

VII. 2030 Plan Compliance with Other Planning Goals and Metro Plan Policies

Metro Plan Environmental Resources Element

The Environmental Resources Element of the Metro Plan, III-C-1 states:

“The Environmental Resources Element addresses the natural assets and hazards in the metropolitan area. The assets include agricultural land, clean air and water, forest land, sand and gravel deposits, scenic areas, vegetation, wildlife, and wildlife habitat. The hazards include problems associated with floods, soils, and geology. The policies of this element emphasize reducing urban impacts on wetlands throughout the metropolitan area and planning for the natural assets and constraints on undeveloped lands on the urban fringe.” (emphasis added)

“The natural environment adds to the livability of the metropolitan area. Local awareness and appreciation for nature and the need to provide a physically and psychologically healthy urban environment are reasons for promoting a compatible mix of nature and city. Urban areas provide a diversity of economic, social, and cultural opportunities. It is equally important to provide diversity in the natural environment of the city. With proper planning, it is possible to allow intense urban development on suitable land and still retain valuable islands and corridors of open space. Open space may reflect a sensitive natural area, such as the floodway fringe, that is protected from development. Open space can also be a park, a golf course, a cemetery, a body of water, or an area left undeveloped within a private commercial or residential development. Agricultural and forested lands on the fringe of the urban area, in addition to their primary use, provide secondary scenic and open space values.” (emphasis added)

*“The compact urban growth form concentrates urban development and activities, thus protecting valuable resource lands on the urban fringe. But concentrating development increases pressures for development within the urban growth boundary (UGB), making planning for open space and resource protection a critical concern within that boundary.”*¹ Planning can ensure the

¹ As explained in the *Metro Plan* Preface and Chapter I, Eugene, Springfield and Lane County are taking incremental steps to transition from a single “metropolitan UGB” to two separate UGBs, “the Eugene UGB” and “the Springfield UGB.” The general references to “the UGB” within the Environmental Resources Element of the *Metro Plan* shall be interpreted as applying to any UGB within the *Metro Plan* area, unless the text specifically refers to the metropolitan UGB, the Springfield UGB or the Eugene UGB.

coexistence of city and nature; one example is the Greenway.” (emphasis added)

“The Environmental Resources Element provides broad direction for maintaining and improving our natural urban environment. Other elements in the Metro Plan that provide more detail with particular aspects of the natural environment: Greenway, River Corridors and Waterways; Environmental Design; Public Facilities and Services; and Parks and Recreation Facilities. The emphasis in the Environmental Resources Element is the protection of waterways as a valuable and irreplaceable component of the overall natural resource system important to the metropolitan area. Waterways are also addressed in the “Greenway and Public Facilities and Services elements.” While some overlap repetition is unavoidable, the Greenway element emphasizes the intrinsic value of the Willamette River waterway for enjoyment and active and passive use by residents of the area. The public facilities element deals with components of the natural resource system in the context of the water and stormwater systems. The public facilities element includes findings and policies related to waterways, groundwater, drinking water protection, the Clean Water Act, and the Endangered Species Act.” (emphasis added)

“The inventories conducted as the basis for this element and the goals and policies contained herein address Statewide Planning Goals 3, 4, 5, 6, and 7 and interpret those goals in the context of the needs and circumstances of the metropolitan area.”

The City’s 2030 Plan amendments re-designate 53.3 acres of agricultural land to “Natural Resource” in the North Gateway area. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.

The City’s 2030 Plan amendments designate 399.2 acres of land Public/Semi Public. Of this acreage, 148.7 acres are already parkland and will be zoned Public Land and Open Space (PLO) to remain parkland. 72 acres will be rezoned from EFU to PLO. The proposal zones a total of 361 public land acres to Public Land and Open Space.

The City’s 2030 Plan amendments designate 274.4 acres of agricultural land (including existing roads and right of way) “Urban Holding Area – Employment.”

The City’s 2030 Plan amendments redesignate 1.8 acres of private land from Park to “Urban Holding Area – Employment.”²

² The Land Rural Comprehensive Plan map shows “Park” designation along the eastern parcel lines of Tax lots 18030100 500, 18030100 501 and 18030100 2000 west of the existing UGB line. The Park designation as shown does not follow waterways or other natural features.

The City's 2030 Plan amendments re-zone 327 acres from Exclusive Farm Use (EFU) to "Agriculture – Urban Holding Area" (AG).

The City's 2030 Plan amendments will yield 53.3 acres of Natural Resource land, 361 acres of Public Land and Open Space land, a total of 414.3 acres. The City's 2030 Plan amendments will yield 274 gross acres of land designated to allow urbanization for urban employment uses.

As a result of the City's 2030 Plan amendments, 414.3 acres of the 575.8 acres of EFU land affected by the plan change will be designated Public/Semi Public and Natural Resource. Both plan designations support implementation of Metro Plan Environmental Resources Element goals 1-4 (p. III-C-3) by:

1. *"Protect valuable natural resources and encourage their wise management, use, and proper reuse."*
2. *"Maintain a variety of open spaces within and on the fringe of the developing area."*
3. *"Protect life and property from the effects of natural hazards."*
4. *"Provide a healthy and attractive environment, including clean air and water, for the metropolitan population."*

As explained in the City's findings under Goal 5 and 6, lands added to the UGB will become subject to existing Springfield Development Code (SDC) land use regulations that require riparian area setbacks, restoration and enhancement along Water Quality Limited Waterways and wetlands to protect and enhance water quality and aquatic species habitat. Development of land within the floodplain is subject to the City's SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards. Springfield's existing development standards have previously been acknowledged to be in compliance with the Metro Plan Environmental Resources Element and applicable Statewide planning goals and administrative rules.

The 2030 Plan amendments will protect and enhance waterways through application of existing acknowledged Metro Plan policies and Springfield Development Code land use regulations to all lands added to the UGB.

The Environmental Resources Element of the Metro Plan, Policy C.1 states:

"Where agricultural land is being considered for inclusion in future amendments to the UGB, least productive agricultural land shall be considered first. Factors other than agricultural soil ratings shall be considered when determining the productivity of agricultural land. Relevant factors include suitability for grazing, climatic conditions, existing and future availability of water for farm irrigation, ownership patterns, land use patterns, proximity to agricultural soils or current farm uses, other adjacent land uses, agricultural

history, technological and energy inputs required, accepted farming practices, and farm market conditions.”

As explained in the findings under Goal 14, the City’s UGB amendment follows the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors.

The Environmental Resources Element of the Metro Plan, Policy C.3 directs a future study to:

“evaluate approaches to use in order to maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities.”

As explained in the findings under Goal 14, the City’s UGB amendment, like UGB amendments by other cities, is required to follow the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors. The City has no authority to require other cities to *maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities*. The City’s analysis explains the City’s rationale for its choice to include the North Gateway and Mill Race sites. The City’s findings provide maps³ depicting the physical separation between Springfield and smaller outlying communities. The City’s choice maintains physical separation between the smaller outlying communities of Marcola, Goshen, Jasper, Pleasant Hill, and Cedar Flat that are located within or near the City’s UGB Preliminary Study Area. The City’s choice to include the North Gateway site, combined with Coburg’s UGB expansion choice, slightly reduces the separation between Springfield and Coburg. The City’s choice to include the Mill Race site does not reduce separation between Springfield and smaller outlying communities. The City’s 2030 Plan amendments are consistent with the intent of Environmental Resources Element Policy C.3.

Environmental Resources Element, Policy C.5 addresses Forestlands:

“Metropolitan goals relating to scenic quality, water quality, vegetation and wildlife, open space, and recreational potential shall be given a higher priority than timber harvest within the UGB.”

The City’s Development Code 5.19-100 implements Policy C.5 by regulating timber harvest within the UGB. This existing regulation will apply to lands added to the Springfield UGB.

Environmental Resources Element, Policy C.19 states:

“Agricultural production shall be considered an acceptable interim and temporary use on urbanizable land and on vacant and underdeveloped urban land where no conflicts with adjacent urban uses exist.”

Environmental Resources Element, Policy C.20 states:

³ Page 405-407

“Continued local programs supporting community gardens on public land and programs promoting urban agriculture on private land shall be encouraged. Urban agriculture includes gardens in backyards and interim use of vacant and underdeveloped parcels.”

The 2030 Plan amendments establish and apply the “Agriculture – Urban Holding Area” zoning district to urbanizable lands added to the UGB to allow agricultural production and community gardens as acceptable interim and temporary uses on land designated to meet long-term employment land needs.

Environmental Resources Element, Policy C.21 states:

“When planning for and regulating development, local governments shall consider the need for protection of open spaces, including those characterized by significant vegetation and wildlife. Means of protecting open space include but are not limited to outright acquisition, conservation easements, planned unit development ordinances, streamside protection ordinances, open space tax deferrals, donations to the public, and performance zoning.”

The City’s 2030 Plan amendments include plan designations and plan policies that consider and address the need for protection of open spaces and protection of significant vegetation and wildlife within the areas added to the UGB.

The City designated 53.3 acres of privately-owned agricultural land to “Natural Resource” in the North Gateway area in consideration of the need for protection of open spaces, including those characterized by significant vegetation and wildlife. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River. The City’s riparian area protection ordinance is applied to all lands added to the UGB.

The City designated 399.2 acres of land Public/Semi Public. Including these lands in the UGB establishes consistent policies and land use regulations to support existing SUB-City-Willamalane partnership efforts to acquire, protect, connect, and enhance public open spaces and waterways in the Mill Race expansion area. The City’s findings under Goal 8 and Goal 11 explain why the City incorporated existing parkland and other public land owned by the City and Springfield Utility Board (SUB) in the UGB expansion to meet community park and open space needs identified in the adopted *Willamalane Comprehensive Plan*, to partially address the 300-acre deficit of parkland identified in the City’s acknowledged residential land inventory (*Residential Land Use and Housing Needs Analysis*), and to accommodate SUB’s existing and planned public water system water facilities.

The 2030 Plan amendments include Urbanization Element policies requiring updates to applicable natural resource inventories prior to land use approval that permits urban development in the North Gateway and Mill Race UGB expansion areas.

The 2030 Plan amendments include Urbanization Element policies that require adoption of updated implementation measures to protect drinking water and surface water resources prior to approval of rezoning that permits urban development.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 48 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 49 states:

“Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing⁴ uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 50 states:

“The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean

⁴ For the purposes of this policy, “clean” is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code.”

The City’s 2030 Comprehensive Plan Urbanization Element, Policy 51 states:

“Grow and develop the City in ways that will to ensure the stability of Springfield’s public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***
- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.”***

The Springfield CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB.

The 2030 Plan designates and zones land and provides policies to implement protection of open spaces and protection of significant vegetation and wildlife.

Environmental Resources Element, Policy C.25 states:

“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.”

The 2030 Plan amendments include plans for urbanization within and adjacent to the floodplains and drainage basins of the Willamette and McKenzie Rivers. Development of land within the floodplain is subject to the City’s SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards and SDC 3.3-300 to regulate uses and development setbacks within the greenway. The City regulates development to address flood control, urban storm runoff, recreation, and water quality through its implementation of SDC 4.3-110, 4.3-115, 4.3-117 and 3.3-200 at time of development approval.

Environmental Resources Element, Policies C.30 and 31 state:

“Except as otherwise allowed according to Federal Emergency Management Agency (FEMA) regulations, development shall be prohibited in floodways if it could result in an increased flood level. The floodway is the channel of a river or other water course and the adjacent land area that must be reserved to discharge a one-percent-chance flood in any given year.”

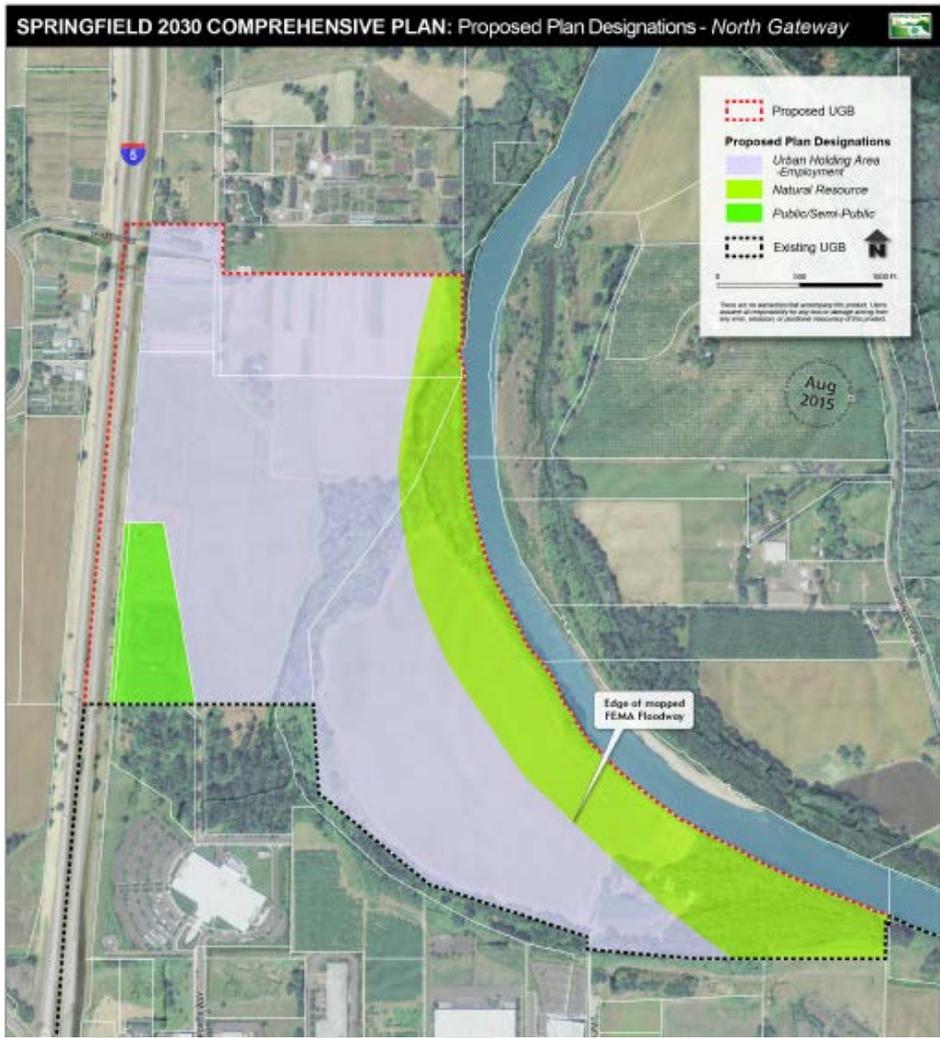
“When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources.”

The City’s land inventories did not count land within the floodway as developable. The CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB. Development of land within the floodplain is subject to the City’s SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards.

2030 Plan re-designates floodway land to Natural Resource and Public/Semi Public. The City’s 2030 Plan amendments designate the 53.3 acres of agricultural land within the FEMA floodway along the floodway of the McKenzie River as “Natural Resource” in the North Gateway area.⁵

⁵ As shown in the **Map: Proposed Plan Designations North Gateway**

The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.



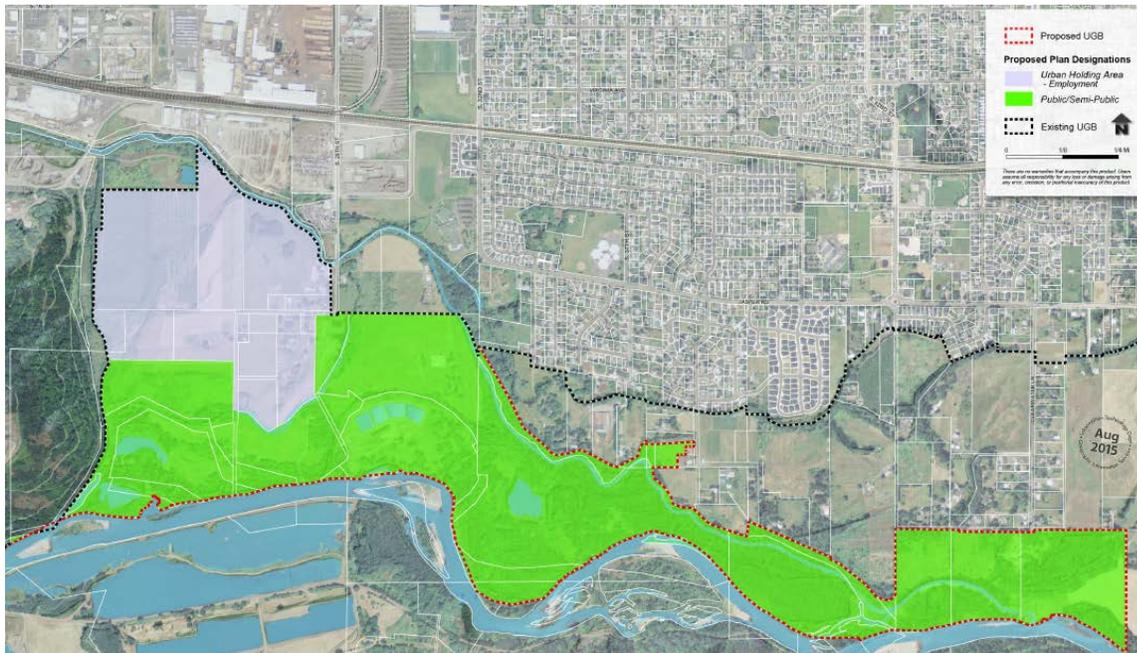
Floodway Extent and Natural Resource Designation: North Gateway UGB Expansion Area

The Middle Fork Willamette River floodway within the Mill Race UGB expansion area is on public land. The 2030 Plan designates that land Public/Semi Public.



Middle Fork Willamette Floodway Extent on Public Land – Mill Race UGB Expansion⁶
(Cross hatch = FEMA floodway)

⁶ As shown in **Map – Proposed UGB Expansion – Mill Race**



Public/Semi Public Plan Designation: Mill Race UGB Expansion Area

The City’s riparian area protection ordinance is applied to all lands added to the UGB, including water quality limited waterways (WQLW) that are direct tributaries to the McKenzie and Willamette Rivers.

Policies of the Metro Plan Environmental Resources Element will continue to be applicable to Springfield, as refined through adoption of adopted policies in the Springfield Comprehensive Plan.

Conclusion Metro Plan Environmental Resources Element: The 2030 Plan designates and zones land and provides policies to implement the applicable policies of the Metro Plan Environmental Resources Element.

Metro Plan Willamette River Greenway, River Corridors, and Waterways Element and Statewide Planning 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.

The Metro Plan Willamette River Greenway, River Corridors, and Waterways Element implements Statewide Planning Goal 15 Willamette River Greenway. The Metro Plan Willamette River Greenway, River Corridors, and Waterways Element is and will continue to be Springfield's existing acknowledged comprehensive plan adopted pursuant to ORS Chapter 197 and other applicable statutes, goals and guidelines for jurisdictions along the river.

660-024-0020 (1)(e) Adoption or Amendment of a UGB

“(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary.”

Pursuant to OAR 660-024-0020(1)(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary.

The 2030 Plan UGB amendment includes land within the Willamette Greenway, therefore Goal 15 is applicable where the Willamette River Greenway coincides with lands added to the UGB in the Mill Race UGB expansion area.

In addition to the Willamette River Greenway, the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element addresses river corridors and waterways.

Policies of the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as refined through adoption of policies in the Springfield Comprehensive Plan.⁷

The 2030 Plan addresses continued compliance with Goal 15 by demonstrating the Plan's consistency with acknowledged Metro Plan policies, by adding new Springfield-specific policies to more specifically address the Greenway land in the Mill Race UGB expansion area, and by implementing Greenway plan policies through the existing Springfield Development Code regulations⁸ applicable to lands within the Willamette Greenway Overlay District.

Willamette River Greenway, River Corridors, and Waterways Element III-D-1 states:

⁷ The jurisdictional area of the *Metro Plan* was found to be in compliance with Goal 15 on September 12, 1982. Subsequent Willamette Greenway boundary determinations have acknowledged by Springfield, Eugene and Lane County.

⁸ SDC 3.3-300 Willamette Greenway Overlay District.

“The Willamette River has long been recognized in the Eugene-Springfield area as a valuable natural asset. A number of policy documents and programs adopted by local jurisdictions have reinforced the community concern to preserve and protect metropolitan river corridors.”

“In the metropolitan area, a large portion of land within the Greenway is in public ownership or public parks such as Mount Pisgah, Skinner’s Butte, Alton Baker, and Island Park.”

“The three jurisdictions cooperated in the development of a bicycle-pedestrian trail system that extends along the Greenway from south of Springfield to north of Eugene and into the River Road area.”

Land along the Greenway in private ownership is in a variety of uses, some of which appear to provide greater opportunity than others for public access and enjoyment. “Certain commercial uses, such as restaurants, can allow customers visual enjoyment of the Greenway. Other uses, such as the many industrial uses, would appear to provide little if any opportunity for access or enjoyment of the Greenway. This is evidenced by much of the existing industrial development along the Willamette River in the Glenwood area.”

Springfield and Lane County previously adopted a new plan for the Glenwood riverfront⁹ that requires and supports transition of land uses along the river from industrial to Residential Mixed Use, Office Mixed Use, Commercial Mixed Use and Employment Mixed Use. Implementation of the plan through the redevelopment of Glenwood will provide opportunities for public access and enjoyment of the Greenway, while maintaining the supply of land to meet 20-year residential and employment needs.

“The statewide Greenway goal specifically applies to the Willamette River. In the Eugene-Springfield area, portions of the McKenzie River share equal importance as a natural resource worthy of conservation and protection. Additionally, the metropolitan network of waterways and associated creeks and drainageways are important features in the metropolitan area, with potential as part of an areawide waterways system. For that reason, while this element must specifically cover the Willamette River Greenway, it is important to consider the McKenzie River, where it is situated within the area of the Metro Plan and the inland system of waterway corridors connecting various parts of Springfield, Eugene, and Lane County to one another.”

