



# Oregon

Theodore R. Kulongoski, Governor

## Department of Land Conservation and Development

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### NOTICE OF ADOPTED AMENDMENT

June 28, 2006



TO: Subscribers to Notice of Adopted Plan  
or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: City of Springfield Plan Amendment  
DLCD File Number 003-06

The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. A copy of the adopted plan amendment is available for review at the DLCD office in Salem and the local government office.

Appeal Procedures\*

### **DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: July 14, 2006**

This amendment was submitted to DLCD for review 45 days prior to adoption. Pursuant to ORS 197.830 (2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

**\*NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE ABOVE DATE SPECIFIED.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist  
Marguerite Nabeta, DLCD Regional Representative  
Colin Stephens, City of Springfield

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**D L C D NOTICE OF ADOPTION**

This form must be mailed to DLCD within 5 working days after the final decision  
per ORS 197.610, OAR Chapter 660 - Division 18

(See reverse side for submittal requirements)

**DEPT OF**

**JUN 26 2006**

**LAND CONSERVATION  
AND DEVELOPMENT**

Jurisdiction: City of Springfield Local File No.: ZON2006-00003  
(If no number, use none)

Date of Adoption: June 19, 2006 Date Mailed: June 23, 2006  
(Must be filled in) (Date mailed or sent to DLCD)

Date the Notice of Proposed Amendment was mailed to DLCD: February 17, 2006

- Comprehensive Plan Text Amendment
- Comprehensive Plan Map Amendment
- Land Use Regulation Amendment
- Zoning Map Amendment
- New Land Use Regulation
- Other: \_\_\_\_\_  
(Please Specify Type of Action)

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached."

Rezoned 2.8 acres of Community Commercial (CC) designated property to  
Medical Services (MS).

Describe how the adopted amendment differs from the proposed amendment. If it is the same, write "Same." If you did not give notice for the proposed amendment, write "N/A."

"SAME"

Plan Map Changed from : \_\_\_\_\_ to \_\_\_\_\_

Zone Map Changed from: Community Commercial (CC) to Medical Services (MS)

Location: Gateway Area of North Springfield Acres Involved: 2.8

Specify Density: Previous: 10-20 du/acre New: 0 du/acre

Applicable Statewide Planning Goals: 9, 10, 11, 12

Was an Exception Adopted? Yes: \_\_\_\_\_ No: XX

DLCD File No.: 003-06 (15024)



ORDINANCE NO. 6175

AN ORDINANCE REZONING 3.5 ACRES OF LAND FROM MEDIUM DENSITY RESIDENTIAL TO MEDICAL SERVICES IN ACCORDANCE WITH THE METRO PLAN DIAGRAM (LRP2006-00003).

WHEREAS,

The City Council of the City of Springfield finds that:

- A. Article 12 of the Springfield Development Code sets forth criteria for amending the Springfield Zoning Map; and
- B. An application for a zone change (ZON2006-00003) was submitted on February 3, 2006 and was in conformance with the provisions of Section 3.050 of the Springfield Development Code; and
- C. Timely and sufficient notice of the public hearing, pursuant to Section 14.030 of the Springfield Development Code was provided; and
- D. On May 2, 2006, a public hearing on the application was convened and concluded before the Springfield Planning Commission;
- E. The Springfield Planning voted four in favor, one opposed to forward a recommendation of approval to the City Council; and
- F. June 5, 2006, a public hearing on the application was convened and concluded before the Springfield City Council; and
- G. The City Council voted to approve the ordinance <sup>above</sup> and ~~declaring an emergency~~; and
- H. The Development Services staff notes, including criteria of approval, findings, and recommendations, together with the testimony and submittals of those persons testifying at the hearing or in writing, have been considered and are part of the record of the proceeding; and
- I. Evidence exists within the record and the findings attached hereto that the proposal meets the requirements of Article 12 of the Springfield Development Code.

