

**SPRINGFIELD PLANNING COMMISSION  
STAFF REPORT & FINDINGS  
TYPE 4 – LEGISLATIVE AMENDMENTS**

<b>Project Name:</b>	Springfield Comprehensive Plan Map Clarification Project
<b>Affected Area:</b>	Applies to all land within the Springfield Urban Growth Boundary, which includes land within city limits and urbanizable land outside city limits
<b>City of Springfield Case Number:</b>	811-23-000129-TYP4
<b>Lane County Case Number:</b>	509-PA23-05396
<b>Joint City of Springfield and Lane County Planning Commissions Hearing:</b>	July 18, 2023
<b>Lane County Board 1<sup>st</sup> Reading:</b>	September 26, 2023
<b>Joint City Council and Board of County Commissioners Hearing:</b>	October 16, 2023

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## **I. NATURE OF THE PROPOSED AMENDMENTS**

The City of Springfield and Lane County seek approval of amendments to adopt a Springfield Comprehensive Plan Map and Land Use Element that replaces the text and Diagram in Chapter II-G of the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) for land within the Springfield Urban Growth Boundary (UGB). The proposed amendments will apply to all land within the Springfield UGB, which includes land within city limits and urbanizable land outside city limits. This proposal includes amendments to:

- The Springfield Comprehensive Plan to adopt a Springfield Comprehensive Plan Map and a Land Use Element and to amend additional text for consistency with this action, as shown in **Exhibit A – Draft Springfield Comprehensive Plan Amendments**, which includes:
  - Exhibit A-1 Springfield Comprehensive Plan Map
  - Exhibit A-2 Land Use Element of Springfield Comprehensive Plan
  - Exhibit A-3 Additional text amendments to Springfield Comprehensive Plan
- The Metro Plan to reflect that the Springfield Comprehensive Plan Map and Land Use Element will replace the text and Diagram in Metro Plan Diagram Chapter II-G for lands within the Springfield UGB, as shown in **Exhibit B – Draft Metro Plan Amendments**.
- Springfield’s Gateway and Glenwood Refinement Plans (text and diagrams) for consistency with adopting a Springfield Comprehensive Plan Map and Land Use Element, as shown in **Exhibit C – Draft Neighborhood Refinement Plan Amendments for Co-adoption**.
- Springfield’s East Main, Mid-Springfield, and Q Street Refinement Plans (text and diagrams) for consistency with adopting a Springfield Comprehensive Plan Map and Land

Use Element, as shown in **Exhibit D – Draft Neighborhood Refinement Plan Amendments for Springfield-only adoption**.

- Springfield’s Downtown Refinement Plan for consistency with adopting a Springfield Comprehensive Plan Map and Land Use Element and to clarify amendments adopted by Ordinance 6148 (2005), as shown in **Exhibit E – Draft Downtown Refinement Plan Amendments (Springfield-only adoption)**.
- The Springfield Development Code for consistency with adopting a Springfield Comprehensive Plan Map and Land Use Element, as shown in **Exhibit F – Springfield Development Code Amendments**.
- Supporting information summarizing the process and approach to create the Springfield Comprehensive Plan Map is provided in **Attachment 3 – Methodology for Springfield Comprehensive Plan Map** of the July 18 Planning Commission meeting materials.

## II. BACKGROUND

For decades, Eugene and Springfield shared a comprehensive plan: the Eugene-Springfield Metropolitan Area General Plan (“Metro Plan”). The Metro Plan was created as the sole, long-range plan (a public policy and vision document) for metropolitan Lane County, including Springfield and Eugene. Both cities recently established separate urban growth boundaries based on a determination of land supplies needed to meet anticipated growth. As a result, comprehensive planning is evolving toward city-specific plans.

As part of continuing to develop the Springfield Comprehensive Plan, a key step is to create a map that shows existing plan designations for each property in Springfield by interpreting and clarifying the Metro Plan Diagram, which was adopted most recently as an 11” x 17” paper map in 2004. The Metro Plan Diagram is a “broad brush,” graphic depiction of projected land uses and major transportation corridors but does not meet today’s needs for showing which plan designations apply to each property within the region. Establishing a property-specific Springfield Comprehensive Plan Map will add greater certainty for understanding the planned land uses. The map will provide timely, accurate information, ultimately increasing confidence in the land use process by providing a solid visual understanding of existing plans and policies.

Given the scale of the Metro Plan Diagram, it was not always clear how to precisely draw the line between differing plan designations (shown as different colors) to develop Springfield’s Comprehensive Plan Map. Staff began work to clarify boundaries of plan designations by researching land use records for all properties that appeared to be near more than one designation on the Metro Plan Diagram. Staff also verified that the proposed version of Springfield’s Comprehensive Plan Map reflects neighborhood refinement plans and any changes to the Metro Plan Diagram adopted since 2004. Staff approached this project with a mix of policy and technical research and informed conversations to seek input on mapping approaches.