⁹ Glenwood Refinement Plan Phase One Amendments
<http://www.springfield-or.gov/dpw/GlenwoodRefinementPlan.htm>

The City of Springfield requires a Discretionary Use Permit for any change or intensification of use, or construction that has a significant visual impact in the Willamette Greenway Overlay District, which is combined with a “Greenway Setback Line.”

Springfield implements Metro Plan Willamette River Greenway, River Corridors, and Waterways Element policies through the land use regulations of its existing, acknowledged Springfield Development Code 3.3-300 Willamette Greenway Overlay District.

The 2030 Plan implements the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element goals, objectives and policies intended to protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of river and waterway corridors through the following new 2030 Plan goals, policies and implementation measures:

The 2030 Comprehensive Plan Urbanization Element, Goal UG-4 states:

“As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City’s land development patterns and infrastructure design.”

The 2030 Comprehensive Plan Urbanization Element, Policy 41 states:

“Protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of the McKenzie and Willamette River and waterway corridors as Springfield grows and develops.”

The 2030 Comprehensive Plan Urbanization Element, Policy 42 states:

“Land use regulations and acquisition programs along river corridors and waterways shall take into account the concerns and needs of the community, such as recreation, resource protection, wildlife habitat, enhancement of river corridor or waterway environments, potential for public access, and opportunities for river-oriented urban development and infrastructure design. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.2 p III-D-4)

The City’s 2030 Comprehensive Plan Urbanization Element, Policy 44 states:

The City of Springfield and Willamalane shall continue to cooperate in expanding water-related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.3, p III-D-4)

The City's 2030 Comprehensive Plan Urbanization Element, Policy 45 states:

New development that locates along river corridors and waterways shall be designed to enhance natural, scenic and environmental qualities of those water features. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4)

2030 Plan Urbanization Element Policies 46, 47 and 52 direct planning efforts to provide public access to the Mill Race, Willamette River Greenway and the McKenzie River and to provide active transportation systems in new growth areas.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 46 states:

"Continue efforts to restore, enhance and manage the Springfield Mill Race to fulfill multiple community objectives. Partner with Willamalane and Springfield Utility Board to provide public access to the Mill Race where appropriate. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4)"

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

"Continue efforts to provide increased opportunities for public access to the Willamette River Greenway and the McKenzie River through comprehensive planning, development standards, annexation agreements, the land use permitting process, and through partnerships with Willamalane, Springfield Utility Board and property owners."

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 52 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***
- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
- ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
- ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.***

In addition to Springfield-specific 2030 Plan Urbanization Policies applicable to lands within the Springfield UGB, the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as specifically refined through adoption of policies in the Springfield Comprehensive Plan.

Metro Plan Environmental Design Element

Metro Plan Environmental Design Element II-D-6 states:

“The Environmental Design Element is concerned with that broad process which molds the various components of the urban area into a distinctive, livable form that promotes a high quality of life.

The Metro Plan must go beyond making the urban area more efficient and better organized to also ensure that the area is a pleasant, attractive, and desirable place for people to live, work, and play. The Environmental Design Element is concerned with how people perceive and interact with their surroundings. Perceptions of livability greatly differ between individuals; so, generalizations concerning this element need to be carefully drawn. Many different indicators of livability have been identified, such as the numbers of local educational, medical, and recreational facilities, and natural environmental conditions. Not all these indicators are directly concerned with environmental design, showing that the concept of livability is influenced by all elements of the Metro Plan. This element focuses on some of the features of the natural and built environment that affect the quality of life.

The metropolitan area is changing in ways that are far-reaching and diverse. Decisions that concern change have an effect on the form of the area. If we are to maintain a livable urban environment and realize the full potential of our desirable and distinctive qualities, daily decisions that concern change must be guided by environmental design principles, such as site planning, in combination with other planning policies.

Based on concerns related to energy conservation, environmental preservation, transportation, and other issues, increased density is desirable. This increases the need for effective, detailed environmental design in order to ensure a high quality of life and a high degree of livability in an increasingly dense urban environment.

This area is noted for the high degree of livability enjoyed by its residents. Environmental design is a process that helps to maintain and enhance these positive attributes.”

This Element has 3 Goals (III-E-1):

- *Secure a safe, clean, and comfortable environment which is satisfying to the mind and senses.*
- *Encourage the development of the natural, social, and economic environment in a manner that is harmonious with our natural setting and maintains and enhances our quality of life.*
- *Create and preserve desirable and distinctive qualities in local and neighborhood areas.*

Policy E-7 states:

“The development of urban design elements as part of local and refinement plans shall be encouraged.”

Policy E-9 states:

“Refinement plans shall be developed to address compatibility of land uses, safety, crime prevention, and visual impact along arterial and collector streets, within mixed-use areas. During the interim period before the adoption of a refinement plan, these considerations shall be addressed by cities in approving land use applications in mixed use areas by requiring conditions of approval where necessary.

Springfield has previously adopted local urban design plans for the Downtown District and the Glenwood Phase One mixed use areas. Springfield addresses this policy as local district and neighborhood refinement plans are adopted. Springfield addresses this policy by implementing Springfield Development Code standards for new development through the land use approval process. 2030 Plan policies require additional refinement planning for new areas added to the UGB.

Conclusion Metro Plan Environmental Design Element: The 2030 Plan amendments are consistent with Metro Plan Environmental Design Element policies.

Statewide Planning Goal 1: Citizen Involvement

OAR 660-015-0000(1)

To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

No amendments to acknowledged citizen involvement programs are proposed. The Springfield and Lane County have acknowledged land use codes that are intended to serve as the principal implementing ordinances for the *Metro Plan*. Chapter 5 of the SDC, *Metro Plan Amendments; Public Hearings*, prescribes the manner in which a Type II *Metro Plan* amendment must be noticed. Requirements under Goal 1 are met by adherence to the citizen involvement processes required by the *Metro Plan* and implemented by the Springfield Development Code, Chapter 5, Section 5.14-135, Eugene Code Section 9.7735, and Lane Code Sections 12.025 and 12.240.

Notice to DLCD was provided on December 31, 2009. Amended Notice to DLCD was provided on July X, 2016. Mailed notice to interested parties, parties of record, and property owners and residents within 500 feet of the proposed boundary change was mailed on August X, 2016.

Conclusion Goal 1: As described in the City’s findings under Goal 9 and 14, the City provided ample opportunities for citizens to be involved in the 2030 planning process. The Record Index provides a complete list of citizen involvement activities over a multi-year period between 2007 and 2016. The CIBL/EOA Appendix D explains how community visioning informed the identification of community economic development objectives and strategies, and the assumptions used in the CIBL/EOA to determine employment land needs. The local record contains complete documentation of each public involvement activity conducted, including meetings, open houses, workshops, surveys, visioning sessions, work sessions, outreach to agencies and service providers, and public hearings. The City published recordings of the CIBL Stakeholder Committee meetings, meeting minutes, 2010 Planning Commission public hearing, and summaries of input received 2007-2016 on the City web site.

Add summary of 2016 process after the summer open houses and public hearing are completed.

Statewide Planning Goal 2: Land Use Planning

OAR 660-015-0000(2)

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.

The Metro Plan and Springfield 2030 Comprehensive Plan are the land use or comprehensive plans required by this goal; the Springfield Development Code and the Lane Code are the implementation measures required by this goal. Comprehensive plans, as defined by ORS 197.015(5), must be coordinated with affected governmental units. Coordination means that

comments from affected governmental units are solicited and considered. The CIBL/EOA provides an adequate factual base for decisions and action in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The current version of the *Metro Plan* was last amended in 2014 (DLCD File no. 003-14, Springfield Ordinance No. 6332; Eugene Ordinance No. 20545; and Lane County Ordinance No. PA 1313).

The 2030 Plan amendments are the next step in Springfield's process to adopt a City-specific comprehensive plan, in light of the evolving framework for land use planning in the Eugene-Springfield metropolitan area. As stated on page I-3 to I-4 of the *Metro Plan*:

"Oregon Revised Statute 197.304 (2007)

Historically, many provisions in the Metro Plan were based on a premise that Eugene and Springfield would continue to have a regional metropolitan urban growth boundary ("metropolitan UGB") that includes both cities and adjacent "urbanizable" areas of Lane County. However, ORS 197.304, adopted by the Oregon Legislature in 2007, requires Eugene and Springfield to divide the metropolitan UGB into two city-specific UGBs. Each city is also required to demonstrate that its separate UGB includes sufficient land to accommodate its 20-year need for residential land consistent with Statewide Planning Goal 10 (Housing) and Goal 14 (Urbanization). These statutory mandates implicitly require each city to also adopt a separate 20-year population forecast. ORS 197.304 allows the cities to take these separate actions "[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary."

The ORS 197.304 mandates are being carried out by the two cities and Lane County through a series of incremental actions over time rather than through a Metro Plan Update process. Some of the land use planning that has historically been included in the Metro Plan will, instead, be included in the cities' separate, city-specific comprehensive plans. This does not diminish the fact that the cities and the county remain committed to regional problem-solving.¹⁰

The three jurisdictions anticipate that the implementation of ORS 197.304 will result in a regional land use planning program that continues to utilize the Metro Plan and regional functional plans for land use planning responsibilities that remain regional in nature. City-specific plans will be used to address those

¹⁰ In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010.

planning responsibilities that the cities address independently of each other.”
(emphasis added)

“In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010.”
(emphasis added)

Each city is taking a different approach to, and is on a different time line for, establishing its own UGB, 20-year land supply and city-specific comprehensive land use plans. As this incremental shift occurs, the Metro Plan will be amended several times to reflect the evolving extent to which it continues to apply to each jurisdiction. During this transition, the three jurisdictions will also continue to work together on any other Metro Plan amendments needed to carry out planning responsibilities that continue to be addressed on a regional basis. (emphasis added)

ORS 197.304 allows the cities to adopt local plans that supplant the regional nature of the Metro Plan “[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary.” As these local plans are adopted, Eugene, Springfield and Lane County wish to maintain the Metro Plan as a guide that will direct readers to applicable local plan(s) when Metro Plan provisions no longer apply to one or more of the jurisdictions. Therefore, when Eugene or Springfield adopts a city-specific plan to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan, that city will also amend the Metro Plan to specify which particular provisions of the Metro Plan will cease to apply within that city.¹¹ Unless the Metro Plan provides otherwise, such Metro Plan provisions will continue to apply within the other city. If the other city later adopts its own city-specific plan intended to supplant the same Metro Plan provisions, it may take one of two actions. That city will either amend the Metro Plan to specify that the particular provisions also cease to apply within that city or, if the provisions do not apply to rural or urbanizable areas within the Metro Plan boundary, to simply delete those particular Metro Plan provisions. (emphasis added)

¹¹ As more specifically explained in Chapter IV of the Metro Plan, one city with co-adoption by Lane County may amend the *Metro Plan* to specify which particular *Metro Plan* provisions no longer apply within the unincorporated (urbanizable) portions of its UGB. The other city is not required to co-adopt such a *Metro Plan* amendment. See Chapter IV.

To better enable the jurisdictions to amend the Metro Plan as required by ORS 197.304, the procedures for amending the Metro Plan, provided in Chapter IV, were revised in 2013. The Eugene City Council, the Springfield City Council, and the Lane County Board of Commissioners adopted identical amendments to Chapter IV of the Metro Plan on November 18, 2013:

Eugene City Council, Ordinance No. 6304

Springfield City Council, Ordinance No. 20519

Lane County Board of Commissioners, Ordinance No. PA 1300”

As explained in Metro Plan pages I-8 to I-9:

“Relationship to Other Plans, Policies, and Reports

The Metro Plan is the basic guiding land use policy document for regional land use planning. As indicated in the Purpose section, above, the region also utilizes: (a) city-wide comprehensive plans; (b) functional plans and policies addressing single subjects throughout the area, including the Eugene-Springfield Public Facilities and Services Plan (Public Facilities and Services Plan) and the regional transportation system plan; and (c) neighborhood plans or special area studies that address those issues that are unique to a specific geographical area. In all cases, the Metro Plan is the guiding document for regional comprehensive land use planning and city-specific plans may be adopted for local comprehensive land use planning. Refinement plans and policies must be consistent with applicable provisions in the Metro Plan or the applicable local comprehensive plan. Should inconsistencies occur, the applicable comprehensive plan is the prevailing policy document. The process for reviewing and adopting refinement plans is outlined in Chapter IV. (emphasis added)

The City coordinated with the affected units of government (Eugene and Lane County) in adoption the 2014 Metro Plan “enabling” amendments. Staff forwarded the 2030 Metro Plan text amendments in Ordinance Exhibit D to Eugene planning staff. Staff coordinated with Eugene and Lane County on the boundary description. Staff coordinated closely with Lane County staff and legal counsel to prepare the 2030 Plan Urbanization Element policies, plan designations and zoning maps. Eugene and Lane County staff participated in the CIBL Technical Advisory Committee, along with representatives from Oregon Department of Transportation, Oregon Economic and Business Development Department, and the Department of Land Conservation and Development. Staff conducted outreach to affect government agencies throughout the multi-year planning process, as documented in the local record.

The 2030 Plan amendments (Ordinance Exhibit D) amend Metro Plan text to clearly state where the new Springfield 2030 Plan policies supplant, add or delete certain Metro Plan policies and findings.

The Metro Plan was amended to adopt the 2030 Plan amendments after public meetings, public workshops and joint hearings of the Springfield and Lane County Planning Commissions and Elected Officials.

Goal 2 Conclusions. The 2030 Plan amendments adopt the CIBL/EOA as the Technical Supplement to the Springfield 2030 Comprehensive Plan Economic Element to establish the adequate factual base for decisions and actions in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The 2030 Plan amendments provide consistent and coordinate comprehensive planning to implement Metro Plan policies and Goal 2.

Statewide Planning Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces

OAR 660-015-0000(5)

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

660-024-0020 (1)(c) Adoption or Amendment of a UGB

“(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;”

Goal 5 and related rules under OAR chapter 660, division 23 are applicable to the proposal only in the areas added to the UGB. [OAR 660-024-0020 (1)(c)]

OAR 660-023-0070 Buildable Lands Affected by Goal 5 Measures

Measures to protect significant resource sites inside the UGB have been factored into Springfield’s CIBL/EOA land inventory process. Significant Wetlands and Riparian Resources — including development setbacks — are identified as “Absolute Constraints” in the City’s

Goals 9, 10 and 14 inventories and have been deducted from the buildable land inventory and calculation of suitable acres on as site. Springfield’s amendment of the UGB adds suitable, unconstrained land based on the inventory and site needs analysis.

OAR 660-023-0250 Applicability

“(1) This division replaces OAR 660, Division 16, except with regard to cultural resources, and certain PAPAs and periodic review work tasks described in sections (2) and (4) of this rule. Local governments shall follow the procedures and requirements of this division or OAR 660, Division 16, whichever is applicable, in the adoption or amendment of all plan or land use regulations pertaining to Goal 5 resources...”

The proposal does not adopt plan or land use regulations pertaining to Goal 5 resources. OAR 660-023-0250(1) is not triggered.

“(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;”

The proposal does not create or amend 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. OAR 660-023-0250(3)(a) is not triggered.

“(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”

2030 Plan requires Goal 5 inventory updates for UGB expansion areas prior to approval of urban uses. The 2030 Plan does not allow new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. Areas added to the UGB to meet employment land needs are designated “Urban Holding Area – Employment (UHA-E)” and zoned “Agriculture—Urban Holding Area (AG).” Although land is added to the City’s urbanizable area, the AG zoning district is a holding district that does not allow new urban uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. The AG zoning district allows a subset of uses that are currently permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. OAR 660-023-0250(3)(b) is not triggered.

“(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 2030 Plan amendments amend the acknowledged Springfield UGB. The City’s GIS-based analysis of the amended UGB area and factual information from adopted City and County ordinances indicates that inventoried Goal 5 resource sites are present in the amended UGB areas. Therefore, for the purposes of this section, the 2030 UGB and associated PAPA “would affect a Goal 5 resource.” [OAR 660-023-0250(3)(c)]

Inventoried Goal 5 Resources: Metro Natural Resources Study 2005-2006 (completed under previous Period Review). Springfield Ordinance 6085 (2004) adopted criteria for determining significant Goal 5 riparian or wildlife habitat sites within the City limits and adopted an updated Goal 5 inventory within the Springfield city limits. The ordinance adopted Exhibit A (criteria), and Exhibit B (list and 6 map tiles entitled Springfield Inventory of Natural Resource Sites within the Springfield city limits). Ord. Section 3 states: “the inventory of significant Goal 5 resources for the Springfield city limits shall include, and be limited to, the resource sites shown for that area on the following documents: April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological Sites Working Paper; the 1998 Springfield Local Wetland Inventory; the Washburne Historic Landmark District; the Historic Landmark Inventory; and the 1992 Gateway Historic resources Survey.”

Springfield Ordinance 6150 (2005) and Lane County Ordinance PA1233 (2006) adopted the Springfield Natural Resources Study — including the Springfield Inventory of Natural Resource Areas as an element of previous *Metro Plan* Periodic Review Task 7 and the Springfield Local Wetland Inventory as an element of previous *Metro Plan* Periodic Review Task 5. The study addressed resources located within the City of Springfield and its urbanizable area. The Study was prepared to complete the inventory process described in OAR 660-023-0030 and the ESEE decision process described in OAR 660-023-0040 and included implementing regulations to achieve Goal 5 compliance. The Springfield Development Code was amended concurrently to add protection measures for identified natural resource areas (wetlands and riparian). The adopting ordinance also included the following text:

“WHEREAS, in addition to the inventories of riparian, upland wildlife habitat and wetland sites referred to above, the following inventories make up the entire inventory of significant Goal 5 resources within the City of Springfield: the April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological Sites Working Paper; the December 1, 1976 list of historic landmarks, and the Water-quality Limited Waterways Map.”

Springfield and Lane County have previously acknowledged Goal 5 inventories and programs to achieve Goal 5 within the existing UGB. The existing Metro Plan Natural Resources Study inventoried resources in the UGB expansion areas because those lands were within the Metro Plan boundary when the inventories were conducted and acknowledged.

Springfield has existing Division 23-compliant programs in place to achieve Goal 5, consistent with OAR 660-023-0050 and those programs will apply to the land added to the UGB.

Springfield Development Code 4.3-117 Natural Resource Protection Areas contains the City’s development standards for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*. The code provisions are applicable to “land within the wetland and/or riparian resource boundary and the development setback area, specifically locally significant protected wetlands, listed in the Local Wetland Inventory and shown on the Local Wetland Inventory Map; locally significant protected riparian areas, listed in the Springfield Inventory of Natural Resources Sites and shown on the Natural Resources Inventory Map.

When the UGB amendment is acknowledged, land use decisions for the urbanizable land added to the UGB will be subject to the development standards in SDC 4.3-117 for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*.

Springfield Development Code 4.3-115 Water Quality Protection contains the City’s development standards for protecting riparian areas along watercourses shown on the Water Quality Limited Watercourses (WQLW) Map, as explained in the City’s findings under Goal 6. When the UGB amendment is acknowledged, the urbanizable land added to the UGB will be subject to the development standards for protecting riparian areas in SDC 4.3-115.

OAR 660-023-0250(3)(c) Conclusion: Goal 5 is applicable to the proposal pursuant to OAR 660-023-0250(3)(c). Goal 5 is applicable to the proposal only in the areas added to the UGB pursuant to 660-024-0020 (1)(c).

Goal 5 Resources within the UGB expansion areas. The following inventoried **Goal 5 resources** and **Water Quality Limited Waterways*** are located within or in proximity to Springfield’s proposed UGB expansion areas:

Goal 5 Resources located within or in proximity to Springfield’s proposed UGB expansion areas		
<i>Wetland Resources</i>	<i>Location/Expansion Area</i>	<i>Goal 5 Inventory</i>
M 01 wetland	Ruff Park	Goal 5 Local Wetland Inventory
W 01a Mill Race	Mill Race	Goal 5 Local Wetland Inventory

M20 Maple Island Slough	North Gateway	Goal 5 Local Wetland Inventory
LC NWI ID 4650, 4642	North Gateway	Goal 5 National Wetland Inventory
LC NWI ID 6349, 6357, 6363, 6373, 6263, 6272, 6274, 6302, 6409, 6419, 6381, 6415, 6420, 6405, 6450, 6466	Mill Race	Goal 5 National Wetland Inventory
Waterways & Riparian Resources	Location/Expansion Area	Protection Status as Goal 5 and/or Water Quality Limited Waterways (WQLW)¹² (for WQLW see Goal 6 findings)
S03 Mill Race A, natural	Mill Race	Goal 5 and Local WQLW
Middle Fork Willamette River	Mill Race	Goal 5 and Oregon WQLW >1000CFS
Gorrie Creek	Mill Race	Goal 5 and Local WQLW
Quarry Creek	Mill Race	Local WQLW
S17 Maple Island Slough ¹³	North Gateway	Goal 5 and Local WQLW
McKenzie River	North Gateway	Goal 5 and Oregon WQLW>1000CFS
S10 McKenzie Oxbow	Oxbow	Goal 5 and Oregon WQLW

¹² Springfield Ordinance No. 6021, adopted July 15, 2002 amends the SDC to reference the WQLW Map. The title of the ordinance includes the statement “adopting the water quality limited watercourse map”, yet ordinance Section 28 states “The Water Quality Limited Watercourse (WQLW) Map, August 2002 is hereby added by reference”. The definition in Chapter 6 of the Development Code for the Water Quality Limited Watercourses is “Those watercourses within the City and its urbanizing area that are specified on the WQLW Map” and that the standards for protecting watercourses in Section 4.3-115 only apply to those watercourses that are shown on the WQLW Map. The August 2002 WQLW map is the most recent adopted map for regulatory purposes.

