

CITY OF SPRINGFIELD, OREGON
ORDINANCE NO. 6373 (GENERAL)

AN ORDINANCE AMENDING THE EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (*METRO PLAN*) DIAGRAM BY REDESIGNATING APPROXIMATELY 418.17 ACRES OF LAND FROM LOW DENSITY RESIDENTIAL (LDR) TO PARKS AND OPEN SPACE; ADOPTING A SEVERABILITY CLAUSE AND PROVIDING AN EFFECTIVE DATE.

THE CITY COUNCIL OF THE CITY OF SPRINGFIELD FINDS THAT:

WHEREAS, Section 5.14-100 of the Springfield Development Code (SDC) sets forth procedures for *Metro Plan* diagram amendments, and

WHEREAS, Section 5.14-115.B.1 a of the SDC classifies amendments to the *Metro Plan* diagram for land between the Springfield City limits and the Urban Growth Boundary (UGB) as being Type II *Metro Plan* amendments that require approval by Springfield and Lane County only, and

WHEREAS, Section 5.14-125 B of the SDC sets forth procedures for property owners to initiate a Type II *Metro Plan* diagram amendment for property under their ownership, and

WHEREAS, the applicant/owner of the subject property initiated a Type II *Metro Plan* diagram amendment for nine contiguous parcels as follows:

Redesignate nine vacant, non-addressed parcels comprising approximately 418.17 acres that are identified as Assessor's Map 17-02-35-00, Tax Lots 3500 & 3604, Assessor's Map 18-02-02-00, Tax Lots 100, 400 & 401, Assessor's Map 18-02-03-00, Tax Lots 600 & 602, Assessor's Map 18-02-09-00, Tax Lot 100, and Assessor's Map 18-02-10-00, Tax Lot 100 as generally depicted and more particularly described in **Exhibit A** to this Ordinance, from Low Density Residential to Parks and Open Space (Planning Case TYP417-00001), and

WHEREAS, on June 6, 2017 the Springfield Planning Commission held a joint public hearing with the Lane County Planning Commission on the proposed *Metro Plan* diagram amendment request and concurrent request for Zoning Map amendment. The Development & Public Works Department staff report, 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. The Planning Commission deliberated on both requests and voted 6 in favor and 0 (none) opposed with one absent to forward a recommendation of approval to the City Council for both requests, and

WHEREAS, on September 18, 2017 the City Council held a joint public hearing with the Lane County Board of Commissioners to receive testimony and hear comments on both proposals. The City Council is now ready to take action on these proposals based upon 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 the Ordinances amending the *Metro Plan* diagram and Springfield Zoning Map; and

WHEREAS, substantial evidence exists within the record and the findings set forth in **Exhibit B**, 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 staff report and recommendations, applicant narrative, and Planning Commission findings and recommendation to this Ordinance set forth in **Exhibit B**, attached hereto and incorporated herein by reference, are hereby adopted

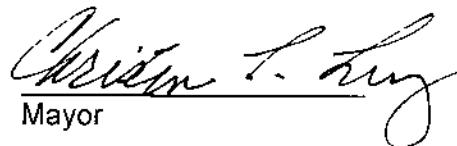
Section 3 The *Metro Plan* diagram designation of the subject property identified as Assessor's Map 17-02-35-00, Tax Lots 3500 & 3604; Assessor's Map 18-02-02-00, Tax Lots 100, 400 & 401, Assessor's Map 18-02-03-00, Tax Lots 600 & 602, Assessor's Map 18-02-09-00, Tax Lot 100, and Assessor's Map 18-02-10-00, Tax Lot 100, more particularly described in **Exhibit A** attached hereto and incorporated herein by reference, is hereby amended from Low Density Residential (LDR) to Parks and Open Space

Section 4 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

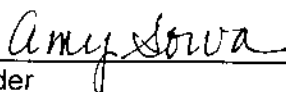
Section 5 Notwithstanding the effective date of ordinances as provided by Section 2 110 of the Springfield Municipal Code 1997, this ordinance shall become effective 30 days from the date of passage by the City Council and approval by the Mayor, or upon the date of acknowledgement as provided in ORS 197 625, or upon the date that an ordinance is enacted by the Lane County Board of Commissioners approving the same amendments described in Section 3 of this Ordinance, whichever date is latest

ADOPTED by the City Council of the City of Springfield this 2nd day of October, 2017
by a vote of 6 for and 0 against

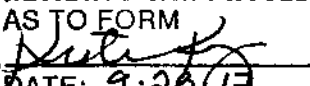
APPROVED by the Mayor of the City of Springfield this 2nd day of October, 2017.


Mayor

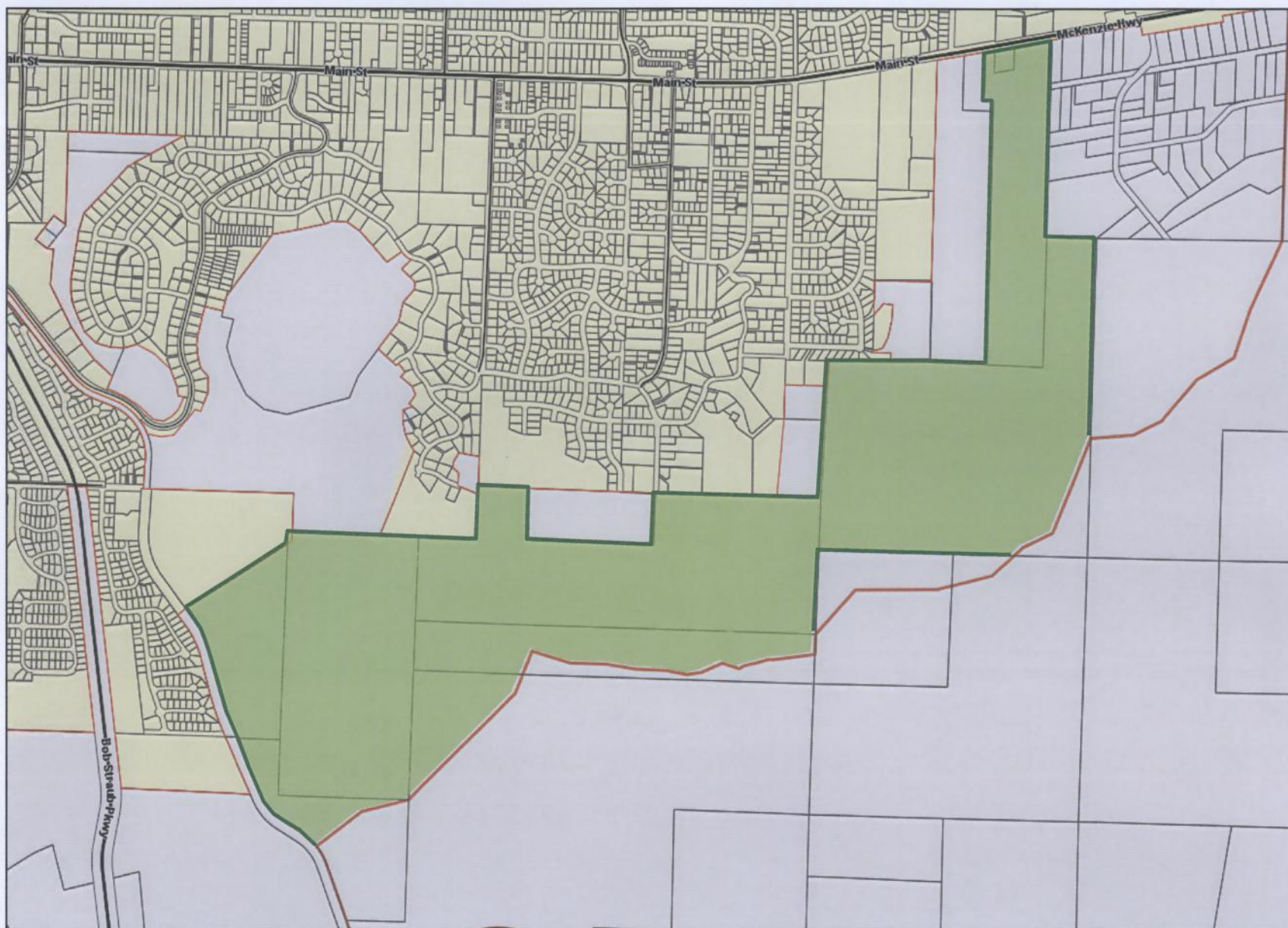
ATTEST.