The project’s Community Engagement Plan includes strategies for working with stakeholders and the general public, including outreach to the broader community and to the owners of property within the areas that require interpretation to seek their knowledge and confirm the understanding of plan designations for their properties. Interviews with city jurisdictions in

Oregon, discussions with the Technical Resource Group and Project Advisory Committee, and guidance from Springfield Planning Commission and City Council influenced how the proposed Springfield Comprehensive Plan Map looks and functions in the context of the proposed Land Use Element of Springfield’s Comprehensive Plan. Attachment 3 – Methodology for Springfield Comprehensive Plan Map provides additional detail about the approach to creating a property-specific Comprehensive Plan Map for Springfield and associated outreach.

The Springfield Comprehensive Plan Map is accompanied by a Land Use Element that transfers the relevant plan designation descriptions from the Metro Plan with some revisions and updates to reflect what applies in Springfield. The Land Use Element also includes a goal, policies, and implementation strategies related to the Springfield Comprehensive Plan Map. To support establishing a Springfield Comprehensive Plan Map and Land Use Element, related amendments are being proposed as described in Section I – Nature of the Proposed Amendments.

### **III. PROCEDURAL REQUIREMENTS**

The proposed amendments are a Type 4 legislative decision because the amendments apply to all land within the Springfield UGB, which includes land within city limits and urbanizable land outside city limits. Under Springfield Development Code (SDC) 5.14.110 and Lane Code 12.300, amendments to the Metro Plan are reviewed under Type 4 procedures as a legislative action. Under SDC 5.14.120(E), amendments to the Springfield Comprehensive Plan are processed as a Metro Plan amendment. Metro Plan amendments are further classified into “types” in Metro Plan Chapter IV, in SDC 5.14.115, and in Lane Code 12.300.010; this is a Type 2 (Type II in Metro Plan and Lane Code) amendment. The proposed amendments are consistent with Metro Plan Policy IV.7.b and IV.12. As such, the proposed Type 2 Metro Plan amendments being considered in conjunction with amendments to Springfield’s Comprehensive Plan require approval by Springfield and Lane County, as they will apply to all land within the Springfield UGB.

Under SDC 5.6.110, amendments to Refinement Plans and the Development Code text are reviewed under a Type 4 procedure as legislative actions.

Per SDC 5.1.600 and the urban transition agreement between the City of Springfield and Lane County, the amendments require a review and recommendation by the Springfield Planning Commission, and Lane County Planning Commission at Lane County’s discretion, prior to action being taken by the Springfield City Council and Lane County Board of Commissioners. The Planning Director for the City of Springfield initiated the amendments on behalf of the City of Springfield as is allowed under SDC 5.14.120(B) and 5.6.105(B).

The Director must send notice to the Department of Land Conservation and Development (DLCD) as specified in OAR 660-18-0020. On June 13, 2023, the City submitted a joint City-County “DLCD Notice of Proposed Amendment” to DLCD in accordance with DLCD submission guidelines via the FTP website. The notice was mailed 35 days in advance of the first evidentiary hearing as required by ORS 197.610(1) and OAR 660-018-0020.

SDC 5.14.130(A) requires the City to provide notice to other relevant governing bodies. The City of Eugene and Lane County received notice on June 28, 2023. Springfield is the “home city” for this amendment. Lane County is included because the proposed amendments apply to unincorporated land within the Springfield UGB.

SDC 5.1.615 and Lane Code Section 14.060 require advertisement of legislative land use decisions in a newspaper of general circulation, providing information about the legislative action and the time, place, and location of the hearing. Notice of the public hearing concerning this matter was published on Thursday, June 22, 2023 in The Chronicle and on Tuesday, June 27, 2023 in The Register Guard, advertising the first evidentiary hearing before the joint City of Springfield and Lane County Planning Commissions on July 18, 2023. The content of the notice complied with the requirements in SDC 5.1.615 and Lane Code 14.060 for legislative actions. Notice was also posted in accordance with SDC 5.1.615(B) and sent to Springfield’s Development Review Committee in accordance with SDC 5.1.615(E). SDC 5.1.615(C) and (D) do not apply to the proposed amendments.

#### IV. APPROVAL CRITERIA & FINDINGS

The amendments to the Metro Plan and Springfield Comprehensive Plan are subject to the same set of approval criteria, which are referenced below under “Metro Plan & Springfield Comprehensive Plan Amendments.” The amendments to Springfield’s Downtown, East Main, Gateway, Glenwood, Mid-Springfield, and Q Street Refinement Plans and to the Springfield Development Code are subject to a different set of approval criteria listed on page 14 under “Refinement Plan and Development Code Amendments.”

Findings showing that the amendments meet the applicable criteria of approval appear in regular text format. Direct citations or summaries of criteria appear in *bold italics* and precede or are contained within the relevant findings.

### METRO PLAN & SPRINGFIELD COMPREHENSIVE PLAN AMENDMENTS

The applicable criteria of approval for amendments to the Metro Plan and the Springfield Comprehensive Plan are at Springfield Development Code 5.14.135 (Metro Plan Amendments), and Chapter 12.100.050 (Method of Adoption and Amendment) and 12.300.030 (Metro Plan Amendment Criteria) of the Lane Code (LC).