¹³ On March 11, 2011, staff received a letter from Wicklund Trust (North Gateway site property owner) stating concern about the accuracy of maps in the adopted Goal 5 inventory depicting the location of natural resource site S-17 on the Wicklund Trust property. The letter contains documentation submitted to the Wicklund Trust’s attorney Jordan Schrader Ramis to describe the soils and vegetation of the land. The letter includes a “Summary of Wetland and Stream Reconnaissance” conducted in August 25-26, 2009 by Raedecker Associates. Based on the adopted inventory, information included in the Wicklund Trust letter, and the City’s GIS-based analysis of mapped resources and analysis of the site utilizing LiDAR remote sensing technology, a Goal 5 inventory for the Wicklund site in accordance with OAR 660-023-0030 and amendment of the Springfield Natural Resources Study will be required prior to approval of a plan amendment or zone change that permits urban development on the site, as described in Urbanization Element Policy x. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.

Keizer Slough	Oxbow	Oregon WQLW
48 th Street Channel	Just east of Oxbow and Keizer Slough	Local WQLW
Cedar Creek	Lively Park, Ruff Park	Goal 5 and Local WQLW

Water Quality Limited Waterways (WQLW) shown on the Springfield WQLW map were included in the Goal 5 inventory of significant sites within the City of Springfield (Springfield Ordinance 6150). As shown in the City’s Water Quality Limited Waterways Map, most of the inventoried WQLWs are located along the existing UGB or within the City Limits. WQLWs contain Oregon Division of State Lands “Essential Salmonid Habitat” Stream Designations. WQLWs are protected under the Water Quality Protection standards in Springfield Development Code 4.3-115. Natural Resource Protection Areas are protected under Springfield Development Code 4.3 –117 Natural Resource Protection Areas.

2030 Plan Urbanization Element Policy 47 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.”

2030 Plan Urbanization Element Policy 48 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.”

2030 Plan Urbanization Element Policy 50 requires an update of the WQLW map to include the areas added to the UGB:

“The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield’s implementation measures to maintain the City’s compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code.”

“(4) Consideration of a PAPA regarding a specific resource site, or regarding a specific provision of a Goal 5 implementing measure, does not require a local government to revise acknowledged inventories or other implementing measures, for the resource site or for other Goal 5 sites, that are not affected by the PAPA, regardless of whether such inventories or provisions were acknowledged under this rule or under OAR 660, Division 16.”

Conclusion OAR 660-023-0250(4): Pursuant to OAR 660-023-0250(4), the City is not required to revise the Metro Natural Resources inventory acknowledged in 2005 or its Springfield Development Code Goal 5 protection implementation measures. Springfield Development Code Goal 5 and Water Quality Limited Waterway protection implementation measures will automatically be applied to protect inventoried resource sites when the UGB expansion is acknowledged and the lands become subject to the applicable Springfield Development Code provisions implementing Goal 5. Any subsequent changes to land use designations must comply with the applicable provisions of Goal 5 and interpretive rules.

“(5) Local governments are required to amend acknowledged plan or land use regulations at periodic review to address Goal 5 and the requirements of this division only if one or more of the following conditions apply, unless exempted by the director under section (7) of this rule...”(emphasis added)

The City is not in periodic review.

“(a) The plan was acknowledged to comply with Goal 5 prior to the applicability of OAR 660, Division 16, and has not subsequently been amended in order to comply with that division;”

Previously acknowledged Metro Natural Resources Inventory and land use regulations comply with Division 16. The Metro Natural Resources Inventory was acknowledged in 2005, after applicability of OAR 660, Division 16 and has been amended in 2011 (Glenwood)¹⁴. OAR 660-023-0250(5)(a) is not triggered.

¹⁴ Springfield Ordinance 6265/ Lane County Ordinance PA1227 updated the Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study to include the Glenwood wetland and riparian sites.

“(b) The jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180; or...

Springfield’s jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180, as identified in the previously acknowledged Metro Natural Resources Inventory and land use regulations that comply with Division 16. OAR 660-023-0250(5)(b) is triggered.

(c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources.”

Based on Lane County’s inventory and City analysis, the Springfield Goal 5 inventory will need to be updated to include the UGB expansion areas to address the boundary changes and to address resource sites (if any) in the expansion areas not addressed by the plan at the time of the last period review work task acknowledgement. For example, Lane County’s plan identifies National Wetland Inventory wetland resources within the UGB expansion areas. Prior to urbanization, the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study will need to be updated for the areas added to the UGB. For example, the City conducted a similar process for the Glenwood area in 2011, as the Glenwood Refinement Plan amendments were being prepared. Thus the 2030 Plan includes Urbanization Element policies 47 and 48:

2030 Plan Urbanization Element Policy 47 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.”

2030 Plan requires a Local Wetland Inventory prior to urban development in UGB expansion areas. The following information is provided to explain why 2030 Urbanization Element Policy 47 is required. A wetlands inventory is a systematic survey of a fairly large geographic area to locate and map wetlands and classify them by type (for example, forested wetland or wet prairie). Many different inventory methods may be used, ranging from remote sensing (using aerial photography or satellite imagery) to on-the-ground surveys. The appropriate type of inventory method depends upon the intended uses, size of area to be covered, and available funds. There are two types of wetlands inventories that comprise the State Wetlands Inventory: the National Wetlands Inventory (NWI) and the Local Wetlands Inventory (LWI).

It is important to note that Lane County’s plan identifies *National Wetland Inventory* wetland resources within the Springfield UGB expansion areas.

“The NWI was developed by the U.S. Fish and Wildlife Service and covers the entire country. It relies on high-altitude aerial photos, with limited field work. While the NWI is extremely useful for many resource management and planning purposes, its small scale, accuracy limitations, age (1980s), and absence of property boundaries make it unsuitable for parcel-based decision making.”¹⁵ (emphasis added)

“To augment the NWI in urban and urbanizing areas where more detailed inventory information is needed, the Department of State Lands (DSL) developed guidelines and rules for Local Wetlands Inventories. An LWI aims to map all wetlands at least 0.5 acres or larger at an accuracy of approximately 25 feet on a parcel-based map. Actual map accuracy varies, and areas that could not be field verified will be less accurate. (The LWI is not a substitute for a detailed delineation of wetland boundaries.) The LWI maps and report provide information about the inventory area and the individual wetlands, including:

- *Total acreage of wetlands in the inventory area*
- *Acreage of each wetland type in the inventory area (e.g., 18 acres of forested wetland)*
- *Location, approximate size, and classification (type) of each wetland mapped*
- *A description of each mapped wetland*
- *A functions and condition assessment of all mapped wetlands*
- *All tax lots containing wetlands*

Once an inventory is completed and approved by DSL, there are certain requirements and implications:

An approved LWI is incorporated into the SWI and is made available by DSL to other agencies and the public. Wetlands and waterways, regardless of whether or not they are mapped, may be regulated under the State Removal-Fill Law. If ground-altering site work is proposed, a more precise wetland boundary may need to be located (a “delineation”) to know where state permit requirements apply. Compliance with wetland and waterway regulations remains the responsibility of the landowner.”

Under Statewide Planning Goal 5, Springfield must conduct an LWI and wetland function and condition assessment (in compliance with OAR 141-086-0180 to 0240 procedures for conducting LWIs), and then must identify locally significant

¹⁵ From http://www.oregon.gov/dsl/WETLAND/docs/fact2_2004.pdf

wetlands (LSW). DSL adopted rules for how LSWs are identified, using information from the LWI. A protection program is then adopted by the local government to further guide the management of LSWs.

An approved LWI must be used by the local government (in place of the NWI) for the Wetland Land Use Notification process (a local-state coordination process)." (emphasis added).

*"Local Wetland Inventories (LWI) provide a planning tool for balancing the protection of wetland functions that are of value to a community with community development needs. A LWI is also required as base information for city or county Goal 5 (Natural Resources) wetland protection programs. Advance information on the location of wetlands helps to avoid last-minute delays when beginning development or conducting real estate transactions."*¹⁶

2030 Plan Urbanization Element Policy 48 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."

"(6) If a local government undertakes a Goal 5 periodic review task that concerns specific resource sites or specific Goal 5 plan or implementing measures, this action shall not by itself require a local government to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task."

Although the City is not in periodic review, the follow-up process to conduct the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study updates in specific areas, including specific UGB expansion areas, prior to urbanization will not by itself require Springfield to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task.

¹⁶ Ibid.

“(7) The director may exempt a local government from a work task for a resource category required under section (5) of this rule. The director shall consider the following factors in this decision:

(a) Whether the plan and implementing ordinances for the resource category substantially comply with the requirements of this division; and

(b) The resources of the local government or state agencies available for periodic review, as set forth in ORS 197.633(3)(g).”

The City is not in periodic review. However, if applicable, the City requests Director exemption under OAR 660-023-0250(7)(a) and (b). 2030 Urbanization Element policies 47 and 48 ensure that thorough, updated Goal 5 analysis will be conducted prior to zoning that allows urban development. To conduct the Goal 5 update prior to UGB amendment adoption would be premature and would be predetermining outcome of UGB Alternatives Analysis prior to completion of public review process, in violation of Goal 1. At a meeting on July 22, 2015 in Salem, DLCD staff concurred with the City’s approach to Goal 5 compliance.

Springfield’s acknowledged plans to address Goal 5 are the Metro Natural Resources Study (UGB expansion areas) and Springfield Natural Resources Study (inside the existing UGB and NR features located along the boundary).

Springfield’s jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110 or aggregate resources as provided under OAR 660-023-0180; or (c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources. Therefore, Subsection (5) is triggered, unless exempted by the director under section (7):

Springfield’s proposal addresses Goal 5 by amending the acknowledged plan. The proposed UGB amendment addresses Goal 5 through Springfield 2030 Urbanization Element policies and through implementation of existing land use regulations in the newly urbanizable areas added to the UGB.

OAR 660-023-0140 Groundwater Resources

Drinking water protection. The proposed UGB expansion areas comprises environmentally sensitive Drinking Water Source Areas that provide the City of Springfield’s drinking water. Development within Drinking Water Source Areas is subject to the Springfield Development Code Drinking Water Protection (DWP) Overlay District¹⁷, which will automatically apply when the UGB is amended. The DWP Overlay District “is established to protect aquifers used as

¹⁷ Springfield Development Code 3.3-200

potable water supply sources by the City from contamination.”¹⁸ The DWP Overlay District was established in 2000, “*establishing procedures and standards for the physical use of hazardous or other materials harmful to groundwater within TOTZ (time of travel zones) by new and existing land uses requiring development approval.*” The DWP Overlay District accomplishes protection “*by including methods and provisions to*

- *Restrict or prohibit the use of hazardous or other materials which are potential groundwater contaminants;*
- *Set standards for the storage, use, handling, treatment, and production of hazardous or other materials that pose a risk to the groundwater within TOTZ; and*
- *Review new or expanded uses of hazardous or other materials that pose a risk to groundwater.*”^{19,20}

Springfield’s Drinking Water Protection program is recognized nationally as a successful model groundwater protection program. The Springfield Drinking Water Protection Plan was adopted May 17, 1999. The public water system²¹ serves over 10,000 Oregon citizens, thus the Springfield Drinking Water Protection Area is a “statewide significant resource” under the state land use program.²²

2030 Plan requires specialized drinking water protection standards to be developed for the North Gateway and Mill Race UGB expansion areas to protect the aquifer system. OAR 660-023-0140(1)(c) Groundwater Resources states that to “*protect significant groundwater resources*” means to *adopt land use programs to help ensure that reliable groundwater is available to areas planned for development and to provide a reasonable level of certainty that the carrying capacity of groundwater resources will not be exceeded.*” OAR 660-023-0140(1)(e) defines “Wellhead protection area” as “*the surface and subsurface area surrounding a water well, spring, or wellfield, supplying a public water system, through which contaminants are reasonably likely to move toward and reach that water well, spring, or wellfield.*”

A 2013 study of the Willamette Wellfield aquifer system provides explanation of the hydrologic connection between the aquifer and surface water in the proposed Mill Race District UGB expansion area.

“Given the unconfined nature of the aquifer and groundwater-level response in neighboring wells to changes in stream stage (CH2M HILL, 1982), the alluvial

¹⁸ Ibid, SDC 3.3-205

¹⁹ SDC 3.3-205B.

²⁰ SDC 3.3-215 states: “the degree of aquifer protection required in this Section is based on scientific and engineering considerations.”

²¹ As defined in OAR 660-023-0140(1)(d) “Public water system” is a system supplying water for human consumption that has four or more service connections, or a system supplying water to a public or commercial establishment that operates a total of at least 60 days per year and that is used by 10 or more individuals per day.

²² Nov. 29, 1999 letter DEQ Drinking Water Protection

aquifer is known to be in hydraulic connection with area surface water features. Those features include the Willamette River, Mill Race, Gorrie Creek, Quarry Creek, and the channels moving water to the west away from the filtration plant dewatering system. Streambed sediments are permeable and allow recharge to the alluvial aquifer. During periods when the surface water features (other than the Willamette River or Mill Race/Gorrie Creek) are dry, groundwater levels decline and wellfield capacity drops by nearly half (Western Groundwater Services, 2007). Groundwater that moves downgradient through the aquifer and is not captured by wells continues to move through the groundwater system discharging eventually to the Willamette River” (Golder Associates, 1995). [GSI Water Solutions, Inc. Geologist Technical Memorandum to Springfield Utility Board, October 29, 2013 paper, page 6]

The 2030 Plan expands the UGB and designates land as “Urban Holding Area- Employment.” Over the 20-year planning period, these lands will transition from rural to urban and be developed with urban industrial and other employment uses. Therefore, land use planning and development regulations applicable to the UGB expansion areas must be coordinated to ensure that Springfield’s Drinking Water Source Areas are protected.

2030 Plan Urbanization Element Policy 51 states:

“Grow and develop the City in ways that will to ensure the stability of Springfield’s public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***

- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.”***

Cultural and Historic Resources. The City reviewed SHPO records of cultural and historic resources within the expansion areas. There is one listing on the State’s Inventory of Historic Structures and Sites that is located in the Mill Race District. The site is shown to be ineligible. There are no listings for the Gateway area.

The City also reviewed Lane County’s list of Historic Structures and Sites (Lane Code 11.030, Updated 8/09/02). No structures or sites in the expansion areas were listed. Section 11.030 was subsequently removed from the Lane Code and “Historic Structures and Sites” are now defined in LC 11.300-10 as “Property currently listed in the National Register of Historic Places, established and maintained under the National Historic Preservation Act of 1966 (PL 89-655) (See LM 11.300) (Revised by Ordinance No. 10-82, Effective 7.9.82).”

No known Goal 5 resources cultural and historic resources will affected by this proposal.

Goal 5 Conclusion: The 2030 Plan amendments are in compliance with the applicable provisions of Goal 5.

Statewide Planning 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

Goal 6 addresses compliance with federal and state environmental quality statutes, and how this compliance is achieved as development proceeds in relationship to air sheds, surface water features and groundwater resources, watershed basins and land resources. Springfield and the Eugene-Springfield Metropolitan area have existing programs in place to maintain and improve the quality of the air, water and land resources of the state.

Springfield’s Environmental Services Division (ESD) coordinates the City’s and Metro region’s compliance with applicable federal and state environmental quality statutes. ESD promotes and protects the public’s health, safety, and welfare by providing professional leadership in the protection of the local environment, responsive service to service recipients, and effective administration of the Regional Wastewater Program. ESD maintains compliance with Goal 6 through multiple programs including:

Water Resources Programs

- implementing the City's National Pollutant Discharge Elimination Systems (NPDES) stormwater discharge permit;
- coordinating the City's Endangered Species Act response;
- implementing the Stormwater Facilities Master Plan in conjunction with the City's Engineering Division.

Industrial Pretreatment Program

- regulating Significant Industrial Users (SIUs) of the regional wastewater system through permits;
- administrating the Pollution Management Practice programs.

Wastewater & Stormwater (Sewer & Drainage) Programs

- implementing local sewer user and stormwater rates and Systems Development Charges (SDCs);
- Public Education and Outreach to inform residents, businesses, and industries about urban stormwater runoff and pollution prevention;
- Public Participation to involve the public in the stormwater planning process;
- Illicit Discharge of Contaminants – to address illegal or illicit dumping of pollutants, whether accidental or intentional;
- Construction Site Runoff - working with contractors and developers where land clearing or construction may result in erosion, sedimentation, and soil loss;
- Post-Construction Erosion Control - ensures that new developments "build in" features (such as bio-swales) to continuously manage water quality in the future
- Good Internal Housekeeping - assessing the City's own maintenance practices and policies to ensure that work crews use the best practices to minimize pollution in their everyday tasks.

Wastewater generated in the Eugene/Springfield metropolitan area is cleaned at the [regional wastewater treatment facility](#). Pollution is controlled at the source through pretreatment programs located both in Springfield and Eugene. These regional industrial wastewater pretreatment programs are designed to protect the environment and the area's wastewater collection and treatment facilities by regulating potentially contaminated wastewater discharges from commercial and industrial activities.

Regulatory activities include developing pollutant limits for industrial discharges, responding to permit violations, and conducting industrial site inspections. The City of Springfield Pretreatment Program works closely with business and industry to control pollutants discharged into the wastewater treatment system; control spills and illicit discharges; and promote pollution prevention and recycling.

The City of Springfield provides Metropolitan Wastewater Management Commission (MWWC) administration, including: legal and risk management services; financial management and

accounting; budget and rate development; billing and customer service; public information, education, and citizen involvement programs. Springfield also provides long-range capital planning, and design and construction management for the regional facility. For more information visit the [MWMC](#) website.

Pursuant to the Intergovernmental Agreement between the City of Springfield and Lane County, Springfield ESD provides a subset of environmental services within the unincorporated urbanizable area.

Lane Regional Air Pollution Authority LRAPA and the U.S. Environmental Protection Agency (EPA) are responsible for monitoring and regulating air quality and air pollution discharges. The Lane Regional Air Protection Agency was created in 1968 to achieve and maintain clean air in Lane County, Oregon in a manner consistent with local priorities and goals. With the support of its member entities, which include Lane County and the cities of Eugene, Springfield, Cottage Grove and Oakridge, LRAPA carries out its mission to protect and enhance air quality through a combination of regulatory and non-regulatory programs and activities. The agency plays an active role in community development and planning, and works collectively with other local governments and community groups to help achieve federal Clean Air Act goals and objectives.

The EPA delegates authority to the Oregon Department of Environmental Quality (DEQ) to operate federal environmental programs within the state such as the federal Clean Air, Clean Water, and Resource Conservation and Recovery Acts. DEQ is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, for managing the proper disposal of hazardous and solid wastes, and for enforcing Oregon's environmental laws. DEQ staff use a combination of technical assistance, inspections and permitting to help public and private facilities and citizens understand and comply with state and federal environmental regulations.

The Oregon Department of State Lands is the administrative agency of the State Land Board responsible for sound stewardship of the state's lands, wetlands, waterways. It is the lead state agency responsible for the protection and maintenance of Oregon's wetlands resources through its administration of the state's removal-fill law, which protects Oregon's waterways and wetlands from uncontrolled alteration.

203 Plan Urbanization Element Policy 52 addresses air quality:

***“Grow and develop the City in ways that maintain and improve Springfield’s air quality to benefit public health and the environment.*”**

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***

- **Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.**
 - **Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.**
 - **Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.”**

Goal 6 is addressed in Metro Plan Environmental Resources Element, pages III-C-15 toC-17 Air, Water and Land Resources Quality. The 2030 Plan amendments are consistent with these Metro Plan policies. The 2030 Plan amendments do not directly permit new land uses or changes in land uses and thus have no direct affect on or applicability to this goal. Any actions affecting land use or development that occur as a result of the 2030 Plan amendments are subject to the applicable goals, statutes and rules at the time those actions are undertaken.

Goal 6 Conclusion. Existing local, regional, state and federal programs and facilities exist to prevent discharges from threatening to violate, or violate applicable state or federal environmental quality statutes, rules and standards. The proposed 2030 plan amendments do not alter the City and region’s acknowledged compliance with Goal 6.

Statewide Planning Goal 7: Areas Subject To Natural Hazards

OAR 660-015-0000(7)
To protect people and property from natural hazards

The Metro Plan and the City’s development code are acknowledged to be in compliance with all applicable statewide land use goals, including Goal 7. Goal 7 requires local governments to address natural hazards within their comprehensive land-use plans. For the purposes of Goal 7, natural hazards include floods, landslides, earthquakes and related hazards, tsunamis, coastal erosion, and wildfires. Comprehensive plans address Goal 7 natural hazard planning through inventories, policies, mapping, ordinances and other implementing measures. Local land use plans guide development in hazardous areas with the overall goal of avoiding or minimizing risks to people and property from natural hazards.

Springfield has existing programs, policies, zoning overlay districts, and development standards to regulate development in areas subject to natural hazards to address threats posed by

natural hazards to people and property. The City of Springfield implements Metro Plan policies and Goal 7 as it relates to land use planning and development through the Springfield Development Code:

- Floodplain Overlay District SDC 3.3-400
- Hillside Development Overlay District SDC 3.3-500

New development within the UGB — including interim development and future development of urbanizable lands added to the UGB through adoption of the proposed 2030 plan UGB amendment — is subject to the Springfield Development Code, including all applicable overlay districts.

The 2030 Plan amendments do not alter existing development standards applicable in areas subject to natural hazards. The 2030 Plan amendments will be implemented through those acknowledged programs, policies, zoning overlay districts, and development standards.

The City's CIBL/EOA land inventory identified "floodway" and slopes >15% as "absolute constraints." These two development constraints are related to Goal 7 natural hazards. Portions of tax lots in the floodway and with slopes >15% were assumed unsuitable for the purposes of the inventory.

OAR 660-009-0005(2) provides the following definition of "development constraints:"

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

The Administrative Rule provides a broad definition of constraints and leaves discretion for local governments in the application of the definition. Absolute constraints were deducted from the buildable portion of lots as they were determined to be factors that temporarily or permanently limit or prevent the use of land for economic development as defined in OAR 660-009-0005(2). For the purpose of the CIBL/EOA inventory, ECONorthwest used the following data sources were used to identify floodway and slope constraints:

- Floodway – Source: Army Corps of Engineers digital "FIRM" maps. File used: fld_way.shp
- Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp

Flood way and slopes greater than 15 percent are considered constrained for the purposes of the buildable lands inventory.