City Recorder

REVIEWED & APPROVED
AS TO FORM

DATE: 9-26-17
OFFICE OF CITY ATTORNEY

PROPERTY INSIDE SPRINGFIELD UGB THAT IS SUBJECT TO METRO PLAN DIAGRAM AMENDMENT



Legal Description of Lands Within Springfield UGB Subject to Metro Plan Diagram Amendment

Tax Lots 17-02-35-00-03500, 17-02-35-00-03604, 18-02-02-00-0401, 18-02-03-00-00600 & 18-02-03-00-00602

All those lands described as Parcels 1 and 2 in that Warranty Deed recorded March 19, 2013 as Instrument Number 2013-015082, those lands described as Parcel 2 in that Warranty Deed recorded May 19, 2014 as Instrument Number 2014-018147, and those lands described as Tracts 1 and 2 in that Statutory Warranty Deed recorded August 22, 2013 as Instrument Number 2013-046265.

Tax Lot 18-02-02-00100

Also, that portion of those lands described as Parcel 3 in that Warranty Deed recorded March 19, 2013 as Instrument Number 2013-015082 lying northerly and westerly of the top of the ridge line, said ridge line being more or less described as follows:

Beginning at a point on the top of a ridge and the east line of said lands, said point being 2005 feet southerly, more or less, from the northeast corner of said lands, thence running southwesterly along said ridge to a point on the south line of said lands, said point being 722 feet westerly, more or less, from the southeast corner of said lands.

Tax Lot 18-02-02-00-00400

Also, that portion of those lands described as Parcel 1 in that Warranty Deed recorded May 19, 2014 as Instrument Number 2014-018147 lying northerly and westerly of the top of the ridge line, said ridge line being more or less described as follows:

Beginning at a point on top of the ridge and the east line of said lands, said point being 200 feet southerly, more or less, from the northeast corner of said lands; thence running southwesterly along said ridge to a point on the south line of said lands, said point being 1084 feet easterly, more or less, from the southwest corner of said lands.

Tax Lot 18-02-10-00-00100

Also, that portion of those lands described as Parcel 3 in that Warranty Deed recorded May 19, 2014 as Instrument Number 2014-018147 lying northerly and westerly of the top of the ridge line, said ridge line being more or less described as follows:

Beginning at a point on the top of a ridge and the north line of said lands, said point being 1084 feet easterly, more or less, from the northwest corner of said lands; thence running southwesterly along said ridge to the point where the west line of said lands intersects the south line of Section, 3, Township 18 South, Range 3 West, of the Willamette Meridian

Tax Lot 18-02-09-00-00100

Also, that portion of those lands described as Parcel 4 in that Warranty Deed recorded May 19, 2014 as Instrument Number 2014-018147 lying northerly and westerly of the top of the ridge line, said ridge line being more or less described as follows:

Beginning at the most easterly northeast corner of said lands; thence running southwesterly along the ridge to a point on the easterly margin of Weyerhaeuser Road said point being on the west line of said lands, and lying 815 feet from the southwest corner of thereof

Staff Report and Findings

**Lane County Board of Commissioners and Springfield City Council
Type I and Type II Amendments to the *Metro Plan* Diagram**

Hearing Date: September 18, 2017

Case Number: TYP417-00001

Applicant: Eric Wold, Willamalane Park & Recreation District

Project Location: Ten contiguous tax lots located generally south of McKenzie Highway, south and east of South 69th Street, and east of the former Weyerhaeuser haul road.

Request

Applicant's Project Narrative: *"Willamalane Park and Recreation District (WPRD), the 'applicant', requests Metro Plan Amendment and Zoning Map Amendment application approval to change the plan and zone designations of the properties that comprise Thurston Hills Natural Area (THNA) Park from Low Density Residential to Parks and Open Space. In 2013, the City of Springfield adopted the 2012 Willamalane Parks and Recreation Comprehensive Plan, which identifies future needs for parks, natural areas, recreation facilities, programs, and services. The Plan includes specific actions directed toward addressing future needs and ensuring the most effective use of community resources. One such specific action included in the Plan is the acquisition and development [of] a natural area park in the Thurston Hills area. This application is a request for Metro Plan Amendment and Zoning Map Amendment approval."*

The City has received an application for a Type I and Type II *Metro Plan* diagram amendment and a Zoning Map amendment from Willamalane Park & Recreation District (Attachment 5). The proposed *Metro Plan* diagram amendment would change the plan designation for about 421 acres within the Springfield Urban Growth Boundary (UGB) from Low Density Residential (LDR) to Parks and Open Space. A concurrent amendment to the Springfield Zoning Map would change the zoning of the property from LDR and Light Medium Industrial (LMI) to Public Land and Open Space (PLO). About 418 acres of the property is outside the City limits but within the Springfield UGB and the *Metro Plan* amendment therefore requires joint adoption by the Springfield City Council and the Lane County Board of Commissioners (Attachment 10). Approximately three acres of the subject property was annexed to the City of Springfield in April, 2017 and the applicable *Metro Plan* amendment and Zone Change requires action by the Springfield City Council only (Attachment 11). The Zoning Map amendment for property within the City's UGB also requires action by the Springfield City Council only (Attachment 12).

About 245 acres of property that is owned by Willamalane Park & Recreation District falls outside the Springfield UGB, and therefore is in Lane County jurisdiction. For the affected areas outside the Springfield UGB, the proposal would retain the *Metro Plan* designation of Forest Land and current zoning of Non-Impacted Forest (F-1) and Impacted Forest (F-2).

In accordance with Springfield Development Code (SDC) Section 5.14-125.A, an amendment to the *Metro Plan* diagram can be initiated by a property owner or public agency at any time. The applicant executed a Memorandum of Understanding (MOU) with the City in 2016 for development of the Thurston Hills Natural Area Park, which includes provisions for initiating the comprehensive plan amendment and zone change. The application was submitted on January 27, 2017 and the joint

ORDINANCE NO 6373

Springfield and Lane County Planning Commissions public hearing on the proposed *Metro Plan* diagram amendment was held on June 6, 2017. At the conclusion of the joint public hearing meeting, the Springfield Planning Commission unanimously adopted a recommendation of support for the proposal (Attachment 7). The application is now scheduled for a public hearing before the joint Springfield City Council and Lane County Board of Commissioners on September 18, 2017.

Overview of Proposed *Metro Plan* Diagram Amendment

The adopted *Metro Plan* diagram designates the subject property for Low Density Residential land use. Consistent with the adopted *Willamalane Comprehensive Plan* (2012), the applicant is proposing to conserve the 666+ acre area for environmental stewardship and education, woodland habitat preservation, and public recreational opportunities. The current residential zoning and comprehensive plan designation for the property does not accommodate the proposed use as a large natural area park. To facilitate project approval, Willamalane has initiated a *Metro Plan* diagram amendment and concurrent Zoning Map amendment to change the plan designation from LDR to Parks and Open Space and the zoning from LDR and LMI to PLO.