#### *SDC 5.14.135 (Metro Plan Amendments)*

A Metro Plan amendment may be approved only if the Springfield City Council and other applicable governing body or bodies find that the proposal conforms to the following criteria:

- (A) The amendment shall be consistent with applicable Statewide Planning Goals; and**
- (B) Plan inconsistency:**
  - (1) In those cases where the Metro Plan applies, adoption of the amendment shall not make the Metro Plan internally inconsistent.**
  - (2) In cases where Springfield Comprehensive Plan applies, the amendment shall be consistent with the Springfield Comprehensive Plan.**

#### *LC 12.300.030 (Metro Plan Amendment Criteria)*

The following criteria will be applied by the Board of Commissioners and other applicable governing body or bodies in approving or denying a Metro Plan amendment application:

- A.** The proposed amendment is consistent with the relevant Statewide Planning Goals; and
- B.** The proposed amendment does not make the Metro Plan internally inconsistent.

**CONSISTENCY WITH APPLICABLE STATEWIDE PLANNING GOALS (SDC 5.14.135(A); LC 12.300.030.A)**

*Statewide Land Use Planning Goal 1: Citizen Involvement*

Finding 1: The project's Community Engagement Plan was the foundation for engaging the Springfield community and stakeholders in the process of creating the amendments. The Springfield Committee for Citizen Involvement (CCI) approved the project's Community Engagement Plan in March 2022. Community engagement involved a(n):

- Mailing to owners of properties that required research needed to clarify plan designations in:
  - Winter 2022: Letter requesting clarifying information during early stages of property research
  - Spring 2023: Postcard announcing the Draft Comprehensive Plan Map was ready for review and feedback and the multiple options for how to learn more and provide feedback
- Project webpage that provided background information, announcements of upcoming meetings along with meeting materials, content from previous meetings, materials for review (including the draft map), timeline, staff contact information, and ways to connect with project information in Spanish.
- Project Advisory Committee: This CCI-appointed Committee (June 7, 2022) resulted from extensive recruitment efforts, such as:
  - Direct e-mail announcements and invitations to apply
  - Announcements on the project webpage, on the homepage on the City's website, on the City's social media platforms, to the Springfield City Club, in the Springfield Chamber of Commerce Bottom Line newsletter, and in a news release
  - Informational flyers around City Hall and other locations around town

The Committee was made up of Springfield residents, Springfield property and business owners/people with other experience working in Springfield (including private-sector land use planning experience), volunteer experience in the region, and more. The Committee met five times and received e-mail updates between meetings and after its last meeting. Meetings were open to the public to observe and were advertised on the project webpage and City Events calendar.
- Technical Resource Group comprised of the Springfield Utility Board, Springfield Public Schools, Willamalane Park and Recreation District, Lane County, Lane Council of Governments, City of Eugene, and the Oregon Department of Land Conservation and Development. The Group met four times and received e-mail updates after meetings.
- Online open house, which ran from April 18 through May 11, 2023. The online open house materials included the draft maps (PDF and web-based interactive version), a storyboard presentation to give context for the draft materials, and comment form.
- In-person open house, held on May 4, 2023, which provided opportunities for participants to view and comment on the printed and web-based/interactive versions of the draft map, to speak with the project team, gather printed project information, use a supervised activity station for children, and have light refreshments.
- Set of Frequently Asked Questions with answers (also translated into Spanish). These questions and answers appeared on the webpage and were available in printed format at the in-person open house.

- Work sessions with Planning Commission on November 1, 2022 and April 18, 2023.
- Work session Council on November 28, 2022.

**CONCLUSION:** Accordingly, the process used to inform the amendments meets Goal 1.

*Statewide Land Use Planning Goal 2: Land Use Planning*

Finding 2: Goal 2, in part, requires Springfield to have and follow a comprehensive land use plan and implementing regulations. The Metro Plan, Springfield Comprehensive Plans, Springfield's neighborhood refinement plans, and Springfield Development Code support this required planning framework. The Oregon Land Conservation and Development Commission previously acknowledged each of these components of Springfield's land use planning program as consistent with Oregon's Statewide Land Use Planning Goals.

Finding 3: The actions proposed with this adoption package include amendments to existing, acknowledged plans and associated regulations by way of amendments to the Metro Plan, Springfield Comprehensive Plan, Springfield's neighborhood refinement plans, and the Springfield Development Code. The amendments include replacing the plan designations shown on the Metro Plan Diagram, which is the existing regional comprehensive plan map, with a Springfield Comprehensive Plan Map that shows property-specific plan designations in the Springfield UGB.

Finding 4: The amendments to the Metro Plan's text are limited to clarifying that Chapter II-G and the designations shown on the Metro Plan Diagram no longer apply to Springfield, to amending additional text throughout the Metro Plan for consistent referencing of applicable planning documents (i.e., the Springfield Comprehensive Plan where appropriate), explaining the Willamette River Greenway boundary as shown on Springfield's Comprehensive Plan Map, and to explaining how to use the Metro Plan and/or Springfield Comprehensive Plan and their relationship in the context of land use planning in Lane County.

