

**CITY OF SPRINGFIELD, OREGON**  
**ORDINANCE NO. 6471 (GENERAL)**

**AN ORDINANCE AMENDING THE EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (*METRO PLAN*) DIAGRAM BY REDESIGNATING APPROXIMATELY 4.99 ACRES OF LAND FROM CAMPUS INDUSTRIAL (CI) TO COMMERCIAL (C); CONCURRENTLY AMENDING THE *GATEWAY REFINEMENT PLAN* DIAGRAM TO REDESIGNATE THE SAME 4.99 ACRES OF LAND FROM CAMPUS INDUSTRIAL (CI) TO COMMUNITY COMMERCIAL (CC); CONCURRENTLY AMENDING THE SPRINGFIELD ZONING MAP BY REZONING THE SAME 4.99 ACRES OF LAND FROM CAMPUS INDUSTRIAL (CI) TO MEDICAL SERVICES (MS); ADOPTING A SEVERABILITY CLAUSE AND PROVIDING AN EFFECTIVE DATE**

**THE CITY COUNCIL OF THE CITY OF SPRINGFIELD FINDS THAT:**

**WHEREAS**, Springfield Development Code (SDC) 5.14.100 sets forth procedures for *Metro Plan* diagram amendments; and

**WHEREAS**, SDC 5.14.115(A) classifies amendments to the *Metro Plan* diagram for land inside the Springfield City limits as being Type I *Metro Plan* amendments that require approval by Springfield only; and

**WHEREAS**, SDC 5.14.125(A) sets forth procedures for property owners to initiate a Type I *Metro Plan* diagram amendment for property under their ownership; and

**WHEREAS**, the applicant/owner of the subject property initiated Type I *Metro Plan* diagram amendment as follows:

Redesignate approximately 4.99 acres of property that is located at the northeast corner of the intersection of Game Farm Road and Maple Island Road, identified as Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, as generally depicted and more particularly described in **Exhibit A** to this Ordinance, from Campus Industrial to Commercial; and

**WHEREAS**, SDC 5.14.120(D) provides that when a *Metro Plan* diagram amendment is enacted that requires an amendment to a refinement plan for consistency, the *Metro Plan* diagram amendment automatically amends the refinement plan diagram if no amendment to the refinement plan text is involved; and

**WHEREAS**, pursuant to SDC 5.14.120(D) the *Gateway Refinement Plan* diagram has been amended as follows:

Redesignate approximately 4.99 acres of property that is located at the northeast corner of the intersection of Game Farm Road and Maple Island Road, identified as Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, as generally depicted and more particularly described in **Exhibit A** to this Ordinance, from Campus Industrial to Community Commercial; and

**WHEREAS**, SDC 5.22.110 sets forth procedures for property owners to initiate an amendment to the Springfield Zoning Map; and

**WHEREAS**, SDC 5.22.110(A)(1) sets forth procedures for concurrent amendments to the *Metro Plan* diagram and Springfield Zoning Map through the Legislative Zoning Map amendment process; and

**WHEREAS** the applicant/owner of the subject property initiated the following Springfield Zoning Map amendment:

Rezone approximately 4.99 acres of property identified herein as Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, as generally depicted and more particularly described in **Exhibit A** to this Ordinance, from Campus Industrial to Medical Services; and

**WHEREAS**, on November 7, 2023 the Springfield Planning Commission conducted a public hearing on the proposed *Metro Plan* diagram amendment request and concurrent request for Zoning Map amendment; the Development & Public Works Department staff reports, including criteria of approval, findings and recommendations, together with the testimony and submittals of the persons testifying at that hearing, were considered and were made a part of the record of the proceeding; and

**WHEREAS**, at the regular meeting on November 7, 2023 the Planning Commission conducted deliberations and voted four (4) in favor and none (0) opposed to forward recommendations of approval to the City Council for the proposed *Metro Plan* diagram and Zoning Map amendments; and

**WHEREAS**, on January 2, 2024 the City Council held a public hearing to receive testimony and hear comments on the proposals; and

**WHEREAS**, The City Council is now ready to take action on these proposals with due consideration given to the above recommendations of the Planning Commission and the evidence and testimony already in the record, as well as the evidence and testimony presented at this public hearing held in the matter of adopting this Ordinance amending the *Metro Plan* diagram and Springfield Zoning Map; and

**WHEREAS**, substantial evidence exists within the record and the findings set forth in **Exhibits B & C**, attached hereto and incorporated herein by reference, that the proposal meets the relevant approval criteria,

NOW, THEREFORE, BASED ON THE FOREGOING FINDINGS, THE COMMON COUNCIL OF THE CITY OF SPRINGFIELD ORDAINS AS FOLLOWS:

Section 1. The above findings and conclusions are hereby adopted.

Section 2. The applicant narrative and staff reports and recommendations to this Ordinance set forth in **Exhibits B & C**, attached hereto and incorporated herein by reference, are hereby adopted.

Section 3. The *Metro Plan* diagram designation of 4.99 acres of the subject property identified herein as Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, generally depicted and more particularly described in **Exhibit A** attached hereto and incorporated herein by reference, is hereby amended from Campus Industrial (CI) to Commercial (C).

Section 4. The *Gateway Refinement Plan* diagram designation of 4.99 acres of the subject property identified herein as Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, generally depicted and more particularly described in **Exhibit A** attached hereto and incorporated herein by reference, is hereby amended from Campus Industrial (CI) to Community Commercial (CC).

Section 5. The Springfield Zoning Map is hereby amended to rezone 4.99 acres of the subject property identified as a portion of Assessor's Map 17-03-15-40, Tax Lot 1000 and Portions of Tax Lots 800, 900 & 1100, generally depicted and more particularly described in **Exhibit A** attached hereto and incorporated herein by reference, from Campus Industrial (CI) to Community Commercial (CC).

Section 6. If any section, subsection, sentence, clause, phrase, or portion of this Ordinance is for any reason held to be invalid or unconstitutional by any court of competent jurisdiction, that portion shall be deemed a separate, distinct, and independent provision and that holding shall not affect the validity of the remaining portion of this Ordinance.

Section 7. Notwithstanding the effective date of ordinances as provided by Section 2.110 of the Springfield Municipal Code 1997, this ordinance shall become effective 30 days from the date of passage by the City Council and approval by the Mayor or upon the date of acknowledgement as provided in ORS 197.625, whichever date is later.

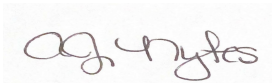
ADOPTED by the City Council of the City of Springfield this 29th day of January, 2024 by a vote of 6 for and 0 against.

APPROVED by the Council President of of the City of Springfield, functioning as Mayor in accordance with Section 17 of the Springfield Charter this 29th day of January, 2024.



\_\_\_\_\_  
Council President

ATTEST:



\_\_\_\_\_  
City Recorder

REVIEWED & APPROVED  
AS TO FORM

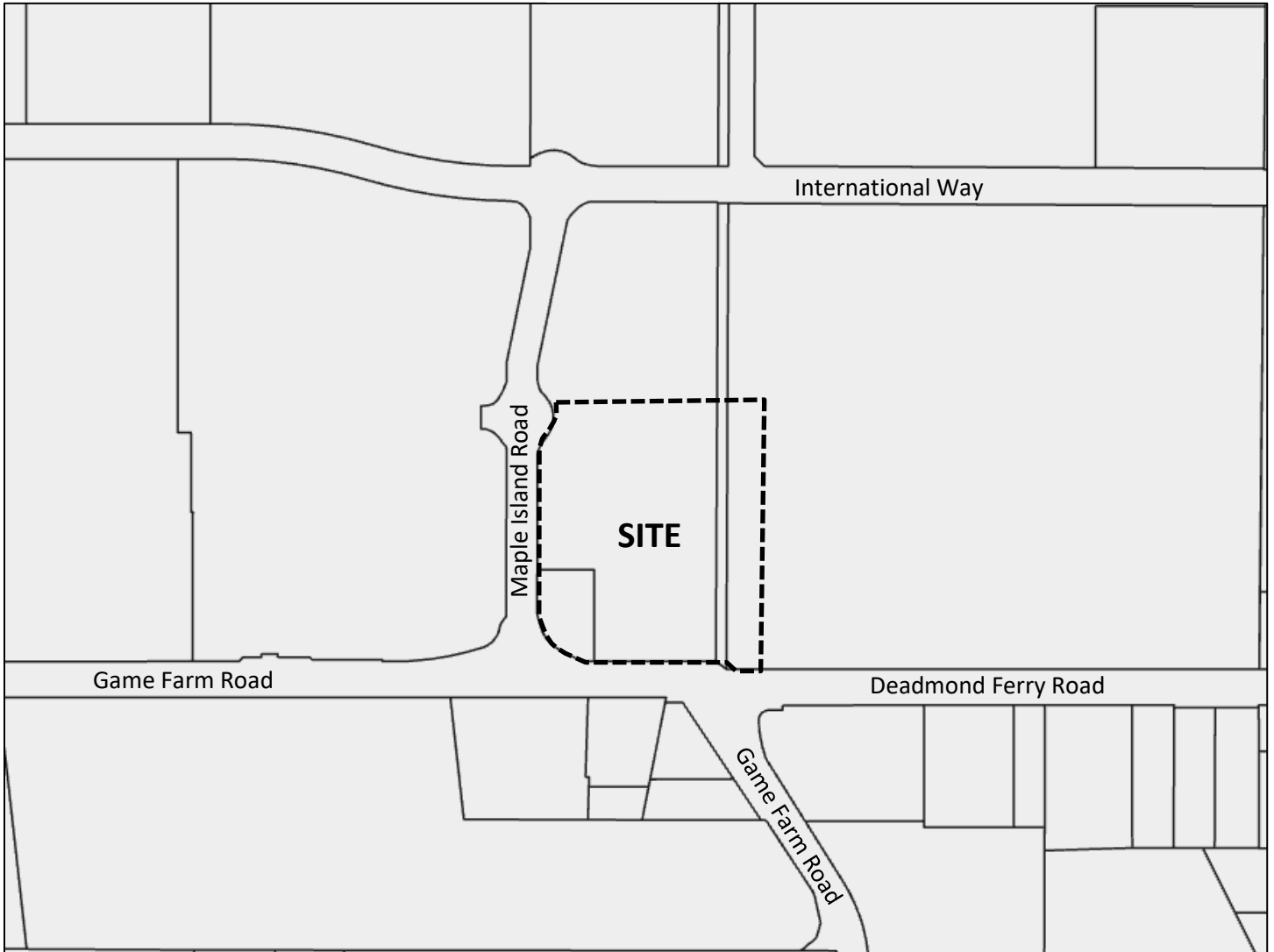


DATE: 1/25/2024

SPRINGFIELD CITY ATTORNEY'S OFFICE

# EXHIBIT A

PROPERTY REDESIGNATED FROM CAMPUS INDUSTRIAL TO COMMUNITY COMMERCIAL  
AND REZONED FROM CAMPUS INDUSTRIAL TO MEDICAL SERVICES