In accordance with SDC 5.14-115.B.1.a, a proposal to redesignate land between the City limits and the Springfield UGB is classified as Type II *Metro Plan* diagram amendment, requiring approval by Springfield and Lane County only. In accordance with SDC 5.14-130, the property owner/public agency initiated amendment to the *Metro Plan* diagram is processed as a Type IV (legislative) land use action that requires joint public hearings before the Lane County and Springfield Planning Commissions, and the Lane County Board of Commissioners and Springfield City Council. The proposal to redesignate land within the City limits is classified as a Type I *Metro Plan* diagram amendment, requiring approval by Springfield only.

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 April 28, 2017, which is 39 days prior to the joint Springfield and Lane County Planning Commission public hearing on the matter.

In accordance with SDC 5.2-110.B, Type IV legislative land use decisions require notice in a newspaper of general circulation. Notification of the June 6, 2017 joint Planning Commissions public hearing was published in the legal notices section of *The Register Guard* on May 16 and 23, 2017. The City also provided written notification to property owners and residents within 300 feet of the outer perimeter of the property on May 16, 2017. As a result of the initial public notification, staff received two telephone calls and one written comment was received from Dave and Kelly Moore, 7291 Holly Street, Springfield, 97478: *"We live at 7291 Holly Street and our property backs directly up to the project site. Although we appreciate how the land is being used, we have concerns about the proximity of the trails to our house. Do you have any insight on where the trails will be, and if so do you expect our home to be visible from the trails?"*

Staff Response. Staff referenced the conceptual trail layout plan provided by Willamalane for the project area. While not a final design or as-built alignment for the planned trail system, it does provide a general idea of the proximity of trails to existing homes to the west and northwest. The general location of the primary "spine" trail that will pass to the east and south of homes on Holly Street is already known because it is based on an existing timber access road. Based on this information and available air photo imagery, staff estimates that the main trail system will be at least 400 feet from the respondents' property. However,

as the trail system develops there may be tributary connections from residential neighborhoods to the west and northwest of the Thurston Hills Natural Area Park. With the density of existing tree cover and planned trail alignments located internal to the Willamalane property, it is unlikely that the trail system and its users would be conspicuously visible or overheard from perimeter residential homes. Staff also notes that the natural area trail system will be subject to further land use approvals thereby allowing interested residents and property owners an opportunity to review the planned trail network and its proximity to nearby streets and residential areas.

A second round of public notification was provided for the joint Lane County Board of Commissioners and Springfield City Council public hearing meeting. Notification of the September 18, 2017 joint public hearing meeting was published in the legal notices section of the Register-Guard on September 1 and 11, 2017. Additionally, written notification was provided to property owners and residents within 300 feet of the outer perimeter of the affected property on August 28, 2017. Staff posted three public hearing notices on the perimeter of the subject property and notices were also posted in the City Hall lobby, on the Development & Public Works Department digital display, and on the City's website.

Background

Applicant's Project Narrative "In 2014, Willamalane acquired 665 acres of property in the Thurston Hills area for the natural area park. Approximately 420 acres of the total acreage is within Springfield's Urban Growth Boundary but outside the existing City limits. The District is also in discussions with landowners to acquire more property along the ridgeline. These land investments will enable Willamalane to preserve views, wildlife habitat and sensitive natural areas, and provide walking, hiking and mountain biking opportunities. Willamalane has been making progress toward the realization of THNA Park through multiple initiatives:

- *Both the 2004 and 2012 Willamalane Comprehensive Plans include strategies to acquire and develop property for a natural area park and trails in the Thurston Hills areas*
- *In 2012, Springfield voters approved a Willamalane capital bond package, which included funds identified for acquisition and improvements of a natural area park in the Thurston Hills area*
- *In 2016, Willamalane and the City executed a Memorandum of Understanding (MOU) regarding the development of THNA Park*

In 2012, Springfield-area voters approved Measure 20-199, a \$20 million Willamalane Park and Recreation District Bond to fund projects aimed at expanding trails and preserving parkland around hillsides, rivers and streams. The bond measure included funding for the THNA project and represents public support for acquisition and development of THNA Park."

Criteria of Approval

Section 5 14-135 of the SDC 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

Finding 1. Of the nineteen statewide goals, thirteen are generally “urban” goals that may apply to review to any 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 nineteen statewide goals are listed below; the narrative that accompanies each goal provides further explanation regarding the thirteen goals identified above.

Goal 1 – Citizen Involvement

Applicant’s Narrative “Goal 1 addresses the need to develop a citizen involvement program to ensure citizen involvement in all phases of the land use planning process. The development of THNA Park has been fueled by citizen involvement since project inception. The Willamalane Park and Recreation Comprehensive Plan was updated in 2012, using community surveys, public involvement, and outreach activities to conduct the Community Needs Assessment. Feedback collected from over 2,000 district stakeholders and residents included their needs and preferences related to natural areas, recreation facilities and programs over the next 20 years. This feedback spurred the inclusion of the development of THNA Park as a future area of improvement in the Willamalane Park and Recreation Comprehensive Plan. In addition, in 2012 Springfield-area voters approved Measure 20-199, a \$20 million Willamalane Park and Recreation District Bond to fund projects aimed at expanding trails for hiking, biking, and walking, and preserving natural areas and parkland around hillsides, rivers and streams. The funds from this bond measure are supporting the THNA project and represent public backing for the project’s development. The Planning Commission of both Springfield and Lane County will meet jointly and will accept testimony on the proposal. Through the procedures established by the city, citizens receive notice of hearings in a generally published local paper and have the opportunity to be heard regarding the proposed amendments. Notice of the public hearing is provided in accordance with SDC requirements to property owners within 300 feet of the proposed Zoning Map Amendment. Since the proposal complies with the City’s citizen involvement program and citizens have opportunities to be involved in the procedure, the proposal is consistent with Goal 1.”

Finding 2: Goal 1 – Citizen Involvement calls for “the opportunity for citizens to be involved in all phases of the planning process”. The proposed amendment to the adopted *Metro Plan* diagram is the subject of a legislative decision-making process with multiple public hearings before the City’s Planning Commission and Council. Because the project area includes property between the City

limits and UGB, the Lane County Planning Commission and Board of Commissioners will be reviewing the proposal jointly with Springfield. The Springfield and Lane County Planning Commissions held a joint public hearing to consider the proposed amendment on June 6, 2017. The joint Planning Commissions public hearing was advertised in the legal notices section of the *Register-Guard* on May 16 and 23, 2017. Additionally, property owners and residents within 300 feet of the outer perimeter of the subject property were notified by mail on May 16, 2017. Staff finds that notification of the joint Planning Commissions public hearing was published in the *Register-Guard* newspaper at least two weeks prior to the meeting date.

Finding 3: Staff advises that a second round of public notification letters was sent on August 28, 2017 for the joint Springfield City Council and Lane County Board of Commissioners public hearing meeting. Additionally, a public hearing notice for the joint City Council and Board of Commissioners meeting was published in the legal notices section of the *Register-Guard* newspaper on September 1, which is at least two weeks prior to the September 18, 2017 meeting date, and again on September 11. Based on the foregoing, staff finds that the proposed *Metro Plan* diagram amendment is consistent with Goal 1 requirements.

Goal 2 – Land Use Planning

Applicant's Narrative "Goal 2 requires that local comprehensive plans be consistent with the Goals, be internally consistent, and that implementing ordinances be consistent with acknowledged comprehensive plans. Goal 2 also requires that land use decisions be coordinated with affected jurisdictions and that they be supported by an adequate factual basis. As required in SDC Sections 4.5-B and 5.14-130, the City is required to give referral notice of the proposed Type II Metro Plan diagram amendment to the City of Eugene and Lane County so they may determine if there are grounds to participate as parties to the hearing. The City also sends the statutorily required notice of the initial public hearing 45 days in advance to the state Department of Land Conservation and Development, ensuring that they are given opportunity for comment and review in conformity to applicable statewide planning goals. The Metro Plan and the SDC, as well as the Statewide Planning Goals and applicable statutes, provide policies and criteria for the evaluation of the Comprehensive Plan amendments. Compliance with these measures assures an adequate factual basis for approval of the proposed Metro Plan diagram amendment. As discussed elsewhere in this document, the proposed Plan Amendment is consistent with the Metro Plan and the Goals. By demonstrating such compliance, the Amendments satisfy the consistency element of Goal 2."