NOW, THEREFORE, THE CITY OF SPRINGFIELD DOES ORDAIN AS FOLLOWS:

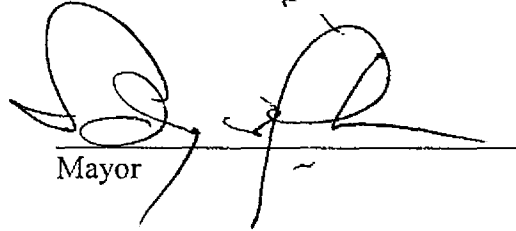
Section 1: The above findings (A through I), and the findings set forth in Exhibit A attached hereto and incorporated herein by reference are hereby adopted in support of the rezoning.

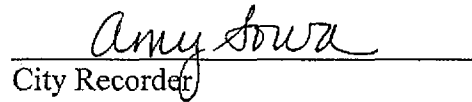
Section 2: The City of Springfield Zoning Map is hereby amended to change the zone of the property described in Exhibit B of this ordinance from Medium Density Residential to Medical Services subject to the following condition of approval:

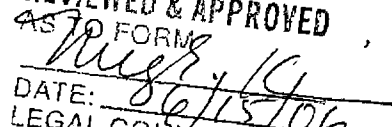
Section 3: If any section, subsection, sentence, clause, phrase, or portion of this Ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, that portion shall be deemed a separate, distinct and independent provision and that holding shall not affect the validity of the remaining portions of this Ordinance.

ADOPTED by the Common Council of the City of Springfield by a vote of 5  
For and 0 against on this 19<sup>th</sup> day of June, 2006. (1 Absent - Fitch)

Attest:

  
\_\_\_\_\_  
Mayor

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

REVIEWED & APPROVED  
AS TO FORM  
  
DATE: 6/15/06  
LEGAL COUNSEL

# Exhibit A

## Zone Map Amendment Findings of Fact (ZON 2006-00003)

### Approval Criteria

The following demonstrates conformance to applicable criteria for zone changes in SDC 12.030(3) and supports the requested zone change from MDR to Medical Services (MS).

#### 12.030(3)(a)

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

The City of Springfield City Council approved an amendment to the Metro Plan Diagram on January 10, 2005, which redesignated 43.9 acres of land on the RiverBend site from MDR to CC and 49.5 acres from MDR to MU. The City also concurrently approved redesignation for this same acreage to CC and MU on the GRP Diagram. On March 21, 2005 concurrent with approval of the original RiverBend Master Plan, the City Council approved zone changes corresponding to the areas redesignated, rezoning to Medical Services (area designated CC) and Mixed Use Commercial (area designated MU).

The Applicant now seeks concurrent approvals to amend the RiverBend Master Plan, redesignate 3.5 acres from MDR to CC, and rezone that same acreage to the Medical Services zoning district. Assuming Council approval of the redesignation of the subject area to CC on the Metro Plan diagram, the proposed zone change is consistent with the subject area's land use designations on the Metro Plan and Gateway Refinement Plan diagrams. The proposal's consistency with applicable Metro Plan policies is outlined below.

#### **Plan Principles**

Findings are made for the applicable policies and not the goals and objectives because the policies embody the intent of the goals and objectives of the Plan. The policies serve as the standard to evaluate planning proposals to ensure compliance the Plan.

#### **B. Growth Management**

**Policy 1**      *The urban growth boundary and sequential development shall continue to be implemented as an essential means to achieve compact urban growth. The provision of all urban services shall be concentrated inside the urban growth boundary. (pg. II-B-3)*

**Policy 9**      *A full range of key urban facilities and service shall be provided to urban areas according to demonstrated need and budgetary priorities. (Pg. II-B-4)*

The subject area is located inside the Springfield UGB and within the city limits. PeaceHealth through its annexation agreement with the City for the original RiverBend site, as well as through annexation agreement inherited that governs the subject area, is obligated to contribute a significant amount of money for off-site and on-site improvements to ensure that adequate public services and facilities will be available to

## Exhibit A

serve future development. As identified in the concurrently submitted Master Plan amendment and as required by the SDC, all required urban services will be provided prior to development through the Site Plan Review/Modification process.