For the purposes of the UGB Boundary Location Alternatives Analysis, City staff used LCOG's Regional Data Base, FEMA maps, and the City's high resolution GIS topographic data (LIDAR) to identify and map constraints, and as explained in the City's findings under OAR 660-024-0060, the UGB Alternatives Analysis of potentially suitable employment land sites referenced the 2016 DOGAMI SLIDO maps of landslide hazards as part of the City's assessment of buildable lands, in addition to application of the slopes constraint.

Springfield's existing UGB and the proposed UGB contain land in the floodplain and floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), all of the North Gateway UGB expansion area is within the 100-year flood plain of the McKenzie River. A portion of the North Gateway UGB expansion area is in the floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), portions of the Mill Race UGB expansion area is within the 100-year flood plain of the Middle Fork Willamette River. Most of this land is in public ownership.

Metro Plan Policy C.31 states:

“When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources.” (III-C-16)

Springfield Development Code 3.3-420C. states that development is prohibited in the floodway unless certification by an engineer or architect is provided demonstrating that encroachments, including fill, new construction, substantial improvements, and other development will not result in any increase in flood levels during the occurrence of the base flood discharge. Replacement of structures already in the floodway is permitted if they are located in the same site and are the same size without the certification.

As shown in Ordinance Exhibit A, the 2030 Plan amendments designate the portion of the North Gateway UGB expansion area within the floodway as “Natural Resource.”

Springfield and Lane County previously adopted implementing measures to reduce risk to people and property from flood hazards within Springfield's UGB. These measures are contained in Springfield Development Code 3.3-400 Floodplain Overlay District and are based on the Oregon Model Flood Damage Prevention Ordinance approved by the Federal Emergency Management Agency (FEMA).

Springfield Development Code 3.3-420A. and B. state that development may occur in areas of special flood hazard if certain development standards for construction of buildings and streets are met.

Springfield Development Code 3.3-420D. states that the cumulative effect of any proposed development, when combined with all other existing and anticipated development, shall not increase the water surface elevation of the base flood more than 1 foot at any point.

Urban and urbanizable land within all areas of special flood hazard as mapped by FEMA is subject to the Floodplain Overlay District development standards (Springfield Development Code 3.3-400 Floodplain Overlay District) in place at the time development occurs.

Landslide hazards. The UGB expansion avoids sloped lands because the needed employment site characteristics are sites with flat topography.

As recommended in Goal 7 Guideline B.2. Springfield requires site-specific reports, appropriate for the level and type of hazard (e.g., hydrologic reports, geotechnical reports or other scientific or engineering reports) prepared by a licensed professional to be submitted with development requests in high hazard areas. Such reports evaluate the risk to the site as well as the risk the proposed development may pose to other properties.

Metro Plan Policy C.32 Local governments shall require site-specific soil surveys and geologic studies where potential problems exist. When problems are identified, local governments shall require special design considerations and construction measures to be taken to offset the soil and geologic constraints present, to protect life and property, public investments, and environmentally-sensitive areas.

Springfield and Lane County previously adopted land use regulations to regulate the development of buildings and streets in hillside areas. These existing implementing measures in Springfield Development Code 3.3-500 Hillside Development Overlay District regulate development to ensure that development minimizes the potential for earth movement and resultant hazards to life and property and provides adequate access for emergency services.

Hillside Development Overlay District standards are applicable in residential zoning districts above 670 feet in elevation OR to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. The City requires special reports (Geotechnical Report, Grading Plan report, Vegetation and Revegetation Report, Verification of Slope and Grade Percentages, a Development Plan report), special engineering requirements, and fire protection requirements for development approvals in these areas.

Development of this land is subject to Springfield Development Code 3.3-500 Hillside Development Overlay District standards.

The cities of Eugene and Springfield updated the *Multi-jurisdictional Natural Hazards Mitigation Plan* (NHMP) in 2014 to identify natural hazard preparedness. This work was performed in partnership with the Oregon Partnership for Disaster Resilience with funding from the Federal Emergency Management Agency (FEMA) Pre-Disaster Mitigation Grant Program. The natural hazards mitigation plan provides the Springfield community with a set of goals, action items, and resources designed to reduce risk from future natural disaster events.

The City and its Lane Livability Consortium partners recently conducted a planning process funded by a HUD Livable Communities grant to increase community resiliency. A resilient community is one that understands and is prepared for natural hazards and other uncertainties. Preparation starts with an understanding of vulnerabilities. The Lane Livability Consortium toolkit presents tools and results for assessing vulnerability. The findings of the completed assessment are used to inform natural hazards planning and other planning, risk management, and investment decisions.

The *Eugene Springfield Multi-Jurisdictional Emergency Operations Plan* is an all-hazards plan which outlines how the cities of Eugene and Springfield will prepare for and respond to emergencies. The purpose of the plan is to establish a comprehensive approach to protect the life, safety and health of the community. The Basic Plan describes how the cities' emergency management systems are organized and provides a framework for collaboration and coordination in order to provide the most efficient and effective use of resources during emergencies and major disasters. The Basic Plan also supports and facilitates emergency management coordination at the federal, state, and county levels.

Goal 7 Conclusion: Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-400 Floodplain Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The proposal addresses flood hazards in compliance with Goal 7. Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-500 Hillside Development Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The 2030 Plan amendments are in compliance with Goal 7.

Statewide Planning Goal 8: Recreational Needs

OAR 660-015-0000(8)

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.

Goal 8 requires planning to meet recreation needs “now and in the future” by governmental agencies having responsibility for recreation areas, 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. Goal 8 requires State and federal agency recreation plans to be coordinated with local and regional recreational needs and plans. Goal 8 guidelines recommend inventories to determine recreation needs in the planning area,” based on adequate research and analysis of public wants and desires.” “Long range plans and action programs to meet recreational needs should be developed by each agency responsible for developing comprehensive plans.”

Metro Plan IIIH Parks and Recreation Facilities Element policy H.2 states:

“Local parks and recreation plans and analyses shall be prepared by each jurisdiction and coordinated on a metropolitan level. The park standards adopted by the applicable city and incorporated into the city’s development code shall be used in local development processes.” (Page III-H-4)

Springfield’s acknowledged Goal 8 Comprehensive Plan element is the Willamalane Park and Recreation Comprehensive Plan.

Public land UGB amendment. The 2030 Plan amendments expand the UGB to encompass certain existing publicly-owned lands, parks, open space and public facilities that are currently located outside of the UGB. The purpose of the public land expansion is to plan designate and zone those lands to protect critical publicly-owned natural resources, parks and facilities therein and to facilitate the efficient planning and management of these lands to benefit Springfield’s residents. Bringing these public lands owned by the City, Willamalane Parks and Recreation (the City’s park and recreation service provider agency) and Springfield Utility Board into the UGB recognizes the need to provide urban services — including Policing and Fire and Life Safety services to protect the health, safety and welfare of the public. The 2030 Plan Public Land, Parks and Open Space UGB expansion includes:

- Certain SUB/City public land including Springfield Utility Board’s Willamette Well Field drinking water source area and drinking water treatment facility south of South 28th Street and the Springfield Mill Race as mapped and listed in Ordinance Exhibit A; and
- Certain Willamalane Parks and Open Space lands as mapped and listed in Ordinance Exhibit A.

Willamalane Park and Recreation District (WPRD) is designated in the Eugene-Springfield Metropolitan Area General Plan as the park and recreation service provider for Springfield and its urbanizable area. Willamalane is a special service taxing district with the authorization to purchase, develop and maintain park facilities, but it has no authority or obligation for Goal 8 compliance; that responsibility lies with the City of Springfield after coordinating with the Park District.

Willamalane owns 783 acres of land (recent acquisitions not included), 37 facilities, seven community recreation and support facilities, and three undeveloped properties in the greater Springfield area. The planning area for Willamalane's 20-year Park and Recreation Comprehensive Plan is generally defined by Springfield's urban growth boundary (UGB). There are a few minor exceptions to this circumstance where the district boundary is outside the UGB. In those cases the Willamalane's planning area is defined by the district boundary. In addition, the district's boundary generally coincides with the Springfield city limits, but there are some instances where the district boundary is outside the city limits and UGB. Developed areas annexed by the City of Springfield are automatically annexed to the District.

Park and Recreation Community Needs Assessment. As part of the update to Willamalane's Park and Recreation Comprehensive Plan (Comprehensive Plan) an extensive community needs assessment was completed.²³ The Community Needs Assessment included public involvement activities such as surveys and workshops in which community input was solicited from a range of cohort groups. Information on parks and facilities, recreation services, and maintenance and operations was gathered to identify future needs for park and recreation services and infrastructure to meet a growing population.

The district population forecast is the same as the forecast used by the City of Springfield for the residential buildable lands study. Over the next 20 years, the population is projected to increase by 22 percent within the Willamalane planning area. As such, Willamalane will have to increase services, parks and facilities just to maintain the current level of service for the planning area.

Willamalane uses a parkland standard of 14.00 acres per 1,000 residents. Based on this standard, 160 additional acres of parkland are currently needed. By 2030, that total increase to 364 acres. The future parkland need of approximately 364 acres includes 68 acres of Neighborhood Parks, 102 acres of Community Parks, and 194 acres of Natural Area.

Willamalane Comprehensive Plan Map 2 lists proposed park and recreation projects. In the proposed Mill Race UGB expansion area, the following park projects are proposed:

- establishing Georgia Pacific Park as a natural area;
- establishing Clearwater Park as a special use park;
- completion of the Middle Fork multi-use path; and
- construction of the Millrace multi-use path.

The proposed UGB expansion will also include the following Willamalane properties in north Springfield:

- the Oxbow;
- Lively Park; and

²³ Willamalane Park and Recreation Comprehensive Plan, Appendix A

- Ruff Park.

There are five (5) existing parks currently outside the existing UGB that Willamalane has requested to include within the UGB. These parks are:

1. Weyerhaeuser-McKenzie Natural Area Park (Tax Lots 17022900002901, 1702300000401). These tax lots are approximately 55 acres in size. The City of Springfield transferred this property to Willamalane in October of 2013. This natural area is one of a few locations in Springfield that offers potentially ADA accessibility to the McKenzie River. Currently the site is improved with an informal parking area, an internal access road and bridge, and a well field operated by Springfield Utility Board. Willamalane has plans to improve the area with a formal parking area and universal access to the water. These plans are consistent with the *McKenzie River Oxbow Natural Area Master Plan* (the master plan for this natural area) as approved by the City of Springfield on June 18, 2001. Willamalane has plans to complete restoration of the property consistent with recommendations in the Master Plan. In addition, the use of this property as a natural area park and creating an accessible connection to the McKenzie River is consistent with the Willamalane Comprehensive Plan and its Community Needs Assessment.
2. Jack B. Lively Memorial Park (Lively Park) (Tax Lot 1702270001101). This park is a community park and is approximately 32 acres in size. A portion of the park is currently outside the UGB. The park is improved with SPLASH, a regional recreational pool facility, a playground, basketball court, sand volleyball court, walking trails, two picnic shelters and a dog park. The tax lot proposed to be included in the UGB is 9.74 acres in size and currently contains soft-surface walking trails, a footbridge, and the north portion of the dog park, consistent with the 2005, Lively Park Master Plan. Willamalane does not have any plans to further develop this area. The existing trail system on the 9.74 acre parcel is consistent with the Jack B. Lively Memorial Park Master Plan and the Willamalane Comprehensive Plan and Community Needs Assessment to provide additional opportunities for walking.
3. Ruff (Wallace M Jr.) Memorial Park (Tax Lots 1702270001502, 1702341115500). This park is a special use park and is 9.79 acres in size. It is located at 1161 66th Street in the Thurston area of Springfield. The park can be accessed from 66th Street and via a pedestrian path from Jacob Lane, which is to the south of the park. The park is currently improved with walking trails, extensive planting of Magnolia trees, and a foot bridge over Cedar Creek. In the spring of 2013 Willamalane acquired Tax Lot 1702341115500, which is 6.1 acres in size and is south of the existing Ruff Park. Although Willamalane does not currently have plans to develop this newly acquired land, any future development within the park, including the panhandle portion will be consistent with the park standards for special use parks per the Willamalane

Comprehensive Plan and the Ruff Park master plan. Currently the park serves the residents within Levi Landing subdivision, which is immediately south of the park and within the UGB. Since Ruff Park serves the residents in the UGB, it should be in the UGB

4. Clearwater Park (Tax Lots 1802080000300, 1802080000400, 1802080000500, 1802080000600). This park is a special use park and is approximately 66 acres in size. The Park has been undergone many changes in the last 3-5 years. It was recently upgraded with a new boat ramp/landing, parking, restroom, park host site, and soft surface trails. The inlet and new channel for the Springfield Mill Race was developed in 2010. It is also the eastern trailhead for the 4-mile Middle Fork Path. Future use in the park is planned to include archery range, 9-hole disc golf, a nature play-ground, and additional soft surface trails. The park offers a place for recreating with family and friends and connecting with nature. The combination of the Middle Fork Willamette River, Springfield Mill Race and their diverse habitat types, presents an opportunity to enhance natural areas, water quality and wildlife habitat while concurrently providing outdoor education and recreation amenities for the people of Springfield. This is a unique destination in south Springfield.
5. Georgia-Pacific Park. This park is approximately 125 acres in size and is classified as a natural area park. The majority of Georgia-Pacific Park is already located within the UGB. Of the 125 acres, approximately 12 acres is outside the UGB. It is jointly owned by SUB, City of Springfield and Willamalane. Plans include developing the Mill Race Path through the park, connecting to the Middle Fork Path. The Comprehensive Plan, and agreements with SUB and the City, calls for the joint development of a management plan and master plan for the park. Having the entire park included in the UGB will facilitate a joint management approach to the park. Besides developing a portion of the Mill Race Path within Georgia-Pacific Park, Willamalane has no additional development plans. Willamalane staff has conceptualized this area for soft surface trails, and habitat restoration. This is a unique destination in south Springfield. By including this entire property in the UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By including these properties within UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By incorporating both Clearwater Park and all of Georgia-Pacific Park into the UGB, the City of Springfield incorporates a regional path system within its jurisdiction. The Middle Fork Path and the Mill Race Path (once completed), will be an eight mile multi-use path that connects downtown to the Middle Fork Willamette River.

The City is bringing into its jurisdiction an increased amount of natural area parks that offer the community the opportunity to access nearby waterways, unique vegetative habitats, and an expanding network of trails and paths.

The UGB line truncates several of these Parks: Lively, Ruff, G-Pacific Park. Currently, these portions of the parks are outside the UGB and Metro Plan boundary and are subject to the Lane Rural Comprehensive Plan and Lane Code. Amending the UGB so that the entire park is within the Metro Plan boundary and Springfield UGB facilitates consistent and efficient comprehensive planning and park management considerations.

Once within the UGB, it is anticipated that the public safety of the parks may increase since the City of Springfield will have planning jurisdiction over these parks and could provide for quicker response time for emergency services compared to County enforcement and emergency services.

The proposed UGB expansion provides a significant opportunity to meet the parkland need for existing and future residents and workers in Springfield, as well as the public at large.

In 2011, Springfield Ordinance 6268 was adopted and acknowledged. The ordinance adopted the Springfield UGB and the Springfield Residential Land and Housing Needs Analysis (RLHNA). The RLHNA identified a deficit of 300 acres of parkland.

The current, acknowledged Springfield UGB only partially addressed land needed for parks, open space and public facilities. Thus, the current UGB does not provide sufficient land for parks and open space, as identified in Springfield's Goal 8 Comprehensive Plan element — the Willamalane Comprehensive Plan.

The proposed UGB expansion addresses a portion of parkland and open space needs that can be met on publicly owned land adjacent to the existing UGB.

Springfield's review and amendment of the UGB to encompass existing publicly owned parks, open space and key public facilities land does not trigger simultaneous review and amendment of housing need or other category of land need. The lands in the UGB expansion are already designated and zoned Parks and Open Space, Agriculture in the Lane County Rural Comprehensive Plan — all non-urban, non-residential land located outside of the current UGB, therefore Springfield's buildable land inventory is not affected.

Therefore the proposed UGB amendment in consideration of one category of land need — certain public facilities, parkland and open space — is consistent with OAR 660-024-0040(3).

Goal 8 Conclusion: Amending the UGB and Metro Plan boundary to including existing Willamalane Parks and Open Space land is consistent with Goal 8 and 14.

Statewide Planning 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.

Goal 11 requires urban development to be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable areas to be served. A provision for key facilities must be included in each plan. Jurisdictions are required to develop and adopt public facility plans for areas within urban growth boundaries.

The goal defines “a timely, orderly and efficient arrangement” as “a system or plan that coordinates the type, locations and delivery of public facilities and services in a manner that best supports the existing and proposed land uses.”

The goal defines “urban facilities and services” as “key facilities and to appropriate types and levels of at least the following: police protection; sanitary facilities; storm drainage facilities; planning, zoning and subdivision control; health services; recreation facilities and services; energy and communication services; and community governmental services.”

As recommended in Goal 11 guideline A.1, the Goal 14 administrative rules provide rules for coordinating plans providing for public facilities and services with plans for designation of urban boundaries, urbanizable land, and for the transition of rural land to urban uses.

OAR 660-024-0040 addresses how land needs for the 20-year planning period must be determined, including land needs for employment, transportation and public facilities.

OAR 660-024-0040(7)

“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with 195.110 and 197.296 for local governments specified in those statutes.”

Conclusion Goal 11 Applicability. Goal 11 is applicable to the 2030 plan amendments as it relates to the City’s determination of 20-year land needs for public facilities for the urban area. School facility needs are not addressed in the 2030 Plan amendments.

Metro Plan Public Facilities and Services Element. The City's 2030 Plan amendments rely upon the acknowledged Metro Plan policies, plans and findings to demonstrate Springfield's continued compliance with Goal 11 for Springfield's urban area. The Metro Plan III-G. Public Facilities and Services Element is the determination of 20-year land needs for transportation and public facilities for the lands within the Metro Plan boundary, including Springfield's urban and urbanizable areas.

The Springfield CIBL/EOA is the City's determination of 20-year land needs for employment. 20-year land needs for transportation and public facilities to serve employment and other uses will be accommodated via existing or planned facilities as identified in the Metro Plan Public Facilities and Services Element. The Metro Plan "Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan Plan Boundary*." (p. III-G-1)

The 2030 Plan amendments expand the UGB and Metro Plan boundary to meet long term employment needs and to bring existing public facilities, parks and open space into the City's UGB and Metro Plan boundary. The 2030 Plan amendment Ordinance Exhibit A amends both the Springfield UGB and the Metro Plan boundary within Springfield's jurisdictional area east of Interstate 5.

Lands within the existing UGB are subject to the Public Facilities and Services Element of the Metro Plan (Chapter III G), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter III G) plans and policies.

Lands added to the Springfield UGB and the Metro Plan boundary will be subject to the Public Facilities and Services Element of the Metro Plan (Chapter III G), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter III G) plans and policies.

2030 Plan establishes "holding area" designation and zoning allowing interim uses in UGB expansion areas consistent with Metro Public Facilities and Services Element. The 2030 Plan amendments plan and zone the UGB expansion areas new land uses within the *Metro Plan* plan boundary to allow agriculture uses, public facilities, parks and open space. These uses are the same uses the Metro Plan Public Facilities and Services Element assumed would occur in those areas.

At the time the Metro Plan Public Facilities and Services Element was acknowledged, the lands included in Springfield's UGB expansion were all within the Metro Plan Boundary²⁴. The

²⁴ A Metro Plan Boundary amendment initiated by Lane County was acknowledged in 2013. The result of that amendment was a Metro Plan Boundary east of Interstate 5 that is coterminous with Springfield's

acknowledged Metro Plan Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan* Plan Boundary as planned at the time the Metro Plan Public Facilities and Services Element was acknowledged. Planned land uses for lands within Springfield’s existing UGB — as articulated in the 2030 Plan amendments — are consistent with planned uses as designated in the acknowledged Metro Plan and as provided with services pursuant to the Metro Plan Public Facilities and Services Element. Planned land uses for lands in Springfield’s UGB expansion areas were assumed to be agriculture uses, public facilities, parks and open space.

2030 Plan long term planned uses within the UGB expansion area are employment uses, public facilities, parks and open space. Lands planned to meet long term employment needs are designated Urban Holding Area-Employment (UHA-E) and zoned Agriculture—Urban Holding Area (AG), an urban transition holding zone. The existing uses on lands designated Urban Holding Area – Employment and zoned Agriculture are agricultural uses and associated farm dwellings. Urban uses are not permitted until after annexation. Lands planned for public facilities, parks and open space are designated Public/Semi Public and zoned Public Land and Open Space.

Public facility plans coordinate the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner. Goal 11 requires cities to develop and adopt public facility plans that describe how urban development will be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable lands within the urban growth boundary to be served. The public facility plan is a support document to the comprehensive plan that coordinates the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner that best supports the existing and proposed land uses. Division 11 provides rules for developing public facility plans. The facility plan describes the water, sewer and transportation facilities which are to support the land uses designated in the acknowledged comprehensive plan [OAR 660-015-0000(1)].

The designated interim “Urban Holding Area – Employment,” the designated “Public/semi-public” and “Natural Resource” land uses in the 2030 Plan amendments are supported by the Metro Plan Public Facilities and Services policies and PFSP.

For the purposes of Goal 11, a water system is subject to regulation under ORS 448.119 to 448.285[OAR 660-015-0000(1)].

For the purposes of Goal 11, extension of a sewer or water system means the extension of a pipe, conduit, pipeline, main, or other physical component from or to an existing sewer or water system, as defined by Commission rules.

existing UGB. The City’s 2030 Plan will expand the Metro Plan Boundary east of Interstate 5 to be coterminous with Springfield’s *amended* UGB.

Goal 11 guideline 1 states that plans providing for public facilities and services should be coordinated with plans for designations of urban boundaries, urbanizable land, and the transition from rural land to urban uses.

The 2030 Plan Urbanization Element includes policies requiring timely coordination of public facilities planning with land use and transportation planning to guide the transition of lands added to the UGB from rural to urban.