**LEGAL DESCRIPTION**

BEGINNING AT A 5/8-INCH REBAR FOUND; THENCE NORTH 88 DEGREES 16 MINUTES 33 SECONDS WEST, A DISTANCE OF 237.55 FEET, MORE OR LESS TO A 5/8-INCH REBAR WITH YELLOW PLASTIC CAP INSCRIBED "LS2609" FOUND; THENCE NORTH 88 DEGREES 16 MINUTES 19 SECONDS WEST, A DISTANCE OF 22.10 FEET, MORE OR LESS; THENCE NORTH 63 DEGREES 55 MINUTES 41 SECONDS WEST, A DISTANCE OF 18.74 FEET, MORE OR LESS; THENCE NORTH 60 DEGREES 32 MINUTES 51 SECONDS WEST, A DISTANCE OF 35.25 FEET, MORE OR LESS; THENCE WITH A CURVE TO THE RIGHT, HAVING AN ARC LENGTH OF 45.62 FEET, WITH A RADIUS OF 70.00 FEET, HAVING A CHORD BEARING OF NORTH 40 DEGREES 11 MINUTES 6 SECONDS WEST, AND WITH A CHORD LENGTH OF 44.82 FEET, MORE OR LESS; THENCE WITH A COMPOUND CURVE TO THE RIGHT, HAVING AN ARC LENGTH OF 35.40 FEET, WITH A RADIUS OF 270.00 FEET, HAVING A CHORD BEARING OF NORTH 15 DEGREES 1 MINUTE 0 SECONDS WEST, AND WITH A CHORD LENGTH OF 35.37 FEET, MORE OR LESS TO A BENT 1/2-INCH REBAR FOUND; THENCE NORTH 1 DEGREE 47 MINUTES 9 SECONDS EAST, A DISTANCE OF 311.51 FEET, MORE OR LESS; THENCE WITH A CURVE TO THE RIGHT, HAVING AN ARC LENGTH OF 41.75 FEET, WITH A RADIUS OF 100.00 FEET, HAVING A CHORD BEARING OF NORTH 31 DEGREES 14 MINUTES 21 SECONDS EAST, AND WITH A CHORD LENGTH OF 41.45 FEET, MORE OR LESS; THENCE WITH A REVERSE CURVE TO THE LEFT, HAVING AN ARC LENGTH OF 74.47 FEET, WITH A RADIUS OF 60.00 FEET, HAVING A CHORD BEARING OF NORTH 1 DEGREE 32 MINUTES 5 SECONDS EAST, AND WITH A CHORD LENGTH OF 69.78 FEET, MORE OR LESS; THENCE SOUTH 88 DEGREES 12 MINUTES 51 SECONDS EAST, A DISTANCE OF 414.32 FEET, MORE OR LESS; THENCE SOUTH 1 DEGREE 47 MINUTES 10 SECONDS WEST, A DISTANCE OF 523.27 FEET, MORE OR LESS; THENCE NORTH 88 DEGREES 16 MINUTES 33 SECONDS WEST, A DISTANCE OF 66.30 FEET, MORE OR LESS TO A 5/8-INCH REBAR WITH YELLOW PLASTIC CAP INSCRIBED "LS2609" FOUND; THENCE NORTH 51 DEGREES 18 MINUTES 18 SECONDS WEST, A DISTANCE OF 24.94 FEET, MORE OR LESS TO THE POINT OF BEGINNING, AND CONTAINING AN AREA OF 217,364 SQUARE FEET, OR 4.99 ACRES, MORE OR LESS.

BEARINGS IN THE DESCRIPTIONS ABOVE ARE BASED ON OREGON STATE PLANE COORDINATES, SOUTH ZONE, NAD - 83, INTERNATIONAL FOOT.

**Staff Report and Findings  
Springfield City Council  
Type 1 Amendment to the Metro Plan Diagram**

**Meeting Date:** January 16, 2024

**File Number:** 811-23-000182-TYP4

**Applicant:** Law Office of Micheal Reeder on behalf of PeaceHealth

**Project Location:** Northeast corner of the intersection of Game Farm Road and Maple Island Road (Assessor's Map 17-03-15-40, Tax Lot 1000 and portions of Tax Lots 800, 900 & 1100).

**Request**

The City has received applications for a Type 1 *Metro Plan* diagram amendment and a concurrent Zoning Map amendment from a property owner. In accordance with Springfield Development Code (SDC) 5.14.115(A)(1), proposals for redesignating land inside the City limits are classified as a Type 1 *Metro Plan* diagram amendment requiring approval by Springfield only. SDC 5.14.125(A) states that an amendment to the *Metro Plan* diagram can be initiated by a property owner at any time. Per SDC 5.1.420(B), the property owner-initiated amendment to the *Metro Plan* diagram is processed as a Type 3 quasi-judicial land use action that requires public hearings before the Springfield Planning Commission and City Council.

The proposed *Metro Plan* diagram amendment would change the plan designation for approximately 4.99 acres of the subject property from Campus Industrial (CI) to Commercial and concurrently change the *Gateway Refinement Plan* designation for the same approximately 4.99 acres from CI to Community Commercial (CC). Concurrent with this *Metro Plan* diagram amendment, an amendment to the Springfield Zoning Map (File 811-23-000181-TYP3) would change the zoning of the same 4.99 acres of property from CI to Medical Services (MS).

The proposed *Metro Plan* diagram, *Gateway Refinement Plan* diagram and Zoning Map amendments would allow for creation of a 4.99-acre site with Community Commercial designation and Medical Services zoning at the southern edge of a large, contiguous area of existing Campus Industrial zoning. The subject site is vacant and is located at the southwest corner of a roughly 42.1-acre property already owned by the applicant. Approximately the eastern 80% of the site (roughly 33.4 acres) is developed as the PeaceHealth Riverbend Annex. Upon redesignation and rezoning of the subject property, the applicant intends to construct a ~66,000 ft<sup>2</sup> rehabilitation hospital on the 4.99-acre site. Hospitals and medical clinics are not listed as permitted uses within the Campus Industrial district (SDC 3.2.400). However, in accordance with SDC 3.2.510, hospital services and medical clinics are listed as permitted uses in the Medical Services zoning district.

The application was submitted on August 24, 2023 and the Springfield Planning Commission conducted a public hearing on the proposed *Metro Plan* diagram, *Gateway Refinement Plan* diagram and Zoning Map amendments on November 7, 2023. The Planning Commission unanimously adopted recommendations of support for the proposal (Attachments 5 & 6).

The City Council conducted a public hearing and gave first reading to the Ordinance at the regular meeting on January 2, 2024. The applicant made a presentation in support of the proposal and no other testimony was received at the public hearing.

## **Background**

The subject property was originally identified as part of the McKenzie-Gateway Special Light Industrial area when the *Gateway Refinement Plan* was adopted in 1992. Implementation of the Special Light Industrial area was subsequently accomplished through the creation and establishment of the Campus Industrial zoning district. Approximately 280 acres of north Springfield extending from I-5 on the west to the McKenzie River on the east is currently zoned and designated for Campus Industrial use. Notable early developments within the CI district included Sony, Symantec, and Royal Caribbean. See the acknowledged Commercial and Industrial Lands Inventory (CIBL) for a history of business development in Springfield. However, these companies have since departed and other companies have gravitated to the area and proceeded to occupy and repurpose many of the sites and buildings, including the applicant (PeaceHealth).

## **Notification and Written Comments**

In accordance with the Oregon Administrative Rules (OARs) 660-018-0020, prior to adopting a change to an acknowledged comprehensive plan or land use regulation, local governments are required to notify the state Department of Land Conservation and Development (DLCD) at least 35 days prior to the first evidentiary hearing. A Notice of Proposed Amendment was transmitted to the DLCD on October 2, 2023, which is 36 days prior to the initial public hearing on the matter.

In accordance with SDC 5.1.425(A), Type 3 land use decisions that amend a comprehensive plan and/or rezone specific properties require mailed notification, a posted notice, and a notice in a newspaper of general circulation. Consistent with the requirements of SDC 5.1.425(A), notification of the November 7, 2023 Planning Commission public hearing and January 2, 2024 City Council public hearing was mailed to property owners and residents within 300 feet of the subject property on October 17, 2023 which is more than 20 days prior to the first hearing. In accordance with SDC 5.1.440(A), the Planning Commission and City Council public hearing notice was published in *The Chronicle* newspaper on October 26, 2023. Staff also posted notices of the November 7, 2023 Planning Commission public hearing and January 2, 2024 City Council public hearing at the following locations: three points along the public street frontages of the subject property (northwest corner, southwest corner and southeast corner); on the Public Notices board in the lobby of Springfield City Hall; on the Development & Public Works office digital display; and on the City's webpage. For the January 2, 2024 City Council public hearing, staff mailed a second round of notification letters to property owners and residents within 300 feet of the subject property on December 7, 2023. Additionally, a second public hearing notice was published in *The Chronicle* newspaper on December 14, 2023. The mailed and posted notices exceed the requirements of SDC 5.1.435.

During the public notification period for the City Council public hearing meeting a comment was received from Nancy Fuhrman (Attachment 7). Ms. Fuhrman's concerns relate to increased traffic and noise from the proposed medical facility. According to the applicant's submittal, the proposed rehabilitation hospital is for patients recovering from injuries or medical procedures. The facility will not have an urgent care center or emergency room, so, unlike the nearby Sacred Heart Hospital, there won't be ambulances inbound with lights and sirens. This limits the noise associated with the facility to normal vehicle traffic and facility operations.

The applicant has provided a supporting Traffic Impact Analysis that confirms the proposed comprehensive plan amendment and zone change will not have a significant affect on existing or planned transportation facilities, including Game Farm Road. The applicant's findings satisfy the Goal 12 requirements discussed in this staff report. Because some of the properties within the Campus Industrial district are vacant or only partially built-out, it is inevitable that traffic will increase incrementally as new sites develop or redevelop – even under the current zoning pattern. The proposed hospital is not designed or intended to accommodate casual or walk-in patients which greatly limits the amount of daytime traffic associated with the facility. At buildout, most vehicle trips associated with the facility would be reasonably expected to be employees and

medical staff that work at the hospital. Details on the traffic and vehicle circulation patterns associated with the facility will be reviewed at the time of a future land use application submittal.

### **Criteria of Approval**

SDC 5.14.135 contains the criteria of approval for the decision maker to utilize during review of *Metro Plan* diagram amendments. The Criteria of approval are:

#### *SDC 5.14.135 CRITERIA*

*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.*

### **A. Consistency with Applicable State-Wide Planning Goals**

*Applicant's Narrative: "The Findings of Facts below demonstrate the amendment is consistent with applicable Statewide Planning Goals. The following applicable statewide planning goal statements have been summarized. The Oregon Land Conservation and Development Commission Goals and Guidelines are incorporated herein by reference, except as noted."*

Finding 1: Of the 19 statewide planning goals, 13 are as "urban" goals that may be applicable to comprehensive plan map amendments in the city; however, it is the proposal and its effect on the purpose of these goals that will determine whether or not the proposed amendment is "consistent with" the applicable goals. The goals that are to be evaluated are: Goal 1 – Citizen Involvement; Goal 2 – Land Use Planning; Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces; Goal 6 – Air, Water and Land Resources Quality; Goal 7 – Areas Subject to Natural Hazards; Goal 8 – Recreational Needs; Goal 9 – Economic Development; Goal 10 – Housing; Goal 11 – Public Facilities and Services; Goal 12 – Transportation; Goal 13 – Energy Conservation; Goal 14 – Urbanization; and Goal 15 – Willamette River Greenway. All of the statewide goals are listed below; the narrative that accompanies each is more expositive when the discussion applies to one of the 13 goals identified above.

#### Goal 1 – Citizen Involvement

*Applicant's Narrative: "The City of Springfield has a citizen involvement program that is acknowledged by the State as in compliance with Goal 1. Citizens are provided the opportunity to be involved in all phases of the planning process. The proposal does not include any changes to the City's citizen involvement program. The requirements under Goal 1 are met by adherence to the City's provisions for citizen involvement as implemented by the Springfield Development Code (SDC)."*



Finding 2: Goal 1 – Citizen Involvement calls for “the opportunity for citizens to be involved in all phases of the planning process.” The proposed property owner-initiated amendment to the adopted *Metro Plan* diagram and concurrent amendment to the *Gateway Refinement Plan* diagram is subject to the City’s acknowledged plan amendment process which is a Type 3 land use action under SDC 5.1.400. The applicable Code sections include SDC 5.14.100 – *Metro Plan* Amendments, SDC 5.1.400 – Type 2 and 3 Procedures and SDC 5.1.425–5.1.440 – Type 3 Notice. SDC 5.1.420(B)(4) requires a public hearing before the Springfield Planning Commission and a public hearing before the Springfield City Council, and includes specifications for the content, timing and dispersal of mailed notice (see description following).