**Policy 24** *To accomplish the fundamental principle of compact urban growth addressed in the text and on the diagram, overall metropolitan-wide density of new residential construction but not necessarily each project, shall average six dwelling units per gross acre over the planning period.*  
(Pg. II-B-7)

Future residential construction proposed through the RiverBend Master Plan on the portions of the site will remain within the density range allowed for the MDR zoning district (i.e., greater than 10 dwelling units to 20 d.u. per gross acre). Portions of Tax Lot 100 not rezoned will retain MDR zoning and be subject to this same density range. The proposed zone change promotes compact urban form by allowing a nominal area to be included in the MS zone for the efficient design and construction of structured parking and medical buildings needed to support the planned medical center, while still allowing the opportunity for housing to be developed.

### **E. The Plan Diagram**

#### **2. Commercial**

##### **(b) Community Commercial Centers**

*"This category includes more commercial activities than neighboring commercial, but less than major retail centers. Such areas usually develop around small department store and supermarket. The development occupies at least 5.0 acres and normally not more than 40 acres. This category contains such general activities as retail stores, personal services, financial, insurance and real estate offices, private recreational facilities, such as movie theaters and tourist related facilities such as motels. When this category is shown next to medium or high density residential, the two can be integrated into a single overall complex, local regulations permitting." (Pg. II-E-4)*

SDC Article 22 establishes a relationship between MS zoning and the CC Plan designation and sets locational criteria as to where the MS zone can be applied. Because the MS district implements the CC designation and this district is expressly intended to provide for development and expansion of hospitals and associated medical facilities, the proposed zone change is consistent with the CC designation. Code also requires that these facilities be developed comprehensively (e.g., through the master plan process); therefore, the inclusion of the subject property in the RiverBend Master Plan is consistent with the above language for including property in the CC designation and MS zoning district.

An area is deemed suitable for hospital development through application of the MS zoning district by conformance to locational provisions outlined in SDC 22.010(3). The additional 3.5 acres proposed for MS zoning abuts RiverBend Drive, which is classified as a collector street and therefore consistent with this Code provision. The Code was

## Exhibit A

adopted by the City Council and acknowledge by DLCD as being in conformance with the Metro Plan policies, statewide planning goals, and applicable statutes and administrative rules. PeaceHealth's proposal retains MDR land use designation on the subject tax lot outside of the 3.5-acres needed for parking facilities, with ample land available to meet densities identified in the Residential Lands Study.

Therefore, the use of CC designated land for MS zoning complies with the above provision in the Metro Plan.

### Plan Elements

#### A. Residential Land Use and Housing Element

**Policy A.1** *Encourage the consolidation of residentially zoned parcels to facilitate more options for development and redevelopment of such parcels. (Pg. III-A-6)*

The subject area proposed for rezoning is part of a larger 11.5-acre parcel that was not in PeaceHealth's ownership when the RiverBend Master Plan was originally approved by the City Council. The consolidation of property ownership allows the Applicant to bring into the Master Plan a nominal area needed for efficient layout and development of parking and medical office components needed for the medical center, while still allowing for future development of residentially zoned areas at densities required by Code and the Gateway Refinement Plan.

**Policy A.2** *Residentially designated land within the UGB should be zoned consistent with the Metro Plan and applicable plans and policies; however, existing agricultural zoning may be continued within the area between the city limits and the UGB until rezoned for urban uses. (Pg. III-A-6)*

Approving the requested zone change, along with the concurrent request for redesignation on the Metro Plan and GRP diagrams, would leave the subject area zoned consistent with its land use designation.

