorporated into the Housing Element of the Metro Plan by all three local jurisdictions in 1999. These applications will specifically add to the supply of buildable MDR inventory and by implementing the Nodal Development Area Metro Plan designation in TransPlan Potential Nodal Area 7C and requiring Master Plan approval prior to development will guarantee that residential development will occur at 12 dwelling units per net acre.

Condition of Approval #8

Submittal of a Master Plan application that demonstrates that residential development will occur at 12 dwelling units per net acre.

GOAL 11: PUBLIC FACILITIES AND SERVICES OAR 660-015-0000(11)

"To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development."

Applicant's Submittal:

*"**Goal 11 – Public Facilities and Services:** To plan and develop a timely, orderly and efficient arrangement of public facilities and services as a framework for urban and rural development.*

OAR 660-011-0005(7)(a)-(g) Definition of Public Facilities:
(a) Water
(b) Sanitary Sewer
(c) Storm sewer
(d) Transportation

Pursuant of State-wide planning goal 11, the City of Springfield has adopted or endorsed the following documents:

- *Eugene-Springfield Metropolitan Area General Plan, revised 2004*
- *City of Springfield Zoning Map, May 2006*
- *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan, 2001*
- *City of Springfield Stormwater Management Plan, Review Draft January, 2004*
- *City of Springfield Stormwater Management Plan, Major Basins/Sub Basins Map, Review Draft, January, 2004*
- *City of Springfield Conceptual Road Network Map, Updated July, 2005*
- *City of Springfield Drinking Water Protection Plan, adopted May, 1999*

Response:
The Eugene-Springfield Metropolitan Area General Plan Diagram and the City of Springfield Zoning Map shows that the subject site is inside of the City of Springfield Urban Growth Boundary. State-wide Planning Goal 11 ensures that public facilities and services are provided in a timely, orderly, and efficient manner. This application proposes to amend the Eugene-Springfield Metropolitan Area General Plan Diagram and will not affect provision and arrangement of public facilities and services. The following findings demonstrate that the existing public facilities and services have the capacity to serve future development on the subject site and will be provided in a timely, orderly, and efficient manner. Subsequent planning actions limited to the subject site (i.e. Master Plan and Site Plan applications) in due time will address the arrangement of public facilities and services on the subject site. See Exhibits 8 and 9 for more information.

Potable Water Service
The subject site will be served by connecting to existing Springfield Utility Board (SUB) water lines adjacent to the site. There are six potential water lines adjacent to the subject site to have the capacity to serve future development. There are two 12" PVC water lines along 28th street have the capacity to serve development in the southwest portion of the subject site. There is an 18" water line in the Right-of-Way of 31st street that has the capacity to serve future development. Currently, there are two 10" water lines that can serve future development on the west portion of the subject site. One of these water lines in located approximately 100' north of the center line of Bonnie Lane and the other is approximately 120' south of the center line of Bonnie Lane. Additionally, there is a 16" water line on the south side of Marcola Road approximately 1075 ft. west of the intersection of Marcola Road and 28th street that has the ability to serve development in the southern portion of the subject site. The water lines in Marcola Road and 31st Street contain sufficient capacity to serve the site. Therefore, this key urban service will be provided in an orderly and efficient manner.

Sanitary Sewer
The City of Springfield provides sanitary sewer service for lands within the City of Springfield city limits. The subject site is within the City of Springfield city limits and can be served by connecting to existing sanitary sewer lines adjacent to the property. The subject site is located in the North Springfield waste water basin and currently has adequate capacity. A 42" concrete main line for the City of Springfield traverses the lower third of the subject site that flows east to west and collects all sanitary sewer water for the subject site with some fill required in the north. The northeast corner of the project will be served by an existing sewer in 31st Street. Currently, this main line has the capacity to facilitate the proposed development's sanitary sewer needs.

There are three sewer lines that connect to the main trunk line on the subject site; an 8" PVC line connects to the main trunk line from the south, approximately 250' west of the intersection of 28th street and Pierce Parkway; an 8" PVC line running north and south along 31st street connects to the main trunk line from the north in the public Right-of-Way for 31st street; an 10" concrete line running north and south connects to the main trunk line from the north, approximately 240' west of the northwest boundary of the subject site. Therefore, this key urban service will be provided in an orderly and efficient manner.

Transportation
The project area is currently served by Marcola Road, 28th, and 31st streets. Marcola Road, the southern border of the subject site, is fully improved and is designated as a Minor Arterial. 28th and 31st streets border the eastern boundary of the subject site. The City of Springfield's Conceptual Road Network Map identifies 28th and 31st streets as the "31st Street Connector". The 28th street portion of the 31st Street Connector is fully improved and classified as a Collector street. Thirty-First Street is not fully improved and also is classified as a Collector street. Currently, 31st street is a two-lane asphalt paved road that does not have gutters, curbs, or sidewalks, although there is a City of Springfield 10' utility and sidewalk easement on the west side of 31st street to facilitate road improvements in the future.

In this section of this statement addressing State-wide Planning Goal 12 – "Transportation" there are additional findings regarding public facilities and services, and those discussions are hereby referenced and incorporated.

Storm Water Control
The subject site is located in #18 Sub-Basin of the West Springfield/"Q" Street Major Basin. Storm water facilities will be designed as a component of subsequent land use approvals to meet City of Springfield storm water policies and regulations. Preliminary storm water plans will keep the development's storm water runoff rates equal to pre-development peak storm water runoff rates. This will be achieved through multiple on-site detention ponds, bio-swales, and open-channels. See Exhibits 8 and 9 for more information.

Conclusion:
The subject site is inside of the Eugene-Springfield Metropolitan Urban Growth Boundary and City of Springfield city limits. This enables public facilities and services to be extended to the site in a timely, orderly, and efficient manner. The subject site has existing public facilities and services adjacent to the site which also have the capacity to serve future development. Therefore, this amendment is in compliance with Goal 11."

Staff's Response:

Staff concurs with the applicant's submittal. Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection.

The Eugene-Springfield Metropolitan Public Services and Facilities Plan (PFSP), ad revised in December 2001, is a refinement plan of the Metro Plan that guides the provision of public infrastructure, including water, sewer, storm water management, and electricity. The PFSP specifically evaluated the impact of nodal development and increased development densities on the potential node sites being considered in the Springfield area.

The PFSP is supportive of mixed-use and nodal development. Findings in the PFSP conclude that most potential nodal development sites can be provided with key urban service using existing infrastructure capacity (Finding #10, PFSP, page 11). Based on this conclusion, Policy #G7 in the PFSP states, ***"Service providers shall coordinate the provision of facilities and services to areas targeted by the cities for higher densities, infill, mixed uses, and nodal development"*** (PFSP, pg. 12). These applications do not preclude the coordination of services in nodal areas.

All urban services needed for existing uses and new development are available to the subject site and other vacant properties in this area, including fire and police protection, parks, sanitary and storm sewer, public transportation, schools, street systems and utilities. The property is served by Springfield Utility Board for water and electricity; by Willamalane Park and Recreation District; by School District 19; and by the City of Springfield for maintenance of sewers, streets, alleys, library and development and permit services.

Staff Finding:

These applications comply with Goal 11 because there are urban level public services available to the subject site.

GOAL 12: TRANSPORTATION
"To provide and encourage a safe, convenient and economic transportation system."

Applicant's Submittal:

"Goal 12 is implemented through Division 12, OAR 660-012-0000 et. seq. The goal and division are implemented at the local level by the Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan) acknowledged for compliance with Goal 12 in 2001.

Plan amendments and land use regulation amendments are regulated under OAR 660-012-0060, the 'Transportation Planning Rule.' If an amendment significantly affects a transportation facility, a local government must provide a form of mitigation. OAR 660-012-0060(1) states:

'A plan or land use regulation amendment significantly affects a transportation facility if it would:

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) As measured at the end of the planning period identified in the adopted transportation system plan:

(A) Allow land uses or levels of development that would result in types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Reduce the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP or comprehensive plan; or

(C) Worsen the performance of an existing or planned transportation facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the TSP or comprehensive plan.'