Finding 5: The amendments to the Metro Plan Diagram are to no longer show land use designations within Springfield's portion of the Metro Plan Boundary east of Interstate 5. As such, the Metro Plan Diagram amendments do not involve redesignating land.

Finding 6: The amendments to the Springfield Comprehensive Plan add a Land Use Element (chapter), reference the Springfield Comprehensive Plan (as opposed to the Metro Plan) where appropriate throughout the Plan, and add a Comprehensive Plan Map to replace the Metro Plan Diagram.

Finding 7: The text of the Land Use Element captures existing text from the previously adopted and acknowledged Metro Plan document and describes the relationship between the various planning documents that apply to making decisions about land use in Springfield. As such, the land use planning framework in Springfield will remain materially unchanged as a result of the amendments though the resources used to refer to properties' designations and to the designations' meanings will differ. The text amendments:

- Transfer the relevant descriptions of Plan designations from the Metro Plan to the Springfield Comprehensive Plan with some revisions and updates to reflect what applies to Springfield, and in so doing:
  - Remove language that does not apply to Springfield (e.g., references to Eugene)
  - Revise the transferred Metro Plan text for Nodal Development, Mixed Use, Public Land and Open Space, and Residential designations to reflect amendments and clarify how they apply in Springfield
- Add a section that clarifies the relationship of the Springfield Comprehensive Plan to the Metro Plan, functional plans, and Springfield’s neighborhood refinement plans; and
- Identify goals, policies, and implementation strategies within the Land Use Element

**Finding 8:** The Springfield Comprehensive Plan Map accompanies the previously described text changes. The Map shows property lines based on tax lot lines; consolidates the Government and Education, Parks and Open Space, and other similar designations into one designation: Public Land and Open Space; and, consistently shows Nodal Development as an overlay designation as opposed to a base designation and/or overlay designation depending on the location. These amendments do not materially change how land can be used or developed in Springfield and are a result of the work that would otherwise be necessary to interpret plan designations for specific properties where ambiguity remains on the Metro Plan Diagram in the case of the Metro Plan Diagram continuing to apply to Springfield. Attachment 3 – Methodology for Springfield Comprehensive Plan Map describes the method the City used to interpret and apply existing designations to the Comprehensive Plan Map.

**Finding 9:** The actions described in these Goal 2 findings align with Statewide Planning Goal 2, as they: (1) identify the issues of determining appropriate plan designations for specific properties where such determination is based on a generalized diagram that is not property specific and that is unaccompanied by policy that would enable a solid understanding of how land can be used in Springfield’s urbanized and urbanizable areas; (2) create solutions to address these issues as presented in the policies and implementation strategies of Exhibit A-2 Land Use Element of Springfield Comprehensive Plan as based on stakeholder input as described in the findings under Statewide Land Use Planning Goal 1; and, (3) make use of an easier-to-read Comprehensive Plan Map a reality (Exhibit A-1 Springfield Comprehensive Plan Map).

**Finding 10:** The amendments do not elicit compliance with the remaining aspects of Goal 2, as they do not: (1) include taking an exception to Goal 2; and, (2) involve changes to the Springfield Development Code that create new regulations consistent with Goal 2, Part III, Sections F.1 and F.2 as demonstrated in the findings.

**CONCLUSION:** Accordingly, the amendments meet Statewide Planning Goal 2.

*Statewide Land Use Planning Goals 3 & 4: Agricultural and Forest Lands*

**Finding 11:** These Goals apply to land outside of Springfield’s UGB, and as such, do not apply to the amendments.

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

Finding 12: Goal 5 does not apply to the map and text amendments to the Metro Plan and Springfield Comprehensive Plan. Springfield conducts its inventories of its natural, scenic and historic areas, and open space resources through separate processes and protects the significant resources through programs. These features are shown on specific maps, which have since been adopted via ordinance and acknowledged by the Oregon Land Conservation and Development Commission. The amendments do not include any changes to the adopted and acknowledged inventories or their protection. The waterbodies shown on the proposed Springfield Comprehensive Plan Map (Exhibit A-1) are for illustrative purposes to orient map users to Springfield's geography. The proposed text amendments to the Metro Plan and Springfield Comprehensive Plan do not relate to Goal 5.

*Statewide Land Use Planning Goal 6: Air, Water and Land Resources Quality*

Finding 13: Goal 6 does not apply to the map and text amendments to the Metro Plan and Springfield Comprehensive Plan. The amendments do not alter the City's acknowledged land use programs regarding the control of pollution to protect the quality of Springfield's air, water, and land resources and do not change the uses allowed to develop—whether outright or conditionally. The water resources, some of which are water quality limited watercourses, shown on the proposed Springfield Comprehensive Plan Map (Exhibit A-1) are for illustrative purposes to orient map users to Springfield's geography. The proposed amendments do not alter the Regional Transportation Plan or the City's acknowledged Transportation System Plan, the policies of which can influence air quality.