**Policy 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. (Pg. III-A-6)*

The Eugene Springfield Metropolitan Area Residential Land and Housing Study Policy Recommendation Report (RLS), dated August 1999, was prepared as a periodic review task and acknowledge by DLCD. The report concluded that the area has a surplus of 3,646 MDR designated units through the planning horizon. There is approximately 828 acres of MDR designated land with a demand of 589 acres, leaving a surplus of 239 acres. Prior zone change approvals (for 43.1 acres from MDR to MUC and 43.9 acres from MDR to MS) at RiverBend left a surplus of approximately 1,584 MDR designated units and 152 acres through the planning horizon (the surplus of housing is based on a ratio of 16 units per flat buildable acre, which is consistent with the ratio used in the RLS).



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In addition, the surplus identified in the RLS does not include any density allocations to land in Springfield that may be developed subject to provisions of SDC Article 27 (Floodplain Development Overlay Zone). Nor does it account for potential housing in other land use designations and/or in nodal development areas. Nor did the RLS include approximately 20 acres of land owned by PeaceHealth in Eugene zoned R-2, but designated High Density Residential (this oversight has been acknowledged by Lane Council of Governments and submitted into the record during the public hearing process for the prior adopted Metro Plan and Refinement Plan amendments.). If this additional area not included in the RLS were factored in to the supply calculation, then the existing surplus of needed residential housing would be higher still. Consequently, the zone map amendment, being consistent with the Metro Plan and GRP, will not affect the City's ability to provide an adequate supply of housing.

**Policy A.8** *Require development to pay the cost, as determined by the local jurisdiction, of extending public services and infrastructure. The cities shall examine ways to provide subsidies or incentives for providing infrastructure that support affordable housing and/or higher density housing. (Pg. III-A-6)*

Through its annexation agreement with the City for the 160-acre RiverBend site, PeaceHealth is obligated to contribute a significant amount of money for off-site and on-site improvements (e.g., nearly \$2 million worth of right-of-way through the site for the MLK Parkway extension, \$2.75 million toward MLK road construction, and \$600,000 toward the construction of a sanitary sewer trunk line within the MLK right-of-way). Additional cost burdens are ascribed through the annexation agreement for the 11.5-acre parent parcel to the area subject to this zone change request. The extension of utilities and other costs borne by the Applicant to serve future development as required under these agreements demonstrates compliance with the above policy.

**Policy A.11** *Generally locate higher density residential development near employment of commercial services in proximity to major transportation systems or within transportation-efficient nodes. (Pg. III-A-8)*

Approval of the proposed zone change will allow for efficient development of the medical center as an employment hub integrated with other commercial services and transit-supported developments along the extended RiverBend Drive, while retaining higher density residential opportunities on the remaining MDR-zoned portions of the site, consistent with this policy.

**Policy A.12** *Coordinate higher density residential development with the provision of adequate infrastructure and services, open space, and other urban amenities. (Pg. III-A-8)*

The area proposed for rezoning was annexed into the City of Springfield. The annexation agreement governing the site and the inclusion of the area subject to zone change into the RiverBend Master Plan (as well as requirement that the remainder of the affected tax lot outside of the proposed rezone be master planned) ensures that adequate level of infrastructure and services needed to serve future development will be provided. The concurrently proposed amendment to the RiverBend Master Plan calls for extension of

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roadways needed to serve the proposed medical center. Utilities needed to serve the subject area are provided as identified on the amended Master Plan. The proposed zone change still allows for open space and public access to the McKenzie River as approved in the Master Plan, consistent with the above policy and GRP Implementation Action 13.4.

**Policy A.13** *Increase overall residential density in the metropolitan area by creating more opportunity for effectively designed in-fill, redevelopment, and mixed use while considering impacts of increased residential density on historic, existing and future neighborhoods. (Pg. III-A-8)*

The proposed change of zone creates an opportunity for more efficiently and effectively designing a suitable mix of uses on the RiverBend campus by allowing for more concentrated medical center development and use of structured parking, particularly within the area subject to rezoning. The zone change does not eliminate the ability to otherwise provide for a robust mix of uses (i.e., medical, office, residential and appropriately scaled commercial retail use) that will serve existing and future neighborhoods in the Gateway area.