OAR 660-012-0060(1):

With regard to OAR 660-012-0060(1)(a) and (b), the proposed Post Acknowledgement Plan Amendment (PAPA) would not change the functional classification of any transportation facility, nor would it change the standards for implementing a functional classification system.

With regard to OAR 660-012-0060(1)(c)(A), the PAPA would not allow types or levels of uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility. The policies of the City of Springfield Development Code and the TransPlan establish the requested plan designation as appropriate to the classification of the streets serving the site. Specific requirements for access to those streets will be determined through the Master Plan and Site Plan reviews and approved only upon demonstration of compliance with the provisions of the acknowledged comprehensive plan and implementing regulations.

With regard to OAR 660-012-0060(1)(c)(B) and (C), a Traffic Impact Analysis (TIA) evaluating the performance of existing and planned facilities as a result of the development proposed by this application has been performed. That TIA … is submitted concurrently with this written statement and the findings of that analysis are hereby incorporated by reference.

TIA Scoping:
When determining the effect of a proposed PAPA, the TPR requires local governments to evaluate impacts to planned facilities as well as those already existing. According to OAR 660-012-0660(4)(b)(C), transportation facilities, improvements or services included in a metropolitan planning organization's federally-approved, financially constrained regional transportation system plan must be included in the analysis. The Metropolitan Planning Committee adopted the Central Lane Metropolitan Planning Organization Regional Transportation Plan on December 9, 2004. The MPO-RTP established a planning horizon of 2025. This is the planning horizon used by the TIA. The following projects (Tables 16, 17 and 18) are within the study area of the TIA and are listed in MPO-RTP 'Table 1a - Financially Constrained Capital Investment Actions: Roadway Projects:'

Table 16: Project Category: Arterial Capacity Improvements

Name	Geographic Limits	Description	Jurisdiction	Estimated Cost	Length	Number
42nd Street	@ Marcola Road	Traffic control improvements	Springfield	$248,000	0	712
42nd Street at Highway 126	42nd St/Hwy 126	Traffic control improvements	Springfield	$200,000	0	799
Eugene-Springfield Highway (SR-126)	@ Mohawk Boulevard Interchange	Add lanes on ramps	ODOT	$310,000	0.68	821

Table 17: Project Category: New Collectors

Name	Geographic Limits	Description	Jurisdiction	Estimated Cost	Length	Number
V Street	31st Street to Marcola	New 2 to 3-lane collector	Springfield	$2,173,000	0.65	777

Table 18: Project Category: Urban Standards

Name	Geographic Limits	Description	Jurisdiction	Estimated Cost	Length	Number
42nd Street	Marcola Road to Railroad Tracks	Reconstruct to 3 lane urban facility	Springfield	$2,551,000	1.03	713
31st Street	Hayden Bridge Road to U Street	Upgrade to 2 to 3-lane urban facility	Springfield	$1,300,000	0.85	765

Because the ultimate purpose of the proposed PAPA is to gain approval of a master planned development, transportation modeling of post-development trip generation is based on the street network depicted in the Preliminary Plan Illustration. In addition to calculating the maximum impact of future

development restricted only by the regulations of the proposed plan designation, the TIA employed an alternative worst-case scenario based on stipulated development restrictions. The level of development possible under the restrictions is far greater than what is proposed by the Preliminary Plan Illustration, but still results in fewer vehicle trips than the unrestricted worst-case. The TIA compared the impacts of future development under the existing plan designations, under the proposed plan designations without restrictions, and under the restricted proposed plan designations. The integrity of the post-development transportation modeling assumptions can be assured by the conditional approval of the proposed PAPA and maintained by subsequent site plan review and development constraints.

Traffic Impact:
OAR 660-012-0060(1)(c)(B): Though some facilities within the scope of the study are projected to operate below the performance standard in the plan year, none will do so as a result of the proposed PAPA. Those facilities projected to operate below the performance standard in the plan year will do so regardless of the proposal under review. Therefore, no facilities are significantly affected under this definition.

OAR 660-012-0060(1)(c)(C): Within the scope of the study, one facility that is otherwise projected to operate below the performance standard in the plan year is made worse by the proposed PAPA. Therefore, this facility is significantly affected under this definition.

- *Mohawk Blvd. @ Eugene-Springfield Hwy. eastbound ramps*

OAR 660-012-0060(3) permits local governments to approve a PAPA that significantly affects a facility without requiring that mitigations bring the facility up to the applicable performance standards. This is allowed only where the facility is currently operating below the performance standard and, despite any planned facilities as defined in Section (4) of the TPR, it is also projected to operate below the performance standard in the plan year. Taking into account the planned facilities previously discussed, the TIA demonstrates that these conditions are met for the facility listed above. OAR 660-012-0060(3) requires transportation improvements that mitigate the net impact and avoid further degradation in the development (opening) year. To address impacts at the eastbound ramps of the Mohawk Blvd. @ Eugene-Springfield Hwy. intersection the TIA proposes the following mitigation:

- *Traffic control changes allowing left-turns form the eastbound ramp center lane*

With regard to OAR 660-012-0060(1)(c)(B) and (C), the analysis has determined that measured at the end of the planning period the proposed amendment will neither reduce the performance of existing or planned transportation facilities below the minimum acceptable performance standards identified in TransPlan nor worsen the performance of transportation facilities that are otherwise projected to perform below the minimum acceptable performance standard identified in TransPlan.

Conclusion:
Pursuant to OAR 660-012-0060(1), the proposed PAPA significantly affects a transportation facility. The TIA proposes to mitigate the degradation of the facility under the conditions of OAR 660-012-0060(3). By requiring development to meet the conditions of OAR 660-012-0060(3), the City may approve the PAPA in compliance with OAR 660-012-0060. Therefore, the City of Springfield can find that the proposed PAPA is consistent with Statewide Planning Goal 12.

Staff Response:

Staff has evaluated the submitted *Marcola Meadows Zone Change Traffic Impact Analysis* (TIA) prepared by Access Engineering, dated February 20, 2007, with respect to State-wide Planning Goal 12 per OAR 660-012-0060 and the 1999 Oregon Highway Plan (OHP) as required by SDC 7.070(3)(a). Staff finds that the assumptions, methods and data used in the TIA are consistent with recognized professional traffic engineering standards and practices.

Goal 12 encourages development that avoids principal reliance on one mode of transportation. Mixed use development is intended to bring people closer to where they shop and work and create, and to support pedestrian-friendly neighborhoods where walking, bicycling and transit use are attractive transportation choices. The subject property is located in proposed TransPlan Node 7C.

The Transportation Planning Rule (TPR) (OAR 660-12-0000 – 660-12-0070), adopted in 1991, and last amended in March 2005 implements Goal 12. The intent of the Transportation Rule is to ***"…promote the development of safe, convenient and economic transportation systems that are designed to reduce reliance on the automobile…"*** The Metro Plan is Springfield's comprehensive plan acknowledged LCDC in 1982. TransPlan (the Eugene-Springfield Metro Area's adopted TSP (Transportation System Plan) is the transportation element of the Metro Plan. DLCD acknowledged the current TransPlan in 2001. The Metro Plan was also amended at that time to include the Nodal Development Area land use designation. Both documents implement Goal 12 and the Transportation Rule in the Eugene-Springfield metropolitan area.

TIA Review Discussion
As discussed in the applicant's submittal above, OAR 660-012-0060 requires a determination as to whether the proposed amendment would "significantly affect" a transportation facility.