*Statewide Land Use Planning Goal 7: Areas Subject to Natural Hazards*

Finding 14: Goal 7 does not apply to the proposed map and text amendments to the Springfield Comprehensive Plan and the Metro Plan as shown in Exhibits A and B. The proposed amendments do not alter the City's acknowledged land use programs regarding potential landslide areas and flood management protections.

*Statewide Land Use Planning Goal 8: Recreational Needs*

Finding 15: Goal 8 does not apply to the proposed amendments. The Recreation Element of the Springfield Comprehensive Plan and the Parks and Recreation Facilities Element of the Metro Plan guide the implementation of Springfield's recreational needs. Willamalane Park and Recreation District's Comprehensive Plan is the Recreation Element of Springfield's Comprehensive Plan. Changes to Willamalane Park and Recreation District's Comprehensive Plan and to the text of Metro Plan's Parks and Recreation Facilities Element are not part of the amendments.

*Statewide Land Use Planning Goal 9: Economic Development*

Finding 16: The Springfield Comprehensive Plan amendments (also referred to as "Springfield 2030 Comprehensive Plan" amendments)—adopted in 2016 as Springfield Ordinance 6361 and Lane County Ordinance PA 1304—expanded the Springfield UGB and Metro Plan boundary. This UGB expansion added land intended to allow Springfield to meet its long-term needs for



employment based on the findings of the Commercial and Industrial Buildable Lands Inventory. Springfield assigned an Urban Holding Area – Employment (UHA-E) plan designation on a property-specific basis within the expansion area. The Oregon Land Conservation and Development Commission approved the expansion and corresponding Plan amendments in March 2019 (Approval Order 19-UGB-001900), thereby acknowledging the amendments. The UHA-E designation will remain in effect until the appropriate permanent employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process, which is not part of this present application. The amendments to the Metro Plan and Springfield Comprehensive Plan retain the property-specific, interim employment designations in the UGB expansion area and do not change the acreage available for employment land identified in the Commercial and Industrial Buildable Lands Inventory in Springfield’s UGB, including land within city limits. The amendments do not fundamentally change the goals and policies applicable to economic development in Springfield, which are the policies in the Economic Element of the Springfield Comprehensive Plan. Accordingly, the City remains in compliance with Goal 9.

*Statewide Land Use Planning Goal 10: Housing*

Finding 17: In August 2011, the Oregon Land Conservation and Development Commission acknowledged the Springfield 2030 Refinement Plan Residential Land Use and Housing Element (“Housing Element”). This Element is part of the Springfield Comprehensive Plan. The proposed amendments do not involve substantive changes to the acknowledged goals and policies of the Housing Element of Springfield’s Comprehensive Plan. This Element supplements and refines the Residential Land Use and Housing Element of the Metro Plan, which also applies to land use planning for housing in Springfield. The proposed amendments do not change the goals and policies therein. The proposed amendments to the Metro Plan Diagram and to the Springfield Comprehensive Plan for adoption of a Springfield Comprehensive Plan Map do not redesignate property and therefore do not affect the Buildable Lands Inventory. Accordingly, the City remains in compliance with Goal 10.

*Statewide Land Use Planning Goal 11: Public Facilities and Services*

Finding 18: Goal 11 does not apply to the proposed amendments. Goal 11 requires Springfield 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. Pursuant to OAR 660-011-0020(2), a public facility plan must identify significant public facility projects which are to support the land uses designated in the acknowledged comprehensive plan. The Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (PSFP) and the Springfield 2035 Transportation System Plan (TSP) are the City’s acknowledged public facilities and transportation system plans that inform infrastructure investments (i.e., water, stormwater, wastewater, transportation, and electricity) in Springfield. The proposed amendments do not entail changes to the acknowledged TSP or PSFP, nor do they change the acknowledged comprehensive plans (Metro Plan and Springfield Comprehensive Plan) in ways that would require additional or different public facilities projects in the PSFP or TSP. The Goal 12 findings below further address transportation planning.

*Statewide Land Use Planning Goal 12: Transportation*

Finding 19: The Transportation Planning Rule (OAR 660-012-0060) implements Goal 12. OAR 660-012-0060 requires a local government to establish mitigation measures if an amendment to

an acknowledged functional plan, comprehensive plan, or land use regulation would “*significantly affect an existing or planned transportation facility.*” Subsections (1)(a)-(c) determine whether the requested amendments to the Metro Plan and Springfield Comprehensive Plan significantly affect a transportation facility.

**Finding 20:** An amendment to an acknowledged comprehensive plan “significantly affects” a transportation facility under Subsection 1(a) if it: “*Change[s] the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan).*” The amendments do not change any functional classification under OAR 66-012-0060(1)(a) as shown in Exhibits A and B.

**Finding 21:** An amendment to an acknowledged comprehensive plan “significantly affects” a transportation facility under Subsection 1(b) if it: “*Change[s] standards implementing a functional classification system.*” The proposed amendments do not change the City’s standards for implementing its functional classification system under OAR 66-012-0060(1)(b) as shown in Exhibits A and B.