Goal 11 guideline 3 states that public facilities and services in urban areas should be provided at levels necessary and suitable for urban uses.

Goal 11 guideline 4 states: “Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. The provision for future public facilities and services in these areas should be based upon: (1) the time required to provide the service; (2) reliability of service; (3) financial cost; and (4) levels of service needed and desired.” (emphasis added)

Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. Existing uses in the UGB expansion areas are rural uses. Urban employment uses are not permitted outright by adoption of the 2030 Plan amendments. Instead, as described in the City’s findings below and under Goal 14, these lands are designated and zoned with an interim “holding zone.”

The 2030 Plan Urbanization Element includes policies requiring timely provision of urban services through the annexation process, consistent with applicable Metro Plan policies.

2030 Plan Urbanization Element Policy 30:

“Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City’s infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City’s Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.”

The PFSP describes the facilities and services needed in urban areas to provide service levels necessary and suitable for urban uses.

Eugene-Springfield Metropolitan Area Public Facilities and Services Plan. The Metro Plan Public Facilities and Services Element incorporates the findings and policies in the Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (PFSP), adopted as a refinement to the Metro Plan. The PFSP is Springfield’s acknowledged public facility plan. The PFSP provides guidance for public facilities and services, including planned water, wastewater, stormwater, and electrical facilities. As required by Goal 11, the PFSP identifies and shows the general location of the water, wastewater, and stormwater projects needed to serve land within the UGB. The PFSP also contains this information for electrical facilities, although not required to by law. (p. III-G-1, 2) The PFSP addresses facilities and services needed to serve the land uses designated in the comprehensive plan, including all urban land designated urban development within the Springfield UGB. The PFSP helps assure that urban development within Springfield’s urban growth boundary is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.

Springfield has a PFSP as required under ORS 197.712(2)(e).

Before the newly urbanizable land added to the Springfield UGB can transition from urbanizable to urban (e.g. annexation to the City of Springfield to allow urban development), transportation and public facilities must be planned and provided to serve the areas added to the UGB.

2030 Plan Urbanization Element Policy 29 states:

“Annexation shall continue to be a prerequisite for urban development and the delivery of City services in accordance with the Springfield Comprehensive Plan and Springfield Development Code.”

2030 Plan Urbanization Element Policy 30 states:

“Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City’s infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City’s Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.”

2030 Plan requires timely amendment of PFSP. 2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

“Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan.”

Goal 11 guideline 5 states “A public facility or service should not be provided in an *urbanizable* area unless there is provision for coordinated development of all the other urban facilities and services appropriate to that area.”

Public facilities and services in Springfield’s *urban* areas will be provided at levels necessary and suitable for urban uses only after annexation to the City and shall be coordinated with development of all the other urban facilities and services appropriate to that area. [2030 Urbanization Element Policies 29, 30 and 31]

2030 Plan Urbanization Element Policy 27 states:

“The coordinated, timely provision of urban services is a central element of the City’s comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City’s financial resources.”***

2030 Plan Urbanization Element Policy 28 states:

“Regionally significant public investments within Springfield’s UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.”

The 203 Plan Urbanization Element (Ordinance Exhibit C-1, page 15-17 sets forth required planning procedures to ensure timely coordination of facilities planning for the UHA-E designated lands added to the UGB:

“PLAN AMENDMENT PROCEDURES AND REQUIREMENTS TO DESIGNATE UHA-E URBANIZABLE LAND FOR URBAN DEVELOPMENT BEFORE ANNEXATION AND DEVELOPMENT APPROVAL

Lands designated UHA-E require comprehensive plan amendments and may require facility plan amendments prior to their designation and zoning for urban employment use. The policies and implementation strategies in this Urbanization Element describe Statewide Planning Goal requirements that must be addressed prior to approval of plan and zoning changes that allow the transition from urbanizable to urban on lands designated UHA-E. Specific policies and implementation strategies are listed under each Urbanization Planning Goal to identify the steps needed before land may be designated, zoned and annexed to permit development to occur. These steps ensure that ample opportunities for citizen involvement are provided through community refinement planning processes conducted at the district scale to establish employment land use designations, zoning, design and development standards, transportation systems and public facilities to meet and balance community and industry needs in the North Gateway and Mill Race UHA-E Districts.”

and:

“Planning Requirements in Urban Holding Areas

District, refinement plan or master plan approval is required prior to or concurrent with annexation of land designated Urban Holding Area- Employment as shown in Table 3. Urban Holding Areas are zoned Agriculture - Urban Holding Area (AG) prior to plan amendment approval and prior to annexation.”

Table 5: Pre-Development Approval Process Steps – Urban Holding Areas	
City-initiated Planning Process	Owner-initiated Planning Process
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and 2030 Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and 2030 Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan

AG zoning remains in effect until Master Plan and new zoning are approved.	designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, Employment). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Master Plan and annexation applications with demonstration of key urban service provision.	4. Applicant prepares and submits Master Plan with proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.
5. City approves City approves Master Plan and annexation.	5. City approves Master Plan and Zoning Map Amendment and annexation.
6. Applicant submits Master Plan Type III, and Site Plan, Subdivision etc. Type II development applications.	6. Applicant submits Site Plan, Subdivision etc. Type II development applications.

The requirements above are also provided in the City’s AG Zoning District land use regulations (Ordinance Exhibit E), as explained in the City’s findings under Goals 9 and 14.

OAR 660-024-0060(8)

“The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations...

The evaluation and comparison must include:

- (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;*
- (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*
- (c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other*

major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

Goal 11 is applicable to the 2030 plan amendments as it relates to the City’s Goal 14 Boundary Alternatives Analysis process to evaluate and compare potential UGB expansion areas.

As part of Springfield’s 2030 Plan CIBL/EOA planning process, ECO Northwest and the City conducted analysis to identify public facilities and services needed to serve target employers, forecast employment growth industries, site types and site needs. The CIBL/EOA planning process identified infrastructure and service capacity constraints and development constraints as they affect the suitability and serviceability of lands in the CIBL inventory to meet identified employment site needs. ECONorthwest and the City examined industry service needs to evaluate the capacity of existing and planned public facilities and services (water, sanitary sewer, stormwater and transportation facilities) to serve areas already inside the UGB as well as areas proposed for addition to the UGB.

As part of Springfield’s UGB Alternatives Analysis process, the City conducted a series of comparative analyses to determine the degree of difficulty of serving alternative locations for UGB expansion, to identify the facilities and services that potentially will be needed and to estimate cost of developing and providing infrastructure and services. The City’s comparative estimated costs are high level approximate “rough cost estimates” expressed in current-year dollars, developed to aid in achieving the requirements of Goal 11, Public Facilities and Services, OAR 660-015-0000(11). Project cost estimates are not intended to be as exact as is required for budgeting purposes.

Goal 14 comparative analyses of serving alternative UGB expansion locations. As part of the City’s evaluation of candidate lands to include in the UGB expansion, staff conducted outreach with agency staff and service providers to conduct comparative analyses of alternative UGB expansion locations to:

- Identify public facilities and services that may be required to serve candidate areas;
- Estimate costs to provide services public facilities and services that may be required to serve candidate areas;
- Identify candidate areas or portions thereof that could be served by facilities that are already planned to serve lands within the existing UGB.
- Compare 20-year land needs for transportation and public facilities that may be required to serve the UGB expansion areas as they ultimately develop with urban uses. For this high level analysis, the City assumed Campus Industrial–type employment uses and densities would be planned for the expansion areas.

The City evaluated and compared of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services

needed to urbanize alternative boundary locations.²⁵ The City’s analysis identified the facilities and services that potentially will be needed — based on service levels for industrial and commercial uses consistent with plan policies.

ORS 197.712(2)(c)

“By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.”

The 2030 Plan expands the UGB to “provide at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.” For the purposes of the City’s public facilities and services analysis to compare and evaluate potentially suitable UGB expansion areas under Goal 14, the City evaluated needed urban services levels for industrial and commercial uses consistent with plan policies in the Metro Plan Public Facilities and Services Element, PFSP, and 2030 Plan Urbanization Element.

OAR 660-011-0025 Timing of Required Facilities

“(1) The public facilities plan shall include a general estimate of the timing for the planned public facility projects. This timing component of the public facilities plan can be met in several ways depending on whether the project is anticipated in the short term or long term. The timing of projects may be related directly to population growth, e.g., the expansion or new construction of water treatment facilities. Other facility projects can be related to a measure of the facility’s service level being met or exceeded, e.g., a major arterial or intersection reaching a maximum vehicle-per-day standard. Development of other projects may be more long term and tied neither to specific population levels nor measures of service levels, e.g., sewer projects to correct infiltration and inflow problems. These projects can take place over a long period of time and may be tied to the availability of long-term funding. The timing of projects may also be tied to specific years.

(2) Given the different methods used to estimate the timing of public facilities, the public facility plan shall identify projects as occurring in either the short term or long term, based on those factors which are related to project

²⁵ The City’s findings under Goal 14: “Public Facilities Analysis” provide summaries of public facilities for UGB study area lands organized by priority categories pursuant to ORS 197.298, and specific references to the facilities plans used as the factual base to inform the analysis.

development. For those projects designated for development in the short term, the public facility plan shall identify an approximate year for development. For those projects designated for development over the long term, the public facility plan shall provide a general estimate as to when the need for project development would exist, e.g., population level, service level standards, etc. Timing provisions for public facility projects shall be consistent with the acknowledged comprehensive plan's projected growth estimates. The public facility plan shall consider the relationships between facilities in providing for development.

(3) Anticipated timing provisions for public facilities are not considered land use decisions as specified in ORS 197.712(2)(e), and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4)."

2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."

To evaluate and compare the ESEE consequences of expanding the UGB in different locations under ORS 197.298 and Goal 14, City Engineering and Finance staff:

- Identified projects that would likely be needed to serve the area
- Prepared rough cost estimates of projects
- Identified potential funding mechanisms

Timing of needed projects shall be identified when the PFSP is updated.

OAR 660-011-0030 Location of Required Facilities

"(1) The public facility plan shall identify the general location of the public facility project in specificity appropriate for the facility. Locations of projects anticipated to be carried out in the short term can be specified more precisely than the locations of projects anticipated for development in the long term.

(2) Anticipated locations for public facilities may require modifications based on subsequent environmental impact studies, design studies, facility master plans, capital improvement programs, or land availability. The public facility plan should anticipate those changes as specified in OAR 660-011-0045.”

The existing PFSP and local facilities plans identify general location of needed public facility projects to serve lands designated for urban employment and other uses within the existing UGB.

The City’s UGB Boundary Alternatives Analysis findings²⁶ (Public Facilities and Services Analysis) identifies anticipated locations for public facilities needed to serve uses within the existing UGB and the UGB expansion areas.

OAR 660-011-0035 Determination of Rough Cost Estimates for Public Facility Projects and Local Review of Funding Mechanisms for Public Facility Systems

“(1) The public facility plan shall include rough cost estimates for those sewer, water, and transportation public facility projects identified in the facility plan. The intent of these rough cost estimates is to:

(a) Provide an estimate of the fiscal requirements to support the land use designations in the acknowledged comprehensive plan; and

(b) For use by the facility provider in reviewing the provider's existing funding mechanisms (e.g., general funds, general obligation and revenue bonds, local improvement district, system development charges, etc.) and possible alternative funding mechanisms. In addition to including rough cost estimates for each project, the facility plan shall include a discussion of the provider's existing funding mechanisms and the ability of these and possible new mechanisms to fund the development of each public facility project or system. These funding mechanisms may also be described in terms of general guidelines or local policies.

(2) Anticipated financing provisions are not considered land use decisions as specified in ORS 197.712(2)(e) and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4).”

The existing PFSP and local facilities plans comply with OAR 660-011-0035. The City’s UGB Boundary Alternatives Analysis planning process provided planning level rough cost estimates. Estimated project costs and comparisons are provided in the City’s findings under Goal 14.

²⁶ The referenced City’s findings are located in this report under Goal 14 subheader OAR 660-024-0060.

OAR Division 11 Conclusion: Springfield’s existing comprehensive plan, PFSP and 2030 Plan Urbanization Element policies comply with the applicable rules of Division 11.

Consistency with Metro Plan Public Facilities and Services Element. The 2030 Plan amendments do not include amendments to the Metro Plan Public Facilities and Services Element or concurrent amendments to the PFSP. The following findings and policies from the existing acknowledged Metro Plan Public Facilities and Services Element are applicable to Springfield land use decisions. Thus, the findings and policies are related to the 2030 Plan amendments, are provided in this report to demonstrate compliance with Goal 11 and Division 11 Public Facilities Planning, and to provide context for the 2030 Plan amendments. Excerpts from existing plan text are shown in italicized font.

“The availability of public facilities and services is a key factor influencing the location and density of future development. The public’s investment in, and scheduling of, public facilities and services are a major means of implementing the Metro Plan. As the population of the Eugene-Springfield area increases and land development patterns change over time, the demand for urban services also increases and changes. These changes require that service providers, both public and private, plan for the provision of services in a coordinated manner, using consistent assumptions and projections for population and land use.”

Goals

1. *Provide and maintain public facilities and services in an efficient and environmentally responsible manner.*
2. *Provide public facilities and services in a manner that encourages orderly and sequential growth.*

Findings and Policies

- *Urban expansion within the UGB is accomplished through in-fill, redevelopment, and annexation of territory which can be served with a minimum level of key urban services and facilities. This permits new development to use existing facilities and services, or those which can be easily extended, minimizing the public cost of extending urban facilities and services.*
- *In accordance with Statewide Planning Goal 11 and OAR 660, the Public Facilities and Services Plan identifies jurisdictional responsibility for the provision of water, wastewater and stormwater, describes respective service areas and existing and planned water, wastewater, and stormwater facilities, and contains planned facilities maps for these services. Electric system information and improvements are included in the Public Facilities and Services Plan, although not required by state law. Local facility master plans and refinement plans provide more specific project information.*

- *The Public Facilities and Services Plan finds that almost all areas within the city limits of Eugene and Springfield are served or can be served in the short-term (0-5 years) with water, wastewater, stormwater, and electric service. Exceptions to this are stormwater service to portions of the Willow Creek area and southeast Springfield, and full water service at some higher elevations in Eugene’s south hills. Service to these areas will be available in the long term. Service to all areas within city limits are either in a capital improvement plan or can be extended with development.*
- *With the improvements specified in the Public Facilities and Services Plan project lists, all urbanizable areas within the UGB can be served with water, wastewater, stormwater, and electric service at the time those areas are developed. In general, areas outside city limits serviceable in the long term are located near the urban growth boundary and in urban reserves, primarily in River Road/Santa Clara, west Eugene’s Willow Creek area, south Springfield, and the Thurston and Jasper-Natron areas in east Springfield.*
- *As discussed in the Public Facilities and Services Plan, a majority of Nodal Development Areas proposed in TransPlan are serviceable now or in the short term. The City of Eugene’s adopted Growth Management Policy #15 states, “Target publicly-financed infrastructure extensions to support development for higher densities, in-fill, mixed uses, and nodal development.”*
- *Springfield relies on groundwater for its sole source of water. Eugene Water & Electric Board’s (EWEB) water source is the McKenzie River and EWEB is developing groundwater sources. The identification of projects on the Public Facilities and Services Plan planned facilities map does not confer rights to a groundwater source.*
- *Administration and enforcement of the Clean Water Act stormwater provisions occur at the state level, through National Pollutant Discharge Elimination System (NPDES) permitting requirements. Applicable jurisdictions are required to obtain an NPDES stormwater permit from the Oregon Department of Environmental Quality (DEQ), and prepare a water quality plan outlining the Best Management Practices (BMPs) to be taken over a five-year permit period for reducing stormwater pollutants to “the maximum extent practicable.”*
- *The Clean Water Act requires states to assess the quality of their surface waters every three years, and to list those waters that do not meet adopted water quality standards. The Willamette River and other water bodies have been listed as not meeting the standards for temperature and bacteria. This will require the development of Total*

Maximum Daily Loads (TMDLs) for these pollutants, and an allocation to point and non-point sources.

- *The listing of Spring Chinook Salmon as a threatened species in the Upper Willamette River requires the application of Endangered Species Act (ESA) provisions to the salmon's habitat in the McKenzie and Willamette Rivers. The decline in the Chinook Salmon has been attributed to such factors as destruction of habitat through channelization and revetment of river banks, non-point source pollution, alterations of natural hydrograph by increased impervious surfaces in the basin, and degradation of natural functions of riparian lands due to removal or alteration of indigenous vegetation.*
- *There are many advantages to keeping channels open, including, at a minimum, natural biofiltration of stormwater pollutants; greater ability to attenuate effects of peak stormwater flows; retention of wetland, habitat, and open space functions; and reduced capital costs for stormwater facilities.*
- *An increase in impervious surfaces, without mitigation, results in higher peak flows during storm events, less opportunity for recharging of the aquifer, and a decrease in water quality.*
- *Stormwater systems tend to be gravity-based systems that follow the slope of the land rather than political boundaries. In many cases, the natural drainageways such as streams serve as an integral part of the stormwater conveyance system.*
- *In general, there are no programs for stormwater maintenance outside the Eugene and Springfield city limits, except for the Lane County Roads Program. State law limits county road funds for stormwater projects to those located within the public right-of-way.*
- *Filling in designated floodplain areas can increase flood elevations above the elevations predicted by Federal Emergency Management Agency (FEMA) models, because the FEMA models are typically based only on the extent of development at the time the modeling was conducted and do not take into account the ultimate buildout of the drainage area. This poses risks to other properties in or adjacent to floodplains and can change the hydrograph of the river.*
- *State Planning Goal 5 and OAR 660-023-0090 require state and local jurisdictions to identify and protect riparian corridors.*

Policies

- **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 this chapter, and other Metro Plan policies.**
- **Policy G.2: Use the planned facilities maps of the Public Facilities and Services Plan to guide the general location of water, wastewater, stormwater, and electrical projects in the metropolitan area. Use local facility master plans, refinement plans, capital improvement plans and ordinances as the guide for detailed planning and project implementation.**
- **Policy G.3: Modifications and additions to or deletions from the project lists in the Public Facilities and Services Plan for water, wastewater, and stormwater public facility projects or significant changes to project location, from that described in the Public Facilities and Services Plan maps 1, 2 and 3, require amending the Public Facilities and Services Plan and the Metro Plan, except for the following:**
 - 1) Modifications to a public facility project which are minor in nature and do not significantly impact the project's general description, location, sizing, capacity or other general characteristic of the project; or**
 - 2) Technical and environmental modifications to a public facility which are made pursuant to final engineering on a project; or**
 - 3) Modifications to a public facility project which are made pursuant to findings of an Environmental Assessment or Environmental Impact Statement conducted under regulations implementing the procedural provisions of the National Environmental Policy Act of 1969 or any federal or State of Oregon agency project development regulations consistent with that act and its regulations.**
- **Policy G.4: The cities and Lane County shall coordinate with EWEB, SUB, and special service districts operating in the metropolitan area, to provide the opportunity to review and comment on proposed public facilities, plans, programs, and public improvement projects or changes thereto that may affect one another's area of responsibility.**
- **Policy G.7: 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.**

- ***Policy G.10: Continue to take positive steps to protect groundwater supplies. The cities, county, and other service providers shall manage land use and public facilities for groundwater-related benefits through the implementation of the Springfield Drinking Water Protection Plan and other wellhead protection plans. Management practices instituted to protect groundwater shall be coordinated among the City of Springfield, City of Eugene, and Lane County.***

- ***Policy G.11: Ensure that water main extensions within the urban growth boundary include adequate consideration of fire flows.***

- **Policy G.13: Improve surface and ground water quality and quantity in the metropolitan area by developing regulations or instituting programs for stormwater to:**
 - a. **Increase public awareness of techniques and practices private individuals can employ to help correct water quality and quantity problems;**
 - b. **Improve management of industrial and commercial operations to reduce negative water quality and quantity impacts;**
 - c. **Regulate site planning for new development and construction to better manage pre- and post-construction storm runoff, including erosion, velocity, pollutant loading, and drainage;**
 - d. **Increase storage and retention and natural filtration of storm runoff to lower and delay peak storm flows to settle out pollutants prior to discharge into waterways;**
 - e. **Require on-site controls and development standards, as practical, to reduce off-site impacts from stormwater runoff;**
 - f. **Use natural and simple mechanical treatment systems to provide treatment for potentially contaminated runoff waters;**
 - g. **Reduce street-related water quality and quantity problems;**
 - h. **Regulate use and require containment and/or pretreatment of toxic substances;**
 - i. **Include containment measures in site review standards to minimize the effects of chemical and petroleum spills; and**
 - j. **Consider impacts to ground water quality in the design and location of dry wells.**

- ***Policy G.14: Implement changes to stormwater facilities and management practices to reduce the presence of pollutants regulated under the Clean Water Act and to address the requirements of the Endangered Species Act.***
- ***Policy G.15: Consider wellhead protection areas and surface water supplies when planning stormwater facilities.***
- ***Policy G.16: Manage or enhance waterways and open stormwater systems to reduce water quality impacts from runoff and to improve stormwater conveyance.***
- ***Policy G.17: Include measures in local land development regulations that minimize the amount of impervious surface in new development in a manner that reduces stormwater pollution, reduces the negative effects from increases in runoff, and is compatible with Metro Plan policies.***
- ***Policy G.18: The cities and Lane County shall adopt a strategy for the unincorporated area of the urban growth boundary to: reduce the negative effects of filling in floodplains and prevent the filling of natural drainage channels except as necessary to ensure public operations and maintenance of these channels in a manner that preserves and /or enhances floodwater conveyance capacity and biological function.***
- ***Policy G.19: Maintain flood storage capacity within the floodplain, to the maximum extent practical, through measures that may include reducing impervious surface in the floodplain and adjacent areas.***
- ***Policy G.26: Plan for the following levels of service for rural designations outside the urban growth boundary within the Metro Plan Boundary:***
 - a. Agriculture, Forest Land, Sand and Gravel, and Parks and Open Space. No minimum level of service is established.***
 - b. Rural Residential, Rural Commercial, Rural Industrial, and Government and Education. On-site sewage disposal, individual water systems, rural level of fire and police protection, electric and communication service, schools, and reasonable access to solid waste disposal facility.***
- ***Policy G.27: Consistent with local regulations, locate new urban water, wastewater, and stormwater facilities on farm land and urban water and wastewater facilities on forest land outside the urban growth boundary only when the facilities exclusively serve land inside the urban growth boundary and there is no reasonable alternative.***

- ***Policy G.29: Facility providers shall coordinate with Lane County and other local jurisdictions and obtain the necessary county land use approvals to amend the Lane County Rural Comprehensive Plan, or the Metro Plan, as needed and consistent with state law, to appropriately designate land for urban facilities located outside the urban growth boundary or the Plan boundary.***
- ***Policy G.30: The cities shall coordinate with Lane County on responsibility and authority to address stormwater-related issues outside the Plan boundary, including outfalls outside the Springfield portion of the urban growth boundary.***

The City's findings under Goal 14, (pages 212-235 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis.