The approach taken in the TIA compares traffic generation estimates for development of the subject site under "Current" versus "Amended" designation/zoning, assuming "reasonable worst case" development scenarios. The TIA concludes that the worst-case development scenario under the "Amended" designation/zoning would generate 50% more daily vehicle trips and 27% more PM Peak-hour trips than under the "Current" designation/zoning. The report then analyzes a development scenario that would be less intensive than the "Amended" designation/zoning worst case but substantially more intensive than the "Current" designation/zoning.

Based on analysis of the "Amended Zoning Capped" scenario, the applicant concludes that by limiting development to the level assumed in that scenario, and requiring minor mitigation in conformance with OAR 660-012-0060(3), the city can find the proposed PAPA in compliance with OAR 660-012-0060.

The three development scenarios analyzed have assumed land use and trip generation estimates as shown in the following tables.

Table 3: Gross Trips - Current Zoning

Current Zoning	Land Use (ITE Code)	Size	Unit	ADT		PM Peak Hour	
				Rate	Trips	Rate	Trips
MDR	Apartment (220)	714.0	Dwelling Units	6.22	4441	0.57	410
CC	Shopping Center (820)	130.0	1000 SF GFA	61.95	8054	5.73	744
CI	Research & Development (760)	33.6	Acres	79.61	2675	15.44	519
CI	Business Park (770)	22.4	Acres	147.91	3313	16.82	377
Total						**18,483**	**2,050**

Table 4: Gross Trips - Amended Zoning Worst Case

Amended Zoning	Land Use (ITE Code)	Size	Unit	ADT		PM Peak Hour	
				Rate	Trips	Rate	Trips
MDR	Apartment (220)	1094.0	Dwelling Units	6.15	6725	0.57	619
CC	Improvement Store (862)	171.0	1000 SF GFA	29.80	5096	2.45	419
MUC	Shopping Center (820) General Office (710)	350.0 50.0	1000 SF GFA 1000 SF GFA	43.80 15.65	15331 782	4.09 2.70	1431 135
Total						**27,935**	**2,604**

Table 4C: Gross Trips - Amended Zoning Capped

Amended Zoning	Land Use (ITE Code)	Size	Unit	ADT		PM Peak Hour	
				Rate	Trips	Rate	Trips
MDR	Single-Family Residential (210) Townhouses (230) Apartment (220)	230 100 400	Dwelling Units	9.73 6.42 6.39	2237 642 2554	0.99 0.60 0.59	227 60 238
CC	Improvement Store (862)	171.0	1000 SF GFA	29.80	5096	2.45	419
MUC	Shopping Center (820) General Office (710)	350.0 50.0	1000 SF GFA 1000 SF GFA	49.28 15.65	12320 782	4.31 2.70	1146 135
Total						**23,631**	**2,225**

The above development scenarios can be compared with the assumed land uses presented in the submitted “Preliminary Plan Illustration.”

Preliminary Plan Illustration

Amended Zoning	Land Use (ITE Code)	Size	Unit
MDR	Single-Family Residential (210) Townhouses (230) Apartment (220)	**192** **123** **174**	Dwelling Units
CC	Improvement Store (862)	171.0	1000 SF GFA
MUC	Shopping Center (820) General Office (710)	**200.0** **38.7**	1000 SF GFA 1000 SF GFA

This comparison shows that the development scenario represented by the Preliminary Plan Illustration is significantly less intense in both MDR and MUC zones than the Amended Zoning Capped scenario, and would likewise achieve Goal 12 compliance.

Issues

Limiting Development
In approving a PAPA, the City must ensure that actual transportation impacts of future development on the property will not exceed the estimated impacts on which a finding of Goal 12 compliance is based. The applicant proposes to set a limit (trip cap) on the actual number of trips that may be generated by future development on the site. This approach requires a procedure to measure and monitor site trip generation as development takes place over time. A Trip Monitoring Plan (TMP) is often used for this purpose. Under this approach conditions of approval for a PAPA would be that a trip cap be imposed on the property, and that a TMP be adopted as part of Master Plan approval to establish how adherence to the trip cap limit would be maintained over time.

A disadvantage of a TMP approach is that it focuses entirely on trip generation, and places no direct limit on the type, level or schedule of site development. If and when the site trip cap is reached no more development would be permitted without amending the limit.

In the present case, it is more desirable to acknowledge that the Amended Zoning scenario would significantly affect transportation facilities, and accomplish Goal 12 compliance through a combination of the proposed mitigation and "Altering land use designations, densities, or design requirements to reduce demand for automobile travel and meet travel needs through other modes." per OAR 660-012-0060(2)(c). Limiting designations and densities to those assumed in the Amended Zoning Capped scenario, or a less intense scenario, would be sufficient to demonstrate Goal 12 compliance.

Future Traffic Analysis Requirements
A key feature of the trip generation estimating procedure for various scenarios in the TIA is accounting for "internal trips." These are trips made between different land uses within a development site, as opposed to trips that have off-site origins or destinations. Obviously, all the on-site uses involved in this exchange of internal trips must exist for this concept to have meaning. Because the Goal 12 test is applied at point 15 or more years into the future, assuming full build out of the site presents no issue. However, in a phased development there is a question about how to address "internal trips" during intermediate years.

Except for the 19 acres proposed to be designated and zoned Community Commercial, the remaining 80 plus acres will be established as a node. The Preliminary Plan Illustration, which will be incorporated into a Master Plan for the entire site, shows a number of pedestrian/bike connections from the proposed residential portion in the north to the commercial portion in the south. One way to address the "internal trip" issue is to condition the Master Plan phasing to require a certain percentage of the residential portion of the site to be developed with a similar percentage of the commercial.

Finally, there are additional transportation related issues that will be specifically addressed in the required Master Plan, but will be conditioned as part of these applications because approval of the Master Plan requires consistency between the Metro Plan designation and the zoning. The applicant has stated that construction of the home improvement center will be Phase 1 of the proposed Marcola Meadows development. Therefore, in addition to the resolution of the internal trip issue and the trip cap discussed above, staff will require the following conditions of approval as part of the Master Plan Phase 1 development: Construction of the entire collector street from Marcola Road to V Street; and Construction of the internal streets in the MUC and CC portions of the site.

Staff Finding:

As conditioned, these applications comply with Goal 12 because the applicant's traffic impacts analysis demonstrates that the proposed PAPA would significantly affect a transportation facility, and as conditioned, degradation of the affected facility would be mitigated per OAR 660-012-0060(3).

Condition of Approval #9

Submittal of preliminary design plans with the Master Plan application addressing the proposed mitigation of impacts discussed in the TIA. The plans shall show the proposed traffic control changes allowing left-turns from the eastbound ramp center lane at the eastbound ramps of the Mohawk Boulevard/Eugene-Springfield Highway intersection. The intent of this condition is to have the applicant demonstrate to ODOT that the proposed mitigation is feasible from an engineering perspective and will be constructed on a schedule that is acceptable to ODOT. Provided that construction of the proposed mitigation is determined to be feasible, then during Master Plan review and approval a condition shall be applied requiring the mitigation to be accomplished prior to the temporary occupancy of any uses in Phase 1 of the development.

Condition of Approval #10

Submittal of a Master Plan application that incorporates a "Development Phasing Plan". The intent of this plan is to address the "internal trip" issue by requiring a certain percentage of the residential portion of the site to be developed with a similar percentage of the commercial. The specific percentages will be made part of the approved Master Plan. The intent of this condition is to also ensure that the proposed land uses in Table 4C do not exceed the individual caps for these uses.

Condition of Approval #11

Submittal of a Master Plan application that shows the entire length of the collector street from Marcola Road to V Street being constructed as part of Phase 1.

Condition of Approval #12

Submittal of a Master Plan application that shows the construction of all streets serving the CC and MUC portions of the subject site being constructed as part of Phase 1.

Condition of Approval #13

Submittal of a Master Plan application that shows proposed connectivity between the residential and commercial development areas.