**Finding 22:** Under Subsection (1)(c), an amendment to an acknowledged comprehensive plan “significantly affects” a transportation facility if it: (A) *results in types or levels of travel or access inconsistent with the functional classification of a transportation facility;* (B) *degrades the performance of a transportation facility such that it would not meet performance standards identified in the TSP or comprehensive plan;* or (C) *degrades the performance of a transportation facility that is otherwise projected to not meet the performance standards in the TSP or comprehensive plan.* To determine whether the amendments “significantly affect” a transportation facility within the meaning of (1)(c), a local government should compare the most traffic-generative use reasonably allowed under current land use requirements with the most traffic-generative use reasonably allowed under the amendments. The amendments to the Metro Plan and Springfield Comprehensive Plan do not change the uses that the Springfield Development Code allows outright, conditionally allows, or prohibits. The amendments do not change the most traffic-generative uses reasonably allowed. Accordingly, the amendments do not result in any of the effects described under (A)-(C).

OAR chapter 660, Division 12 includes provisions adopted under the “Climate Friendly and Equitable Communities” rules adopted and certified effective on August 17, 2022, as amended by temporary rules effective May 12, 2023 through November 7, 2023. These provisions are either not yet operative for the City of Springfield under OAR 660-012-0012 or apply only upon amendment to the Springfield Transportation System Plan. Amendments to Springfield’s Transportation System Plan do not accompany the subject amendments, and therefore the remaining provisions of OAR chapter 660, Division 12, are not applicable.

**CONCLUSION:** The amendments do not “significantly affect” an existing or planned transportation facility under OAR 660-012-0060(1)(a), (b), or (c) and thus comply with OAR 660-012-0060 and Goal 12 requirements.

*Statewide Planning Goal 13: Energy Conservation*

Finding 23: Goal 13 does not apply to the amendments. The City's acknowledged regulations that implement Goal 13 remain unaffected by the amendments. The amendments do not entail proposed development and do not change the types of development allowed outright or conditionally.

*Statewide Planning Goal 14: Urbanization*

Finding 24: The Oregon Land Conservation and Development Commission acknowledged Springfield's UGB expansion in 2019. The diagram and map amendments show the UGB as previously acknowledged in 2019.

Finding 25: The 2019 acknowledgement brought land into Springfield's expanded UGB that was rurally designated by Lane County to new designations administered by Springfield: Public/Semi-Public, Urban Holding Area- Employment, and Natural Resource. Springfield applied these new designations on a property-specific basis. The diagram and map amendments retain the property-specific designations, with the exception of the Public-Semi-Public designation—the function of which is fundamentally unchanged. The Public/Semi-Public designation acknowledged in 2019 is proposed to be named: Public Land and Open Space to provide a consistent naming convention throughout Springfield and to produce a map that is easier to read. The text amendments to the Springfield Comprehensive Plan to rename Public/Semi Public to Public Land and Open Space will not result in additional changes to the Springfield Comprehensive Plan or Metro Plan regarding the purpose or outcomes of this designation. As shown in Exhibit B, Metro Plan Chapter II-G: Metro Plan Diagram, will no longer apply to Springfield.

Finding 26: The designations of remaining areas within Springfield's UGB (including property within the city limits) are more clearly represented with property lines on the Springfield Comprehensive Plan Map as compared to the generalized, large-scale Metro Plan Diagram. As previously noted, the amendments to the Springfield Comprehensive Plan Map depict the Metro Plan designations at a more precise scale as described in Attachment 3 – Methodology for Springfield Comprehensive Plan Map and amend the Metro Plan to no longer show Plan designations within the Springfield UGB (coterminous with the Metro Plan boundary) as shown in Exhibit B. These actions do not affect Springfield's approach to using land efficiently within its UGB through orderly and logical growth patterns as specified by Goal 14.

**CONCLUSION:** Accordingly, the City remains in compliance with Goal 14.

*Statewide Planning Goal 15: Willamette River Greenway*

Finding 27: Goal 15 does not apply to the amendments. The Metro Plan Diagram has previously shown the Willamette River Greenway ("Greenway") boundary, and the Greenway boundary will continue to be shown on the Springfield Comprehensive Plan Map in its existing location (Exhibit A-1). The Springfield Comprehensive Plan Map and associated amendments do not change to the applicability of the Greenway boundary as reflected in the previously acknowledged Metro Plan Diagram. Additionally, the amendments do not entail development activities within the Greenway boundary.

*Statewide Planning Goals 16-19: Estuarine Resources, Coastal Shorelands, Beaches and Dunes, Ocean Resources*

**Finding 28:** These Goals do not apply to the amendments. Land within Springfield’s UGB (land within city limits and the urbanizable land outside city limits) is outside of Oregon’s coastal areas to which Goals 16-19 apply.