**Policy A.22** *Expand opportunities for a mix of uses in newly developing areas and existing neighborhoods through local zoning and development regulations. (Pg. III-A-10)*

This zone change will allow a properly designed mix of uses on the entire RiverBend campus, while effectively providing space for structured parking needed by the medical center. Even with the proposed rezoning, the amended RiverBend Master Plan retains suitable acreage for a mix of uses that are not otherwise permitted under solely MDR zoning.

### B. Economic Element

**Policy 1** *Demonstrate a positive interest in existing and new industries, especially those providing above average wage and salary levels, an increased in variety of job opportunities, a rise in the standard of living, and utilization of our existing comparative advantage in the level of education and skill of the resident labor force.*

Approving MS zoning for the nominal area proposed demonstrates support for the medical center under construction, as well as other uses allowed through the RiverBend Master Plan. Planned medical uses provide above average wage and salary levels and increase job opportunities not only in the Gateway area, but also to all of the Eugene-Springfield metropolitan area and beyond. This strengthens the region's competitive advantage with state-of-the-art healthcare facilities, provides considerable economic benefit to the local labor pool, and leverages local skills and educational offerings.

**Policy 3** *Encourage local residents to develop job skills and other educational attributes that will enable them to fill existing job opportunities.*

The development enabled by the requested zone change will provide needed support facilities to the medical center, which will in turn improve and diversify the metropolitan

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area economy by providing a mix of uses and various employment opportunities. The development will directly employ the resident labor force in a variety of skilled, semi-skilled, and unskilled positions, through the construction phase and subsequently throughout the life of the planned medical center.

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

The proposed zone change would add 3.5 acres to the inventory of needed commercial lands identified in the City's adopted Commercial Lands Study. Insofar as the SCLS identified a deficit of commercially zoned land, approval of the requested zone change would help reduce that deficit.

**Policy 11**      *Encourage economic activities, which strengthen the metropolitan area's position as a regional distribution, trade, health and service center.*

This zone change is consistent with the above policy by helping achieve PeaceHealth's master planning objectives and thereby furthering Springfield's contribution to the region's healthcare service delivery system. The approval demonstrates positive interest in expanding employment in the existing local medical services industry, which tends to offer higher employment income. SHMC is the regional medical center for a multi-county region, but the Hilyard site cannot accommodate existing demands much less growth needs and the needs of expanding medical technologies. The dual campus concept and development of a new acute care hospital and trauma center at RiverBend strengthens the metropolitan area's position as the center of the region's health care service delivery system.

**Policy 22**      *Review local ordinances and revise them to promote greater flexibility for promoting appropriate commercial development in residential neighborhoods.*

This zone change request is made in direct compliance with Policy 22 and is made for the purpose outlined above. The change of MDR to MS will allow for flexibility in arranging needed medical office buildings and parking facilities, including structured parking in the area proposed for rezoning, and thereby supporting appropriate medical and mixed use commercial uses outlined in the RiverBend Master Plan that will serve existing and future residential neighborhoods. In addition, SDC 22.010(3) requires the MS district be applied on sites that have access to a collector or arterial street where Community Commercial, Major Retail Commercial, or Mixed Use Metro Plan designations exist. The MS District through the provisions of SDC is appropriate for the CC designation. The CC designation also allows for integration with MDR "into a single overall complex", thereby allowing uses permitted in the MS zoning district to be appropriately mixed with residential neighborhoods, also integrating the mix of uses allowed in the MUC zone into a single master planned development area.