Staff Finding:

As conditioned, these applications comply with Goal 12 because the applicant's traffic impacts analysis demonstrates that the proposed PAPA would significantly affect a transportation facility, and as conditioned, degradation of the affected facility would be mitigated per OAR 660-012-0060(3).

GOAL 13: ENERGY CONSERVATION

"To conserve energy." land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Applicant's Submittal:

"Response:
The purpose of this Metro Plan Diagram Amendment (PAPA) application is to re-designate land on the subject site to: 1) expand the amount of land designated for Medium Density Residential; 2) re-designate the land currently designated for Campus Industrial to Light Medium Industrial and Mixed-Use Commercial; 3) and re-designated the Community Commercial land on the subject site to Mixed-Use Commercial.

The Metro Plan is an acknowledged plan by the Oregon Department of Land Conservation and Development. Therefore, the Metro Plan is currently consistent with the provisions of State-wide Planning Goal 13. The City of Springfield adopted the Metro Plan (Ordinance No. 6087) on May 17, 2004. This application does not amend any component of the Metro Plan that is related to Goal 13 as adopted by Springfield City council on May 17, 2004. Therefore, this PAPA application is consistent with the Metro Plan and State-wide Planning Goal 13."

Staff's Response:

Staff concurs with the applicant's submittal. The Energy Goal is a general planning goal and provides little guidance for site specific comprehensive plan diagram changes. The area in which the subject site is located is identified in the TransPlan as having potential for nodal development (see the Goal 12 discussion). Development of the subject site with commercial uses has the potential to reduce automobile trips both in duration and frequency by providing commercial services in close proximity to the proposed residential areas in the north of the subject site, other existing nearby residential development and existing and future industrial development to the east. By reducing the frequency, number and duration of automobile trips the proposal will conserve energy. Nodal development of the type proposed here will also conserve energy by promoting infill development and intensification of land use within the UGB. Locating commercial uses in nodal areas rather than in a typical linear fashion will also help conserve energy. Finally, the development of the subject site will be subject to building codes intended to maximize energy efficiency.

Staff Finding:

These applications comply with Goal 13 because implementation of Nodal Development Area 7C will help conserve energy.

Goal 14: URBANIZATION

"To provide for an orderly and efficient transition from rural to urban land use."

Applicant's Submittal:

"Response:
All of the parcels affected by this application are currently within the Urban Growth Boundary and were annexed into the City of Springfield. The annexation was made in compliance with an acknowledged comprehensive plan and implementing ordinances, and established the availability of urban facilities and services. Therefore the amendment is consistent with State-wide Planning Goal 14.

Staff's Response:

Staff concurs with the applicant's submittal. Goal 14 requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs. There are three studies that address this issue:

1. The Eugene-Springfield Metropolitan Residential Lands and Housing Study, Policy Recommendations Report (1999);

2. The Springfield Commercial Lands Study (February 2000) indicated that there is a general shortage of commercial land for future development; and

3. The Metropolitan Industrial Lands Inventory Report (1992).

Goal 14 also encourages compact forms of development within Urban Growth Boundaries.

These applications apply to land within the city limits and within the City's Urban Growth Boundary. Future development approval will increase and intensify land use within the city limits. This alleviates pressure to urbanize rural lands. The subject site is also fully served by urban services and will capitalize on public expenditures made for this purpose. The proposed amendments address the studies listed above in responses to Goals 9 and 10 and the availability of public facilities and services in Goal 11.

Staff Finding:

These applications comply with Goal 14 because the City has adopted residential, commercial and industrial land inventories and the subject site is located within Springfield's Urban Growth Boundary.

GOAL 15: WILLAMETTE RIVER GREENWAY OAR 660-015-0005

"To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway."

Applicant's Submittal:

Response:
"The subject site is not within the Willamette River Greenway. Therefore, this goal is not relevant and the amendment will not affect compliance with Goal 15.."

Staff's Response:

Staff concurs with the applicant's response.

Staff's Finding:

Goal 15 is not applicable to these applications because the subject site is not located on or near the Willamette River.

Goals 16 through 19 – Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources.

Applicant's Submittal:

"Response:
There are no coastal, ocean, estuarine, or beach and dune resources related to the property or involved in the amendment. Therefore, these goals are not relevant and the amendment will not affect compliance with Goals 16 through 19."

Staff's Response:

Staff concurs with the applicant's response.

Staff's Finding:

Goals 16 – 19 do not apply in Springfield because they pertain to coastal areas.

Staff's Response and Finding:

As conditioned, these applications comply with the applicable State-wide Planning Goals as discussed above.

SDC Section 7.070(3) ***"(b) Adoption of the amendment must not make the Metro Plan internally inconsistent."***

Applicant's Submittal:

*"**Growth Management***
Metro Plan, Policy 1. ' The UGB and sequential development shall continue to be implemented as an essential means to achieve compact urban growth. The provision of all urban services shall be concentrated inside the UGB.'

Response:
The two parcels affected by this application are currently within the Springfield portion of the Metropolitan Urban Growth Boundary and have been incorporated into the City of Springfield. The annexation was made in compliance with an acknowledged comprehensive plan and implementing ordinances, and established the availability of urban facilities and services.

As such, the subject site is providing for compact urban growth and has the essential services available for development. As defined in the glossary of the Metro Plan, compact urban growth is defined as:

'The filling in of vacant and underutilized lands in the UGB, as well as redevelopment inside the UGB'.

The PAPA will allow compact urban growth to occur on lands that are currently within the UGB and underutilized for an urban area. The development of the site will provide needed commercial employment opportunities and also provide medium density residential development.

Metro Plan, Policy 24. 'To accomplish the Fundamental Principle of compact urban growth addressed in the text and on the Metro Plan Diagram, overall metropolitan-wide density of new residential construction, but necessarily each project, shall average approximately six dwelling units per gross acre over the planning period.'

Response:
The proposed development seeks to achieve a density for all residentially designated and zoned land of approximately twelve dwelling units per net acre. The future development of the site, therefore, will help the region achieve its goal of compact urban development.

Metro Plan, Objective 8. ' Encourage development of suitable vacant, underdeveloped, and redevelopable land where services are available, thus capitalizing on public expenditures already made for these services.'

Response:
The subject site is currently underdeveloped with access to readily available public facilities and services. Approval of this proposal will capitalize on the public services and expenditures already made and planned for in the immediate area. In short, the underdeveloped subject site is suitable for residential and commercial uses (specifically the proposed mixed residential and commercial area) and has access to public facilities and services.

Metro Plan Specific Elements
A. Residential Land Use and Housing Element

Response:

With the adoption of the Eugene-Springfield Metropolitan Area General Plan 2004 Update (effective February 2006) the subject site's residentially designated land was removed from the inventory of land designated for low-density residential uses and was designated for medium-density residential uses. (An application concurrent with this application proposes to "fix" the boundary of the residentially designated

land.) Therefore, the current MDR, Medium Density Residential zone is in compliance with the current Metro Plan designation.

Metro Plan, Policy A.8. 'Require development to pay the cost, as determined by the local jurisdiction, of extending public services and infrastructure. The cities shall examine ways to provide subsidies or incentives for providing infrastructure that support affordable housing and/or higher density housing.'

The applicant shall conform with City of Springfield requirements for paying the fair cost of extending public services and infrastructure. A variety of housing types are proposed as part of the Preliminary Plan Illustration including small lot single-family detached, townhomes, apartments, senior cottages and a congregate care facility.

Metro Plan, Policy A.10. ' Promote higher residential density inside the UGB that utilizes existing infrastructure, improves the efficiency of public services and facilities, and conserves rural resource lands outside the UGB.'

Metro Plan, Policy A.11. ' Generally locate higher density residential development near employment or commercial service, in proximity to major transportation systems or within transportation-efficient nodes.'

Metro Plan, Policy A.12. ''Coordinate higher density residential development with the provision of adequate infrastructure and services, open space, and other urban amenities.