**CONCLUSION:** The amendments to the Metro Plan and Springfield Comprehensive Plan are consistent with the applicable Statewide Land Use Planning Goals based on the aforementioned findings and thus meet the criteria at SDC 5.14.135 and LC 12.300.030.

**ADOPTION OF THE AMENDMENT SHALL NOT MAKE THE METRO PLAN OR SPRINGFIELD COMPREHENSIVE PLAN INTERNALLY INCONSISTENT (SDC 5.14.135(B); LC 12.300.030.B)**

**Finding 29:** The Metro Plan anticipated Springfield would continue creating aspects of its land use planning program on a city-specific basis to reflect the unique needs of Springfield. The Metro Plan also anticipated the need for comprehensive land use planning to occur based on property-specific maps years before Springfield began work to create its Comprehensive Plan Map. Precedent for the amendments exists in the introductory text and explanatory text in Chapter II-G of the Metro Plan as described on pages iii-v, II-G-2—II-G-3, and IV-5 Policy 10.

**Finding 30:** As summarized, pages iii through v state:

*ORS 197.304, adopted by the Oregon Legislature in 2007, requires Eugene and Springfield to divide the metropolitan UGB into two city-specific UGBs... 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... The three jurisdictions<sup>1</sup> 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 planning responsibilities that the cities address independently of each other... 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.*

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<sup>1</sup> Lane County, Springfield, and Eugene

Finding 31: Upon reference to the instances where the Metro Plan Diagram is “parcel-specific” as described on Metro Plan page II-G-2<sup>2</sup>,” page II-G-3 of the Metro Plan states, in part:

*There is a need for continued evaluation and evolution to a parcel-specific diagram.*

Finding 32: Policy IV.10 on page IC-5 states, in part:

*... Until a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city’s refinement and functional plans must be consistent with the Metro Plan. After a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city’s refinement and functional plans must be consistent with its city specific comprehensive plan (instead of the Metro Plan).*

Finding 33: The primary purpose of amending the Metro Plan is to continue Springfield’s evolution to a city-specific plan where appropriate. Planning actions in response to ORS 197.304 have included Springfield’s acknowledged Residential Land Use and Housing Element, Economic, Urbanization, and Transportation Elements of its Comprehensive Plan. Springfield’s creation of a property-specific Comprehensive Plan Map is the next step so that planning for future residential, economic, and other needs is based on clear information about Springfield’s existing conditions. The necessary amendments to the Metro Plan, as previously described under Goal 2 findings and incorporated herein by reference, are for consistent and appropriate referencing and use of terms (Exhibit B). While the plan designations within Springfield’s segment of the Metro Plan boundary east of Interstate 5 no longer apply to Springfield, the Metro Plan designations were transferred to Springfield’s Comprehensive Plan Map and have been interpreted for specificity where needed (Attachment 3 – Methodology for Springfield Comprehensive Plan Map). The remaining policy components of the Metro Plan will not conflict with this approach given the amendments do not involve new Metro Plan findings, new goals or policies in response to those findings, or modified text to existing findings, goals, or policies beyond clarifying where the Springfield Comprehensive Plan now applies.

Finding 34: The primary purpose of amending the Springfield Comprehensive Plan is to add a Comprehensive Plan Map and accompanying Land Use Element, which establishes Springfield’s first property-specific Comprehensive Plan Map. The text supports the Map by describing how to use and interpret it. The amendments do not remove or create new goals, policies, or implementation strategies or actions for the Springfield Comprehensive Plan aside from the new Land Use Element. The amendments to the existing, adopted and acknowledged chapters of the Springfield Comprehensive Plan are administrative in nature and support consistent and appropriate use of plans and application of policy, as they reference which land use plan applies when reading a policy (e.g., Metro Plan, or Springfield Comprehensive Plan, or both).

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<sup>2</sup> Parcels shown on the Metro Plan Diagram with a clearly identified Plan designation (i.e., parcels that do not border one plan designation); lands outside the UGB within the Metro Plan Boundary (though this instance no longer applies to Springfield); parcels with parcel-specific designations adopted through the Plan amendment process

**CONCLUSION:** Based on the preceding findings, the amendments do not make the Metro Plan or Springfield Comprehensive Plan internally inconsistent. The criteria at SDC 5.14.135(B) and LC 12.300.030.B are met.

## REFINEMENT PLAN AND DEVELOPMENT CODE AMENDMENTS

The applicable approval criteria for the amendments are at:

### *SDC 5.6.115 (Refinement Plans, Plan Districts and the Development Code—Adoption or Amendment):*

- (A) In reaching a decision on the adoption or amendment of refinement plans and this code’s text, the City Council shall adopt findings that demonstrate conformance to the following:
  - (1) The Metro Plan and Springfield Comprehensive Plan;
  - (2) Applicable State statutes; and
  - (3) Applicable State-wide Planning Goals and Administrative Rules.
- (B) Applications specified in SDC 5.6.105 may require co-adoption by the Lane County Board of Commissioners.