Finding 3: The Planning Commission public hearing to consider the proposed amendments was held on November 7, 2023. Mailed notification of the Planning Commission and City Council public hearings was provided to all property owners and residents within 300 feet of the subject property on October 17, 2023. The Planning Commission and City Council public hearings were advertised in the legal notices section of *The Chronicle* newspaper on October 26, 2023. Staff also posted notices of the scheduled public hearings at the following locations: three points along the subject property frontages on Game Farm Road (at the southeast corner of the site near the intersection with Deadmond Ferry Road and at southwest corner of the site near the roundabout intersection with Maple Island Road) and at the northwest corner of the site at a second roundabout on Maple Island Road; on the City’s website; on the Public Notices board in the lobby of City Hall; and on the digital display in the Development & Public Works office lobby.

Finding 4: The recommendations of the Planning Commission to the Springfield City Council are included as Attachments 5 and 6 to the covering Agenda Item Summary (AIS) for consideration at the public hearing meeting held on January 2, 2024. Because of the nearly two-month delay between the two scheduled public hearing meetings, staff completed another round of public notifications for the January 2, 2024 City Council public hearing. A second notification of the City Council public hearing was mailed on December 7, 2023 to all property owners and residents within 300 feet of the subject property. The City Council public hearing was also readvertised in the legal notices section of *The Chronicle* newspaper on December 14, 2023. The meeting agenda, AIS, covering staff reports and supporting documents were posted on the City’s website the Thursday prior to the January 2, 2024 meeting and the public was invited to provide comments through the City’s webpage, submittal to staff or direct submittal to Council. Additional information was also provided to the public for how to attend the public hearing meeting via online meeting platform or by phone. As a result of the second round of public hearing notification, a written comment was received from Nancy Fuhrman and is included as Attachment 7. The notice for this proposed *Metro Plan* diagram amendment complies with SDC 5.1.425–5.1.440 and is consistent with Goal 1 requirements.

## Goal 2 – Land Use Planning

*Applicant’s Narrative:* “Goal 2 requires local plans and regulatory measures to be consistent with statewide goals and land use decisions to be supported by an adequate factual basis. Goal 2 also requires that comprehensive plan amendments be adopted after a public hearing by the governing body that provides citizens an opportunity to comment on the proposed amendment. Goal 2 establishes a land use planning process and policy framework as a basis for all land use decisions and requires the development of an adequate factual base to support these decisions. A minor change is one that does not have significant effect beyond its immediate area and is based on special studies or information. The justification for the particular change must be established. The City of Springfield has adopted a comprehensive land use Plan amendment process, including specific

*standards that must be addressed to justify the change. In addition, Oregon Administrative Rules have been promulgated for the Exception Process. Substantial compliance with SDC 5.14.100 and the OAR provisions is addressed above and below in this written statement in compliance with the applicable provisions of Goal 2. The SDC implements Goal 2 by providing state-acknowledged procedures and criteria governing land use decisions. This Plan amendment and related zone change application will be considered by the Planning Commission and City Council following two public hearings. This application is being processed in compliance with the requirements of SDC and thus complies with Goal 2.”*

Finding 5: Goal 2 – Land Use Planning outlines the basic procedures for Oregon’s statewide planning program. In accordance with Goal 2, land use decisions are to be made in accordance with a comprehensive plan, and jurisdictions are to adopt suitable implementation ordinances that put the plan’s policies into force and effect. Consistent with the City’s coordination responsibilities and obligations to provide affected local agencies with an opportunity to comment, the City sent a copy of the application submittals to the following agencies: Willamalane Park & Recreation District; Springfield Utility Board (water, ground water protection, electricity and energy conservation); Lane 911; United States Postal Service; Northwest Natural Gas; Emerald People’s Utility District; Rainbow Water District; Eugene Water and Electric Board – Water and Electric Departments; Springfield School District #19 Maintenance, Safe Routes to School and Financial Services; Lane County Transportation, County Sanitarian; Lane Regional Air Pollution Authority; Comcast Cable; CenturyLink; Lane Transit District; and ODOT Planning and Development, State Highway Division. Additionally, notice was provided electronically to DLCDC on October 2, 2023.

Finding 6: The *Metro Plan* and *Springfield 2030 Comprehensive Plan* together make up the acknowledged comprehensive plan for guiding land use planning in Springfield. The City has adopted other neighborhood- or area-specific plans (such as Refinement Plans) that provide more detailed direction for land use planning under the umbrella of the *Metro Plan* and *Springfield 2030 Comprehensive Plan*. The subject site is within the boundary of the adopted *Gateway Refinement Plan*. Therefore, the proposed amendment to the *Metro Plan* diagram will concurrently amend the *Gateway Refinement Plan* diagram.

Finding 7: The City has adopted the *Urbanization, Residential Land and Housing* and *Economic* elements of the *Springfield 2030 Comprehensive Plan*. These adopted elements either replace and supersede (i.e. *Urbanization* and *Economic* elements) or update and supplement (i.e. *Residential Land and Housing* element) the corresponding *Metro Plan* elements. Springfield’s *Comprehensive Plan* elements have been acknowledged by DLCDC. Ensuring that the proposed *Metro Plan* diagram amendment does not create an internal inconsistency in the *Metro Plan* is addressed in Criterion B.1 below.

Finding 8: The public hearing process used for amendment of the *Metro Plan* is specified in Chapter IV *Metro Plan* Review, Amendments, and Refinements. The findings under Criterion B (below) demonstrate that the proposed amendment will not make the adopted *Metro Plan* internally inconsistent.

Finding 9: The City’s Development Code is a key mechanism used to implement the goals and policies of the City’s adopted comprehensive plans including the *Metro Plan*, elements of the *Springfield 2030 Comprehensive Plan* and neighborhood-specific Refinement Plans. The proposal is classified as a Type 1 amendment to the adopted *Metro Plan* diagram that is approved by Springfield only in accordance with SDC 5.14.115(A). Type 1 *Metro Plan* amendments within City limits do not

require concurrent approval or adoption by Lane County. The proposed *Metro Plan* diagram amendment is site-specific and is therefore processed as a Type 3 land use action as described in SDC 5.1.420. The process observed for the proposed *Metro Plan* diagram amendment is consistent with the policies pertaining to Review, Amendments and Refinements. Additionally, the proposed *Metro Plan* diagram amendment and concurrent *Gateway Refinement Plan* diagram amendment has been initiated in accordance with the provisions of the City's acknowledged comprehensive plan and Development Code (SDC 5.14.125(A)). The proposed *Metro Plan* diagram and *Gateway Refinement Plan* diagram amendments are consistent with City ordinances, policies, plans, and studies adopted to comply with Goal 2 requirements. Notice and coordination requirements "with those local governments, state and federal agencies and special districts which have programs, land ownerships, or responsibilities within the area" that includes this proposal have been provided consistent with Goal 2.

### Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces

*Applicant's Narrative:* "Goal 5 requires the conservation of open space and the protection of numerous natural, cultural, historic and scenic resources. The goal applies to the following resources: riparian corridors, water and riparian areas and fish habitat, wetlands, wildlife habitat, mineral and aggregate resources, energy sources, natural areas, scenic views and sites, open space, groundwater resources, wilderness areas, historic resources, cultural areas, Oregon recreational trails, federal wild and scenic waterways and state scenic waterways. OAR 660-023-0010 and 0020 includes definitions, standards and specific rules applicable to each Goal 5 resource inventoried for conservation under the goal. The Goal 5 resources listed above have been appropriately considered by the City of Springfield in the Plan. The property does not contain any inventoried Statewide Goal 5 resources. There are no known significant natural assets or historic resources on the property. The amendment does not propose a change to the City's list of Goal 5 resources or propose a change to any regulatory measures related to Goal 5. The proposed request will not allow new uses that could be in conflict with a significant Goal 5 resource site. Goal 5 is not applicable."

Finding 10: Goal 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources applies to more than a dozen natural and cultural resources such as wildlife habitats and wetlands, and establishes a process for each resource to be inventoried and evaluated. The subject site has not been identified as a historic resource in the City's Register of Historic Sites, nor as an open space resource in the adopted 2012 Willamalane Park & Recreation District Comprehensive Plan. Project O3 in the 2023 Willamalane Comprehensive Plan (awaiting adoption by the City of Springfield) lists "North Springfield Trail Connectivity" as an ongoing project in the general vicinity of the Campus Industrial district but there are no planned connections through the subject site. Finally, there are no features within the subject property that are identified in the City's acknowledged Local Wetlands Inventory or Natural Resources Inventory. As noted in the applicant's narrative, there are no identified or inventoried Goal 5 resources located within the subject site. Therefore, this action does not alter the City's acknowledged compliance with Goal 5.

### Goal 6 – Air, Water and Land Resources Quality

*Applicant's Narrative:* "Goal 6 is generally implemented during the comprehensive planning process and local regulations. The City of Springfield's Environmental Services Division (ESD) coordinates the City's compliance with applicable state and federal environmental quality statutes. ESD manages multiple programs to maintain compliance with Goal 6 including 1) Water Resources Programs, such as implementing the City's National Pollutant Discharge Elimination System (NPDES) stormwater

*discharge permit, 2) Industrial Pretreatment Program such as administering the Pollution Management Practice programs, and 3) Wastewater & Stormwater Programs. The proposed Plan amendment does not alter the City's acknowledged compliance with Goal 6. As Goal 6 pertains to site-specific development, it requires that adequate protective measures are taken to ensure the maintenance of an, water and land quality. This Plan amendment will encourage development of land inside the city for medical services. All new development must comply with applicable local, state and federal air and water quality standards. The general vicinity of the Subject Property is served by adequate on-site water and sanitation facilities. The proposed use of the Subject Property is not expected to produce or discharge any product or by-product that would degrade the quality of the any water and land resources."*

Finding 11: Goal 6 – Air, Water and Land Resources Quality applies to local comprehensive plans and the implementation of measures consistent with state and Federal regulations on matters such as clean air, clean water, and preventing groundwater pollution. The proposed *Metro Plan* diagram amendment does not affect City ordinances, policies, plans, and studies adopted to comply with Goal 6 requirements. Future development of the site will be subject to the city's adopted and acknowledged land use regulations at the time of development.

Finding 12: There are no mapped Water Quality Limited Watercourses within or adjacent to the subject property. Therefore, this action does not alter the City's acknowledged compliance with Goal 6.

#### Goal 7 – Areas Subject to Natural Hazards

*Applicant's Narrative: "The Metro Plan and the SDC are acknowledged to be in compliance with all applicable statewide land use goals, including Goal 7. The City of Springfield has existing programs, policies, zoning overlays, and development standards to regulate development in areas subject to natural disasters and hazards. The Subject Property included is not in the City's Floodplain Overlay District or the Hillside Development Overlay District. The proposed Plan amendment does not affect any City regulations or alter mitigation requirements for any properties in areas subject to natural disasters and hazards. Goal 7 is not applicable. There are no known areas subject to natural disasters or hazards on the Subject Property. The Subject Property is not located within the 100 - year flood hazard area as determined by Flood Insurance Rate Map (FIRM) Panel 41039C1133F effective June 2, 1999. FEMA has updated flood maps to better show the risk of flooding in Central Lane County. The revised pending maps continue to show the Subject Property in Zone X. The western and southern edge of the Subject Property are in an area with 0.2% annual chance of flood and the remaining portion is considered an area of minimal flood hazard."*

Finding 13: Goal 7 – Areas Subject to Natural Hazards applies to development in areas such as floodplains and potential landslide areas. Local jurisdictions are required to apply "appropriate safeguards" when planning for development in hazard areas. The City has inventoried areas subject to natural hazards such as the McKenzie and Willamette River floodplains and potential landslide areas on steeply sloping hillsides. The subject site is on vacant, level ground that is not within the mapped 100-year flood hazard area of the McKenzie River. Future development of the site is subject to the provisions of the City's Site Plan Review process as described in SDC 5.17.100.