Finding 4: 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.

Finding 5: The Eugene-Springfield Metropolitan Area General Plan (*Metro Plan*) is 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*. The City of Springfield and the City of Eugene are in the process of adopting individual comprehensive plans to ultimately replace the *Metro Plan* in accordance with the requirement in ORS 197.304 that each city shall separately establish its urban growth boundary and buildable lands inventory. The Springfield City Council and Lane County Board of Commissioners have co-adopted the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* as a Springfield-specific refinement to

the *Metro Plan*. The residential land use policies of both the *Metro Plan* and the *Springfield 2030 Refinement Plan* are applicable to this application.

Finding 6: The public hearing process used for a *Metro Plan* amendment is specified in Chapter IV *Metro Plan* Review, Amendments, and Refinements. The findings under Criteria B (below) demonstrate that the proposed amendment will not make the adopted *Metro Plan* internally inconsistent.

Finding 7: The *Springfield Development Code* is a key mechanism used to implement the goals and policies of the City's adopted comprehensive plans. The proposal is classified as a Type I amendment to the adopted *Metro Plan* diagram that is approved by Springfield only in accordance with SDC 5.14-115.A. The proposed *Metro Plan* diagram amendment is processed as a Type IV land use action (legislative) as described in SDC 5.1-140 and 5.14-130. Staff finds that the proposed *Metro Plan* diagram amendment is consistent with the policies pertaining to Review, Amendments and Refinements. Additionally, the proposed *Metro Plan* diagram amendment has been initiated in accordance with the provisions of the City's acknowledged Comprehensive Plan and Development Code. Staff finds the proposed *Metro Plan* diagram amendment does not affect City ordinances, policies, plans, and studies adopted to comply with Goal 2 requirements.

Goal 3 – Agricultural Land

Applicant's Narrative. "Tax Lots within the subject site are designated by the *Metro Plan* as Low Density Residential and by the *Springfield Zoning Map* as Low Density Residential (LDR), with the exception of one tax lot that includes the Light Medium Industrial (LMI) designation. The proposal does not involve designated agricultural lands. Therefore, the proposed Amendments are consistent with Goal 3."

Finding 8: Goal 3 – Agricultural Land applies to areas subject to farm zoning that are outside acknowledged urban growth boundaries (UGBs): "Agricultural land does not include land within acknowledged urban growth boundaries or land within acknowledged exceptions to Goals 3 or 4." (Text of Goal 3). The City has an acknowledged UGB and therefore consistent with the express language of the Goal, does not have farm land zoning within its jurisdictional boundary. Furthermore, the site of the proposed *Metro Plan* diagram amendment is inside the City's acknowledged UGB. Consequently, and as expressed in the text of the Goal, Goal 3 is not applicable.

Goal 4 – Forest Land

Applicant's Narrative. "Goal 4 does not apply to land included with the proposal. The tax lots within Springfield jurisdiction are not designated for forest use and the proposed amendments will not [be] removing land from the forestland base. Willamalane previously received a grant from the U.S. Forest Service for the preparation of a community forest plan for a 78.97-acre tract of land in [the] northern portion of THNA Park. The overarching goal of the community forest is to maintain a large tract of productive forestland adjacent to an urban area and introduce public access, recreation, environmental education, and best practices for sustained stewardship. A portion of the park is located within Lane County jurisdiction and is designated as forestland. Proposed uses and development within this portion will be addressed through separate land use approval processes with Lane County. Therefore, the proposed Amendments are consistent with Goal 4."

Finding 9: Goal 4 – Forest Land applies to timber lands zoned for that use that are outside acknowledged UGBs with the intent to conserve forest lands for forest uses: “Oregon Administrative Rule 660-006-0020: Plan Designation Within an Urban Growth Boundary Goal 4 does not apply within urban growth boundaries and therefore, the designation of forest lands is not required.” The City has an acknowledged UGB and does not have forest zoning within its incorporated area. Furthermore, the site of the proposed *Metro Plan* diagram amendment is inside the City’s UGB. Consequently, and as expressed in the text of the Goal, Goal 4 is not applicable.

Finding 10: As stated in the applicant’s narrative, approximately 245 acres of the project area lies outside the City’s UGB and exclusively within Lane County jurisdiction. The comprehensive plan designation and zoning for the Lane County portions of the project area are Forest land, and there are no proposed changes to the plan designation or zoning. The applicant is addressing the Goal 4 requirements in more detail in the application submitted to Lane County under separate cover (Case 509-PA17-05292).

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

Applicant’s Narrative: “Goal 5 requires local governments to protect a variety of open space, scenic, historic, and natural resource values. Goal 5 and its implementing rule, OAR Ch 660, Division 16, require planning jurisdictions, at acknowledgment and as a part of periodic review, to (1) identify such resources, (2) determine their quality, quantity, and location, (3) identify conflicting uses, (4) examine the economic, social, environmental, and energy (ESEE) consequences that could result from allowing, limiting, or prohibiting the conflicting uses, and (5) develop programs to resolve the conflicts. There is only one subject property on Springfield’s acknowledged Metro Plan Goal 5 inventory. No threatened or endangered species have been inventoried on the site, and no archaeological or significant historical inventoried resources are located on the site. The National Wetland Inventory and Springfield Local Wetland Inventory maps have been consulted and the site includes one inventoried Goal 5 resource. However, the proposed Amendment does not change the protection status of the resource. It can be argued that the proposed Amendment enabling the future development of the site as a regional park will help protect the resource as opposed to the Low Density Residential classification. The proposed Amendments also do not suggest development on the site that would impact the resource. Therefore, the proposed Amendments do not alter the City’s compliance with Goal 5.”

Finding 11: 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 site that is subject of the proposed *Metro Plan* diagram amendment has been identified in the City’s Natural Resources inventory, and it contains the Frederick Gray house which is an Oregon registered historic site. Additionally, the project area is specifically identified as a major natural area park in the Willamalane Park & Recreation District Comprehensive Plan. The property containing the Gray house is inside the Springfield City limits and therefore is subject to a Type I *Metro Plan* diagram amendment. The Springfield City Council will be reviewing the amending Ordinance concurrently with the subject Type II *Metro Plan* amendment at the joint public hearing meeting on September 18, 2017 (Attachments 10 and 11).

Finding 12: The City does not have a specific zoning district which it applies to inventoried Goal 5 natural resources: the presence of these resources is completely independent of the process used to

zone and designate land. Protective measures for all of the City's inventoried Goal 5 resources are applicable to the resource and are not circumscribed or altered based on zoning classification. The proposed amendment to the *Metro Plan* diagram does not modify or alter the City's Development Code or other *Metro Plan* policies relating to identified natural resources. In fact, the proposed plan designation and zoning as Parks and Open Space enhances the opportunity for conservation and protection of the natural and historic resources within the property.

Finding 13: The proposed *Metro Plan* diagram amendment does not make any changes to adopted Goal 5 natural resources development standards or protective measures adopted to comply with Goal 5 requirements. 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 "The purpose of Goal 6 is to maintain and improve the quality of the air, water and land resources of the state. Generally, Goal 6 requires that development comply with applicable state and federal air and water quality standards. In the context of the proposed *Metro Plan* diagram amendment, Goal 6 requires that the applicant demonstrate that it is reasonable to expect that applicable state and federal environmental quality standards can be met. The proposed Amendments do not modify any of the Goal 6 related policies of the *Metro Plan*, nor do they amend the *Regional Transportation Plan*, the *Springfield Development Code*, other applicable Goal 6 policies, or any regulations implementing those policies. Therefore, the proposed Amendments do not alter the City's compliance with Goal 6."