Goal 11 PFSP Conclusions: The City conducted analysis to identify public facilities that are likely to be needed within the 2010-2030 planning period to serve the North Gateway and Mill Race UGB expansion areas.(Table 17)

The 2030 plan amendments designate urbanizable land in the UGB expansion areas as "Urban Holding Area - Employment (UHA-E), an urban transition plan designation. Lands designated UHA-E are zoned Agriculture, an urban transition zoning district. Urban land uses are not permitted until subsequent plan amendments and zone changes that demonstrate compliance with applicable planning goals including Goal 11 are adopted and acknowledged to allow transition from rural to urban. Public facilities and services needed to serve land designated for urban development in the UHA-E districts will be determined in coordination with subsequent refinement and master planning of the two new employment districts. The PFSP shall be amended as necessary after specific facility needs are determined. The 2030 Plan Urbanization Element and AG Zoning District land use regulations describe the required sequencing of post-acknowledgement plan amendments, including PFSP amendments.

The 2030 plan amendments meet the applicable requirements of Goal 11. As Springfield adopts subsequent plan amendments and zone changes that make adjustments to permitted uses or densities, the City will evaluate effects on capacity of public infrastructure, and where necessary, propose additional plan amendments in compliance with this goal.

OAR 660-011-0000 Definitions

(1) "Public Facilities Plan": A public facility plan is a support document or documents to a comprehensive plan. The facility plan describes the water, sewer and transportation facilities which are to support the land uses designated in the appropriate acknowledged comprehensive plans within an urban growth boundary containing a population greater than 2,500. Certain elements of the public facility plan also shall be adopted as part of the comprehensive plan, as specified in OAR 660-11-045.

(2) "Rough Cost Estimates": Rough cost estimates are approximate costs expressed in current-year (year closest to the period of public facility plan development) dollars. It is not intended that project cost estimates be as exact as is required for budgeting purposes.

(3) "Short Term": The short term is the period from year one through year five of the facility plan.

(4) "Long Term": The long term is the period from year six through the remainder of the planning period.

(5) "Public Facility": A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.

(6) "Public Facility Project": A public facility project is the construction or reconstruction of a water, sewer, or transportation facility within a public facility system that is funded or utilized by members of the general public.

(7) "Public Facility Systems": Public facility systems are those facilities of a particular type that combine to provide water, sewer or transportation services.

For purposes of this division, public facility systems are limited to the following:

(a) Water:

(A) Sources of water;

(B) Treatment system;

(C) Storage system;

(D) Pumping system;

(E) Primary distribution system.

(b) Sanitary sewer:

(A) Treatment facilities system;

(B) Primary collection system.

(c) Storm sewer:

(A) Major drainageways (major trunk lines, streams, ditches, pump stations and retention basins);

(B) Outfall locations.

(d) Transportation:

(A) Freeway system, if planned for in the acknowledged comprehensive plan;

(B) Arterial system;

(C) Significant collector system;

(D) Bridge system (those on the Federal Bridge Inventory);

(E) Mass transit facilities if planned for in the acknowledged comprehensive plan, including purchase of new buses if total fleet is less than 200 buses, rail lines or transit stations associated with providing transit service to major transportation corridors and park and ride station;

(F) Airport facilities as identified in the current airport master plans;

(G) Bicycle paths if planned for in the acknowledged comprehensive plan.

(8) "Land Use Decisions": In accordance with [ORS 197.712\(2\)\(e\)](#), project timing and financing provisions of public facility plans shall not be considered land use decisions as specified under [ORS 197.015\(10\)](#).

(9) "Urban Growth Management Agreement": In accordance with OAR 660-003-0010(2)(c), and urban growth management agreement is a written statement, agreement or set of agreements setting forth the means by which a plan for management of the unincorporated area within the urban growth boundary will be completed and by which the urban growth boundary may be modified (unless the same information is incorporated in other acknowledged documents).

(10) Other Definitions: For the purposes of this division, the definitions in [ORS 197.015](#) shall apply except as provided for in section (8) of this rule regarding the definition in [ORS 197.015\(10\)](#).

Statewide Planning Goal 12: Transportation

OAR 660-015-0000(12)

To provide and encourage a safe, convenient and economic transportation system

Goal 12 lists nine requirements for transportation plans, including the requirement for Transportation plans to conform with local and regional comprehensive land use plans. This section of the City's findings explain how the subject 2030 Plan amendments to the comprehensive plan were coordinated with local and regional transportation planning to support and advance the planning objectives in Goal 12:

"Plans shall (1) consider all modes of transportation including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian; including mass transit,

air, water, pipeline, rail, highway, bicycle and pedestrian; (2) be based upon an inventory of local, regional and state transportation needs; (3) consider the differences in social consequences that would result from utilizing differing combinations of transportation modes; (4) avoid principal reliance upon any one mode of transportation; (5) minimize adverse social, economic and environmental impacts and costs; (6) conserve energy; (7) meet the needs of the transportation disadvantaged by improving transportation services; (8) facilitate the flow of goods and services so as to strengthen the local and regional economy; and (9) conform with local and regional comprehensive land use plans."

The City's findings under Goal 12 provide supporting rationale to explain how coordination with local and regional transportation planning strongly influenced the City's evaluation of policy alternatives under Goal 9 and 12, and its evaluation of Urban Growth Boundary Alternatives under Goal 14 and OAR 660-024-0060.

Goal 12 defines *Transportation* as "the movement of people and goods."

Goal 12 defines *Transportation Facility* as "any physical facility that moves or assists in the movement of people and goods excluding electricity, sewage and water."

Goal 12 defines *Transportation System* as "one or more transportation facilities that are planned, developed, operated and maintained in a coordinated manner to supply continuity of movement between modes, and within and between geographic and jurisdictional areas."

Goal 12 defines *Mass Transit* as "any form of passenger transportation which carries members of the public on a regular and continuing basis."

Goal 12 defines *Transportation Disadvantaged* as "those individuals who have difficulty in obtaining transportation because of their age, income, physical or mental disability."

Springfield's acknowledged transportation plans are the regional transportation system plan (RTSP) *TransPlan*, which guides development through 2021, and Springfield's local 2035 Transportation System Plan (TSP), effective 2015-2035.²⁷ The plans were acknowledged to affirm conformance with local and regional comprehensive land use plans in compliance with Goal 12. The acknowledged regional and local transportation system plans are in effect over the 2010-2030 planning period of the subject 2030 Plan amendments to the comprehensive plan. In 2016, the RTSP is in the process of being updated.²⁸

²⁷ The Springfield TSP and adopted findings are included in the record.

²⁸ Central Lane MPO Unified Planning Work Program FY2016-2017 Interim Review and Update, Addendum to the UPWP, May 2016, Item 4 Regional Transportation System Plan. The MPO is scheduled to resume work of the RTSP after the Eugene TSP is completed. See also Item 6. Transportation Planning Performance Measures and Revised Estimated Timeline.

Springfield and Eugene, having separate UGBs, are in the process of developing local comprehensive land use plans that will eventually supplant the Metro Plan comprehensive land use plan. Updates to the regional transportation plan will conform with Eugene and Springfield's local comprehensive land use plans, as required by Goal 12. Updates to the TSP will conform with Springfield's local comprehensive land use plan.

The City's subject 2030 Plan amendments as they address land uses within the existing UGB have been planned in coordination with Springfield's acknowledged TSP and *TransPlan*.

The City's subject 2030 Plan amendments as they address lands added to the UGB have been planned in coordination with the applicable transportation policies in Springfield's acknowledged TSP, Metro Plan Transportation Element Land Use policies.

Springfield 2030 Economic and Urbanization Element policies guide land use development over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP, and Metro Plan Transportation Element Land Use policies.

Transportation planning required prior to future development in UGB expansion areas.

Transportation planning will be coordinated with future urbanization of lands added to the UGB by the City's subject 2030 Plan amendments through future amendments to the TSP and RTSP. The City and Lane County adopted 2030 Plan Urbanization Element policies and land use regulations requiring a post-acknowledgement plan amendment process — including necessary updates to the TSP — prior to issuance of land use development approval that increases trips above existing rural levels of use. By adopting Ordinance Exhibits A-2, A-3 and E, the City and Lane County designated the newly urbanizable employment lands added to the UGB as "Urban Holding Area – Employment" and zoned the lands "Agriculture –Urban Holding Area."

Springfield 2030 Economic and Urbanization Element policies guide development of employment land uses over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP and in coordination with regional transportation plans as they are updated.

The required PAPA process to update the TSP will address OAR 660-009-0000(1)(i): *"Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities."*

OAR 660-012-0000(1) Oregon Administrative Rules Division 12 implements Statewide Planning Goal 12 (Transportation) "to provide and encourage a safe, convenient and economic transportation system" and "implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities

and services in close coordination with urban and rural development.” The Stated purpose of Division 12 Transportation Planning is:

“to direct transportation planning in coordination with land use planning to:

(a) Promote the development of transportation systems adequate to serve statewide, regional and local transportation needs and the mobility needs of the transportation disadvantaged;

(b) Encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation;

(c) Provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation;

(d) Facilitate the safe, efficient and economic flow of freight and other goods and services within regions and throughout the state through a variety of modes including road, air, rail and marine transportation;

(e) Protect existing and planned transportation facilities, corridors and sites for their identified functions;

(f) Provide for the construction and implementation of transportation facilities, improvements and services necessary to support acknowledged comprehensive plans;

(g) Identify how transportation facilities are provided on rural lands consistent with the goals;

(h) Ensure coordination among affected local governments and transportation service providers and consistency between state, regional and local transportation plans; and

(i) Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities.”

Because Springfield’s population is greater than 2,500, Goal 12 administrative rules required the City to prepare and adopt a TSP. Prior to 2014, Springfield met this requirement through the local and regionally adopted TransPlan.

TransPlan (last amended in 2002) conforms with the land use designations and land use patterns established in Springfield’s acknowledged local and regional comprehensive land use plans — the Metro Plan and Springfield’s acknowledged refinement plans.

Prior to 2014, the 2002 TransPlan served as both the adopted local TSPs for Eugene and Springfield and as the Regional Transportation System Plan (RTSP) for the Central Lane MPO area.

In 2014 the Springfield 2035 TSP was adopted to supersede TransPlan as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects transportation systems within the Springfield UGB.

In 2016, the city of Eugene is preparing the Eugene TSP.

TransPlan will remain as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted by the appropriate MPO jurisdictions. An updated RTSP is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.²⁹

As stated in the City's TSP findings³⁰:

"... the needs, projects, and policies identified in the Springfield TSP are consistent with TransPlan population and employment projections and therefore the TSP is consistent with TransPlan. Thus, TransPlan can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete. Until the new RTSP is adopted, Springfield is still held to the adopted performance standards in TransPlan (acting as the RTSP) and nothing in the 2035 Springfield TSP will inhibit or discourage continued achievement of the 2002 TransPlan performance objectives."

The City of Springfield 2035 Transportation System Plan (TSP) was adopted and acknowledged in 2014³¹ to replace the TransPlan as Springfield's local TSP after a thorough TSP planning process involving the general public, stakeholders, other agency staff and local and regional appointed and elected officials. The TSP conforms with the land use designations and land use patterns established in Springfield's local and regional comprehensive land use plans — the Metro Plan (including the acknowledged Springfield 2030 Residential Land Use and Housing Element³² and Springfield's acknowledged refinement plans).

The Springfield TSP is a comprehensive 20-year plan to guide transportation investments within the City of Springfield UGB — replacing TransPlan as the Transportation Element of the Metro Plan for the City of Springfield. The TSP was adopted by Springfield and Lane

²⁹ Central Lane MPO Unified Planning Work Program (WPWP) Addendum to the UPWP May 2016, p. 8 revised timeline, Action Item 4.

³⁰ Springfield File No. TYP413-00009, Staff Report Attachment 1, p. 19.

³¹ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, Staff Report Exhibit A 2/24/14.

³² Springfield Ordinance No. 6268 establishing a separate City of Springfield UGB pursuant to House Bill 3337 (2006) as codified in Oregon Revised Statute 197.304.

County as a post acknowledgement plan amendment of the Metro Plan — as a supporting facility refinement plan providing more detailed policy guidance for specific transportation facilities, as required under Goal 12.

Springfield’s acknowledged TSP provides a 20-year blueprint for how the City should maintain and improve the transportation network to meet growth demands within the existing Springfield UGB. The TSP addressed OAR 660-009-0000(1) (a) – (h).

The Springfield TSP identifies the preferred future multi-modal transportation system and the City’s policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. The TSP goals and policies implement the Goal 12: Transportation Element of the Metro Plan.³³ It is important to note that transportation modelling for the acknowledged TSP was developed in coordination with Springfield’s 2030 comprehensive planning as follows:

“The transportation model used in the Springfield TSP differs from the TRANSPLAN model used in TransPlan. The TSP used the Springfield 2035 BUILD 1 (full build) model, which incorporates the Springfield 2030 land use plan. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area. The employment forecast was made by LCOG based on historical trends.”³⁴ (emphasis added)

“Comparisons are made below with TRANSPLAN, the regional TSP for the Eugene/Springfield area. There are significant differences between TRANSPLAN and the SPRINGFIELD travel model:

- a) TRANSPLAN geography is that of the METROPLAN; it does not include the City of Coburg. The SPRINGFIELD 2035 geography is that of the current MPO which includes Coburg and some additional Lane County land surrounding the UGBs.*
- b) TRANSPLAN model used 295 transportation analysis zones; the 2035 SPRINGFIELD model uses 666 transportation analysis zones. Thus, the latter has more refinement in the analysis units.*
- c) TRANSPLAN model did not have special treatment for BRT system operations; the 2035 SPRINGFIELD model does.*
- d) TRANSPLAN land use included the TRANSPLAN nodes. The 2035 SPRINGFIELD model has no specific nodes specified.*
- e) TRANSPLAN used the TPR vehicle trip rate reduction of 10% allowed by the TPR. The 2035 SPRINGFIELD model did not. (VTR=vehicle trip reduction). Under this*

³³ Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report, p. 2.

³⁴ Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report Attachment A: Statistics from the Springfield 2035 BUILD 1 travel demand model.

reduction trips from areas designated as mixed-use, pedestrian friendly areas are removed and transferred to other modes.”³⁵

As stated in the adopted TSP findings, Springfield Ordinance 6314 Exhibit A, the previously adopted and acknowledged Springfield TSP demonstrated that the TSP is consistent with the 2002 TransPlan.

As previously noted in the City’s TSP findings:

“the 2002 TransPlan will still serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until the new RTSP is adopted. An updated RTSP is being worked on through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission. This regional process will enable the full effect of Springfield’s policies and priorities, the City of Eugene’s Envision Eugene strategies and multimodal projects and LTD’s final transit network to be appropriately represented within the LCOG travel demand model. At that time, both cities and the region can establish and evaluate key performance statistics to replace and/or supplement those included in TransPlan that allow the cities and the region to monitor over time progress toward this TSP criteria. Further, as noted previously although the horizon years for Springfield’s TSP and the RTP are different than that of TransPlan, the total population and employment estimates, upon which the recommended multimodal projects and policies in the TSP are based, are consistent. Detailed information received from LCOG provides the following information:

- *The 2002 TransPlan modeled year 2020 total Population estimates for the Metro Area as 325,400; year 2025 total population was forecast as 351,263. The Springfield TSP is based on a total population for the Metro Area of 316,452 people, less than that of TransPlan.*
- *The 2002 TransPlan modeled year 2020 covered employment of 164,100 jobs; year 2025 forecasts reflect 176,004 jobs. The Springfield TSP accounts for only 164,110 in the region.*

Based on these population and employment forecast comparisons, it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the 2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan and can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete. (emphasis added)

³⁵ Ibid.

Conclusion 660-009-0000(1): The acknowledged Springfield TSP, including the travel demand model, and the 2030 Plan amendments were coordinated to advance the objectives of OAR 660-009-0000(1).

OAR 660-012-0000(2)

The stated purpose (2) of Division 12:

“In meeting the purposes described in section (1), coordinated land use and transportation plans should ensure that the planned transportation system supports a pattern of travel and land use in urban areas that will avoid the air pollution, traffic and livability problems faced by other large urban areas of the country through measures designed to increase transportation choices and make more efficient use of the existing transportation system.”
(emphasis added)

OAR 660-012-0000(3)

The stated purpose (3) of Division 12 addresses coordination of land use and transportation planning:

“Coordinating land use and transportation planning will also complement efforts to meet other state and local objectives, including containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change.” (emphasis added)

“(a) In all urban areas, coordinated land use and transportation plans are intended to provide safe and convenient vehicular circulation and to enhance, promote and facilitate safe and convenient pedestrian and bicycle travel by planning a well-connected network of streets and supporting improvements for all travel modes. (emphasis added)

(b) In urban areas that contain a population greater than 25,000 persons, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting the provision of transit service where feasible and more efficient performance of existing transportation facilities through transportation system management and demand management measures. (emphasis added)

(c) Within metropolitan areas, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting changes in the transportation system and land use patterns. A key outcome of this effort is a reduction in reliance on single occupant automobile use, particularly during peak periods. To accomplish this outcome, this division

promotes increased planning for alternative modes and street connectivity and encourages land use patterns throughout urban areas that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs. The result of applying these portions of the division will vary within metropolitan areas. Some parts of urban areas, such as downtowns, pedestrian districts, transit-oriented developments and other mixed-use, pedestrian-friendly centers, will be highly convenient for a variety of modes, including walking, bicycling and transit, while others will be auto-oriented and include more modest measures to accommodate access and circulation by other modes.”
(emphasis added)

The RTSP and TSP promote increased planning for alternative modes and street connectivity.

The Springfield 2035 TSP contains multiple goals and policies which support implementation of OAR 660-012-0000(3) and Springfield’s existing and proposed plan designations, existing land use efficiency measures and new 2030 Plan policies. These TSP policies include, but are not limited to:

TSP Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.

TSP Policy 1.3: Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).

TSP Policy 2.3: Expand existing Transportation Demand Management (TDM) programs related to carpooling, alternate work schedules, walking, bicycling, and transit use in order to reduce peak hour congestion and reliance on SOVs.

TSP Policy 2.5: Coordinate with Lane Transit District (LTD) to increase the transit system’s accessibility and convenience for all users, including the transportation-disadvantaged population. (NOTE Action 2: Monitor and adjust bus stop locations as needed to support surrounding land uses and provide more efficient and safe service).

TSP Goal 3: System Design: Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.

TSP Policy 3.2: Expand and enhance Springfield’s bikeway system and provide bicycle system support facilities to both new development and redevelopment / expansion.

TSP Policy 3.3: *Street design standards should be flexible and allow appropriate-sized local, collector, and arterial streets based upon traffic flow, geography, efficient land use, social, economic, and environmental impacts.*

TSP Policy 3.7: *Provide for a pedestrian environment that supports adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking by providing direct routes and removing barriers when possible.*

TSP Policy 3.8: *Coordinate the design of Springfield's transportation system with relevant local, regional, and state agencies. (NOTE Action #3 – Partner with LTD to provide frequent transit network connections along major corridors. Frequent transit network should connect to local neighborhood bus service and major activity center to provide viable alternatives to vehicle trips).*

The 2030 Plan amendments support and advance TSP and RTSP coordinated land use and transportation planning policies and measures designed to increase transportation choices and make more efficient use of the existing transportation system. The City and Lane County adopted 2030 Plan policies and implementation strategies that are supportive of land use patterns that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs.

2030 Plan policies and the UGB amendment direct planned employment growth to existing employment centers and corridors serviced by the region's existing and planned public transit network. The UGB Alternatives Analysis considered "containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change" when it compared the advantages and disadvantage of alternative expansion areas. The City's policy choices to absorb growth within the existing UGB, to reduce the size of the UGB expansion, and to expand the UGB expansion into two sites immediately adjacent to existing, developed industrial zones reduces VMT and the associated energy, air quality, GHG impacts compared to expanding into land more distant from the City.³⁶

2030 Plan Urbanization Element Policy 51 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy***

³⁶ The City's findings under Goal 14, page 388 explain how comparative VMT associated impacts were considered in the UGB Boundary Alternatives Analysis conducted under OAR 660-024-0060.

vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.

- **Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.**
- **Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.**
- **Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.”**

2030 Comprehensive Plan policies to guide future transportation system planning. To address Goal 12, the City and Lane County adopted policies in the 2030 Plan Urbanization Element to guide future transportation system planning to serve the lands added to the UGB through the subject UGB amendment:

2030 Plan Urbanization Element Policy 23 states:

“Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area.”

2030 Plan Urbanization Element Policy 39 states:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.”

2030 Plan Urbanization Element Policy 40 states:

“Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.”

2030 Plan Urbanization Element Policy 27 states:

***“The coordinated, timely provision of urban services is a central element of the City’s comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.*”**

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City’s financial resources.”***

2030 Plan Urbanization Element Policy 28 states:

“Regionally significant public investments within Springfield’s UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.”