Metro Plan, Policy A.13. 'Increase overall residential density in the metropolitan area by creating more opportunities for effectively designed in-fill, redevelopment, and mixed use while considering impacts of increased residential density on historic, existing and future neighborhoods.'

*The proposed Preliminary Plan Illustration development will promote higher density development by increasing the total supply of medium density designated and zoned land within the metropolitan area. The applicant is proposing to develop the residential portion of the site under the Springfield standards for nodal development, with a minimum net density of 12 units per acre. In addition, the portion that is proposed as single-family development is proposed under the standards for cluster development with notably smaller lot sizes and common open space provided. The mix of single-family small lot development and multi-family development is located near '**Potential Nodal Development Area 7C'** (TransPlan) and the applicant is proposing to develop a mix of commercial uses that shall include employment and commercial opportunities for future residents of the proposed development and existing residents of the metropolitan area. The proposed development is located at the intersection of North 28th Street and Marcola Road approximately one-quarter mile east of the Marcola Road/North 19th Street intersection with Highway 126; as such this proposed development is in close proximity to major transportation routes and is designed to be a walkable community that promotes a combination of higher densities and employment and commercial opportunities.*

The proposed Preliminary Plan Illustration development effectively integrates the higher density development with the existing neighborhoods in several ways. Most importantly the lowest density development, single-family detached lots, is located adjacent to the residential neighborhoods to the west and north. The higher density housing (apartments, cottages and congregate care) is located along the east side of the subject site, and internally north of the proposed commercial and industrial properties. The proposed development will minimize the disturbance to existing development while achieving the city's and regions need for higher density, mixed-use development.

Metro Plan, Policy A.17. 'Provide opportunities for a full range of choice in housing type, density, size, cost, and location.'

The applicant's proposed Preliminary Plan Illustration includes a variety of housing types including small-lot single-family development, townhomes, apartments, senior cottages and congregate care. The density of development is proposed within the desired ranges for medium density residential and includes more than 20% of common open space for use by the residents of the development. The location of the housing is central to the proposed nodal development area 7C (TransPlan) and shall provide a variety of employment and commercial opportunities for the existing residents of the area and future residents of the development.

Metro Plan, Policy A.20. 'Encourage home ownership of all housing types, particularly for low-income households.'

The applicant's proposed development will include a variety of home ownership options on small single-family lots and townhome lots. The size of the lots and the options for home ownership will increase the supply of affordable ownership housing in the region.

Metro Plan, Policy A.22. 'Expand opportunities for a mix of uses in newly developing areas and existing neighborhoods through local zoning and development regulations.'

The proposed Preliminary Plan Illustration increases the mix of uses by providing residential, commercial (main street, neighborhood retail, professional office) and industrial opportunities, while also infilling in an area of more typical suburban development. The increased commercial and employment opportunities will benefit the existing residents and future residents of the development site.

B. Economic Element

Response:

A detailed analysis of Economic Element policies is contained in the applicant's response State-wide Planning Goal 9 – "Economic Development." Those responses are hereby incorporated by reference.

F. Transportation Element

Response:

The project area is currently served by Marcola Road, 28th, and 31st streets. Marcola Road, the southern border of the subject site, is fully improved and is designated as a Minor Arterial. 28th and 31st streets border the eastern boundary of the subject site. The City of Springfield's Conceptual Road Network Map identifies 28th and 31st streets as the "31st Street Connector." The 28th street portion of the 31st Street Connector is fully improved and classified as a Collector street. Thirty-First Street is not fully improved and is classified as a Collector street. Currently, 31st street is a two-lane asphalt paved road that does not have gutters, curbs, or sidewalks. There is a City of Springfield 10' utility and sidewalk easement on the west side of 31st street to facilitate road improvements in the future.

Additional information in this statement's response to State-wide Planning Goal 12 – "Transportation" is hereby referenced and incorporated.

Metro Plan, Policy F.1: 'Apply the nodal development strategy in areas selected by each jurisdiction that have identified potential for this type of transportation-efficient land use pattern.'

Response:

The subject site is identified in TransPlan as "Potential Nodal Development Area" 7C. The applicant seeks to develop the majority of the site under the nodal standards as detailed in the Springfield Development Code. The applicant's proposed development will include residential, industrial and commercial development creating a mix of uses that complements the nodal standards.

Metro Plan, Policy F.13. 'Support transportation strategies that enhance neighborhood livability.'

Metro Plan, Policy F.14: Address the mobility and safety needs of motorists, transit users, bicyclists, pedestrians, and the needs of emergency vehicles when planning and constructing roadway system improvements.

Metro Plan, Policy F.26: Provide for a pedestrian environment that is well integrated with adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking.

Response:
The proposed development shall be served by the existing streets (Marcola Road, North 28th Street, North 31st Street) and future streets including a collector and local streets. It will be easy to get around, and to do so on foot. All streets will have wide sidewalks, any of them setback from vehicle traffic. The entire community will be connected with all-weather multi-use off street pathways. It will be convenient, and safe, to wall from one Village to the next.

Metro Plan, Policy F.36. 'Require that new development pay for its capacity impact on the transportation system.

Response:
Based on the Traffic Impact Analysis, the PAPA will not have a capacity impact upon the transportation system. Please see Attachment 1, TIA for more information.

A detailed analysis of the PAPA's consistency with the State Transportation Planning Rule, OAR Division 12, 660-012-0000 et. seq., (TPR) is contained in the applicant's response State-wide Planning Goal 12 – "Transportation." Those responses are hereby incorporated by reference. With regard to the Transportation Element of the Metro Plan, the City can find that the proposed PAPA will not make the Metro Plan internally inconsistent.

G. Public Facilities and Services Element
Metro Plan, Policy G.1. ' Extend the minimum level and full range of key urban facilities and services in an orderly and efficient manner consistent with the growth management policies in Chapter II-B, relevant policies in this chapter, and other Metro Plan policies.'

Response:
The two parcels affected by this application are currently within the Urban Growth Boundary and were annexed into the City of Springfield. The annexation was made in compliance with an acknowledged comprehensive plan and implementing ordinances, and established the availability of urban facilities and services. A detailed analysis of the availability of those services is contained in the applicant's response State-wide Planning Goal 11 – "Public Facilities and Services." Those responses are hereby incorporated by reference.

Metro Plan, Policy G.5. 'Consider wellhead protection areas and surface water supplies when planning stormwater facilities.'

Response:
A stormwater management plan shall be created during the master plan process. Special emphasis will be placed upon the wellhead protection area and surface water supplies when planning stormwater facilities. See Exhibits 8 and 9 for more information.

H. Parks and Recreation Element
Response:
The changes proposed by this application will have no impact on any recreation area, facility or opportunity that has been inventoried and designated by the Metro Plan or any relevant facility plan regarding the City's recreational needs. The recreational needs of the community are adequately met by the existing and planned facilities enumerated in the Willamalane 20-year Park and Recreation Comprehensive Plan, 2004 and other associated documents. A detailed analysis of the subject site in relation to the various parks and recreation system studies, inventories, refinement plans, and facilities plans is contained in the applicant's response State-wide Planning Goal 8 – 'Recreation.' Those responses are hereby incorporated by reference. With regard to the Parks and Recreation Element of the Metro Plan, the City can find that the proposed PAPA will not make the Metro Plan internally inconsistent.

I. Historic Preservation Element

Response:
The changes proposed by this application will have no impact on any historic resource that has been inventoried and designated by the Metro Plan or any relevant facility plan or inventory regarding the City's historic resources. With regard to the Historic Preservation Element of the Metro Plan, the City can find that the proposed PAPA will not make the Metro Plan internally inconsistent.