### **CRITERION #1: SDC 5.6.115(A)(1): CONFORMANCE WITH THE METRO PLAN AND SPRINGFIELD COMPREHENSIVE PLAN**

Finding 1: The amendments to the neighborhood refinement plans and Springfield Development Code are made in direct response to Criterion 5.6.115(a)(1) to align the text of affected refinement plans and Code to the Metro Plan and/or Springfield Comprehensive Plan where applicable. The Springfield Comprehensive Plan itself is the reason for the resultant amendments to the Springfield Development Code, and as demonstrated in the Findings under the approval criteria at SDC 5.14.135(B) and LC 12.300.030.B, incorporated herein by reference, precedent for the subject amendments exists in the Metro Plan.

Finding 2: The amendments to Springfield’s neighborhood refinement plans are limited to those described in Exhibits C, D, and E. Referencing the Springfield Comprehensive Plan instead of, or in addition to, the Metro Plan where appropriate and correctly referencing designation names to align with the Comprehensive Plan Map are not substantive policy changes that affect the future development character and function of Springfield’s neighborhoods. The amendments depict Nodal Development areas as overlays and combine various public- and parks-based designations into one designation name of “Public Land and Open Space” but do not change the original descriptions or intent of the various pre-existing designations. As such, the amendments are merely labelling changes to aid in making the Comprehensive Plan Map easy to read and in making policy easier to interpret and apply.

Finding 3: The amendments to the Springfield Development Code in response to the creation of the Springfield Comprehensive Plan Map and Land Use Element of the Springfield Comprehensive Plan are also narrowly scoped and administrative in nature as shown in Exhibit F. The purpose of these changes is to aid the user of the Development Code by clarifying how to navigate applicable planning documents, whether the Metro Plan and/or the Springfield Comprehensive Plan.

**Finding 4:** The text amendments to the Downtown Refinement Plan include a correction to clarify that the policies in the Refinement Plan's Public Spaces Element adopted by Ordinance 6148 (2005) replace the Public Spaces Element adopted in Ordinance 5316 (1986). During the process of researching Springfield's adopted refinement plans for this project, it became apparent that Ordinance 6148 did not clearly state whether the intent was to only amend but retain the original 1986 Public Spaces policies or whether the intent was to amend and replace the existing policies. Since 2005, however, the Downtown Refinement Plan was published on the City's website without the 1986 Public Spaces Element policies. Because retaining the 1986 policies would make the Public Spaces Element redundant to the added 2005 policies, the proposed amendment clearly removes the 1986 Plan policies in favor of the 2005 policies, as shown in Exhibit E. These amendments do not change any other content of the Metro Plan or Springfield Comprehensive Plan.

**CONCLUSION:** Based on the preceding findings, the refinement plan and Code amendments conform to the Metro Plan and Springfield Comprehensive Plan. Approval criterion SDC 5.6.115(A)(1) is satisfied.

#### ***CRITERION #2: SDC 5.6.115(A)(2): CONFORMANCE WITH APPLICABLE STATE STATUTES***

**Finding 5:** ORS 197.175 generally requires the City to exercise its planning and zoning responsibilities in accordance with ORS Chapters 195, 196 and 197 and the goals approved under ORS Chapters 195, 196 and 197. Compliance with Oregon's Statewide Land Use Planning Goals are discussed under Criterion #1. There are no statutes in ORS Chapters 195, 196, or 197 that apply to the substance of these amendments.

**Finding 6:** ORS 197.610 and OAR 660-018-0020 require local jurisdictions to submit proposed comprehensive plan or land use regulation changes to the Oregon Department of Land Conservation and Development (DLCD). As noted in the Procedural Findings on pages 3-4 of this staff report, notice of the proposed amendments was provided to DLCD more than 35 days in advance of the first evidentiary hearing concerning the amendments.

**CONCLUSION:** Based on the aforementioned finding, the proposed refinement plan and Code amendments are consistent with applicable state statutes and meet SDC 5.6.115(A)(2).

#### ***CRITERION #3: SDC 5.6.115(A)(3): CONFORMANCE WITH APPLICABLE STATEWIDE PLANNING GOALS AND ADMINISTRATIVE RULES***

**Finding 7:** The proposed amendments to Springfield's neighborhood refinement plans and the Springfield Development Code are the result of proposed changes to the Springfield Comprehensive Plan and Metro Plan and the desired consistency between all four planning tools. The findings addressing the approval criteria at SDC 5.14.135(A) and LC 12.300.030.A for amendments to the Metro Plan and Springfield Comprehensive Plan are incorporated herein by reference in demonstration that the proposed refinement plan and Code amendments conform to Oregon's Statewide Planning Goals and Administrative Rules.

**CONCLUSION:** The applicable approval criteria at SDC 5.6.115 are satisfied.

**VI. OVERALL CONCLUSION:**

The findings herein demonstrate the Metro Plan and Springfield Comprehensive Plan amendments are consistent with the applicable criteria of approval at SDC 5.14.135 and LC 12.300.030, and the proposed amendments to Refinement Plans and the Springfield Development Code are consistent with the applicable criteria of approval at SDC 5.6.115.