Finding 14: 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. Therefore, this action does not alter the City's acknowledged compliance with Goal 6.

Goal 7 – Areas Subject to Natural Hazards

Applicant's Narrative "Goal 7 requires that development subject to damage from natural hazards and disasters be planned and/or constructed with appropriate safeguards and mitigation. The goal also requires that plans be based on an inventory of known areas of natural disaster and hazards, such as areas prone to landslides, flooding, etc. After review of the natural constraints map and the FEMA Floodplain Map in relation to the subject area, the area is not included in the City's inventory of known areas of natural hazard other than steep slopes, which can be at-risk for landslides. Proposed development of the site as a Regional Park does not propose incompatible levels of development with steep slopes (such as roads, homes, or other infrastructure) and will be designed accordingly to minimize the risk posed by steep slopes. The site is located well outside of any established FEMA flood hazard areas. Therefore, approval of the proposed Amendments will not alter the City's acknowledged compliance with Goal 7 through its adopted plans, codes and procedures."

Finding 15: 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 flood plains and potential landslide areas on steeply sloping hillsides. Portions of the subject site are within the City's mapped potential landslide hazard areas – particularly the hillsides in the southwest quadrant of the property.

Finding 16: Based on the City's topographical mapping information, much of the property subject to the *Metro Plan* amendment and Zone Change has slopes exceeding 15 percent and/or lies above the 670-foot elevation mark. Both of these factors contribute to the application of the City's Hillside Development (HD) Overlay District to the subject property. The HD Overlay District is primarily used to ensure that development in hillside areas minimizes the risk of earth movement and landslides, protects natural features and vegetation, protects water features and channels, and protects public health and safety. Any development on the subject property, including a public recreational trail system and related amenities, would be subject to the applicable provisions of the HD Overlay District and related permitting requirements.

Finding 17: The proposed *Metro 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 the Hillside Development Overlay District and landslide hazard areas. Furthermore, the site proposed for *Metro Plan* diagram amendment is not exempted from conformance with regulations affecting these hazard areas. Therefore, this action has no effect on the City's acknowledged compliance with Goal 7.

Goal 8 – Recreational Needs

Applicant's Narrative. "Goal 8 requires local governments to plan and provide for the siting of necessary recreational facilities to "satisfy the recreational needs of the citizens of the state and visitors," and where appropriate, provide for the siting of recreational facilities including destination resorts. The Willamalane 20-year Park and Recreation Comprehensive Plan was adopted by the City of Springfield as part of the Metro Plan's compliance with Goal 8. The applicant proposes conversion of 428.95 acres of Low Density Residential land for open space and recreation purposes. The proposed Amendment designate said land for parks and open space use, consistent with the definition of a Regional Park permitted in the zoning district. City approval of the proposal will constitute an increase in the availability of public recreational facilities in the area following development of said parkland. As such, changing the designation of the subject property will have no impact on the City's existing park and open space supply. In no case, as a result of the proposed Amendment, would a reduction in recreational facilities occur. Through the proposed Amendment, the proposal will increase the amount of recreation capacity within Springfield. The proposal does not involve the siting of destination resorts. Based on these findings, the proposed Amendments are consistent with Goal 8."

Finding 18: 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. As previously stated herein, Willamalane has an adopted 20-Year Comprehensive Plan for the provision of park, open space and recreation services for Springfield which was acknowledged by the Department of Land Conservation and Development after adoption by the Springfield City Council on November 4, 2013. The proposed *Metro Plan* diagram amendment would be consistent with Willamalane's adopted Comprehensive Plan, which is a refinement plan to the *Metro Plan*. The Thurston Hills Natural Area Park is identified as a key element of the Comprehensive Plan (Project 3.9). Because the City has co-adopted the Willamalane Comprehensive Plan as a

refinement plan to the *Metro Plan* for purposes of consistency with Goal 8 Recreational Needs, the proposed action would be consistent with the provisions of the adopted comprehensive plans. The proposal would not conflict with other ordinances, policies, plans, and studies adopted to comply with Goal 8 requirements. Therefore, this action has no adverse effect on the City's acknowledged compliance with Goal 8.

Goal 9 – Economic Development

Applicant's Narrative “Goal 9 requires the city to provide adequate opportunities for a variety of economic activities vital to the health, welfare, and prosperity of the citizens. The proposed Amendments will not affect the city's capacity for economic development, and do not alter the City's compliance with Goal 9.”

Finding 19: Goal 9 – Economic Development addresses diversification and improvement of the economy. It requires local jurisdictions to conduct an inventory of commercial and industrial lands, anticipate future needs for such lands, and provide enough appropriately-zoned land to meet the projected demand over a 20-year planning horizon. The City previously completed an analysis of its employment land base and determined that a deficit existed. To address the projected deficit of commercial and industrial land, the City has undertaken a multi-year process to expand the Urban Growth Boundary (UGB) in the Gateway and South 28th Street areas. Expansion of the UGB is intended to provide sufficient employment-generating land area for the mandated 20-year planning horizon. The proposed redesignation and rezoning of the subject property would not have an effect on the amount of employment land within the City's inventory.

Finding 20: The proposed redesignation and rezoning would not affect other City ordinances, policies, plans, and studies – such as the Commercial-Industrial Buildable Lands (CIBL) Survey – adopted to comply with Goal 9 requirements. All of the city's economic development policies related to zoning classifications rely on commercial, industrial and mixed use land inventories. This proposed redesignation would not have an effect on the commercial and industrial land inventory and would not adversely impact the City's acknowledged compliance with Goal 9.

Finding 21: The subject property is listed in the residential land inventory as discussed in Goal 10 findings below, and conversion to a different type of land use was not envisioned for this site when the City completed its studies and conclusions in 2011. A portion of Assessor's Map 18-02-09-00, Tax Lot 100 is inside the City's UGB and is currently zoned Light Medium Industrial (LMI), but is designated LDR on the *Metro Plan* diagram. A plan-zone conflict currently exists for this parcel that will be corrected by the proposed *Metro Plan* Diagram amendment and Zone Change. Staff observes that, notwithstanding the LMI zoning, the LDR designation for the portion of Tax Lot 100 inside the City's UGB constitutes a plan-zone conflict which means that this parcel would not have been counted as part of the City's CIBL inventory. Therefore, the proposed redesignation and rezoning of Tax Lot 100 should have no impact on the CIBL inventory and the City's actions to expand the UGB for employment purposes.

Goal 10 - Housing

Applicant's Narrative “Goal 10 requires that communities plan for and maintain an inventory of buildable residential land for needed housing units. The 2011 Springfield Residential Land and Housing Needs Analysis (RLHNA) analyzes housing inventory and need for the next 20 year and is Springfield's most current adopted housing study related to Goal 10. Analysis of the subject site identified 159.08 acres of buildable residential land that were included in the RLHNA inventory.

ORDINANCE NO 6373

Removal of the land from the residential inventory will not detrimentally affect the City's existing surplus of building residential land in the Low Density Residential zoning district. The findings under Metro Plan Residential Land Use and Housing Element Policy A 3 are incorporated by reference herein as demonstration of consistency with Goal 10."