Finding 14: The proposed *Metro Plan* diagram amendment and concurrent *Gateway Refinement Plan* diagram amendment has no effect on City ordinances, policies, plans, and studies adopted to comply with Goal 7 requirements and siting standards for development within hillside areas or the mapped

flood hazard area of the McKenzie and Willamette Rivers. Therefore, this action has no effect on the City's acknowledged compliance with Goal 7.

### Goal 8 – Recreational Needs

*Applicant's Narrative: "Goal 8 addresses the recreational needs of Oregon residents and visitors. Provisions of this goal are appropriately implemented by a legislative process as part of periodic review of the Plan. The City of Springfield evaluated projected population growth, changes in community demographics, and the recreational needs of citizens and visitors. In compliance with Goal 8, the Metro Plan Diagram designates areas needed for Parks and Open Space. The subject property does not contain any land identified as needed to meet recreational needs or to satisfy the demand for recreational facilities. The proposed Plan amendment and zone change will not affect the City's supply of land available for recreation areas or recreational facilities. The proposed change from Campus Industrial to Commercial has no direct impact on recreational needs. Goal 8 is not applicable."*

Finding 15: Goal 8 – Recreational Needs requires communities to evaluate their recreation areas and facilities and to develop plans to address current and projected demand. The provision of recreation services within Springfield is the responsibility of Willamalane Park & Recreation District. Willamalane has just adopted a new Comprehensive Plan for the provision of park, open space and recreation services for Springfield (2023 *Willamalane Comprehensive Plan*). The 2023 *Willamalane Comprehensive Plan* has not yet been co-adopted by the City of Springfield, but it provides current and updated information about the City's recreational needs under Goal 8.

Finding 16: There are no park or recreational facility projects in the adopted 2012 *Willamalane Comprehensive Plan* that affect the subject property. The 2023 *Willamalane Comprehensive Plan* identifies a potential project in the general vicinity of the subject site. Project O3 – North Springfield Trail Connectivity (also depicted as Project L27 on Figure 35, Page 110) shows a linear multi-purpose path that is not a Willamalane facility, but that could be extended to connect with local trail systems at Coburg Loop and Armitage Park from north Springfield. The multi-use path shown on Figure 35 of the *Willamalane Comprehensive Plan* and described in Appendix 11, Page 27, follows the alignment of International Way which is just north of the subject site. There is an existing multi-use pathway along the north side of International Way. However, there are no dedicated pathway connections shown to or through the subject property. Future development of the subject site would require the provision of setback sidewalks on the east side of Maple Island Road, which would improve pedestrian accessibility along this segment of road and would eventually connect with the multi-use pathway to the north along International Way. Based on the foregoing, the proposed *Metro Plan* diagram amendment would not affect Willamalane's adopted Comprehensive Plan or other ordinances, policies, plans, and studies adopted to comply with Goal 8 requirements. Therefore, this action is consistent with the City's acknowledged compliance with Goal 8.

### Goal 9 – Economic Development

*Applicant's Narrative: "The purpose of Goal 9 is to diversify and improve the economy of the State and is primarily applicable to commercial and industrial development. In 2007 the Oregon legislature adopted House Bill 3337 establishing land use planning requirements for the Eugene - Springfield Metro area. ORS 197.304 established a mandate that Springfield and Eugene separately determine the projected 20-year need for housing and establish separate urban growth boundaries to meet housing needs. Although ORS 197.304 only required separate UGBs for housing, it was implicit*

*that the two cities independently plan for other land use needs including employment growth, as defined by Goal 9. Pursuant to Goal 9, in 2010, Lane County and the cities of Springfield and Eugene approved the Regional Prosperity Economic Development Plan providing a framework to better align regional economic growth with the area's assets and values. Given the complexity involved with addressing ORS 197.304, the City of Springfield chose to phase adoption of various amendments to the Plan. To address OAR 660-009-0015(1) and (4), the City of Springfield prepared an Economic Opportunities Analysis (EOA) to review "the types and amounts of industrial and other employment uses likely to occur in the planning area". The EOA identified "Medical Services" as a Target Industry and typically located in Plan Designations Commercial, Commercial Mixed Use, High Density Residential Mixed Use, Light Medium Industrial Mixed use or Medium Density Mixed use, or Mixed Use. The City of Springfield inventory of Commercial Industrial Buildable Land (CIBL) identified the Subject Property as vacant Campus Industrial Land. The CIBL also concluded there were not enough large vacant sites within the City of Springfield UGB to accommodate the projected economic growth. Relevant City of Springfield economic development strategies include:*

- Provide sites with a variety of site characteristics to meet both commercial and industrial economic opportunities, including sites that are available for relatively fast development. This include[s] large sites for major employers.*
- Support and assist existing businesses within Springfield by assessing what kind of assistance businesses need and developing programs to meet that need.*
- Attract and develop new businesses, especially those related to regional business clusters. The City would like to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses.*
- Maintain flexibility in planning through providing efficient planning services and developing planning policies to respond to the changing needs of businesses.*

*On December 5, 2016, the City of Springfield adopted Ordinance No. 6361 amending the Springfield urban growth boundary and adopting the Springfield 2030 Comprehensive Plan (2030 Plan) Economic and Urbanization Policy Elements. The 2030 Economic Element provides policy direction to address the community's commercial, industrial, and other employment development needs and supplants the Economic Element in the Metro Plan. The new In-Patient Rehabilitation Facility requires a site approximately 4.99 acres in size. Based on data provided by LCOG on June 1, 2023, inside the City of Springfield there are no vacant lots between 4.0 to 8.0 acres in size currently zoned Community Commercial or Medical Services. There are two vacant lots zoned Mixed Use Commercial that fall within this size range located on the PeaceHealth RiverBend campus across from the hospital. Although the MUC zone would allow an In-Patient Rehabilitation Facility, it is vital that the two properties remain available for uses that require proximity to the hospital. The Plan amendment will allow the Subject Property to be designated Commercial and fulfill a key economic goal to support the health care cluster. The new In-Patient Rehabilitation Facility will provide a medical service offering patients a transition between services provided in a hospital and those typically available in an assisted care facility. The Subject Property is located close to other major medical facilities including the PeaceHealth RiverBend and McKenzie Willamette hospitals. The Subject Property is within a block of frequent transit service and bike routes. The Plan amendment will not have an adverse impact on availability of suitable sites for a variety of economic activities. The Plan amendment will provide the following economic benefits:*

- 1. The change in plan designation will stimulate development of an underutilized portion of the RiverBend Campus and result in a more efficient land use Pattern.*

2. *Strengthen the medical services sector in the City of Springfield helping to address a “target industry”.*
3. *Development of the site for the planned In-Patient Rehabilitation Facility is expected to add approximately 150 jobs and result in direct and indirect benefits to the local economy.*

*For further information regarding the Plan amendment’s compliance with the City of Springfield 2030 Economic Element, please refer to the analysis below regarding SDC 5.14.135(B).”*

Finding 17: Under Goal 9 – Economic Development, the proposed plan amendment must ensure that there is enough serviceable land within the Springfield UGB to meet the industrial and commercial site needs identified in the *Economic Element* and the City’s acknowledged *Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL-EOA)*. The CIBL identifies the City’s needed sites for employment uses based on use categories and site size ranges, rather than by cumulative area needed within the UGB.

Finding 18: Table 5-1 of the CIBL concluded that there was a surplus of 235 commercial sites less than one (1) acre, and a deficit of two (2) commercial sites 2-5 acres, but a surplus of forty-four (44) industrial sites of that size. The plan designation proposed for this property would create a commercial site of roughly 5 acres from a currently vacant 6.8-acre industrial site and a small portion (approximately 0.6 acres) of a larger, existing industrial site. The approximately 0.6-acre portion taken from the southwest corner of the ~35-acre PeaceHealth Riverbend Annex property has no appreciable impact on the City’s CIBL or the property’s size classification because it was already inventoried as a 20+ acre “developed” site.

Finding 19: A recent *Metro Plan* diagram amendment and zone change adopted in Ordinance 6422 removed one commercial site in the 2-5 acre category from the City’s Commercial and Industrial Buildable Lands Inventory (CIBL) and added a commercial site in the less than 1 acre category. Subsequently, adoption of Ordinance 6429 added back about 1.14 acres of commercial to the less-than-one-acre site, which, in aggregate, resulted in a new commercial site in the 2-5 acre category and removed a site from the less than 1 acre category. Additionally, the recently approved Latter Day Saints temple on International Way – currently under construction – removed a 5-20 acre industrial site from the inventory. By creating a new 4.99-acre commercial site from a combination of vacant and developed industrial properties, the proposed redesignation would: 1) remove another 5-20 acre industrial site from the inventory; 2) create another commercial site of 2-5 acres (which eliminates the deficit); and, 3) create a new vacant industrial site in the 2-5 acre category.

Conclusion: The proposal does not have an adverse impact on the City’s CIBL and would eliminate a deficit of commercial sites 2-5 acres in size. Based on the foregoing, this proposal is consistent with Goal 9.

#### Goal 10 - Housing

*Applicant’s Narrative: “Goal 10 is intended to provide for the housing needs of the citizens of the State. This Goal is primarily implemented through the provisions of the Plan. The proposed Plan Amendment does not impact the buildable land supply for housing. The new expanded IPF will initially provide 50 beds for those needing 24-hour medical care exceeding what is typically offered in an assisted care facility or nursing home. The size of the site will allow the facility to add 10 more beds in the future. The facility will not provide the complete services of a hospital so being in close proximity to the two hospitals in Springfield will be beneficial.”*

Finding 20: Goal 10 – Housing applies to the planning for – and provision of – needed housing types, including multi-family and manufactured housing. Goal 10 requires the City to evaluate and maintain a sufficient buildable land base for projected housing needs over the forecast period. The City monitors and updates the calculated acreage of residential buildable lands when redesignation and rezoning actions affect the net acreage attributed to Low, Medium, and High-Density Residential uses.

Finding 21: The proposed redesignation does not affect the City’s inventory of residential land. Therefore, Goal 10 is not applicable.

### Goal 11 – Public Facilities and Services

*Applicant’s Narrative: “The Subject Property is located in the City of Springfield and a full range of urban services are available to serve the site and the anticipated development. The Plan amendment will not affect the City or other service providers’ ability to provide public services.”*

Finding 22: Goal 11 – Public Facilities and Services addresses the efficient planning and provision of public services such as sewer, water, law enforcement, and fire protection. In accordance with OAR 660-011-0005(5), public facilities include water, sewer and transportation facilities, but do not include buildings, structures or equipment incidental to the operation of those facilities. The proposed redesignation and rezoning cannot result in permitted uses that will have an adverse effect on the demand for public facilities and services provided to the subject property and adjacent properties. This area of Springfield is already planned for a variety of Campus Industrial uses and the public facilities serving this area have been designed accordingly.

Finding 23: The existing public facilities available to serve the subject site are detailed in the accompanying Zone Change staff report (File 811-23-000181-TYP3) and are incorporated herein by reference. Existing and planned public facilities and services (including infrastructure to be constructed in conjunction with the proposed rehabilitation hospital) will be evaluated with the Site Plan Review process and are deemed to be adequate to support buildout of the site under the current Campus Industrial zoning and designation or the proposed Commercial designation. Under either land use designation, a proposed development would be responsible for managing drainage on the site, improving the public street frontages (particularly along Maple Island Road), extending the throat of the midpoint roundabout intersection on Maple Island Road to create a driveway entrance, and calculating sewage flow volumes relative to the capacity of the existing sanitary sewer pump station located at the southeast corner of the property. Under the current Campus Industrial designation, the subject property could be developed with a large corporate headquarters building, regional distribution center or manufacturing facility that would require similar infrastructure and have similar impacts to those of a rehabilitation hospital. For the aforementioned reasons, it is found that the proposed redesignation of 4.99 acres of Campus Industrial to Commercial will not have a significant impact on the overall land use characteristics and configuration for the *Gateway Refinement Plan* area. The proposed redesignation will result in maintaining stable demand on public facilities and services. Therefore, the changes to the type and distribution of land uses resulting from the proposed *Metro Plan* amendment will not have an adverse impact to the City’s sanitary or storm sewer systems, or other public infrastructure. The proposal is consistent with Goal 11 requirements.