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### C. Environmental Resources Element

**Policy 1**      *Springfield, Lane County and Eugene shall consider downstream impacts when planning for urbanization, flood control, urban storm water runoff, recreation, and water quality along the Willamette and McKenzie Rivers.*

The City's urbanization, flood control, storm water, recreation and water quality provisions referenced by this policy are implemented through the City's various standards in the SDC. Consequently, when development of the site is proposed, all such development must comply with the SDC provisions implementing the referenced elements. However, it should be noted that the annexation agreement for the subject site and for the original Master Plan area obligates PeaceHealth to develop in accordance with state-of-the-art storm water quality measures to protect surface and groundwater quality by adequately managing and treating storm water runoff from the development site. PeaceHealth has prepared a storm water management plan, which includes all the Best Management Practices and requirements of the City to ensure water quality is preserved. PeaceHealth will comply with all applicable policies and regulations in the SDC that address water quality and uses along McKenzie River.

**Policy 2**      *Except as otherwise allowed according to FEMA regulations, development shall be prohibited in floodways if it could result in an increased flood level. The floodway is the channel of a river or other watercourse and the adjacent land area that must be reserved to discharge a one-percent-chance flood in any given year*

No portion of the area subject to the proposed rezone is located within the FEMA floodway. While Policy 2 is not relevant to the proposal, the RiverBend Master Plan has previously demonstrated compliance with the above policy by not locating any development within the floodway other than portions of a required multi-use riverside trail.

**Policy 20**      *Positive steps shall be taken to protect the Springfield municipal groundwater supplies along the McKenzie River and the middle fork of the Willamette River.*

Because the subject area is within the 2-5 year TOTZ for the Springfield Utility Board's Sports Way wellfield, future development within the proposed rezone area will be required to demonstrate consistency with applicable standards in SDC Article 17.

**Policy 24**      *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." (pg. III-C-10)*

The City's approval of the original RiverBend Master Plan took into account conservation of open spaces, particularly areas of significant vegetation and wildlife

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value - such as the Douglas fir grove identified on the City's Goal 5 inventory and the McKenzie River riparian area. However, the proposed zone change and concurrently submitted amendments to the RiverBend Master Plan have no effect on any of these significant vegetation or open space areas, or on previously approved plans to conserve and enhance these areas.

The area proposed for rezoning includes a remnant filbert orchard. Nuts are harvested from this orchard, but given its small size, isolated location, potential for contraction of Eastern filbert blight, it does not have long-term viability as a commercial orchard and minimal value as an open space buffer or amenity. Therefore, although the Gateway Refinement Plan's Natural Assets policy (GRP Policy 8.3) calls for the City to "encourage" retention of such orchards as open space amenities, this small remnant orchard may ultimately be removed to accommodate the needed Medical Services uses allowed under the proposed zone change.

Because the proposal does not affect any Goal 5 resources or areas identified as Natural Assets in the GRP, the requested zone change does not affect compliance with the above Metro Plan policy, the GRP, or obligations in PeaceHealth's annexation agreement with the City to protect and enhance the river's riparian corridor.

### **D. Willamette Greenway, River Corridors, and Waterway Element**

**Policy 2**      *Land use regulations and acquisition programs along river corridors and waterways shall take into account all the concerns and needs of the community; including recreation, resource and wildlife protection; enhancement of river corridor and waterway environments; potential for supporting nonautomobile transportation; opportunities for residential development; and other compatible uses.*

Because the proposed zone change is distant from river corridors and waterways and does not affect plans to protect and enhance the riverfront included in the prior approved Master Plan, the proposed zone change does not change any of the regulations that implement the Metro Plan or GRP, or affect the RiverBend project's compliance with the above policy.

**Policy 5**      *New development that locates along river corridors and waterways shall be limited to uses that area compatible with natural, scenic and environmental qualities of those water features." (pg. III-D-4)*

The area subject to the proposed rezone is not located along river corridors or waterways, so the above policy is not applicable to the requested zone change. Moreover, any development as a result of this application will proceed through a thorough site plan review process to determine issues such as compatibility and protection of environmental qualities.