Finding 22. Goal 10 – Housing applies to the planning for – and provision of – needed housing types, including multi-family and manufactured housing. As noted by the applicant's narrative, staff and third-party analysis has determined that a surplus of LDR designated land exists within the City's land inventory. The proposal would not reduce the City's residential land inventory below threshold levels requiring mitigation or compensatory actions elsewhere within the UGB, but it will require an adjustment to the City's tabulation of buildable residential land still in the inventory. Table 6-7, Residential Land and Housing Element, *Springfield 2030 Refinement Plan* identifies total surplus of 378 acres of Low Density Residential land within the Springfield UGB as of 2010. Since 2010, the City of Springfield has approved two applications to redesignate and rezone LDR property that have reduced the identified surplus. About 7 acres of LDR land was removed from the inventory upon adoption of Ordinance 6364 on March 7, 2017. Approximately 370 acres of LDR designated land remains within the City's buildable residential land inventory after adoption of Ordinance 6364. Pending an appeal to the Oregon Land Use Board of Appeals (LUBA), Ordinance 6369 adopted on June 19, 2017 would remove another 3.3 acres of LDR from the inventory. The proposed *Metro Plan* Amendment and Zone Change would remove about 159 acres of buildable low density residential land from the inventory, and would bring the City's inventory of surplus LDR land to just under 208 acres. The applicant provides additional discussion of the impact of this proposal to the City's residential land inventory in Section B.1 below

Finding 23: The applicant's narrative identifies findings in response to *Metro Plan Housing Element Policy A 3* that demonstrates consistency with Goal 10. The applicant's narrative does not specifically address any policies within the *Springfield 2030 Plan Residential Land Use and Housing Element*, but because the proposed amendment maintains the surplus of LDR designated land, staff find that the proposed amendment is not inconsistent with the *Springfield 2030 Plan Residential Land Use and Housing Element*

Goal 11 – Public Facilities and Services

Applicant's Narrative "Goal 11 requires the provision of a timely, orderly and efficient arrangement of public facilities and services. The subject site can be served by an orderly extension of urban services. The proposed Amendments will not affect the ability to provide needed services. Therefore, the Amendments are consistent with Goal 11."

Finding 24: 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 will not result in permitted uses that will have an appreciable effect on the demand for public facilities and services provided to the subject property and adjacent properties. In fact, removal of the subject property from the residential land inventory greatly reduces the demand for public facilities and services that otherwise would be required to develop the land to urban standards – particularly for land within steeply-sloping, hillside areas. Therefore, the City's continued acknowledged compliance with Goal 11 is not affected by this proposal.

Goal 12 – Transportation

Applicant's Narrative "Goal 12 requires local governments to provide and encourage a safe, convenient and economical transportation system. The proposed map Amendment involves approximately 666 acres of property, of which the majority is within the Low Density Residential zoning district. In compliance with OAR 660-012-0060, a transportation analysis report is included as Exhibit D. This report highlights that the PM peak hour and average daily trip (ADT) generation associated with the proposed use is a reduction in the potential that would be generated by the site if it were developed under land use permissions associated with the existing plan and zone designations. Therefore, the Amendments are consistent with Goal 12."

Finding 25: The proposed redesignation from LDR to Parks and Open Space would change the types of uses permitted to be developed on the property, and significantly reduce the intensity of use on the subject property. Rezoning of the property to PLO would implement the amended Comprehensive Plan designation for the property. Although the PLO District allows for a variety of recreational, cultural and educational buildings and facilities (including schools and recreation centers), the planned Thurston Hills Natural Area Park will not have such facilities. The applicant's project narrative and supporting transportation analysis acknowledges that the proposed *Metro Plan* Diagram amendment and Zone Change would result in a marked reduction in vehicle trips associated with the property.

Finding 26: 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).

Finding 27: The proposed *Metro Plan* Diagram amendment and Zone Change, and eventual development of the Thurston Hills Natural Area Park itself, affects portions of southeast Springfield identified for extension of local and collector streets to complete the transportation network for the area. The City's Conceptual Local Street Plan identifies a number of north-south and east-west connector streets that pass through the subject property. Portions of the Thurston Hills that abut the western and northwestern edges of the subject property are isolated by geography and intervening land ownership. As a result, the fragmented road network lacks good connectivity that facilitates efficient emergency response and promotes the dispersal of traffic throughout the system.

Finding 28: The City of Springfield and Willamalane Parks and Recreation District have executed a memorandum of understanding to allow for a temporary emergency access road to replace the planned local road extension of Jessica Drive shown on the Conceptual Local Street Map through the northern stub of the property proposed for *Metro Plan* Diagram amendment and Zone Change. This extension, if warranted in the future, will provide the necessary secondary emergency access to adjoining developable residential properties (Attachment 8).

Finding 29: The applicant has provided a memorandum from an Oregon Licensed Professional Engineer addressing Oregon's Transportation Planning Rule Goal 12 requirements. The finding of "no significant effect" is accepted and approved by the City of Springfield based on a lack of trip generation associated with the proposed zone change from Low Density Residential (LDR) to Parks and Open Space.

Finding 30: The City of Springfield's adopted Transportation System Plan (TSP) includes a planned "as development occurs" collector street which is shown bisecting the property proposed for the *Metro Plan* Diagram amendment and Zone Change. This collector street would provide connectivity around the southern side of the Mountaingate development connecting with planned park, school and commercial development areas. Since no urban-density development will occur on the subject property, the collector street will remain a planned facility in the TSP, but will need to be implemented through mechanisms other than development of the area for residential uses if the *Metro Plan* Diagram amendment and zone change are approved.

Goal 13 – Energy Conservation

Applicant's Narrative "The Energy goal is a general planning goal and provides limited guidance for site-specific map amendments. Goal 13 is directed at the development of local energy policies and implementing provisions and does not establish any requirements with respect to other types of land use decisions. To the extent that Goal 13 could be applied to the proposed Amendments, the designations are consistent with Goal 13. The proposal will not hinder management or conservation practices related to energy consumption."

Finding 31: Goal 13 – Energy Conservation states that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles". The proposed comprehensive plan amendment and rezoning does not affect the City's ordinances, policies, plans, or studies adopted to comply with Goal 13 requirements. Converting the 421 acres of property from LDR to PLO should result in a significant reduction in energy consumption because a natural area park has a minimal energy footprint in comparison to an equivalent area developed with single family dwellings. The developer will have an opportunity to incorporate suitable energy conservation measures into the future site development upon redesignation and rezoning of the subject property. The City's building codes comply with all Oregon State Building Codes Agency standards for energy efficiency in residential building design. The site's solar access is not compromised by surrounding development. The City's conservation measures applicable to storm water management, erosion and sediment control, and groundwater protection apply to all recreational 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 proposed Amendments apply to a site that is currently undeveloped and rural in nature. By cultivating the space as a Regional Park, a more seamless interface is created between the rural and urban environment, enhancing the livability of the urban area. Therefore, Goal 14 does not apply."

Finding 32: 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 did not plan for recreational land use on the subject property when completing its Residential Land and Housing Inventory. However, consistent with provisions of Goal 14, the City is responding to a request from a public agency to redesignate and rezone the subject property from residential to public parks and open space. The proposed comprehensive plan amendment and zone change will be noted on both the residential land inventory and the public open space inventory; similar reporting of inventory changes due to development will occur as required by ORS. However, 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 "Goal 15 does not apply to the proposal because the subject area is not located within the Willamette River Greenway"

Finding 33: 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. The proposed comprehensive plan amendment and zone change does not change or nullify the requirement for development proposals to comply with the City's existing Willamette River Greenway regulations regardless of the underlying zoning, and to demonstrate compliance with Goal 15 requirements. Any new development proposed on land within the Willamette Greenway Overlay District would be subject to a separate Type III land use approval process requiring a public hearing before the Springfield Planning Commission or Hearing Official, therefore this action has no effect on the city's acknowledged compliance with Goal 15.

Goals 16-19 Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources

Applicant's Narrative "The subject site is not located within any coastal, ocean, estuarine, or beach and dune resources related area. Goals 16-19 do not apply to this application."