### Goal 12 – Transportation

*Applicant’s Narrative: “The intent of Goal 12 is implemented through the provisions of the State Transportation Planning Rule (TPR) (OAR 660, Division 12) which was adopted by LCDC in 1991.*



*OAR 660-012-0060(1) requires that amendments to functional plans, acknowledged comprehensive plans, and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and level of service of the facility. To determine whether the proposed amendments will significantly affect a transportation facility, the TPR lists specific criteria against which the proposed amendments are to be evaluated. The TPR provides that a plan or land use regulation amendment significantly affects a transportation facility if it:*

- a) Changes the functional classification of an existing or planned transportation facility;*
- b) Changes standards implementing a functional classification system;*
- c) Allows types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or,*
- d) Would reduce the level of service of the facility below the minimum acceptable level identified in the TSP (Transportation System Plan).*

*For a complete analysis of how the application meets Goal 12 and the Transportation Planning Rule, please see Exhibit II - Traffic Impact Analysis and Transportation Planning Rule Analysis prepared by Sandow Engineering.”*

Finding 24: The Transportation Planning Rule (TPR), Oregon Administrative Rule OAR 660-12-0060, requires local governments to put in place mitigation measures as provided in the TPR whenever an amendment to a functional plan, an acknowledged comprehensive plan, or land use regulation (including a zone change) would “significantly affect” an existing or planned transportation facility.

Finding 25: Under the TPR, a plan amendment or zone change may result in a “significant affect” under OAR 660-012-0060(2)(a) and (b) by changing the functional classification of an existing or planned transportation facility or by changing the standards implementing a functional classification system. The subject application proposed to amend the *Metro Plan* diagram designation from Medium Density Residential (MDR) to Commercial designation. The proposed amendments do not alter the functional classification of any facility or change any standards for implementing the functional classification system and therefore do not result in a “significant affect” under OAR 660-012-0060(2)(a) or (b).

Finding 26: Under the TPR, a plan amendment or zone change may also result in a “significant affect” if it would result in any of the effects listed under OAR 660-012-0060(2)(c) “based on projected conditions measured at the end of the planning period identified in the adopted TSP.”

Finding 27: Under the TPR, a “significant affect” occurs if the proposed amendment(s) would result in types or levels of travel or access that are inconsistent with the identified function classification of the existing or planned transportation facilities, that degrade the performance of an existing or planned transportation facility such that it would not meet performance standards identified in the TSP, or that degrade the performance of an existing or planned transportation facility that is otherwise not projected to meet the performance standards identified in the TSP.

Finding 28: As required by SDC 5.22.110, the applicant has submitted a Traffic Impact Analysis (TIA) addressing trip generation associated with the proposed zone change to show compliance with the TPR at OAR 660-012-0060. The applicant’s TIA can be found in Exhibit H to the application materials submitted for the *Metro Plan* diagram amendment and zone change.

Finding 29: The City’s Transportation Planning Engineer has reviewed the TIA and concurs with the applicant’s trip generation methodology and findings. The applicant’s TIA provides Trip Generation

scenarios for the existing and proposed plan designations and zoning. The trips generated by the existing zoning were compared to the proposed zoning under “reasonable worst-case scenario” or the reasonable most-traffic-generative use conditions.

Finding 30: The applicant’s proposed zoning scenario is the reasonable most-traffic-generative use for the subject property. Specifically, the applicant assumes that the subject property would develop as an approximately 72,000 square foot medical clinic, which represents the reasonable most-traffic-generative use that could be constructed on this site.

Finding 31: Under the applicant’s reasonable most traffic-generative scenario, the proposed *Metro Plan* diagram amendment and zone change would result in an increase of 132 peak hour trips over the reasonable most traffic-generative scenario under the current Campus Industrial zoning and designation. When calculated based on 2023 traffic volumes and also projected to the 2035 planning horizon, the applicant’s TIA reaches the following conclusions: 1) the proposed zone change will not cause traffic levels, patterns, or access that are inconsistent with the functional classification of an existing or planned transportation facility; 2) the proposed zone change does not degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards; and, 3) all existing and planned transportation facilities will meet the applicable standards. The TIA further concludes that no off-site mitigation is required to accommodate the proposed development. The TIA’s analysis and findings in support of these conclusions are incorporated herein by reference. Therefore, the increase in trips proposed with this plan amendment and zone change will not result in any significant affect listed under OAR 660-012-0060(2)(c).

Conclusion: Based on the above findings, the subject proposal to amend the *Metro Plan* diagram designation is consistent with OAR 660-012-0060 and SDC 5.22.115(C)(4)(b), and no additional mitigation is required under the TPR. The proposal is consistent with Goal 12 requirements.

### Goal 13 – Energy Conservation

*Applicant’s Narrative: “The Subject Property does not contain any non- renewable energy resources on the property. The proposed Plan amendment will not amend or affect any land use regulations enacted to implement Goal 13. All new development will be required to comply with local, state and federal codes related to energy conservation. Goal 13 is not applicable.”*

Finding 32: The Oregon Land Use Board of Appeals (LUBA) has established that Goal 13 does not require a specific energy analysis or other Goal 13 analysis for changes to a comprehensive plan diagram or zoning. See *Barnard Perkins Corp. v. City of Rivergrove*, 34 Or LUBA 660 (1998).

Finding 33: The proposed comprehensive plan diagram amendment and rezoning does not affect the City’s ordinances, policies, plans, or studies adopted to comply with Goal 13 requirements. Converting 4.99 acres of the property from Campus Industrial to Commercial should not have an appreciable impact to energy consumption. The developer will have an opportunity to incorporate suitable energy conservation measures when detailed construction plans are prepared for the site, irrespective of the zoning. The City’s building codes comply with all Oregon State Building Codes Agency standards for energy efficiency in commercial building design. The City’s conservation measures applicable to storm water management, temporary storage, filtration and discharge would apply to any Campus Industrial, commercial or medical services uses developed on this site; therefore, this action has no effect on the City’s acknowledged compliance with Goal 13.

Goal 14 - Urbanization

*Applicant's Narrative: "The Subject Property is in the Springfield Urban Growth Boundary and inside the city limits. This Plan amendment does not propose to expand the Urban Growth Boundary thus does not require a review of the transition of rural to urban land uses. Therefore, the provisions of Goal 14 and OAR Chapter 660, Division 24 (Urban Growth Boundaries) are not applicable."*

Finding 34: Goal 14 – Urbanization requires cities to estimate future growth rates and patterns, and to incorporate, plan, and zone enough land to meet the projected demands. The City already planned for employment land use on the subject property when completing its Commercial and Industrial Buildable Land inventory. As previously determined and stated above, a surplus of industrial land in the 2-5 acre range exists in the City's employment land inventory already. The City is responding to a request from a property owner to redesignate and rezone 4.99 acres of the subject property from Campus Industrial to Medical Services use. Very similar and complementary employment land uses already exist in the immediate vicinity of the subject site. The subject property is within the existing UGB and is already annexed to the City. The proposed redesignation and zone change does not affect the City's adopted ordinances, policies, plans, or studies adopted to satisfy the compliance requirements of Goal 14.

Goal 15 – Willamette River Greenway

*Applicant's Narrative: "Goals 15 through 18 are inapplicable to this application as they are geographically oriented and only apply to the Willamette River Greenway and coastal resources."*

Finding 35: Goal 15 – Willamette River Greenway establishes procedures for administering the 300 miles of greenway that borders the Willamette River, including portions that are inside the City limits and UGB of Springfield. The subject site is not within the adopted Willamette River Greenway Boundary area so this goal is not applicable; therefore, this action has no effect on the City's acknowledged compliance with Goal 15.

**B. Plan Inconsistency****1. In those cases where the Metro Plan applies, adoption of the amendment shall not make the Metro Plan internally inconsistent.**

*Applicant's Narrative: "The Plan amendment is a request to change the Plan designation for a specific site and does not include any proposed changes to the Plan text. Adoption of the Plan amendment will not cause any internal inconsistencies in the Metro Plan."*

Finding 36: The adopted *Metro Plan* and *Springfield 2030 Comprehensive Plan* are the principal policy documents that create the broad framework for land use planning within the City of Springfield. As explained herein, both are applicable to this application. The City's adopted Zoning Map implements the zoning designations of the *Metro Plan* diagram and localized Refinement Plans, which are adopted amendments to the *Metro Plan*. The subject property is within the *Gateway Refinement Plan* area, so the proposed amendment to the *Metro Plan* diagram will concurrently amend the Refinement Plan diagram. The policies and implementation actions of the *Springfield 2030 Refinement Plan – Economic Element* have updated and superseded the goals, objectives and policies of the *Metro Plan's* Commercial Element pertaining to employment lands. Therefore, the *Metro Plan* Commercial Element does not apply to this proposal.

Finding 37: In accordance with Chapter IV – *Metro Plan* Review, Amendments, and Refinements, the City’s Comprehensive Plan is not designed or intended to remain static and unyielding in its assignment of land use designations. To that end, provisions of Chapter IV, Policy 7.a, allow for property owners to initiate an amendment to the *Metro Plan* diagram to reflect a change in circumstances or need.

Finding 38: There are no conflicts created by this proposed diagram amendment based on needed employment land inventories. The development of this land with a commercial (i.e. medical services) use would not conflict with other land use elements in the *Metro Plan* including residential, industrial, park and open space, or government and education. Therefore, adoption of the amendment to the *Metro Plan* diagram will not result in an internal inconsistency.

Finding 39: The City has adopted the *Gateway Refinement Plan* for the northwest quadrant of Springfield, including the subject site. The proposed redesignation would amend the *Gateway Refinement Plan* diagram to change the site’s land use designation from Campus Industrial to Community Commercial. The Community Commercial designation in the adopted Refinement Plan is necessary to implement the requested Medical Services zoning. There are no specific policies or implementation actions in the Commercial or Industrial elements of the adopted Refinement Plan that preclude the redesignation of one employment land use to another employment land use – in this case, from Industrial to Commercial.

Finding 40: Implementation Action 7.0 of the Industrial element requires the City to “ensure that McKenzie-Gateway SLI Site development achieves a high level of aesthetics and amenity, consistent with the intent of the Metro Plan SLI designation and with the “campus industrial” concept.” The proposed redesignation does not preclude the site from adhering to the requirements of Implementation Action 7.0, and this consistency with Refinement Plan provisions would be determined at the time of Site Plan Review.

Finding 41: Implementation Action 8.0 of the Industrial element requires the City to “provide for an efficient and flexible transportation system for the McKenzie-Gateway SLI Site.” The subject site already has a mature and efficient transportation system developed along the site frontages and in the immediate vicinity, including provisions for passenger vehicle, commercial vehicle, pedestrian, bicycle, and bus rapid transit modes of travel. As evidenced by the TIA submitted in support of the proposed redesignation (see Goal 12 analysis in Criterion A, above), the requested action does not adversely impact the local transportation system.

Conclusion: Because the City has adopted the *Springfield 2030 Refinement Plan – Economic Element*, the Commercial Element of the *Metro Plan* no longer applies to this proposal. Additionally, based on the foregoing findings the requested redesignation does not cause the adopted *Gateway Refinement Plan* to be internally inconsistent. For the above reasons, Criterion B.1 is met.