J. Energy Element
Metro Plan, Goal 1: Maximize the conservation and efficient utilization of all types of energy.

Response:
The proposed PAPA and subsequent development of the site will encourage conservation and efficient utilization of energy by a concentration of employment, services and residences on the site, and enabling transit services to the site.

Metro Plan, Policy J.3. ' Land allocation and development patterns shall permit the highest possible current and future utilization of solar energy for space heating and cooling, in balance with the requirements of other planning policies; and'

Response:
The applicant shall design future development according the standards of the Springfield Development Code includes all standards relevant to solar orientation.

Metro Plan, Policy J.8. 'Commercial, residential, and recreational land uses shall be integrated to the greatest extent possible, balanced with all planning policies to reduce travel distances, optimize reuse of waste heat, and optimize potential on-site energy generation.'

Response:
The requested approval of the PAPA proposed herein, if approved, will enable the subsequent zone changes and development of a master planned mixed use development that shall provide employment, services and residential opportunities (see Preliminary Plan Illustration…). The proposed development envisions a series of eight (8) villages that include main street retail, neighborhood retail, general retail and residential uses (single-family detached, townhomes, apartments, senior cottages and congregate care.) Workers and residents will have the option to obtain dining, shopping, and other commercial amenities less than a mile from the subject site consistent with Policy J.8's mandate to balance all planning policies to reduce travel distance. Existing residential neighborhoods are adjacent to the subject site. The presence of schools and the Willamalane Park to the north provides proximity to recreational land uses.

Because the amendments facilitate development of an integrated master planned mixed-use development with a mix of commercial, residential and adjacent industrial zoning near recreational land uses (all within reasonable walking distance, which allows mixing of uses and reduces travel distances) it is consistent with this policy (see Preliminary Plan Illustration… for more information).
.

K. Citizen Involvement Element
Metro Plan, Goal. ' Continue to develop, maintain, and refine programs and procedures that maximize the opportunity for meaningful, ongoing citizen involvement in the community's planning and planning implementation processes consistent with mandatory statewide planning standards.'

Response: As noted in applicant's findings regarding State-wide Planning Goal 1, Citizen Involvement, the City's acknowledged program for citizen involvement provides citizens the opportunity to review and make recommendations in written and oral testimony on the proposed PAPA, consistent with Goal 1. The action proposed is consistent with and does not amend the citizen involvement element of the Metro Plan.

Aspects of the Metro Plan that have not been discussed within this application will be dealt with during future development proposals including site review and conditional use permit."

Staff's Response:

Staff concurs with the applicant's submittal concerning applicable Metro Plan policies. There are two discussion topics in this response: 1) The citing of additional Metro Plan text; and 2) Whether the PAPA makes the Metro Plan internally inconsistent. The "internally inconsistent" discussion was raised in the applicant's response to Goal 9, above, but is more appropriately discussed under this criterion.

1. Additional Metro Plan Text:

"B.23 Provide for limited mixing of office, commercial, and industrial uses under procedures which clearly define the conditions under which such uses shall be permitted and which: (a) preserve the suitability of the affected areas for their primary uses; (b) assure compatibility; and (c) consider the potential for increased traffic congestion."

These applications address "Marcola Meadows", west of 28th/31st Streets. The TransPlan Potential Nodal Development Areas Map shows proposed Node 7C includes areas east of 28th/31st Streets. The southern portion of this area is zoned and designated Light-Medium Industrial. This area is almost fully developed. The northern portion of this area is zoned and designated Low Density Residential. This area is fully developed. The point is that the "greater area" of Proposed Nodal Development Area 7C will comply with Policy B.23 by providing "for limited mixing of commercial and industrial uses while preserving the area for industrial uses".

The definition of nodal development area is provided in the Metro Plan:

"Nodal Development Area (Node): Areas identified as nodal development areas in TransPlan are considered to have potential for this type of land use pattern. Nodal development is a mixed use, pedestrian friendly land use pattern that seeks to increase concentrations of population and employment in well defined areas with good transit service, a mix of diverse and compatible land uses, and public and private improvements designed to be pedestrian and transit oriented.

Fundamental characteristics of nodal development require:

- ***Design elements that support pedestrian environments and encourage transit use and bicycling;***
- ***A transit stop which is within walking distance (generally within ¼ mile) of anywhere in the node;***
- ***Mixed uses so that services are available within walking distance;***
- ***Public spaces, such as parks, public and private open space, public facilities, that can be reached without driving; and***
- ***A mix of housing types and residential densities that achieve an overall net density of at least 12 dwelling units per net acre"***

Approval of applications will allow the area to realize the nodal development potential identified in TransPlan (7C) consistent with the definition of Nodal development cited above. Transportation issues are more fully addressed under the Goal 12 discussion. The applicant has also submitted a Preliminary Plan Illustration, an example of what the required Master Plan application, which is a condition of approval of these applications, may look like.

The Transportation Element of the Metro Plan supports the applicant's proposal. The compact development configuration proposed by the applicant will reduce dependence on the automobile, shorten trip lengths, reduce trip frequency, shorten trip duration, and lower systems costs. The proposal will limit air pollution and urban sprawl. The proposed applications are consistent with the Growth Management Principles of the Plan that encourage compact growth and carries out the intent of the Transportation Element.

2. Whether the PAPA makes the Metro Plan Internally Inconsistent.

The purpose of the Metro Plan's economic element is to implement State-wide Planning Goal 9: ***"…to diversify and improve the economy of the state. In order to grow the region's economy it is essential that the supply of land in each zoning designation include not only sites sufficient in size to accommodate the needs of the commercial or industrial operations (including expansion), but also includes sites which are attractive from the standpoint of esthetics, transportation costs, labor costs, . . . proximity to markets, and anticipated growth of local markets…."***

The applicant has addressed the following Economic Element Policies in the response to Goal 9, above:

"B.6 Increase the amount of undeveloped land zoned for light industrial and commercial uses correlating the effective supply in terms of suitability and availability with the projections of demand."'

"B.12 Discourage future Metropolitan Area General Plan Amendments that would change development-ready industrial lands (sites defined as short-term in the Metropolitan Industrial Lands Special Study, 1991) to non-industrial designations."

In the response to Goal 9, the applicant has demonstrated that the SCLS shows a shortage of commercial land and the MILIR shows a surplus of industrial land in Springfield.

Under Policy B.6, the supply of commercial land does not correlate with demand. A real life example is the actual "commercial" demand in the Gateway CI District as shown on the applicant's Table 7 (see Goal 9). This Table lists all of the existing businesses in that district. In a district that requires 60 percent of the acreage to be dedicated to light industrial uses, there is currently only one such use, Shorewood Packaging, which was constructed in 1997. Since that time no light industrial use has gone into the Gateway CI District. There has been no CI development applications ever submitted for the subject site. Redesignation and rezoning were identified as methods to increase the supply of commercial land in the SCLS. Any rezoning essentially reduces other land use inventories, especially the CI District. Approval of these applications will exchange an industrial development ready site for a predominantly commercial development ready site. In light of any more up-to-date commercial/industrial land studies, one must use the existing studies which were adopted with 20 year horizons in order to comply with the Metro Plan and ultimately Goal 9 (see the CIBL discussion under Goal 9). These applications will add a total of 34 acres of Community Commercial and Mixed Use Commercial to the commercial land inventory and facilitate the provision of commercial services to residents of the area and employees of current and future industrial development east of 28th/31st Streets that comprise Proposed Nodal Development Area 7C.

Under Policy B.12, staff contends the "discourage" language does not contain an outright prohibition on changing development ready industrial sites to non-industrial (commercial and residential) designations. It is important to keep in mind that when making decisions based on the Metro Plan, not all of the goals and policies can be met to the same degree in every instance; some of the goals, objectives and policies conflict. Therefore, use of the Policy B.6 suggests correlating the supply of land zoned for Industrial and commercial uses with demand. Given the surplus of industrially zoned land and the deficit of commercial land there is not a correlation between existing supply and demand for the two categories. The "correlation policy" conflicts with Policy B.12 which discourages rezoning development ready industrial parcels to other designations. Given the deficit of commercial lands in the City, staff contends the policy of correlating existing supply with demand is more important than the policy of not converting development ready light medium industrial sites to other uses.