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### E. Environmental Design Element

**Policy 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. (pg. III-E-3)*

The zone change increases a nominal amount of MS-zoned area that will be incorporated into the RiverBend Master Plan. Insofar as City previously approved the Master Plan, which includes a variety of commercial, residential and other land uses and was demonstrated to be consistent with the above and other planning policies, the proposed rezone does not affect that previously established conformance with applicable policies.

### F. Transportation Element

#### Land Use Policies

**Policy F.1** *Apply the nodal development strategy in areas selected by each jurisdiction that have identified potential for this type of transportation-efficient land use pattern. (pg. III-F-4)*

Although the City did not apply the Nodal Development land use designation to the RiverBend site, the mix of uses and other provisions approved in the RiverBend Master Plan are consistent with the nodal development strategy. The request to include an additional 3.5-acres in the MS-zoned portion of the Master Plan area facilitates the development of structured parking, and a more transportation-efficient land use pattern as called for in the above policy.

**Policy F.3** *Provide for transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium and high density residential development within ¼ mile of transit stations; major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit. (Pg. III-F-5)*

**Policy F.4** *Require improvements that encourage transit, bicycle, and pedestrian in new commercial, public, mixed use, and multi unit residential. (Pg. III-F-5)*

The proposed zone change and concurrent amendments to the approved RiverBend Master Plan enable the development of transit-supportive land use patterns and development by establishing RiverBend Drive as a major transit corridor, with a mix of intensive uses at transit-supportive densities on the site and within a ¼-mile of planned transit stations, consistent with the above policies.

#### Transportation Demand Management (TDM) Policies

The TDM policies outline on page III-F-6 of the Metro Plan are in place to create a management and implementation system for the Metro area that reduces the reliance on the automobile and the need for capital expenditure on transportation systems and to

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reduce the strain on road capacity. Developing nodal development areas throughout the Metro area is one of the approaches of supporting TDM policies and implementation goals. The subject site is located within potential nodal development area 7B in TransPlan. GRP Implementation Action 13.6 requires identification of nodal development areas as part of the master plan process, if adopted prior to the City's own process for assessing and implementing nodal development, to ensure requirements of nodal development as outlined in the Metro Plan are satisfied. PeaceHealth has identified in the approved RiverBend Master Plan the ability to comply with nodal development objectives. The Master Plan also includes a comprehensive TDM Plan intended to extend PeaceHealth's aggressive TDM program to the RiverBend campus.

The proposed zone change enhances the ability for the Master Plan to effectively incorporate structured parking and a more efficient arrangement of planned medical uses integrated with a mix of other uses and transportation systems serving all modes of travel, and is therefore consistent with these policies. Specific issues of transportation connectivity and modes of traffic movement are germane to the review process for the concurrently submitted Master Plan amendment.

### **G. Public Facilities and Service Element**

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

The subject area is located in Springfield's UGB. PeaceHealth, through its annexation agreement, is obligated to contribute a significant amount of money for off-site and on-site improvements consistent with the Metro Plan. The approved RiverBend Master Plan otherwise established how urban services would be established and extended to serve proposed development. The concurrently submitted Master Plan and proposed zone change does not affect the ability to provide needed services, and all the required urban services shall be provided prior to or at the time of development as required through the Site Plan Review process.

The remaining policies outlined under the Public Facilities and Service Element pertain to locating utilities (e.g., storm water lines, wastewater lines), modification to projects listed in the Public Facilities Services Plan, administrative guidelines to plan for large facilities (e.g., hospitals), and services development within the urban growth boundary. These policies are more germane to, and were met through the review of the previously approved master plan. Although the amended Master Plan under concurrent review with this rezone request modifies the location of certain utilities, neither the Master Plan amendments nor the proposed zone change affect compliance with the above policy.

### **H. Parks and Recreation Facilities Element**

Nothing in this application is in conflict with any aspect or policy of the Parks and Recreation Facilities Element.