**2. In cases where Springfield Comprehensive Plan applies, the amendment shall be consistent with the Springfield Comprehensive Plan.**

*Applicant’s Narrative: “The Plan amendment is consistent with the Springfield Comprehensive Plan including the policies listed below in bold italics:*

***Policy E.3 Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are***

***designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.***

*The Plan amendment will facilitate development of an underutilized land and allow an inpatient rehabilitation facility to be developed on the site bringing about 150 new jobs to the City of Springfield at about 30 employees per acre.*

***Policy E.6 Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process.***

*The Plan amendment will facilitate efficient land use by increasing the overall intensity and density of the uses on the PeaceHealth RiverBend Annex campus.*

***Policy E.7 Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.***

*The Plan amendment concentrates development within the city limits on a site with available infrastructure for public facilities and services.*

***Policy E.16 Consider the economic opportunities provided by transportation corridors and seek to maximize economic uses in corridors that provide the most optimal locations and best exposure for existing and future commercial and industrial uses.***

*The Plan amendment will stimulate development on a multi-modal transportation corridor. The new employees will increase ridership on the EmX and use of the bike routes.*

***Policy E.28 Increase the potential for employment in the regional industry clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Local Food and Beverage Production and Distribution, Specialty Agriculture, Wood & Forest Products, and Transportation Equipment.***

*The Plan amendment will facilitate development of a new in-patient rehabilitation facility increasing employment in the Health Care industry. This Plan amendment will increase the Health Care cluster in the Gateway [area] of the City.*

***Policy E.40 Provide the services, infrastructure, and land needed to attract the identified industry clusters, especially where they can increase economic connectivity among businesses.***

*The Plan amendment will increase the amount of land available for community commercial uses including the proposed in-patient rehabilitation facility.”*

Finding 42: The applicant is proposing to redesignate a vacant portion of its own property holdings to facilitate construction of a medical facility in an area of expanding medical and health-related industries in north Springfield. The health care use proposed for this location (i.e. specialty hospital) is specifically identified in the CIBL as being a top-tier sector for commercial land uses within the City’s employment land base.

Finding 43: The proposed *Metro Plan* diagram amendment will concurrently amend the *Gateway Refinement Plan* diagram. The land use designation for the subject site would be changed from Campus Industrial to Community Commercial. In accordance with SDC 3.2.505(B), the requested Medical Services zoning requires a commercial land use designation of Community Commercial, Major Retail Commercial or Mixed Use Commercial for its implementation.

Finding 44: Through its previous Commercial and Industrial Buildable Land inventory, the City has determined that a large surplus of 2-5 acre industrial sites exist within the Springfield land base. The proposed redesignation and rezoning of this property from Campus Industrial to Medical Services would slightly reduce this acknowledged surplus while providing a development-ready site for a key target industry employment use. The proposed redesignation also eliminates the deficit of commercial sites in the 2-5 acre category.

Finding 45: The proposed redesignation is consistent with Policy E.1 of the *Springfield 2030 Comprehensive Plan – Economic Element* whereby the applicant is proposing to redesignate a vacant, undeveloped site with specific characteristics (e.g. size, location and configuration) and for a specific intended employment use. Consistent with Policy E.11 and Implementation Strategy E.11.1 of the *Economic Element*, the proposed employment use is Medical Services which represents a top “target sector” as described in the City’s Economic Opportunities Analysis.

Finding 46: By redesignating the subject property, the proposal meets Policy E.28 and Implementation Strategy E.28.3 of the *Economic Element* which encourages employment in regional clusters of target industries, particularly medical services. The proposed redesignation would facilitate construction of a rehabilitation hospital on the site, which contributes to a local cluster of health care and health-related users that have located or relocated into the North Gateway area of Springfield. These include a major regional hospital, specialty clinics, medical laboratories, physicians’ offices, and administrative headquarters for health care plan and health insurance providers.

Finding 47: The Economic Element policies and implementation actions of the *Springfield 2030 Comprehensive Plan – Economic Element* apply to the subject site. The accompanying Zone Change staff report (File 811-23-000181-TYP3) discusses and evaluates the application’s consistency with the adopted policies and implementation strategies of the *Economic Element*. The findings and conclusions in Criterion C.1 of the Zone Change staff report are adopted herein by reference and in part satisfy the requirements of *Metro Plan* Amendment Criterion B.2.

Conclusion: Based on the foregoing, the proposal to redesignate the subject property from Campus Industrial to Commercial is consistent and compatible with the adopted policies of the *Metro Plan* and the *Springfield 2030 Comprehensive Plan – Economic Element*. The action reduces an acknowledged surplus of 2-5 acre industrial sites and eliminates the deficit of 2-5 acre commercial sites in favor of creating a key target industry development site. The action also contributes to an industry cluster of similar medical and health care related sites in the Riverbend and North Gateway area of Springfield. Therefore, the proposal meets Criterion B.2.

### **Conclusion and Recommendation**

Based on the applicant’s narrative, the findings herein, testimony submitted into the record, the criteria of SDC 5.14.135 for approving amendments to the *Metro Plan*, the proposed *Metro Plan* diagram amendment is consistent with the applicable criteria.

**Staff Report and Findings  
Springfield City Council  
Zone Change Request**

**Hearing Date:** January 16, 2024

**File Number:** 811-23-000181-TYP3

**Applicant:** Micheal Reeder, Law Office of Mike Reeder

**Property Owner:** PeaceHealth

**Site:** Northeast corner of the intersection of Game Farm Road and Maple Island Road (Assessor's Map 17-03-15-40, Tax Lot 1000 and portions of Tax Lots 800, 900 & 1100).

**Request**

Rezone approximately 4.99 acres of vacant property from Campus Industrial (CI) to Medical Services (MS). Concurrently rezone the abutting public right-of-way for Game Farm Road and the eastern half of Maple Island Road as measured from centerline abutting the subject site.

**Site Information/Background**

The application was initiated on August 24, 2023 and amended on October 2, 2023, and the Planning Commission public hearing on the matter of the zone change request was held on November 7, 2023. The zone change request is being processed concurrently with a *Metro Plan* diagram amendment submitted under separate cover, File 811-23-000182-TYP4. The City Council reviewed both applications and the Planning Commission's recommendations at a public hearing held on January 2, 2024.

The site that is subject of the zone change request is a 4.99-acre property located at the northeast corner of the intersection of Game Farm Road and Maple Island Road. The property is comprised of four separate tax lots (or portions thereof) and it adjoins the PeaceHealth Riverbend Annex facility to the east (Assessor's Map 17-03-15-40, Tax Lot 1000 and portions of Tax Lots 800, 900 & 1100). The property is vacant and contains a remnant filbert orchard that probably pre-dates the creation of the Campus Industrial zoning district.

The subject site has corner frontage on Game Farm Road along the southern boundary and Maple Island Road along the western boundary. The properties immediately to the west, north and east are zoned and designated for Campus Industrial (CI) use. Properties to the south and southeast are zoned and designated R-1 residential and R-3 residential. The property to the southwest is zoned and designated Mixed Use Commercial (MUC). The applicant is proposing the zone change from Campus Industrial to Medical Services as an initial step to facilitate future construction of a rehabilitation hospital on the site.

Staff is recommending concurrently annexing the abutting public right-of-way for Game Farm Road and the eastern half of Maple Island Road to ensure the Springfield Zoning Map depicts the rezoned area correctly and there are no remnant pieces of Campus Industrial zoning created through this action.

**Notification and Written Comments**

Notification of the November 7, 2023 Planning Commission public hearing and January 2, 2024 City Council public hearing was sent to all property owners and residents within 300 feet of the site on October 17, 2023. Newspaper notice of the public hearing meetings was published in *The Chronicle* on October 26, 2023. Following the Planning Commission public hearing meeting, a second mailed notice of the January 2, 2024

City Council public hearing was sent to property owners and residents within 300 feet of the site on December 7, 2023. A newspaper notice of the January 2, 2024 City Council public hearing meeting was published in *The Chronicle* on December 14, 2023. Staff responded to one request for online access to view the application materials and one telephone inquiry about the proposal during the period from initial public notification on October 17, 2023 through to closure of the public hearing on January 2, 2024. One written comment was received during the notification periods for both public hearing meetings (Attachment 7) and it is addressed in the Metro Plan Amendment staff report (Attachment 1, Exhibit B). At the public hearing on January 2, 2024, the applicant provided testimony in support of the proposal and no other testimony was received.

### **Criteria of Approval**

Springfield Development Code (SDC) 5.22.100 contains the criteria of approval for the decision maker to utilize during review of Zoning Map amendment requests. The Criteria of Zoning Map amendment approval criteria are:

#### *SDC 5.22-115 CRITERIA*

#### *C. Zoning Map amendment criteria of approval:*

1. *Consistency with applicable Metro Plan policies and the Metro Plan diagram;*
2. *Consistency with applicable Refinement Plans, Plan District maps, Conceptual Development Plans and functional plans; and*
3. *The property is presently provided with adequate public facilities, services and transportation networks to support the use, or these facilities, services and transportation networks are planned to be provided concurrently with the development of the property.*
4. *Legislative Zoning Map amendments that involve a Metro Plan Diagram amendment shall:*
  - a. *Meet the approval criteria specified in Section 5.14-100; and*
  - b. *Comply with Oregon Administrative Rule (OAR) 660-012-0060, where applicable.*

### **Proposed Findings In Support of Zone Change Approval**

#### **Criterion: Zoning Map amendment criteria of approval:**

#### **1. Consistency with applicable *Metro Plan* policies and the *Metro Plan* diagram;**

*Applicant's Narrative:* *“Following approval of the amendment to change the Plan Diagram designation from Campus Industrial to Commercial, the zoning map amendment will be consistent. There are no mandatory Metro Plan policies related to the proposed zoning.”*

*Approval Standard:* *Metro Plan Chapter IV, Policy 7.a states: “A property owner may initiate a [Type I Metro Plan diagram] amendment for property they own at any time. Owner initiated amendments are subject to the limitations for such amendments set out in the development code of the home city.”*



Finding 1: The property owner initiated a concurrent *Metro Plan* diagram amendment in accordance with provisions of SDC 5.14.100 (File 811-23-000182-TYP4). Rezoning 4.99 acres of the subject property from Campus Industrial (CI) to Medical Services (MS) is consistent with the requested *Metro Plan* diagram amendment initiated by the applicant. Upon adoption of the amending Ordinance, the *Metro Plan* diagram would be amended and the requested zone change from Campus Industrial to Medical Services would be consistent with the provisions of the adopted Comprehensive Plan. Prior or concurrent amendment of the *Metro Plan* diagram will be required for the subject zone change request to be approved.

Finding 2: The proposed zone change is consistent with provisions of the *Metro Plan* whereby zoning can be monitored and adjusted as necessary to meet current urban land use demands. The requested change from CI to MS would facilitate the future review and approval of a hospital facility on currently vacant property. Additionally, the requested rezoning would allow for a recalibration of the amount and type of uses within the Campus Industrial zone of north Springfield.

Finding 3: The subject site is part of a large, contiguous area of north Springfield that is zoned and designated for Campus Industrial use. The Campus Industrial zoning district was implemented in this area after adoption of the *Gateway Refinement Plan* in 1992. As of October 2023, there is still a substantial area of vacant and undeveloped CI zoned lands including the subject site.

Finding 4: The City has initiated adoption of the *Springfield 2030 Comprehensive Plan – Land Use Element* that will also introduce a new, parcel-specific land use designation map for Springfield. Upon implementation, the new *Land Use Element* and Comprehensive Plan Map will replace and supersede the *Metro Plan* Land Use Element and Diagram. This initiative has already proceeded through joint public hearings with the Springfield and Lane County Planning Commissions and is scheduled for public hearings and final adoption with the Joint Elected Officials (Springfield and Lane County). The new *Land Use Element* and Comprehensive Plan map are anticipated to become effective after the subject application is adjudicated by the Springfield Planning Commission and City Council. Therefore, no conflict exists for this proposed *Metro Plan* diagram amendment and Zone Change.

Finding 5: The policies of the *Springfield 2030 Comprehensive Plan – Economic Element* also apply to the subject site. The *Economic Element* of the City’s *2030 Comprehensive Plan* updated and replaced the *Economic Element* of the *Metro Plan*. The “*Economic Element*” policies cited below are from the *Springfield 2030 Comprehensive Plan*.

Approval Standard: Policy E.1 of the *Economic Element* states:

*Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential.*

Finding 6: The applicant is proposing to rezone approximately 5 acres of vacant, undeveloped property to accommodate a targeted employment use, which in this case is a specialized medical services facility (i.e. rehabilitation hospital). The proposed rezoning is consistent with Policy E.1.