The requirement of this criterion that adoption of these proposed applications not make the Metro plan internally inconsistent does not mean that every goal, objective, finding and policy of the Metro Plan must support these applications. Because of recognized conflicts in the Metro Plan, the proper inquiry is whether on balance the most relevant of the Plan policies support the Metro Plan Diagram Amendment. The applicant submitted findings the various Metro Plan policies cited above and in response to Goal 9

which are beneficial to the Planning Commission and City Council in weighing the relevant portions of the Metro Plan as they perform the required balancing.

The Planning Commission and the City Council should determine if the applicant and staff demonstrate that in order to comply with Statewide Planning Goal 9, Metro Plan policies and adopted land inventories that Campus Industrial land should be converted to commercial and residential and that conditions that applied during the Home Depot review process in 2001 have changed. Staff contends these issues have been addressed in this staff report and recommends approval of these applications, with conditions. In making their decisions, the Planning Commission and the City Council should consider the impact of piece-meal conversions on the future availability of developable industrial land, regardless of current trends. Given this situation and the requirement that the City maintain an adequate supply of commercial land as well as industrial land, the Planning Commission and City Council must make a choice. The basis of this choice is - will approval of these applications be in the best interests of Springfield's citizens

Staff's Finding:

The text of the Metro Plan, specifically the policies, supports this criterion in much the same way that these applications were found to be consistent with the applicable State-wide Planning Goals (especially Goals 9 and 12). The Metro Plan policies cannot exist without acknowledgement and acknowledgment cannot exist without findings of Goal consistency.

X. SPRINGFIELD ZONING MAP AMENDMENT CRITERA AND FINDINGS

SDC Article 12 describes the criteria to be used in approving a Springfield Zoning Map amendment. SDC Section 12.030(3) lists: ***"Zoning Map amendment criteria of approval: (a) Consistency with applicable Metro Plan policies and the Metro Plan diagram; (b) Consistency with applicable Refinement Plans, Plan District maps, Conceptual Development Plans and functional plans; and (c) The property is presently provided with adequate public facilities, services and transportation networks to support the use, or these facilities, services and transportation networks are planned to be provided concurrently with the development of the property. (d) Legislative Zoning Map amendments that involve a Metro Plan Diagram amendment shall: 1. Meet the approval criteria specified in Article 7 of this Code; and 2. Comply with Oregon Administrative Rule (OAR) 660-012-0060, where applicable"***

SDC Section 12.030(3)(a)" Consistency with applicable Metro Plan policies and the Metro Plan diagram;"

Applicant's Submittal:

"Response:
The adopted Metro Plan 'Land Use Diagram' (2004 update) shows three land use designations on the subject site: Campus Industrial, Commercial and Medium Density Residential [see Attachment 2]. *A Metro Plan diagram amendment changing the land use designations is under concurrent review with this zoning map amendment application. If the concurrent amendment to the Metro Plan diagram changing the allocation of land use designations for the property is approved, the proposed Zoning Map Amendment will be consistent with and implement the Metro Plan 'Land Use Diagram."*

Note: The applicant cited the same Metro Plan policies in the response to this criterion that were used in addressing SDC 7.070(3)(b). Therefore, those citations are not listed again in the applicant's response to this criterion.

Staff's Response and Finding:

The applicant has cited "consistency with Metro Plan policies and the Metro Plan diagram" in the response to SDC Section 7.070(3)(b), above. Staff found that the applicant complied with that criterion and therefore, complies with criterion 12.030(3)(a).

SDC Section 12.030(3)(b) ***"Consistency with applicable Refinement Plans, Plan District maps, Conceptual Development Plans and functional plans; and"***

Applicant's Submittal:

"Response:
A Conceptual Development Plan (CDP), previously created for the 56 acres of existing Campus Industrial (CI) zoning on the subject site per SDC 21.020, was approved by the City of Springfield in 1999 (file number 98-02-47). SDC 21.020 states that: ***'A Master Plan shall comply with any applicable approved Conceptual Development Plan or upon approval of a Master Plan or Site Plan for the entire CI District, the Master Plan or Site Plan may supplant and take precedence over an approved Conceptual Development Plan.'*** *This proposed zone change, if approved, shall remove the CI zoning from the subject site and a forthcoming Master Plan application* [see Attachment - Preliminary Plan Illustration] *for the entire subject site (including all land within the previously adopted CDP) consistent with these amendments shall be submitted to the City; as such, the previously approved CDP will be supplanted by the forthcoming Master Plan per SDC 37.010 et seq.. As such a finding of consistency with the conditions of the previously adopted CDP (98-02-47) is not applicable to this proposal."*

Staff's Response:

The subject site is not within an adopted refinement plan or plan district. The applicant cites the 1999 Conceptual Development Plan for the CI portion of the property. Staff concurs with the applicant's submittal concerning that plan. There are no other plans specific to this property.

Staff's Finding:

These applications comply with SDC Section 12.030(3)(b) because there are no applicable refinement plans or plan districts that currently apply, and upon approval of these applications, the current Conceptual Development Plan will no longer apply. However, there will be a Master Plan that applies to the entire subject site that is a condition of these applications.

Section 12.030(3)(c) ***"The property is presently provided with adequate public facilities, services and transportation networks to support the use, or these facilities, services and transportation networks are planned to be provided concurrently with the development of the property."***

Applicant's Submittal:

"Response:
The discussion of compliance with Statewide Planning Goal 11 – 'Public Facilities and Services,' and Goal 12 – 'Transportation' in the findings regarding the Statewide Planning Goals [see the applicant's response to SDC 7.070(3)(a) that] *are incorporated herein by reference. With the findings established and referenced herein, the proposal complies with this criterion.*

Staff's Response:

Staff concurs with the applicant's statement. Criterion (c) is also addressed in staff's response to Goals 11 and 12, under criterion 7.070(3)(a).

Staff's Finding:

The applicant has shown that the subject site can be served by urban services in the response to SDC Section 7.070(3)(a), above. Staff found that the applicant complied with that criterion and therefore, complies with criterion 12.030(3)(c).

Section 12.030(3)(d) ***"Legislative Zoning Map amendments that involve a Metro Plan Diagram amendment shall: 1. Meet the approval criteria specified in Article 7 of this Code; and 2. Comply with Oregon Administrative Rule (OAR) 660-012-0060, where applicable."***

Staff's Response and Finding:

These applications comply with SDC Section 12.030(3)(d) because this criterion is addressed in staff's response to SDC Section 7.070(3) used in approving a Type II Metro Plan amendment; and the response to State-wide Planning Goal 12 in SDC Section 7.030(3)(a) in particular.

XI. CONCLUSION, RECOMMENDATION OF STAFF AND RECAP OF CONDITIONS

The Metro Plan's economic element begins with a background discussion of the **"…a) a decline in the lumber and wood products industry as a source of employment; (b) limited increase in employment in other manufacturing activities; (c) diversification of the non-manufacturing segments of the local economy, primarily in trade, services, finance, insurance, and real estate; and (d) the development of this metropolitan area as a regional trade and service center serving southern and eastern Oregon."**

The Special Light Industrial/Campus Industrial designation was adopted to assist in the diversification of the metro area's economy in the transition after the wood products industry decline. Staff's discussion in Goal 9 details the history of this designation and zoning district. However, change has rapidly occurred in the "high-tech" industry, so that the SONY site where music CDs were produced for about 5 years has closed due to "new technologies" and has been replaced with a medical research facility. The "Pierce" property has been "shovel ready" for over 30 years and has not been developed. Has the demand for the light industrial manufacturing uses originally intended for the CI district disappeared? The applicant's Table 7 shows that there is only one manufacturing facility in the Gateway CI, Springfield's other CI District. If these applications are approved, there will still be over 100 acres of CI zoned and designated vacant land in the Gateway CI District.