Finding 34: Goals 16-19 – Estuarine Resources; Coastal Shorelands, Beaches and Dunes; and Ocean Resources: these goals do not apply to land within the Willamette Valley, including Springfield. Therefore, in the same way that Goals 3 and 4 do not apply in Springfield, Goals 16-19 do not apply in Springfield or to land use regulations adopted in Springfield.

Conclusion: Staff has concluded, with the exception of Goal 7 – Areas Subject to Natural Hazards (as explained in the preceding text under this Goal), that the proposed *Metro Plan* diagram land use designation amendment from Low Density Residential to Parks and Open Space is consistent with the criteria for such action in SDC 5.14-135 (A): "The amendment shall be consistent with applicable Statewide Planning Goals."

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 application requests amendment of the *Metro Plan* diagram from Low Density Residential to Parks and Open Space for 421.15 acres. This section of the application narrative addresses the consistency of the Amendments with the applicable policies of the *Metro Plan*, to demonstrate that adoption of the Amendments will not make the *Metro Plan* internally consistent. This narrative only addresses those policies that apply to the proposal, and does not discuss those portions of the *Metro Plan* that (1) apply to land uses other than the current or proposed designations for the subject site and will not be affected by the proposed *Plan* diagram, or (2) clearly apply only to specific development applications (e.g., site plan review submittals or ORDINANCE NO. 6373

subdivisions). All Metro Plan policies were evaluated in relation to their applicability to the Amendments and the following policies were found to be applicable to the proposal. The findings demonstrate how the Plan Amendments are consistent with, and are in fact supported by the policy directions contained in the Metro Plan.

Metropolitan Residential Land Use and Housing Element

Residential Land Supply and Demand

A 3 Provide an adequate supply of buildable residential land within the UGB for the 20-year planning period at the time of Periodic Review.

In June 2011, the City of Springfield adopted an ordinance amending the Metro Plan to adopt the Springfield 2030 Refinement Plan Residential Land Use and Housing Element and to establish a separate Springfield Urban Growth Boundary pursuant to ORS 197.304. The ordinance included the Springfield Residential Land and Housing Needs Analysis (RLHNA), which is an 'analysis of land supply and housing demand prepared by ECNorthwest that incorporates input from citizens, stakeholder groups, commissions, and elected officials received throughout a multi-year citizen involvement process that included a Residential Lands citizen advisory committee, online public surveys, community workshops, work sessions, open houses and public hearings'. This analysis applies to the proposal, which involves the removal of land from the residential inventory. According to the RLHNA, Springfield has a 378-acre surplus of Low Density Residential land, and a 300-acre deficit of Parks and Open Space Land. In regard to parks and open space land, the technical analysis on page 71 states

'The Parks and Open designation has a deficit of 300 acres. This need does not imply that the City should expand the UGB for parks and open space. The City has a surplus of buildable lands in the low and medium density residential plan designations that can provide land for future parks within those designations, consistent with the objectives of the adopted Park and Recreation Comprehensive Plan. A portion of the parks and open space need can also be met on residentially designated land that has constraints and therefore is not counted as buildable acres (e.g. ridgeline trail systems).'

As discussed above, the technical analysis identifies a deficit of land in the Parks and Open Space designation and includes an estimate of future land needs. The estimate of land needed for parks and open space uses a parkland standard of 14 acres per 1,000 persons based on the level of service standard established in the 2004 Willamalane Parks and Recreation Comprehensive Plan, which projected need for parkland in Springfield between 2002 and 2022. Based on the level of service standard, an additional 357 acres of parks and open space land is needed by 2030. Although Willamalane adopted an update to the Comprehensive Plan in 2012, the 2004 Comprehensive Plan was the adopted plan at the time of preparation of the RLHNA. The estimates of parks and open space land needs in the RLHNA and 2012 Plan are consistent (357 acres and 364 acres, respectively). The projected deficits of 357 acres in the Springfield RLHNA and 364 acres in the 2012 Plan fall within the estimated surplus of buildable land remaining in the UGB for residential use in Springfield by 2030. In addition, Statewide Planning Goal 8 allows cities and park districts to acquire land for park uses outside of Urban Growth Boundaries. Willamalane's service district boundary and planning area extend outside the Springfield UGB in some areas. However, a majority of the proposed parkland is within the UGB on residentially designated land, a portion of which is land that has constraints and therefore is not counted as buildable acres. The RLHNA database was obtained from the City of Springfield and reviewed in order to isolate properties associated with THNA Park that were included in the analysis and are within Springfield jurisdiction. Based on these properties, the Applicant identified buildable residential acres

associated with each tax lot and resolved several discrepancies in the database. The analysis determined that 159.08 acres within subject site are accounted for in the RHLNA as buildable residential acres, as illustrated in Table [4-1] Buildable Residential Acres within THNA Park [See Page 22 of applicant's submittal]. Removal of the residential buildable acres from Springfield's housing inventory will result in a remaining surplus of more than 300 acres of buildable residential acres. Thus, the proposal is consistent with this functional plan. Willamalane's service district boundary and planning area extend outside the Springfield UGB in some areas. However, a majority of the proposed parkland is within the UGB on residentially designated land, a portion of which is land that has constraints and therefore is not counted as buildable acres. The land outside of the UGB is rural forestland in character and will not be negatively impacted by the Amendments. Based on these findings, the proposed Amendments are consistent with the Residential Land Use and Housing element of the Metro Plan.

Environmental Resources Element

Forest Lands

- C.5 Metropolitan goals relating to scenic quality, water quality, vegetation and wildlife, open space, and recreational potential shall be given a higher priority than timber harvest within the UGB.
- C.7a Conserve forest lands by maintaining the forest land base and protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.

Riparian Corridors, Wetlands, and Wildlife Habitat

- C.8 Local governments shall develop plans and programs which carefully manage development on hillsides and in water bodies, and restrict development in wetlands in order to prevent erosion and protect the scenic quality, surface water and groundwater quality, forest values, vegetation, and wildlife values of those areas.

The proposal will not amend, supersede, or violate any adopted regulations, plans, or programs that manage development impacts on natural resources. The proposal will not compromise existing established protection provisions in the SDC, will protect the amount of open space along the ridgeline, and will create a community forest. There are no documented occurrences of endangered or threatened plant or wildlife species on the subject site. There is one wetland site per the National Wetland Inventory, which will be better protected from future development under the proposed Parks and Open Space designation than the existing Low Density Residential designation. THNA Park will conserve forestland through a community demonstration forest, and the Regional Park designation will protect the scenic quality of the hillside. Based on these findings, the proposed Amendments are consistent with the Environmental Resources Element.

Open Space

- C.21 When planning for and regulating development, local governments shall consider the need for protection of open spaces, including those characterized by significant vegetation and wildlife. Means of protecting open space include but are not limited to outright acquisition, conservation easements, planned unit development ordinances, streamside protection ordinances, open space tax deferrals, donations to the public, and performance zoning.

Willamalane currently manages approximately 783 acres of land in 37 parks and three undeveloped properties, including two parks classified as Natural Area Parks. 'Environment' and 'Stewardship' are two of Willamalane's Core Values (2012 Plan, p. 8), and the 2012 Plan is guiding the proposed development of THNA Park. One of the "General Parks and Natural Areas Strategies" in the 2012 Plan that is applicable to the proposed park and supports the policies in the Environmental Resources Element of the Metro Plan is as follows.

'A7 Work with interested parties to acquire and preserve natural areas for future generations.' (2012 Plan, p. 27)

In addition, four 'Natural Area Park Strategies' in the 2012 Plan that will be applied to THNA Park support the goals and policies in the Environmental Resources Element of the Metro Plan.