Approval Standard: Policy E.4 of the *Economic Element* states:

*Expand industrial site opportunities by evaluating and rezoning commercial, residential, and industrial land for the best economic return for the community through the process of City refinement planning,*

*review of owner-initiated land use proposals, expanding the urban growth boundary, and other means.*

Finding 7: The subject rezoning request is an owner-initiated land use proposal. However, the applicant is proposing to rezone the property from Campus Industrial to Medical Services to facilitate development of an approximately 67,000 ft<sup>2</sup> medical facility on vacant property already owned by the applicant. The proposed rezoning changes an industrial site to a Medical Services site, which is not consistent with Policy E.4.

Finding 8: While the proposed rezoning removes an industrial site from the City's inventory and therefore acts contrary to Policy E.4, there are other available industrial sites within the Campus Industrial district and in other industrial zones within Springfield. As contemplated by Policy E-4, the site is being rezoned to potentially provide a better economic return for the community. Based on the findings in this section, the proposal satisfies the preponderance of applicable policies in the Economic Element and should achieve a net benefit within the City's employment land base. For these reasons, the proposed rezoning is consistent with Criterion 1.

Approval Standard: Policy E.5 of the *Economic Element* states:

*Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. "Short-term supply" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.*

Finding 9: The subject proposal represents an economic development opportunity if the zoning for the property is changed. By definition, the rezoning action would create a "competitive short-term supply" site because the site is delineated from a larger contiguous landholding and the applicant would be able to proceed immediately with submittal of site plans. The proposed rehabilitation hospital represents an employment use because it is anticipated to have approximately 150 employees (Applicant Narrative, Page 17). The proposed rezoning is consistent with Policy E.5.

Approval Standard: Policy E.6 of the *Economic Element* states:

*Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process.*

Finding 10: The subject rezoning request would allow for consideration of a new medical services use on vacant property that is currently zoned for Campus Industrial use. In the absence of a rezoning, the applicant would be unable to initiate the development review process for the proposed rehabilitation hospital use. The proposed rezoning is consistent with Policy E.6

Approval Standard: Policy E.7 of the *Economic Element* states:

*Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.*

Finding 11: The subject site has frontage on fully developed public streets along the southern and western boundaries. A roundabout intersection at the northwest corner of the property can be modified

to provide direct access to the subject site. All public utilities are available to serve the subject site, including electricity, telecommunications, water, sanitary sewer and storm sewer. The property is close to major transportation corridors and the Gateway-Riverbend EmX bus rapid transit route which runs along International Way. The infrastructure needed to serve the proposed medical services on the site are already available, or can be provided without costly extensions or upgrades to adjacent utilities. Therefore, the proposed rezoning is consistent with Policy E.7.

Approval Standards: Policy E.11 of the *Economic Element* states:

*Integrate opportunistic economic development objectives into Springfield's land use and supply analyses and policies.*

Implementation Strategy E.11.1 of the *Economic Element* states:

*Plan, zone and reserve a sufficient supply of industrial and commercial buildable land to create opportunity sites for employment uses identified in the 2015 Economic Opportunities Analysis (EOA), with an initial emphasis on Target Industries listed in the analysis Table S-1, Target Industries, Springfield 2010-2030 (page iii-iv.)*

Finding 12: The proposed rezoning would create an approximately 5-acre opportunity site for construction of a rehabilitation hospital on currently vacant property. The proposed rehabilitation hospital represents an employment use in Medical Services which is the number one listed target industry in Table S-1 of the 2015 Economic Opportunities Analysis. The proposed rezoning is consistent with Policy E.11 and Implementation Strategy E.11.1.

Approval Standards: Policy E.12 of the *Economic Element* states:

*Recruit or support businesses that pay higher than average wages for the region (as reported by the Oregon Employment Department) to diversify and expand Springfield's economy.*

Implementation Strategy E.12.5 of the *Economic Element* states:

*Support increased potential for employment in one of the regional industry clusters.*

Finding 13: The proposed rezoning would facilitate construction of a medical services facility that pays higher than average wages for Lane County according to 2023 wage information from the Oregon Employment Department. These medical sector wages include nurses, physicians, physician assistants, physical therapists, medical assistants, medical technicians, and hospital administrators.

Finding 14: The adjoining property to the east is occupied by the PeaceHealth Riverbend annex, which operates as a medical laboratory facility and administrative offices for the nearby Sacred Heart Medical Center at Riverbend. The adjacent property to the west is occupied by PacificSource, which operates as a health insurance provider and health care plan administrator. The proposed rehabilitation hospital is located in-between the PeaceHealth and PacificSource buildings and it would represent the third medical services and health care related facility on the two adjacent sites. In combination with the nearby Sacred Heart Riverbend Medical Center, this aggregation contributes to a medical services industry cluster as identified in the City's acknowledged *Commercial Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL)* (See CIBL page 132). An "industrial cluster" is explained in the CIBL as including sectors with a higher-than-average number of businesses within a geographic area and with anticipated higher than average employment growth (See CIBL pp. 129).

The Sacred Heart Riverbend campus is described in the CIBL as an emerging medical services cluster (See CIBL pg. 132). In this case, the subject property would become part of the cluster of medical and health care related facilities (listed in Finding 20 below) that are located within an approximately 0.5 square mile area of the *Gateway Refinement Plan*: the cluster area begins at the intersection of Riverbend Drive at Martin Luther King, Jr. Boulevard, incorporates the Sacred Heart at Riverbend hospital campus, and extends in a north and northwesterly direction to International Way near the intersection with Sports Way. The proposed rezoning is consistent with Policy E.12 and Implementation Strategy E.12.5.

Approval Standard: Policy E.16 of the *Economic Element* states:

*Consider the economic opportunities provided by transportation corridors and seek to maximize economic uses in corridors that provide the most optimal locations and best exposure for existing and future commercial and industrial uses.*

Finding 15: In combination with the concurrent *Metro Plan* diagram amendment, the proposed rezoning introduces a new zoning district into a large, contiguous area of existing Campus Industrial zoning. However, this is the most expeditious step necessary (and available under current Development Code provisions) to create a new, viable site for the proposed rehabilitation hospital on property already owned by the applicant.

Finding 16: Provisions of the Campus Industrial zoning district specifically preclude the type of medical services facility proposed by the applicant. Because the property has been vacant and continues to host a remnant filbert orchard that likely pre-dates the implementation of CI zoning more than 30 years ago, it seems unlikely that another potential site user would be displaced by the requested rezoning action. Additionally, the proposed rezoning is the minimum area necessary to accommodate the rehabilitation hospital and there is vacant CI zoned property remaining to the north of the site.

Finding 17: The applicant has identified the subject property as a potential site and stated a market need that can be addressed by the proposed rezoning. The proposed rezoning looks to capitalize on siting a new 67,000 ft<sup>2</sup> medical facility with 150 employees on a vacant, undeveloped piece of property at the intersection of Game Farm Road and Maple Island Road. Along the southern boundary of the site, the proposed rehabilitation hospital has frontage on Game Farm Road which is developed as an urban major collector street. The primary frontage along the western boundary of the site is located on Maple Island Road, which is developed as a local street. The property has an existing roundabout intersection at the northwest corner that can be readily extended to provide future access to the site. The property's corner location on two existing developed public streets with roundabout intersections offers a comparative advantage to other Campus Industrial zoned sites in the vicinity that are either not currently annexed (and therefore not development-ready) or that lack fully improved public street frontages (such as properties along Deadmond Ferry Road east of International Way).

Finding 18: The subject property has been vacant and unused for urban land use activities since the Campus Industrial zoning district was established in 1992. The economic opportunity presented by the applicant is to utilize land that has been zoned for urban uses but has remained vacant for more than 30 years. In addition to developing a currently vacant piece of property, the proposed end user (i.e. medical services) is a key target industry (as defined in the CIBL) that generates considerable direct and indirect economic benefits for the City and region. The proposed rezoning is consistent with Policy E.16.

Approval Standards: Policy E.28 of the *Economic Element* states:

*Increase the potential for employment in the regional industry clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Local Food and Beverage Production and Distribution, Specialty Agriculture, Wood & Forest Products, and Transportation Equipment.*

Implementation Strategy 28.3 of the *Economic Element* states:

*Promote further development of the health care cluster by examining land-use policies and, if necessary, modifying those policies to promote health care cluster development where the supporting uses are consistent with 2030 Plan policies or when policies are amended through a district or corridor refinement planning process.*

Finding 19: The economic conditions of 2024 are significantly different than when the Campus Industrial district was initially created in 1992. It is also notable that many of the original “colonizers” of the City’s Campus Industrial district – such as Sony, Symantec and Royal Caribbean – are no longer operating in the area. Instead, other users have gravitated to the area and repurposed the buildings and facilities. Within close proximity to the Sacred Heart Medical Center, several of the users are in health care and closely related industries.

Finding 20: The proposed rezoning would introduce another health care related use (i.e. specialized medical services facility) into a local cluster of similar and complementary uses. These existing uses include PacificSource health plans, the PeaceHealth Riverbend annex (medical laboratories), Sacred Heart Medical Center at Riverbend campus (which incorporates the main hospital building, Riverbend Pavilion building, Northwest Specialty Clinics building and Ronald McDonald House), PeaceHealth medical practitioners operating at the former Birthing Center on Deadmond Ferry Road, and the Women’s Care center on Martin Luther King Jr. Boulevard at Riverbend Drive. All of these facilities are clustered in a roughly 0.5-square-mile area of the north Gateway region of Springfield. The proposed rezoning is consistent with Policy E.28 and Implementation Strategy E.28.1.

Conclusion: The proposed rezoning meets Criterion 1.

**2. Consistency with applicable Refinement Plans, Plan District maps, Conceptual Development Plans and functional plans;**

Applicant’s Narrative: *“The Subject Property is within the boundary of the Gateway Refinement Plan adopted on November 9, 1992. In 1992, the Subject Property was shown on the land use diagram as part of the McKenzie-Gateway Special Light Industrial site. Below are applicable Gateway Refinement Plan policies in **bold italics** followed by the applicant’s findings.*

***8.0 Provide for an efficient and flexible transportation system for the McKenzie-Gateway SLI Site.***

***9.0 Improve the appearance and effectiveness of the main approaches to the McKenzie-Gateway SLI Site. . . .***

*Through substantial public and private investments, significant capital improvements have improved the transportation system serving the McKenzie-Gateway SLI Site. The proposed Zone Change will not have an adverse impact on the transportation system. The planned development will increase potential transit riders using the nearby EmX stations.*

***10.0 Mitigate the impacts of incremental (SLI) development on existing onsite (non-SLI) uses occupying the McKenzie-Gateway SLI Site.***

*Policy 10.0 recognized that full development of the McKenzie-Gateway SLI Site would likely occur incrementally. The Subject Property is located at the southwest corner of the RiverBend Annex campus. The impetus for the proposed Zone Change is the proposed use of the Subject Property for a new expanded PeaceHealth RiverBend In-Patient Rehabilitation Facility. Through the site plan review process, any development will be required to comply with SDC standards including requirements for landscaping, building setbacks, parking, etc. Development of the Subject Property will be compatible with surrounding land uses including the remaining portion of the RiverBend Annex campus.*

***11.0 Ensure that development plans adequately consider the site's natural landscape features and amenities, and provide for the development needs of future developers.***

*The proposed Zone Change to Medical Services will allow different uses than the existing CI Campus Industrial zone but many of the development standards, such as landscape requirements for parking areas and stormwater management will remain the same. The site plan review process requires that developers adequately consider existing site conditions.*

***12.0 Encourage the preservation and/or enhancement of reminders of the area's rich agricultural heritage, which are found in the McKenzie-Gateway SLI area.***

*The policy above is directed towards the City of Springfield encouraging historic preservation but is not a mandatory policy for reviewing a zone change request. The Subject Property contains a small remnant of a significantly larger filbert orchard to the west of the site. The applicant will consider ways to provide a reminder of the area's rich agricultural heritage such as a commemorative plaque or display of historic photos in the building. Regardless of zoning, any new development will require changes in grade making it impracticable to retain the orchard.*

***13.0 Ensure adequate storm drainage management planning emphasizing the minimization of negative impacts on water quality and quantity resulting from McKenzie-Gateway SLI Site development.***

*Any development of the Subject Property will require compliance with City, state and federal water quality standards and to review of proposed storm drainage for the site."*

Finding 21: The applicant's narrative responses for Policies 8.0 – 13.0 are incorporated as findings herein and demonstrate the proposal is consistent with Criterion 2.