2030 Plan Urbanization Element Policy 24 states:

“Lands added to the UGB in 2016 for employment, public facilities, parks, open space and recreation in the Mill Race area shall be comprehensively planned in the context of a larger Mill Race District that includes the Booth Kelly Mixed Use site and the industrially-zoned lands south of the railroad corridor. The plan shall identify opportunities for integrating economic development, recreation, arts, culture, historic interpretation, and pedestrian/bicycle connectivity between the Middle Fork Willamette River and Downtown District; and shall identify development standards that protect Drinking Water Source Areas and other natural resources from incompatible development.”

Conclusion 660-012-0000(2) and (3): The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to advance the objectives of OAR 660-012-0000(2) and (3).

OAR 660-012-0015(3)

OAR 660-012-0015(4)

OAR 660-012-0016(1)

As previously explained, Springfield has acknowledged regional and local Transportation System Plans establishing a system of transportation facilities and services adequate to meet identified local transportation needs, consistent with adopted elements of the state TSP, as required in OAR 660-012-0015(3) and (4), and OAR 660-012-0016(1)

OAR 660-012-0020 Elements of Transportation System Plans

OAR 660-012-0025 Complying with the Goals in Preparing Transportation System Plans; Refinement Plans

Springfield's comprehensive plan — consisting of the acknowledged Metro Plan as further refined and augmented through acknowledgement of the local TSP, Springfield 2030 Comprehensive Plan and Springfield's seven acknowledged neighborhood refinement plans — coordinate land use planning with the local and regional transportation plans allocating urban population density and employment to designated centers and other identified areas in the MPO to provide for implementation of the metropolitan area's integrated land use and transportation plan or strategy.

Springfield's TSP was previously acknowledged to be consistent with Division 12 and the Central Lane MPO's Regional Transportation Plan (RTP). TSPs for cities and counties located within an MPO area must be consistent with both the Division 12 Transportation Planning Rule (TPR) and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements. The TPR distinguishes requirements for communities based on population size. Given Springfield's population and the fact that it is a member of the Central Lane MPO, the following elements addressed in the acknowledged Springfield TSP:

- A determination of transportation system needs;
- State, regional, and local transportation needs;
- Needs of the transportation disadvantaged;
- Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR 660-009 and Goal 9;
- Calculation of local and regional transportation needs based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile;
- System design to support increasing transportation choices and reducing automobile reliance;
- A road plan for a system of arterials and collectors and standards for the layout of local streets and other important non-collector street connections.
- Functional classifications of roads in the Springfield TSP are consistent with functional classifications of roads in state and regional TSPs and provide for continuity between adjacent jurisdictions;
- The standards for the layout of local streets shall provide for safe and convenient bike and pedestrian circulation necessary to carry out OAR 660-012-0045(3)(b);
- New connections to arterials and state highways consistent with designated access management categories;

- A public transportation plan that describes public transportation services for the transportation disadvantaged and identifies service inadequacies; intercity bus and passenger rail service and identifies the location of terminals; and identifies existing and planned transit trunk routes, exclusive transit ways, terminals and major transfer stations, major transit stops, and park-and-ride stations;
- A bicycle and pedestrian plan for a network of bicycle and pedestrian routes throughout the planning area consistent with the requirements of ORS 366.514;
- A rail, water and pipeline transportation plan which identifies where mainline and branchline railroads and railroad facilities, port facilities, and major regional pipelines and terminals are located or planned within the planning area;
- A plan for transportation system management and demand management;
- A parking plan as provided in OAR 660-012-0045(5)(c);
- Policies and land use regulations for implementing the TSP as provided in OAR 660-012-0045

The TSP supersedes *TransPlan* as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects land within the existing Springfield UGB. The TSP adoption findings confirmed that the TSP is consistent with the Metro Plan and *TransPlan*. *TransPlan* will remain in effect as the region's Regional Transportation System Plan (RTSP) until such time as a new RTSP is adopted by the partner jurisdictions. An updated *RTSP* is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.³⁷

The Springfield 2035 Transportation System Plan (2035 TSP) meets state requirements for a transportation system plan and is a resource for future transportation decision making. The 2035 TSP identifies the preferred future multi-modal transportation system and the City's policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. This TSP is intended to provide the City with flexibility as staff, the public, and decision makers prioritize and fund critical transportation investments. The TSP provides:

- *A blueprint for transportation investment*
- *A tool for coordination with regional agencies and local jurisdictions*
- *Information to ensure prudent and effective land use choices*
- *Solutions to address existing and future transportation needs for bicycles, pedestrians, transit, vehicles, freight, and rail*

The TSP is the transportation element of and a supporting document to Springfield's current comprehensive planning document (Metro Plan, 2004 update) as required by state law. The City

³⁷ Springfield Ordinance 6314

updated the 2035 TSP goals and policies during the planning process to implement the Goal 12: Transportation Element of the Metro Plan.

Oregon Transportation Plan (OTP) Policy 2.2 – Management of Assets “It is the policy of the State of Oregon to manage transportation assets to extend their life and reduce maintenance costs.”

The 2030 Plan addresses transportation/land use planning coordination for employment sites added to the UGB. Urbanization Element Policy 38 requires that the TSP be updated and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over levels permitted in the AG zone and before any urban level development can occur in the UGB expansion areas:

“To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.” (emphasis added)

Urbanization Element Policy 39 requires:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.” (emphasis added)

Urbanization Element Policy 49 prohibits regional retail uses in the UGB expansion areas:

“Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing³⁸ uses and office/tech/flex employers in Springfield’s target industry sectors. Limited

³⁸ For the purposes of this policy, “clean” is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield’s drinking water source areas from contamination.

neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses. (emphasis added)

Springfield's existing transportation capacity and operational efficiency was measured through the TSP process. Future transportation capacity and operational efficiency will be measured through use of Lane Council of Governments (LCOG) Regional Transportation Model.

The acknowledged TSP is consistent with the statewide Transportation Planning Rule and the Central Lane MPO's Regional Transportation Plan (RTP) as required under OAR 660-012-0016. TSPs for cities and counties located within an MPO area must be consistent with both the statewide Transportation Planning Rule and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements.

The Central Lane MPO RTP meets federal guidelines for the area and guides regional transportation system planning and development. The RTP currently has a planning horizon that goes beyond the planning horizons of the Metro Plan and *TransPlan*. The RTP is updated every four years. Springfield's TSP is consistent with the most currently updated RTP.

The 2030 Plan Springfield's comprehensive plan and the proposed 2030 Plan elements and UGB amendment has been coordinated with the RTP.

Conclusion 660-012-0020, OAR 660-012-0025, OAR 660-012-0030 (1), (2). The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to comply with 660-012-0020, OAR and 660-012-0025.

OAR 660-012-0030 Determination of Transportation Needs

OAR 660-012-0030(1)

OAR 660-012-0030(2)

Conclusion OAR 660-012-0030 (1) and (2). The acknowledged Springfield TSP and 2030 Plan Economic and Urbanization Element policies and UGB amendments were coordinated to identify transportation needs relevant to the planning area including state, regional and local needs; the needs of the transportation disadvantaged; the needs for movement of goods and services to support industrial and commercial development as described in the City's findings under Goal 9 and Goal 14. The TSP is acknowledged to be in compliance with OAR 660-009-0030 (1), and (2). Future updates to the TSP are required to address the needs for movement of goods and services to support industrial and commercial development in the UGB expansion areas, as required by 2030 Urbanization Element policies³⁹ and

³⁹ Exhibit C-1Urbanization Element Policy 38 and 39

OAR 660-012-0030(3)

“Within urban growth boundaries, the determination of local and regional transportation needs shall be based upon:

(a) Population and employment forecasts and distributions that are consistent with the acknowledged comprehensive plan, including those policies that implement Goal 14.

Forecasts and distributions shall be for 20 years and, if desired, for longer periods; and

(b) Measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.”

The planning year horizon for the acknowledged Springfield TSP is 2035, consistent with the Regional Transportation Plan (RTP), which is also 2035. The planning year horizon for the current RTSP (i.e. TransPlan) is 2025 (as amended in 2010).

Springfield’s previously acknowledged UGB provides adequate residential land to accommodate the forecast population growth for the 2010-2030 planning period by designating land to meet the City’s deficit of high density residential land.⁴⁰ The acknowledged TSP was planned in coordination with the 2010-2030 forecast residential land need. The transportation model used in the Springfield TSP used the Springfield 2035 BUILD 1 (full build) model, which incorporates the Springfield 2030 land use plan. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area.⁴¹ The employment forecast was made by LCOG based on historical trends. Land use was allocated in the TSP as described in the acknowledged Springfield Residential Land Use and Housing Element.⁴² The determination of transportation needs in the TSP was based on measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile. 2010-2030 residential growth needs were addressed in the TSP. The planned transportation system addresses transportation needs.

It is important to note that based on the population and employment forecast comparisons used in the recent transportation system modelling work, “it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the

⁴⁰ Springfield Ordinance 6316 Glenwood Refinement Plan Phase One amendments included measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.

⁴¹ For more detailed information see Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14.

⁴² For example, the TSP allocated high density residential land uses in the Glenwood Residential Mixed-Use district, based on the Glenwood Refinement Plan Phase One plan amendments and Glenwood Plan District zoning code. The area is designed Mixed Use Nodal Development in the Metro Plan and was granted one of the first Multi-modal Mixed Use Area (MMA) designations in the state.

2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan.”⁴³

TSP Update to address 2030 UGB/Employment Forecast. Springfield’s CIBL/EOA identified a need to expand the UGB to accommodate future employment land needs. Because a UGB expansion had not yet occurred when the TSP was adopted, the TSP addressed land uses within Springfield’s existing UGB. Subsequent to acknowledgement of the 2030 Plan and UGB amendment, the TSP will need to be updated as necessary before any urban level development that increases trips over existing rural levels can occur in the UGB expansion areas.⁴⁴ As previously stated, the 2030 Urbanization Element policies (Ordinance Exhibit A-2, C-1, D) and Springfield Development Code land use regulations (Ordinance Exhibit A-3 and E) adopted by the City and Lane County ensure that the TSP is updated to reflect the Springfield 2030 employment forecast adopted into the Comprehensive Plan (Ordinance Exhibit B-2) and to provide distributions that are consistent with the comprehensive plan as amended through acknowledgement of the subject ordinance, including the 2030 Plan designations and policies that implement Goal 14.

2030 Plan Urbanization Element Policy 38 states:

“To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.”

The City’s findings under Goal 14, (pages 212-235 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis. The City’s findings under Goal 14, Factor 3 ESEE Consequences p. 388-393 address transportation impacts related to distance from the city and from major transportation facilities. Vehicle Miles Travelled

Conclusion OAR 660-012-0030 (3). The acknowledged Springfield TSP was coordinated with Springfield 2030 population forecasts and land use distributions that are consistent with the acknowledged comprehensive plan. The 2030 Plan amendments require transportation planning updates prior to any

⁴³ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 3.

⁴⁴ As explained in the City’s detailed findings under Goal 14 Public Facilities Analyses, and supported by evidence in the form of maps and adopted facilities plans in the local record, both UGB expansion areas would be served by existing or planned transportation facilities or projects already assumed and identified in the TSP.

plan or zoning amendment that allows urban levels of development in the UGB expansion areas designated UHA-E. The acknowledged Springfield TSP and comprehensive plan, and the subject 2030 Plan amendments support implementation of land use patterns and transportation system improvements to encourage reduced reliance on the automobile.

OAR 660-012-0035(1),(3),(4) and (5)

Transportation and land use coordination policies intended to provide a transportation system to support economic development and goods movement while reducing reliance on the automobile were relevant to the Springfield 2035 TSP and are relevant to 2030 Plan. The findings for the TSP⁴⁵ provide explanation:

“The 2035 Springfield TSP is also consistent with the 2002 TransPlan from a goals and policy standpoint. Attachment B is a memorandum that provides a comparison and consistency evaluation between the draft goals for the RTSP update and policies contained in the Eugene, Springfield, and Coburg TSPs currently being prepared, and the existing Lane County TSPs and TransPlan. Each of these documents has very similar goal and policy objectives and in no way in conflict with each other to the extent that any one plan might undermine the implementation of another. It should be noted that while the Springfield 2035 TSP does not specifically address or include the nodal growth policies that are identified in the 2002 TransPlan, there is nothing in the 2035 Springfield TSP that would inhibit or discourage the potential for growth in the nodal areas that have already been established in Springfield’s current comprehensive land use planning document (Metro Plan, 2004 update) and enabled through the City’s zoning and development code. Additionally, a similar or greater lever of alternative travel mode projects are identified for implementation in these areas compared to TransPlan. Consequently, with the 2002 TransPlan still in effect as the adopted RTSP for the Central Lane MPO area and with the Metro Plan still serving as the City’s comprehensive land use planning document, adoption of the 2035 Springfield TSP will not interfere with or undermine continued implementation and evaluation of TPR compliance or progress as periodically assessed through the currently adopted 2002 TransPlan performance measures.” (emphasis added)

As stated in TSP staff report⁴⁶, the projects, plans and policies in the acknowledged TSP support implementation of the 2002 TransPlan performance measures:

“The TSP policies in Chapter 2, the transportation planning toolbox and the recommended projects in Chapter 5 are all based on the premise of reducing reliance on the automobile in the future. The majority of the recommended projects are either

⁴⁵ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 4-35.

⁴⁶ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report, Attachment 1, p. 15.

transit, new off-street pedestrian and bicycle facilities, and/or upgrades to existing streets to add pedestrian and bicycle features. There are very few projects aimed solely at facilitating motor vehicle mobility. Further, the city is exploring alternative mobility standards at key locations to reduce the need for and impact of roadway improvement projects on state facilities.” (emphasis added)

“In addition, the land use allocation of jobs and households that serves as the basis for the LCOG travel demand model focuses the majority of the growth in key redevelopment opportunity areas within the City, such as the Glenwood Riverfront Area, Downtown, Gateway, and Jasper-Natron. Noted in TransPlan as nodal areas, these areas are intended as mixed use, high density environments that will require a robust pedestrian, bicycle and transit infrastructure.” (emphasis added)

The 2030 Plan designates employment land to provide efficient freight/goods movement to support economic development.

Metro Plan Transportation Element p. III-F-11 states:

“The OTP recognizes that goods movement of all types makes a significant contribution to the region’s economy and wealth and contributes to residents’ quality of life. OTP Policy 3A promotes a balanced freight transportation system that takes advantage of the inherent efficiencies of each mode.”

“Goods movement is directly supported by system-wide and roadway transportation system improvements.”

The 2030 Plan provides coordinated land use and transportation policies intended to provide a transportation system to support economic development and goods movement — consistent with Metro Plan Transportation Element Policy F.29 which states:

“Support reasonable and reliable travel times for freight/goods movement in the Eugene Springfield region.”

The 2030 Plan designates employment growth areas with convenient access to I-5, and State Highways and truck routes to facilitate movement of goods.

Metro Plan Transportation Element p. III-F-1 describes the transportation planning strategies addressed in the Metro Plan Transportation Element to implement a safe, convenient, and economic transportation system in compliance with Goal 12:

“Three types of transportation planning strategies are reflected in the goals and policies in this element: transportation demand management (TDM), land use, and system improvements. TDM strategies focus on reducing demands placed on the transportation system, and thus system costs, by providing incentives to redistribute or

eliminate vehicle trips and by encouraging alternative modes. Land use strategies focus on encouraging development patterns that reduce the need for automobiles, reduce trip lengths, and support the use of alternative modes. System improvements focus on increasing efficiency and adding capacity or new facilities to the existing highway, transit, bicycle, and pedestrian systems. (emphasis added).

Together, these strategies form a balanced policy framework for meeting local and state transportation goals to: increase urban public transit rider-ship; reduce reliance on the automobile; substitute automobile trips with alternative modes, such as walking and biking; and reduce automobile energy consumption and transportation costs.

Not all Transportation Element policies will apply to a specific transportation-related decision. When conformance with adopted policy is required, policies in this and other Metro Plan elements will be examined to determine which policies are relevant and can be applied. When policies support varying positions, decision makers will seek a balance of all applicable policies. Goals are timeless, but some policies will expire as they are implemented.”

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

“However, it should be noted that the 2002 TransPlan continues to serve as the region’s Transportation Planning Rule (TPR) required RTSP until such time as a new RTSP is adopted by the appropriate MPO jurisdictions. The performance measures by which progress towards meeting TPR requirements over the TransPlan planning horizon are evaluated for the Central Lane MPO area shall also remain in effect until (1) both Eugene and Springfield have completed updates to their land use and transportation plans, (2) a new assessment (based on analysis from both new local TSPs) of how well the Region is addressing TPR requirements is completed, (3) a determination of how or if the current performance measures need to be updated is completed, and (4) a new RTSP is completed and adopted. Because it is important that the local TSP for Springfield continues to support the policies and general objectives of the 2002 TransPlan until a new RTSP is adopted, Staff has prepared findings confirming that the Springfield TSP is consistent with the 2002 TransPlan.”

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

“For the purpose of serving as Springfield’s local TSP, TransPlan will be replaced by the Springfield 2035 TSP. However, TransPlan will continue to serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted. An updated RTSP is being developed through a regional process described in a work plan agreed to with the Land Conservation and Development Commission. The Central Lane MPO member jurisdictions are in the process of refining the task details

and timelines in the existing RTSP update work plan with LCDC to more accurately reflect the coordination challenges and various dependencies between the RTSP, local TSP, and land use planning work that is underway. This includes future work needed to assess compliance with the TPR per capita VMT reduction requirements or assess and incorporate updated performance measures in the Regional Transportation System Plan (RTSP) based on the analysis conducted for the Springfield and Eugene TSPs after each local TSP is reconciled with any land use plan changes that are made through the processes that are currently underway. As previously noted, until that work is complete, the current 2002 TransPlan and its performance measures will remain in effect.”
(emphasis added)

Metro Plan Transportation Element Policies F.1, F.2, F.3, and F.4 coordinating transportation planning with plan use planning are implemented through the projects, programs and policies in the Springfield TSP and through Springfield’s acknowledged comprehensive plan land use designations and land use regulations.

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.”

Policy F.2: “Support application of the nodal development strategy in designated areas through information, technical assistance, or incentives.”

Policy F.3: “Provide for transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.”

Policy F.4: “Require improvements that encourage transit, bicycles, and pedestrians in new commercial, public, mixed use, and multi-unit residential development.”

The Metro Plan⁴⁷ defines Nodal development (node) as follows:

Nodal development (node): 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, walking and bicycling;

⁴⁷ Metro Plan Chapter V Glossary, p.V-4.

- 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 least 12 units per net acre.

Nodal developments will vary in the amount, type, and orientation of commercial, civic, and employment uses; target commercial floor area ratios; size of building; and the amount and types of residential uses.

As demonstrated in the TSP findings, the acknowledged Springfield TSP provides local comprehensive plan coordinated land use-transportation policies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4.

The subject 2030 Plan amendments (Ordinance Exhibits B, C, D and E) provide local comprehensive plan land use goals, policies and implementation strategies coordinated with transportation policies, programs, projects and strategies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4. The City's 2030 Plan emphasizes a compact urban growth pattern, by providing land to meet all employment land needs for sites smaller than 5 acres within the existing UGB.⁴⁸

The City's previously acknowledged 2030 Plan Residential Land and Housing Element Policies and land use efficiency measures and densities allocate all residential and housing growth needs to lands within the existing UGB.⁴⁹

The 2030 Comprehensive Plan Economic and Urbanization Elements address the integral relationship between transportation systems and land use in comprehensive planning through land use plan amendments and policies that direct urban development and urban expansion to areas identified as necessary and suitable for urban development; and through policies that address (1) the need for all modes of transportation to support economic development and livability including mass transit, rail, highway, bicycle and pedestrian; (2) the transportation needs of the workforce and target industry employers based on Springfield's Economic Opportunities Analysis; (3) avoiding principal reliance upon any one mode of transportation; (4) minimizing adverse social, economic and environmental impacts

⁴⁸ As explained in the CIBL/EOA and the City's findings under Goal 9.

⁴⁹ Acknowledged 2030 Residential Land Use and Housing Policy H.1 densities support transit: Residential Low Density 6-14 du/acre, Residential Special Density 8-14, Residential Medium Density 14-28 du/acre, Residential High Density 28-42 du/acre, Springfield Development Code Glenwood Plan District Residential Mixed Use 50 du/ac minimum, no maximum, Mixed Use Residential MUR 20 du/acre minimum; MUC no maximum. Policy H.3 and implementation actions 3.1, 3.2, 3.3, 3.4; Policy H.4; Policy H.5; Policy H.7 and implementation actions 7.1, 7.2, 7.4; Policy H.10; Policy H.13.

and costs; (5) conserving energy by reducing travel distance; (6) meeting the needs of the transportation disadvantaged by improving access to transportation services; and (7) locating employment centers to facilitate the flow of goods and services so as to strengthen the local, regional and state economy.

The employment forecast identifies a need to provide sites for 13,000 + new jobs through 2030. The integral relationship between transportation facilities and services and employment land uses was a consideration of utmost importance in the City's evaluation of options to accommodate employment growth and diversification of the economy. The City needs to expand the UGB to add 223 acres of suitable, large sites to its employment land inventory. Decreasing the distance needed to travel to and from these new employment and industrial areas added to the UGB and to and from redevelopment employment and industrial areas within the city is an important consideration used by the City to evaluate options for accommodating forecast employment growth. Suitable, well-located employment sites will facilitate the safe, efficient and economic flow of freight and other goods and services within the region and throughout the state. The City's Goal 14 Boundary Alternatives Analysis evaluated potential growth areas to determine whether new jobs would be located within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN).

The 2030 Plan emphasizes and provides policy support for redevelopment and new development that increases capacity in areas served by transit. Needed employment in new employment areas added to the UGB, within existing employment areas and in redevelopment employment areas within the city should be located where adequate transportation facilities already exist, are planned or can be logically and efficiently extended to ensure that jobs are accessible via a choice of transportation modes including modes accessible to the transportation disadvantaged. The 2030 Comprehensive Plan allocates the majority of new jobs to employment land within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN). Adding suitable large employment sites to existing city employment centers supports the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation. This strategy promotes equity and opportunity by ensuring that access to jobs is possible through the region's public transit network.