- 'A39 Acquire and develop a system of natural-area parks that protects, conserves and enhances elements of the natural and historic landscape that give the region its unique sense of place' (2012 Plan, p. 39)*
- 'A40 Develop comprehensive natural resource management plans for natural areas as a basis for making acquisition, development and restoration decisions.' (2012 Plan, p. 39)*
- 'A41. Provide opportunities for nature-based recreation, such as wildlife viewing, fishing, hiking, bicycling, nature play, etc.' (2012 Plan, p. 39)*
- 'A42 Protect and enhance a variety of habitat types within Willamalane's park and open space system, including upland and wildlife communities such as oak savannah, wetlands, upland prairie and riparian forest.' (2012 Plan, p. 39)*

These strategies are applicable to the proposed Amendments and subsequent park development. The park will be public regional open space, and will preserve vegetation and wildlife through trailheads, trails, and a community demonstration forest. The proposed Amendments singlehandedly facilitate the project's development, which is inherently open space protection by designation. Based on these findings, the proposed Amendments are consistent with the Environmental Resources Element of the Metro Plan.

Environmental Design Element

- E 1 In order to promote the greatest possible degree of diversity, a broad variety of commercial, residential, and recreational land uses shall be encouraged when consistent with other planning policies.*
- E 2 Natural vegetation, natural water features, and drainage-ways shall be protected and retained to the maximum extent practical. Landscaping shall be utilized to enhance those natural features. This policy does not preclude increasing their conveyance capacity in an environmentally responsible manner.*
- E 5 Carefully develop sites that provide visual diversity to the urban area and optimize their visual and personal accessibility to residents.*

The Environmental Design Element of the Metro Plan sets broad goals and policies for desired qualities of life in the Eugene-Springfield area. The proposed Amendments promote diversity by increasing the amount of recreational land use in Springfield, and have the potential to offer the first mountain biking recreational area in the city. In addition, by converting land zoned Low Density Residential to Parks and Open Space, natural vegetation can be protected and retained to the maximum extent practical. The core use of the Natural Park as defined by Willamalane is for

'wildlife habitat and natural resource conservation,' with an 80.20 split in land designated for preservation versus land for recreation. Preserved from development, the site can house a community forest, and the single wetland located within the site boundary can be protected. The proposed Amendments also enable visual diversity by creating a richer interface between the urban-rural boundary. Based on these findings, the proposed Amendments are consistent with the Environmental Design Element of the Metro Plan.

Transportation Element

Transportation System Improvements Roadways

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

Springfield's 2035 Transportation System Plan (TSP) identifies two potential future roadway projects in the vicinity of the subject site: R-45 and R-46. R-45 focuses on improvements within the Jasper-Natron area, and involves constructing multiple roadways between Bob Straub Parkway, Jasper Road, and Mt. Vernon Road. R-46 addresses Bob Straub Parkway to Mountaingate Drive and involves a new collector with a three-lane cross-section with sidewalks and bicycle facilities. The Springfield Conceptual Local Street Map shows several future local streets in the vicinity of the subject site. These future streets include an extension of a private road off of Weyerhaeuser Road, a connection between Mountaingate Drive and [South] 66th Street, and extensions and connections of Jessica Street and [South] 69th Street. Planned connections are also anticipated between Daisy Street, Glacier Street, and [South] 79th Street. Language included in Recital 16 of the MOU between Willamalane and City regarding the Thurston Hills Natural Area addresses future roadway and street projects. This language is included for reference:

16. Portions of the area included by Willamalane in the Thurston Hills Natural Area Park are identified for possible future roadway extensions in the City's adopted Conceptual Street Map. City acknowledges that all extensions depicted on the Conceptual Street Map may not be needed given that the Willamalane-owned property will not be developed for residential uses, but that an access for the connectivity and/or public safety purposes may be required as a condition of approval through the Metro Plan amendment and zone change process.

The annexation agreement between Willamalane and the City resulting from a separate request for Annexation application approval of Map 17-02-35-00 Lot 03602 will address future street extensions. Approval of the proposed Amendments will not disrupt roadway system improvements or the mobility and safety needs of motorists, transit users, bicyclists, pedestrians, and emergency vehicles.

Parks and Recreation Facilities Element

H 1 Develop a system of regional-metropolitan recreational activity areas based on a facilities plan for the metropolitan area that includes acquisition, development, and management programs. The Metro Plan and system should include reservoir and hill parks, the Willamette River Greenway, and other river corridors.

The Goal of the Parks and Recreation Facilities Element is to provide a variety of parks and recreation facilities to serve the diverse needs of the community's citizens (Metro Plan, III-H-4). The proposed Amendments are required to enable the acquisition of land for and development of a Regional Park, and to further satisfy the need for a larger parks inventory in Springfield. Based on

these findings, the proposed Amendment is consistent with the Parks and Recreation Facilities Element of the Metro Plan.

Citizen Involvement Element

K 2 Maintain and adequately fund a variety of programs and procedures for encouraging and providing opportunities for citizen involvement in metropolitan area planning issues. Such programs should provide for widespread citizen involvement, effective communication, access to technical information, and feedback mechanisms from policymakers.

The development of THNA Park has been characterized by citizen involvement from its inception to its implementation. The Willamalane Park and Recreation Comprehensive Plan was updated in 2012, using feedback from surveys, public events, and outreach activities. This feedback sparked the development of THNA Park and the project was listed in the 2012 Plan as a key area of development. Springfield-area voters approved Measure 20-199 in 2012, a \$20 million Willamalane Park and Recreation District Bond to further support the project and fund expansion of trails and preservation of parkland around hillsides, rivers, and streams. The Planning Commissions of both Springfield and Lane County will meet jointly to review the proposal and will accept public testimony on the proposal. Citizens will also have the opportunity to participate in the subsequent design process for amenities within THNA Park."

Finding 35: The adopted *Metro Plan* is the principal policy document that creates the broad framework for land use planning within the City of Springfield. The City's adopted Zoning Map implements the zoning designations of the *Metro Plan* diagram and localized Refinement Plans. The subject property is not within an adopted Refinement Plan area so the *Metro Plan* is the prevailing Comprehensive Plan for the site. The *Springfield 2030 Refinement Plan Residential Land Use and Housing Element* was adopted in 2011 as a refinement of the *Metro Plan*; any proposed amendment to the City's residential inventory must with this Springfield Comprehensive Plan element in addition to those of the *Metro Plan Residential Land Use Element*.

Finding 36: 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 and public agencies to initiate an amendment to the *Metro Plan* diagram to reflect a change in circumstances or need. The applicant is proposing to amend the *Metro Plan* designation for the subject property from LDR to Parks and Open Space, and to concurrently rezone the property from LDR and LMI to PLO. There are no conflicts created by this proposed diagram amendment based on needed residential land inventories and, according to the applicant's narrative, the proposed amendment addresses a deficit of public natural open space in the community. The development of this land with recreational uses does not significantly conflict with other land use elements in the *Metro Plan* including residential, commercial, industrial, or government and education. Therefore, Criteria B.1 has been met.

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

Applicant's Narrative: "The Springfield Comprehensive Plan is represented through the Metro Plan. All criteria for the Metro Plan have been met based on the preceding findings. The proposed Amendments are consistent with all applicable Metro Plan approval criteria."

ORDINANCE NO. 6373

Finding 37: As previously stated herein, the subject property is subject to the policies of the *Springfield 2030 Refinement Plan Residential Land Use and Housing Element*, which is an element of the Springfield Comprehensive Plan. The proposed amendment does not eliminate the surplus of LDR designated lands identified in that element, and therefore the proposed amendment is consistent with the Springfield Comprehensive Plan. Therefore, Criteria B.2 has been met.

Conclusion and Recommendation

Based on the applicant's narrative, the findings above, and the criteria of SDC 5.14-135 for approving amendments to the *Metro Plan*, staff finds the proposed *Metro Plan* diagram amendment from LDR to Parks and Open Space is consistent with these criteria. Accordingly, the Lane County and Springfield Planning Commissions unanimously adopted recommendations of support for the proposal on June 6, 2017, which are included herein as Attachment 7.