Finding 22: For Policy 12.0, it is not logical or feasible to preserve remnant filbert orchards on the subject site – especially groves that have not been actively managed for productivity, blight and other issues. The current and proposed zoning is not conducive to maintaining agricultural activities on the site. Additionally, other orchards in the vicinity have been incrementally displaced by buildings, infrastructure, and manicured landscaping as the Campus Industrial district has developed and evolved. The applicant's suggestion to commemorate the historic agricultural use through a plaque or other visual display is commendable and supported by the City of Springfield.

Finding 23: For Policy 13.0, upon rezoning of the subject property, the proposed development will be subject to the stormwater regulatory requirements in effect on the date of submittal. Staff advises that

these stormwater requirements are increasingly stringent and far more complex and detailed than what was originally contemplated in the 1992 Refinement Plan. For this reason, any stormwater management design for the subject site that meets current Development Code provisions and the City's adopted Stormwater Management requirements will satisfy the stated standards referenced in the original Refinement Plan but under a stricter regulatory environment.

Conclusion: The proposed rezoning meets Criterion 2.

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

*Applicant's Narrative: "The Subject Property is within the City limits and is presently provided with adequate public facilities, services and transportation networks to support the planned use."*

Finding 24: The property requested for zone change has frontage on Game Farm Road (which is classified as a collector street), and Maple Island Road (classified as a local street). Along the southern boundary of the property, Game Farm Road is developed with one vehicle travel lane and one bicycle lane in each direction and there is a short segment of bi-directional center turn lane. The Game Farm Road frontage has existing setback sidewalk, street trees and street lighting. Along the western boundary of the property, Maple Island Road is developed with one vehicle travel lane and bicycle lane in each direction. Street trees and street lighting has been installed. Setback sidewalks have been installed adjacent to the roundabout intersections at the northwest and southwest corners of the property, but the western edge of the subject site lacks a continuous sidewalk connection. Additionally, the bicycle lanes on Maple Island Road converge to the adjacent sidewalk at the southwest and northwest corners of the site where there are roundabout intersections. Upon future development of the subject property, should this occur, the developer will be responsible for completing the sidewalk connection along Maple Island Road.

Finding 25: The proposed rezoning would allow for introduction of a new medical services use within an area of similar and complementary uses. The applicant is proposing to rezone only the property area necessary for the rehabilitation hospital, which leaves other vacant Campus Industrial land to the north of the site available for future development.

Finding 26: The northwest corner of the proposed development site is located about 850 feet walking distance from bus rapid transit service on International Way. Existing transit platforms are positioned just to the west of the roundabout intersection at Maple Island Road and International Way.

Finding 27: The entire Campus Industrial district – which this site is proposed to be a part of – has an interconnected network of sidewalks and pedestrian walkways that are commonly used for exercise and recreation by local employees. The proposed rehabilitation hospital would have similar walkable facilities on the public street frontages and internal to the site.

Finding 28: The Campus Industrial district of north Springfield has been provided with a full suite of public utilities and services with sufficient capacity to support the requested rezoning from CI to MS. Existing public utilities within or on the perimeter of the subject property include the following:

- Sanitary Sewer: There is an existing 8-inch sanitary sewer line within Maple Island Road that runs southward to the intersection with Game Farm Road and then eastward to an existing sanitary sewer pump station at the southeast corner of the site. The pump station serves the

adjacent Campus Industrial and R-3 residential areas to the north and east of Game Farm Road and Deadmond Ferry Road, including the subject site. Collected sewage is pumped westward to the regional treatment plant on River Avenue in Eugene. To accommodate the proposed development, the applicant will be responsible for modeling anticipated sewage flows from the site to ensure they meet projected volumes as contemplated by the Campus Industrial designation and zoning and the City's Sanitary Sewer Master Plan. Additionally, the applicant may be proportionally responsible for any upgrades to the existing sanitary sewer pump station necessary to increase capacity and flows as new development occurs within the service area. Review and approval of sanitary sewer plans will be done in conjunction with detailed site plans for the proposed development. **Confirmation of sanitary sewer capacity in the system and pump station serving the subject property is a condition of approval to be satisfied prior to or concurrently with Site Plan Review for the proposed development.**

- **Storm Sewer:** There are public storm sewer lines that run along the Maple Island Road and Game Farm Road frontages of the subject site. These storm sewer lines have been sized for full buildout of the entire Campus Industrial district of north Springfield. At present, not all sites within the anticipated catchment area have fully developed so there is some excess capacity in the public stormwater system. However, evolving stormwater regulations now require more infiltration and management of drainage on individual sites and discharge to the public system is limited to pre-development flow conditions, or less. As future development occurs the developer will be responsible for installing private stormwater facilities to manage drainage on the site.
- **Water:** Springfield Utility Board (SUB) water service is located along the public street frontages of the property. The applicant will need to review the location and availability of public fire hydrants as site development plans are prepared for the project. **Confirmation of existing and proposed fire hydrant locations, coverage areas and flow capacities necessary to serve the proposed rehabilitation hospital is a condition of approval to be satisfied prior to or concurrently with Site Plan Review for the proposed development.**
- **Electricity:** SUB Electric has underground conduit and electrical facilities along the Maple Island Road frontage of the property. There are existing overhead lines on the south side of Deadmond Ferry Road and Game Farm Road that can also serve the subject property. The planned electrical facilities are to be placed underground and area suitable for future development of the site with a medical services use.
- **Telecommunications:** Comcast and CenturyLink have telecommunication facilities along the Maple Island Road and Game Farm Road frontages of the property, including fiberoptic lines. The existing and planned facilities are suitable for future development of the site with a medical services use.

Finding 29: Should the applicant's concurrent applications for Metro Plan amendment and zone change be approved, future development of the subject site with a medical services use would be subject to the land use approval process outlined in SDC 5.17.100 (Site Plan Review).

Conclusion: As conditioned, the proposed rezoning meets Criterion 3.

**4. Legislative Zoning Map amendments that involve a Metro Plan Diagram amendment shall:**

- a. Meet the approval criteria specified in Section 5.14.100; and**

*Applicant's Narrative: "The findings provided above related to SDC 5.14.100 are hereby incorporated by reference."*



**b. Comply with Oregon Administrative Rule (OAR) 660-012-0060, where applicable.**

*Applicant's Narrative:* “The applicant retained a licensed traffic engineer (Sandow Engineering) to prepare a Traffic Impact Analysis and Transportation Planning Rule Analysis. The report contains the following findings:

- The addition of development trips does not trigger any intersections to not meet the LOS standards.
- The intersection of Gateway Street at Beltline Road currently operates at LOS F during the PM peak hour. The zone change and proposed use will add less than a 3% increase in trips. This trip increase is insignificant in terms of impact on the intersection. Therefore, no mitigation is recommended.
- The addition of development traffic does not substantially increase queuing conditions.
- There is no off-site mitigation needed for this development.
- TPR findings are demonstrated to be met.

*Based upon the findings above, the zone change complies with the Transportation Planning Rule (TPR). For further information, refer to Exhibit I – Traffic Impact Analysis and Transportation Planning Rule Analysis.”*

Finding 30: The applicant has submitted a concurrent *Metro Plan* diagram amendment application (File 811-23-000182-TYP4) under separate cover. The applicant’s submittal materials, narrative, and staff findings and recommendations demonstrate compliance with the *Metro Plan* amendment provisions of Chapter IV of the *Metro Plan* and SDC 5.14.135.

Finding 31: The applicant has initiated an amendment to the *Metro Plan* diagram to change the designation for approximately 4.99 acres of property from Campus Industrial to Commercial under separate cover (File 811-23-000182-TYP4). That amendment will also include redesignating the land to Community Commercial in the Gateway Refinement Plan. Prior or concurrent redesignation to Community Commercial is necessary for the subject site to be rezoned from CI to MS. In accordance with SDC 3.2.505(B), the Medical Services zoning district can be implemented on a limited range of land use designations including Community Commercial, Major Retail Commercial, Mixed Use, High Density Residential and Medium Density Residential provided these sites abut a collector or arterial street.

Finding 32: The subject site is proposed to be redesignated to Commercial (under the *Metro Plan* diagram) and concurrently redesignated to Community Commercial under the *Gateway Refinement Plan* diagram. The site abuts a collector street (Game Farm Road) along the southern boundary. Therefore, provided the requested *Metro Plan* diagram and concurrent *Gateway Refinement Plan* diagram amendments are adopted, the subject site meets the requirements of SDC 3.2.505(B) for implementation of the Medical Services zoning district.

Finding 33: The rezoning area is a contiguous 4.99 acres plus adjacent public rights-of-way for Game Farm Road and the eastern half of Maple Island Road, which meets the requirements of SDC 3.2.505(C) for implementation of the Medical Services district on sites at least 3 contiguous acres in size. The concurrent rezoning of abutting public rights-of-way eliminates remnant pieces of Campus Industrial zoning on the property perimeter.

Finding 34: The applicant has submitted a supporting Traffic Impact Analysis for the project, which meets the requirements of SDC 3.2.505(E) for implementation of the Medical Services district.

Finding 35: The requested zone change is being undertaken as a site-specific change in compliance with provisions of the adopted *Metro Plan* and the Springfield Development Code. Oregon Administrative Rules (OAR) 660-012-0060 requires that, “if an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map), would significantly affect an existing or planned transportation facility, then the local government must put in place measures” to mitigate the impact, as defined in OAR 660-012-0060(2). The findings in the applicant’s Traffic Impact Assessment (TIA) and the findings under Goal 12 provided in the concurrent *Metro Plan* diagram and *Gateway Refinement Plan* amendment contemplate the proposed zone change from CI to MS for the subject property. Based on those findings, which are incorporated by reference herein, no significant affect will occur and therefore no mitigation measures are necessary. Therefore, the rezoning complies with OAR 660-012-0060.

Conclusion: The proposed rezoning of the subject property and additional public rights-of-way meets Criterion 4.

**Conclusion:** Based on the above-listed criteria, as conditioned herein the criteria for rezoning have been met.

### **Conditions of Approval**

SDC Section 5.22.120 allows for the Approval Authority to attach conditions of approval to a zone change request to ensure the application fully meets the criteria of approval. The specific language from the Code section is cited below:

#### **5.22.120 CONDITIONS**

**The Approval Authority may attach conditions as may be reasonably necessary in order to allow the Zoning Map amendment to be granted. Staff is recommending the following conditions of approval.**

#### **Conditions of Approval:**

- 1. Prior to or concurrent with submittal of a Site Plan Review application for the proposed rehabilitation hospital or another permitted medical services use, the applicant must prepare and submit a capacity analysis for the sanitary sewer system and pump station serving the property. The analysis must confirm that adequate sanitary sewer capacity exists for the proposed development. Alternatively, prior to City approval of the Site Plan Review application, the applicant must demonstrate that the necessary capacity can be provided through pump station upgrades. The applicant is responsible for paying the costs of any necessary pump station upgrades in proportion to the impact of the proposed development, prior to issuance of building permits for the project.**
- 2. Prior to or concurrent with submittal of a Site Plan Review application for the proposed rehabilitation hospital or another permitted medical services use, the applicant must prepare and submit a fire hydrant location, coverage, and flow capacity analysis for the site. The analysis must confirm that adequate capacity and coverage exists or can be provided for the proposed**

**development through installation of new fire hydrants. The applicant is responsible for paying the costs of any necessary water system upgrades in proportion to the impact of the proposed development, prior to issuance of building permits for the project.**