2030 Plan Urbanization Element Goal UG-1 states:

“Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city and to urbanizable lands where future annexation and development may occur.”

2030 Plan Urbanization Element Policy 2 states:

“Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land

supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.

- ***Continue to provide public policy and financial support when possible for redevelopment in Springfield.***
- ***Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.***
- ***Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.***
- ***Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.***
- ***Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships.”***

2030 Plan Urbanization Element Goal UG-2 states:

“Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — both within and between neighborhoods and districts.”

2030 Plan Urbanization policies identify the City’s strategies for providing public incentives to assist redevelopment of sites to meet employment land needs, as resources are available.

2030 Plan Urbanization Element Policy 17 states:

“In new growth and redevelopment areas throughout the City, plan and support the transition to transportation-efficient land use patterns by providing incentives such as City-initiated plan and zoning updates, technical assistance, implementation of design standards, and permit processing assistance to guide the development of well-designed neighborhoods, efficient and economically viable mixed use districts and corridors.”

2030 Plan Urbanization Element Policy 18 states:

“Within districts and neighborhoods currently characterized by a limited range of land uses and activities, pursue comprehensive planning and zoning code updates to allow for mixed-use development at appropriate locations as one method of providing additional land use diversity and choices — as described in the Economic and Residential Land Use Elements of this plan.”

2030 Plan Urbanization Element Policy 19 states:

“Support new development and redevelopment in mixed use areas to address Springfield’s needs for housing, employment, and shopping opportunities in connected walkable neighborhood locations served by the region’s frequent transit network (FTN).”

2030 Plan Urbanization Element Policy 20 states:

“Plan and zone land to support transit-oriented land use patterns and development, including but not limited to higher intensity development in the City’s employment and commercial centers and along major transit corridors; employment uses located within ¼ mile of transit stations or stops; and residential development within ½ mile of transit stations or stops.”

2030 Plan Urbanization Element Policy 21 states:

“As permitted under Oregon law, require improvements in new commercial, public, mixed use, and multi-unit residential development that encourage walking, bicycling and the use of transit.”

2030 Plan Urbanization Element Policy 36 states:

“The City shall continue to seek funding opportunities and public-private partnerships to allow construction of key urban infrastructure elements to support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin Corridor multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.”

2030 Plan Urbanization Element Policy 39 and 40 address multi modal transportation planning requirements for the UGB expansion areas:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.” (Policy 39)

“Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.” (Policy 40)

The City’s North Gateway and Mill Race districts designate suitable employment land to provide additional employment capacity on sites immediately abutting land previously identified as “Potential Nodes” in TransPlan. This action designates land to expand existing employment areas in support of new employment occurring in walkable centers and corridors served by the region’s Frequent Transit Network.

2030 Plan Economic Element Policies support employment growth within existing Nodal Development (ND) designated areas (RiverBend: Ordinance 6241, Downtown: Ordinance 6146, Marcola Meadows – Ordinance 6195; Glenwood - Ordinance 6316); 30th and Main – Ordinance 6177); and approved Glenwood Mixed Use Multi Modal Areas (MMAs): Ordinance 6316; and existing employment centers served by transit, as described in the City’s findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network. Over 400 additional units of High Density Mixed-Use Residential housing are planned at the Glenwood site. 518 units of Medium Density Residential housing are planned at the Marcola Meadows site.⁵⁰

2030 Plan Economic Element Policies support designation and zoning of land to increase employment in Mixed-Use areas, as described in the City’s findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network.

The CIBL/EOA identified location relative to transit routes as a “characteristic of needed sites” for some of Springfield’s target industry employers that require sites larger than 5 acres, as described in the CIBL/EOA and in the City’s findings under Goal 9. This action supports development of needed larger employment sites and new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network. An example of this pattern working in Springfield is the International Way and RiverBend employment center served by the Gateway EmX Bus Rapid Transit service.⁵¹ 730 units of Medium Density Residential housing are planned for the RiverBend site.⁵²

In the City’s 2030 Plan UGB Boundary Location Alternatives Analysis under Goal 14, the City considered location relative to transit routes as a “characteristic of needed sites” for some of Springfield’s target industry employers, and thus evaluated alternatives on the basis of being able to provide suitable sites

⁵⁰ Marcola Meadows Master Plan

⁵¹ LCDC toured this area and other developed nodal development and transit-served areas at a past Commission meeting in Springfield.

⁵² RiverBend Master Plan

for large employers in locations within a ½ mile of existing or planned Frequent Transit Network (FTN) public transit routes.

Conclusion OAR 660-012-0035(4) and (5): The subject 2030 Plan amendments include local comprehensive plan land use policies, land use designations and land use regulations that are coordinated with the acknowledged TSP and RTSP to support implementation of relevant Metro Plan Transportation Element and Use Policies F.1, F.2, F.3, and F.4 and relevant requirements of OAR 660-012-0035 (4) and (5).

Conclusions OAR 660-012-0035. The subject 2030 Plan amendments include local comprehensive plan Economic Element and Urbanization Element land use policies (Ordinance Exhibit B and C) coordinated with transportation policies to support provision of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

Existing acknowledged comprehensive plan policies, plan designations, zoning and Springfield Development Code and proposed 2030 Plan UGB, policies, plan designations, zoning and Springfield Development Code direct and regulate new residential, employment and mixed-use land uses to support achievement of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

OAR 660-024-0045 Implementation of the Transportation System Plan

(1) *“Each local government shall amend its land use regulations to implement the TSP.”*

(2) *“Local governments shall adopt land use or subdivision ordinance regulations, consistent with applicable federal and state requirements, to protect transportation facilities, corridors and sites for their identified functions. Such regulations shall include:*

(a) Access control measures, for example, driveway and public road spacing, median control and signal spacing standards, which are consistent with the functional classification of roads and consistent with limiting development on rural lands to rural uses and densities;

(b) Standards to protect future operation of roads, transitways and major transit corridors;

(c) Measures to protect public use airports by controlling land uses within airport noise corridors and imaginary surfaces, and by limiting physical hazards to air navigation;

(d) A process for coordinated review of future land use decisions affecting transportation facilities, corridors or sites;

(e) A process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities, corridors or sites;

(f) Regulations to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT of:

(A) Land use applications that require public hearings;

(B) Subdivision and partition applications;

(C) Other applications which affect private access to roads; and

(D) Other applications within airport noise corridors and imaginary surfaces which affect airport operations; and

(g) Regulations assuring that amendments to land use designations, densities, and design standards are consistent with the functions, capacities and performance standards of facilities identified in the TSP.”

(3) “Local governments shall adopt land use or subdivision regulations for urban areas and rural communities as set forth below. The purposes of this section are to provide for safe and convenient pedestrian, bicycle and vehicular circulation consistent with access management standards and the function of affected streets, to ensure that new development provides on-site streets and accessways that provide reasonably direct routes for pedestrian and bicycle travel in areas where pedestrian and bicycle travel is likely if connections are provided, and which avoids wherever possible levels of automobile traffic which might interfere with or discourage pedestrian or bicycle travel.”

(4) To support transit in urban areas containing a population greater than 25,000, where the area is already served by a public transit system or where a determination has been made that a public transit system is feasible, local governments shall adopt land use and subdivision regulations as provided in (a)–(g) below...”

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g). In 2016 Springfield is conducting several projects that will update the Springfield Development Code and Engineering Design Standards Manual to enhance compliance with OAR 660-

012-0045. The TSP Implementation project updates development code and engineering design manual standards city-wide. TSP Appendix I “Plan Implementation and Recommended Ordinance/Code Language” outlines recommended code updates to implement the TSP.⁵³ While the existing SDC meets TPR standards, the TSP project will implement the updated policies found in TSP Chapter 2. The Downtown District Design Standards project updates standards applicable to land within the Downtown Refinement Plan. The Main Street Corridor Plan Phase Two project will create an innovative zoning code for the Main Street Corridor. Both projects address "safe and convenient" pedestrian and bicycle facility routes, facilities and improvements, bicycle and vehicular parking requirements and facilities, alleys, accessways, curb extensions, pedestrian crossings, facility designs to support transit use, and development standards listed in OAR 660-012-0045(4) and (5). The SDC (city-wide) allows provision of on-street parking and shared parking to meet minimum off-street parking requirements. The City’s acknowledged Glenwood Plan District code implements off-street parking maximums.

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

Springfield adopted new land use regulations that protect transportation facilities for their identified functions. The 2030 Plan designates and zones the lands added to the UGB to meet long range employment needs Urban Holding Area- Employment. The 2030 Plan applies 2030 Urbanization Element (Ordinance Exhibit C-2) policies requiring TSP and PFSP amendments prior to approval of rezoning for urban use as explained in Urbanization Element Table 5: pre-Development Approval Process Steps – Urban Holding Areas and Policies 38 and 39. The City and Lane County adopted and applied the AG-Urban Holding Area Zoning District (Ordinance Exhibits A, E) establishing land use regulations in SDC 3.2-915(A)(4) which states: ***“Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels.”*** AG zone SDC 3.2-930, Table 1. Pre-Development Approval Process Steps – Urban Holding Areas Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial), including the following two steps:

<u>Table 1. Pre-Development Approval Process Steps – Urban Holding Areas</u>	
<u>City-initiated Planning Process</u>	<u>Owner-initiated Planning Process</u>
1. <u>City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code standards.</u>	1. <u>Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.</u>

⁵³ The recommended updates would amend SDC Sections 4.2, 4.6, and 3.2 (panhandle lots), Appendix I. p. 3-4.

<p><u>2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u></p>	<p><u>2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).</u></p>
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Conclusions: OAR 660-12-0045. The 2030 Plan amendments and Springfield’s existing Development Code provide land use regulations consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

OAR 660-012-0060 Plan and Land Use Regulation Amendments

OAR 660-024-0020 (1)(d) states:

“The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Conclusions OAR 660-012-0060. The City and Lane County assigned the “Urban Holding Area – Employment (UHA-E)” comprehensive plan designation and “Agriculture – Urban Holding Area (AG)” interim zoning to the urbanizable employment lands added to the UGB in the City’s 2030 Plan amendments. The zoning does not allow development that would generate more vehicle trips than development permitted under the existing Lane County Agriculture zoning assigned prior to the inclusion of the lands in the UGB.

The UHA-E designation and AG zone establish an urban transition land use district that restricts interim uses to those already permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. As permitted under OAR 660-024-0020 (1)(d), the OAR 660-012-0060 requirement to conduct a transportation impact analysis can be deferred until the analysis is needed to evaluate a proposed plan or zoning amendment that will allow urban development.

The subject 2030 Plan amendments do not trigger the transportation planning rule requirements under OAR 660-012-0060.

Adoption of the 2030 Plan UGB amendment triggers a need to update the Springfield Transportation System Plan prior to approval of plan designation or zoning amendments and annexation to allow urban development in the UHAs. Exhibit E SDC AG zone describes the required sequencing of these post-acknowledgement plan amendments prior to approval of any land use proposal that creates significant impacts above levels assumed by acknowledged Transportation Systems Plans.

Compliance with Section 60 of the TPR for lands inside the previously-acknowledged Springfield UGB.

The 2030 plan codifies and relies upon the acknowledged comprehensive plan designations, Metro Plan land use policies and TSP. Inside the current UGB, the 2030 Plan implements existing acknowledged comprehensive plan designations that were in place when the region's acknowledged transportation system plans and Springfield's local Transportation System Plan were adopted. Plan and zoning map designations interpreting and implementing those designations do not cause "significant impacts" within the meaning of the rule.

LUBA has determined that plan and zoning amendments do not have significant impacts under Section 60 to the extent that those amendments were in place and therefore necessarily assumed by acknowledged Transportation Systems Plans. The leading case on this issue is *Mason v. City of Corvallis*, 49 Or LUBA 199 (2005). In *Mason*, the subject decision rezoned land from low-density rural to urban low-density-residential (LDR) densities allowed under a city comprehensive plan designation that had been assumed in the city's acknowledged TSP.

Elements of the 2030 Plan that reflect, interpret, or implement comprehensive plan designations and other land use measures assumed by TransPlan/TSP do not have significant impacts within the meaning of Section 60 of the TPR.

The same is true of elements of the 2030 Plan that incorporate or otherwise reflect other post-acknowledgment plan or zoning amendment decisions that have become final and no longer subject to appeal. Those decisions are deemed "acknowledged" by operation of law and are presumed to have been made in full compliance with the LCDC's transportation goal and interpretive rule. See *Friends of Neabeack Hill v. City of Philomath*, 139 Or App 39, 911 P2d 350, rev. den. 323 Or 136(1996). Examples reflected in the draft 2030 Plan include post-acknowledgment amendments relating to RiverBend, the Sports Complex, Gateway Refinement Plan, Downtown Refinement Plan, and Glenwood Refinement Plan.

The 2030 Plan supports implementation of the TSP and Metro Plan Transportation Element policies addressing the following goals:

1. *"Provide an integrated transportation and land use system that supports choices in modes of travel and development patterns that will reduce reliance on the automobile and enhance livability, economic opportunity, and the quality of life."*
2. *"Enhance the Eugene-Springfield metropolitan area's quality of life and economic opportunity by providing a transportation system that is:*

- *Balanced,*
- *Accessible,*
- *Efficient,*
- *Safe,*
- *Interconnected,*
- *Environmentally responsible,*
- *Supportive of responsible and sustainable development,*
- *Responsive to community needs and neighborhood impacts, and*
- *Economically viable and financially stable.”*

As one strategy to achieve these goals, the Metro Plan policies in the Transportation Element address land use as follows:

“The Oregon Transportation Planning Rule (TPR) [OAR 660-012-0060(1)(c) and (d) and (5)] encourages plans to provide for mixed-use, pedestrian-friendly development, based on information that documents the benefits of such development and the Land Conservation and Development Commission’s (LCDC) policy interest in encouraging such development to reduce reliance on the automobile. The rule [OAR 660-012-0045(4)(a) and (e)] requires local governments to adopt land use regulations that allow transit-oriented developments on lands along transit routes and require major developments to provide either a transit stop on site or connection to a transit stop when the transit operator requires such an improvement. The rule [OAR 660-012-0045(3)] also requires local governments to adopt land use regulations that provide for safe and convenient pedestrian and bicycle access within new developments and from these developments to adjacent residential areas and transit stops and to neighborhood activity centers.”

The acknowledged TSP establishes Springfield’s local transportation system plan consistent with the policy direction of Policy 1B of the OHP to coordinate land use and transportation decisions to efficiently use public infrastructure investments to:

- *Maintain the mobility and safety of the highway system;*
- *Foster compact development patterns in communities;*
- *Encourage the availability and use of transportation alternatives; and*
- *Enhance livability and economic competitiveness.*

2030 Plan supports implementation of TransPlan/Metro Plan Transportation Element/TSP strategies to reduce reliance on single occupancy vehicles. Springfield previously designated and zoned lands to support implementation of the regional principles, goals, policies and strategies of the adopted Metro Plan Transportation Element intended to support achievement of compact urban growth, increase residential densities, and encourage mixed-use developments in designated areas. Springfield previously designated lands “Nodal Development;” established Mixed-Use zoning districts and a Nodal

Overlay District in the Springfield Development Code; applied Mixed-use zoning and a Nodal Development Overlay District; and designated one of the first Multi-modal Mixed Use Areas (MMA) ⁵⁴ Areas in the state (Glenwood).

The subject Springfield 2030 Comprehensive Plan policies (and the previously acknowledged 2030 Residential Land Use and Housing Element policies and implementation measures) support implementation of nodal development as one land use strategy intended to increase use of alternative modes of transportation and increased opportunities for people to live near their jobs and to make shorter trips for a variety of purposes. The CIBL/EOA allocates employment growth to nodal areas as shown in the applicable adopted Springfield refinement plans and master plans. The City's subject 2030 Plan amendments implement existing acknowledged comprehensive plan designations and zoning map designations interpreting and implementing those designations that were in place when the Springfield Transportation System Plan was adopted. The 2030 Plan Economic Element and Urbanization Element policies in Ordinance Exhibits B and C provide clear city-specific land use policy direction coordinated with Springfield TSP policies, projects and programs to support implementation of land use and transportation planning measures that are intended to:

- Maintain the mobility and safety of the highway system;
- Continue to foster compact development patterns in Springfield;
- Continue to encourage the availability and use of transportation alternatives by allocating 2030 employment growth to areas with existing or planned public transit service; and
- Enhance Springfield's livability and economic competitiveness.

The Metro Plan Transportation Element noted the challenge of changing long-established land use patterns to encourage availability and use of transportation alternatives”:

“The Market Demand Study for Nodal Development (ECONorthwest and Leland Consulting Group, 1996) recommended that the public strategy for nodal development should be flexible and opportunistic and include use of financial incentives, targeted infrastructure investments, public-private partnerships, and an inviting administrative atmosphere.” ⁵⁵

*“During the public review of the nodal development strategy, many comments were received that identified the need for incentives for developers, builders, property owners, and neighborhoods to ensure that nodal developments would be built consistent with design guidelines. The type of support and incentives suggested ranged from public investments in infrastructure to technical assistance and economic incentives.”*⁵⁶

⁵⁴ As defined in OAR 660-012-0060(10)(B)(b)(A),(B), (C),(D) and (E).

⁵⁵ Metro Plan p.III-F-4

⁵⁶ Ibid.

As described in the City's findings under Goal 9, the 2030 Plan Economic Element policies identify Springfield's public strategy for supporting redevelopment of higher density, transit-oriented mixed-use development as a key element in the city's overall economic development strategy. Springfield provides information, technical assistance, financing incentives and infrastructure support for nodal development primarily through the Springfield Economic Development Agency's (SEDA) administration of the Glenwood and Downtown urban renewal districts. [Metro Plan Transportation Element Policy F.2, F.3]

As described in the TSP, Springfield coordinates with the MPO and partners with Lane Transit District and Springfield School District 19 to implement demand management programs (Point-to Point Solutions, Smart Trips Program, Safe Route to Schools).

Downtown Parking Management Plan to support Downtown redevelopment. Springfield's Downtown District is exempt from parking requirements. The Downtown Parking Management Plan⁵⁷ was adopted in 2010. Section VII of the Plan presents Springfield's strategies for regulating parking efficiently to support safe and positive customer experience to support Downtown commerce and to help Springfield attract a more diverse mix of retail, office and residential uses. The City is currently implementing the strategies and is considering parking management program options to incentivize redevelopment in Glenwood.

2030 Plan policies support compact urban design to reduce traffic impact on state highways. The Oregon Highway Plan recognizes that access management strategies can be implemented to reduce trips and impacts to major transportation facilities, such as freeway interchanges, and that communities with compact urban designs that incorporate a transportation network of arterials and collectors will reduce traffic impacts on state highways, postponing the need for investments in capacity-increasing projects.

The 2030 Plan policies support employment growth in centers and corridors accessible by transit, walking and bicycling. Metro Plan Transportation Element p. III-F-9 states:

"Transit services are particularly important to the transportation disadvantaged population: persons who are limited in meeting their travel needs because of age, income, location, physical or mental disability, or other reasons. The Americans with Disabilities Act (ADA) requires fixed-route systems like Lane Transit District's (LTD) to provide a comparable level of service to the elderly and persons with disabilities who are unable to successfully use the local bus service. LTD's Americans with Disabilities Act Paratransit Plan, 1994-1995 Update (January 18, 1995) was found to be in full compliance with the ADA by the Federal Transit Administration."

Metro Plan Transportation Element Policy F.18 states:

⁵⁷ Springfield Downtown Urban Design Plan – Parking Management, Rick Williams consulting, July 2010.

“Improve transit service and facilities to increase the system’s accessibility, attractiveness, and convenience for all users, including the transportation disadvantaged population.”

Metro Plan Transportation Element Policy F.19 states:

“Establish a BRT system composed of frequent, fast transit service along major corridors and neighborhood feeder service that connects with the corridor service and with activity centers, if the system is shown to increase transit mode split along BRT corridors, if local governments demonstrate support, and if financing for the system is feasible.”

Metro Plan Transportation Element Policy F.20 states:

“Implement traffic management strategies and other actions, where appropriate and practical, that give priority to transit and other high occupancy vehicles.”

Metro Plan Transportation Element Policy F.22 states:

“Construct and improve the region’s bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion.”

Metro Plan Transportation Element Policy F.23 states:

“Require bikeways along new and reconstructed arterial and major collector streets.”

Metro Plan Transportation Element Policy F.24 states:

“Require bikeways to connect new development with nearby neighborhood activity centers and major destinations.”

Metro Plan Transportation Element Policy F.26 states:

“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.”

Metro Plan Transportation Element Policy F.27 states:

“Provide for a continuous pedestrian network with reasonably direct travel routes between destination points.”

Metro Plan Transportation Element Policy F.28 states:

“Construct sidewalks along urban area arterial and collector roadways, except freeways.”

Goal 12 Conclusion. Based on the findings and conclusions stated, the City’s 2030 Plan amendments are consistent with Goal 12, and the relevant policies of the Metro Plan.

Statewide Planning Goal 13: Energy Conservation

OAR 660-015-0000(13)

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.”

Metro Plan IIIJ Energy Element addresses Goal 13. The 2030 Plan amendments so not affect compliance with Goal 13 or Metro Plan IIIJ Energy Element. 2030 Plan policies support and encourage use of energy efficient buildings, energy efficient transportation systems and modes, recycling and re-use of previously land and buildings, and increasing employment capacity in higher density mixed-use multi-modal centers and corridors.

The Goal 14 boundary alternatives analysis requires cities to consider and balance energy consequences as one of the four Goal 14 ESEE locational factors in comparing different sites for potential urbanization.

To implement Goal 13, the Springfield Development Code addresses lot size, dimension, and siting controls; building height and bulk; density of uses; availability of light, wind and air; compatibility of and competition between competing land use activities; and provisions for collection of waste.

Goal 13 conclusion. The 2030 Plan amendments are consistent with Goal 13, as implemented through the policies in Metro Plan IIIJ Energy Element and the 2030 Plan policies.