Approval of these applications will implement TransPlan Nodal Development area 7C, resulting in a master planned commercial/residential mixed use development for the entire site.

In the Executive Summary, staff stated there were two primary Goals 9 and 10 that needed to be addressed. Staff contends that, as conditioned, these applications addressed both Goals and all other applicable criteria of approval.

However, in making their decisions, the Planning Commission and the City Council should consider: 1) Lacking an updated commercial and industrial land study, will the City be better served by converting Campus Industrial land to Commercial and Multi-family Residential; and 2) Will Springfield's citizens, especially the neighbors, be assured that a "quality" development will be constructed over time.

Re-cap of Conditions of Approval:

Condition of Approval #1

The submittal and approval of a Master Plan application prior to any development on the subject site.

Note: The applicant has stated the intent to submit a Master Plan application. Rather than require a separate Memorandum of Understanding or similar document at this time, staff is highlighting potential issues as part of these applications that must be addressed during the Master Plan approval process. The Metro Plan diagram and Zoning Map amendment applications are concurrent. SDC Section 12.040 gives the City authority to add conditions ***"…as may be reasonably necessary in order to allow the Zoning Map amendment to be granted."*** The Master Plan application process will require a public hearing and approval by the Planning Commission. This note applies to all of the additional conditions of approval that relate to the required Master Plan application.

Condition of Approval #2

Submittal of documentation from the Department of State Lands and/or the Army Corps of Engineers with the Master Plan application demonstrating the existing drainage ditch is not a regulated watercourse/ wetland, and if necessary, submittal of a wetland delineation for other wetlands that may be on the subject site.

Condition of Approval #3:

Submittal of a Master Plan application that incorporates the relocation of the existing drainage ditch and conversion to a major water feature that will be an integral part of the proposed development area. The construction of the entire water feature must be completed as part of the Phase 1 development.*

* The applicant has stated that Phase 1 will include the home improvement center. This means that this and all other conditions referencing "Phase 1" must be incorporated into proposed Master Plan Phase 1 development.

Condition of Approval #4

Submittal of a Master Plan application that addresses compliance with the Drinking Water Overlay District standards in SDC Article 17 and how these regulations will be applied for each proposed phase.

Condition of Approval #5:

Submittal of a Master Plan application that addresses the relationship of the proposed development to Willamalane's future park on the north side of the EWEB Bike Path and an explanation of any coordination efforts with Willamalane concerning the timing and development of the future park

Condition of Approval #6

Submittal of a Master Plan application that addresses coordination with EWEB to determine if any easements are required in order to cross the EWEB Bike Path to access the future park.

Condition of Approval #7

Submittal of a Master Plan application that shows the proposed home improvement center building design similar to the existing building in Scottsdale, Arizona or a building design that complies with the current building design standards in SDC Article 21.

Condition of Approval #8

Submittal of a Master Plan application that demonstrates that residential development will occur at 12 dwelling units per net acre.

Condition of Approval #9

Submittal of preliminary design plans with the Master Plan application addressing the proposed mitigation of impacts discussed in the TIA. The plans shall show the proposed traffic control changes allowing left-turns from the eastbound ramp center lane at the eastbound ramps of the Mohawk Boulevard/Eugene-Springfield Highway intersection. The intent of this condition is to have the applicant demonstrate to ODOT that the proposed mitigation is feasible from an engineering perspective and will be constructed on a schedule that is acceptable to ODOT. Provided that construction of the proposed mitigation is determined to be feasible, then during Master Plan review and approval a condition shall be applied requiring the mitigation to be accomplished prior to the temporary occupancy of any uses in Phase 1 of the development.

Condition of Approval #10

Submittal of a Master Plan application that incorporates a "Development Phasing Plan". The intent of this plan is to address the "internal trip" issue by requiring a certain percentage of the residential portion of the site to be developed with a similar percentage of the commercial. The specific percentages will be made part of the approved Master Plan. The intent of this condition is to also ensure that the proposed land uses in Table 4C do not exceed the individual caps for these uses.

Condition of Approval #11

Submittal of a Master Plan application that shows the entire length of the collector street from Marcola Road to V Street being constructed as part of Phase 1.

Condition of Approval #12

Submittal of a Master Plan application that shows the construction of all streets serving the CC and MUC portions of the subject site being constructed as part of Phase 1.

Condition of Approval #13

Submittal of a Master Plan application that shows proposed connectivity between the residential and commercial development areas.

Conclusion and Recommendation:

As conditioned, staff has demonstrated that the proposed applications comply with the applicable criteria of approval listed in SDC Sections 7.030 and 12.030.

Staff recommends the Planning Commission: Approve the attached Order and forward the proposed applications, as may be amended, to the City Council with a recommendation for adoption.

BEFORE THE PLANNING COMMISSION
OF THE CITY OF SPRINGFIELD, OREGON

ORDER AND RECOMMENDATION FOR	**]**	
A METRO PLAN DIAGRAM AMENDMENT	**]**	**CASE NUMBER LRP 2006-00027**
AND A SPRINGFIELD ZONING MAP AMENDMENT	**]**	**CASE NUMBER ZON 2006-00054**

NATURE OF THE APPLICATIONS

This is a consolidated application for the above referenced case numbers. The applicant is proposing to amend the Metro Plan diagram from Campus Industrial (CI) to Commercial/Nodal Development Area (NDA), Community Commercial (CC) and Medium Density Residential (MDR)/NDA; and to amend the Springfield Zoning Map from CI to CC, Mixed Use Commercial (MUC) and MDR. The applicant intends to obtain the proper Metro Plan designations and zoning to allow the submittal and approval of the appropriate applications (including, but not limited to: Master Plan, Subdivision and Site Plan Review) in order to construct a phased mixed-use residential and commercial development with nodal attributes. The proposed development will include design elements that support pedestrian environments and encourage transit use, walking and bicycling; a transit stop which is within walking distance (generally ¼ mile) of anywhere in the node; mixed uses so that services are available within walking distance; public spaces, such as parks, public and private open space, and public facilities, that can be reached without driving; and a mix of housing types and residential densities that achieve an overall net density of at lease 12 units per net acre.

1. The above referenced applications have been accepted as complete.

2. The applications were initiated and submitted in accordance with Section 3.050 of the Springfield Development Code. Timely and sufficient notice of the public hearing, pursuant to Section 14.030 of the Springfield Development Code, has been provided.

3. On March 27, 2007 the Planning Commission held a public hearing on the proposed amendments. The Development Services Department staff notes and recommendation together with the oral testimony and written submittals of the persons testifying at that hearing have been considered and are part of the record of this proceeding.

CONCLUSION

On the basis of this record, the proposed amendments are consistent with the criteria of SDC Sections 7.030 and 12.030. This general finding is supported by the specific findings of fact and conclusion in the Staff Report and Findings.

ORDER/RECOMMENDATION

It is ORDERED by the Springfield Planning Commission that approval of CASE NUMBER LRP 2006-00027, and CASE NUMBER ZON 2006-00054, be GRANTED and a RECOMMENDATION for approval forwarded to the Springfield City Council.

_____
Planning Commission Chairperson

ATTEST

AYES:
NOES:
ABSENT:
ABSTAIN:

ATTACHMENT 2

Maps Submitted by the Applicant

ATTACHMENT 3

Legal Description for the Zoning map Amendment

ATTACHMENT 4

The Preliminary Plan Illustration (a rendering of the proposed Master Plan)

ATTACHMENT 5

ODOT Correspondence

ATTACHMENT 6

DLCD Correspondence

ATTACHMENT 7

TransPlan Proposed Nodal Development Area Map