# Exhibit A

## I. Historic Preservation Element

**Policy 1** *Adopt and implement historic preservation policies, regulations and incentive programs that encourage the inventory, preservation, and restoration of structures; landmarks; sites; and areas of cultural, historic, or archeological significance, consistent with overall policies (pg III-I-2)*

This policy is directed at the obligation of the City, rather than individual applicants. However, cultural and archaeological investigations of the subject site by qualified professionals did not identify any significant Goal 5 historic resources, or structures or sites inventoried by the City of Springfield.

## J. Energy Element

Nothing in this application is in conflict with any aspect or policy of the Energy Element.

### SDC 12.030(3)(b)

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

On January 10, 2005, the City of Springfield City Council approved amendments to the Gateway Refinement Plan (GRP) diagram and text (and Metro Plan diagram), and to the text of the Springfield Commercial Lands Study, pertaining to portions of the 158-acre RiverBend Master Plan area. Consistent with applicable GRP policies, the plan diagram amendment allowed for rezoning of up to 49.5 acres on the Mixed Use designated portion of the site to Mixed Use Commercial, and rezoning of 43.9 acres on the Community Commercial (CC)- designated part of the site to Medical Services (MS). On March 21, 2005, the City Council approved the implementation of applicable GRP policies and implementation actions by rezoning 43.1 acres to MUC and 43.9 acres to MS, consistent with the GRP diagram and text (and Metro Plan diagram).

The proposed zone change for 3.5 acres to MS is consistent with the GRP designation for this same acreage, presuming City Council approval of the concurrently submitted application to amend the Metro Plan and GRP diagrams for this acreage to CC.



# Exhibit A

## *Gateway Refinement Plan*

### **Residential Element**

**Policy 12.0.** *Allow rezoning of land within the “McKenzie-Gateway MDR site” to Medical Services (“MS”) on land designated Community Commercial or Mixed Use on the Metro Plan diagram, and rezoning to Mixed Use Commercial (MUC) on land designated Mixed Use on the Metro Plan diagram as implemented during Master Plan and/or during City’s nodal implementation project.*

This policy specifically allows medical services uses and MS zoning on land designated CC. Approval of the requested zone change and concurrently submitted Plan diagram Master Plan amendments implements the above policy by applying the MS zone consistent with this policy.

**Implementation Action 12.1** *Redesignation of a total of 99 acres of land within the McKenzie/Gateway MDR site to Community Commercial and/or Mixed Use through the Metro Plan amendment process shall be allowed and shall be implemented by application of Mixed Use Commercial (“MUC”) or Medical Services (“MS”) zoning district through the Master Plan approval and/or during the City’s nodal implementation process.*

Approval of the requested rezone of 3.5-acres to Medical Services, combined with the other MS-zoned acreage on-site, results in a total of 47.4 acres of MS-zoned area within the McKenzie/Gateway MDR site. Adding the 43.1 acres of MUC-zoned acreage, the non-residentially zoned acreage on the amended RiverBend Master Plan area totals 90.5 acres, consistent with the limitation in the above policy.

**Implementation Action 12.4** *In addition to all applicable standards and provisions regulating development in Springfield, any development adjacent to McKenzie River or McKenzie River riparian setback shall provide public access to McKenzie River or McKenzie River riparian setback. Surface parking areas shall not be visible from the McKenzie River corridor and shall be screened from public streets.”*

PeaceHealth’s previously approved Master Plan demonstrated compliance with the above action by providing access to the river through an on-site trail system that will connect to on-street bike and pedestrian ways. The requested zone change and concurrent Master Plan amendment do not affect the prior approved Plan’s conformance to the above policy.

## Exhibit A

**Implementation Action 12.6**      *Within the city limits at the McKenzie-Gateway MDR Site, the Medical Services ("MS") zoning district shall implement the Community Commercial designation if part of an approved Master Plan for development of a major medical facility. The adopted Master Plan shall demonstrate that the subject property will be able to accommodate the number of housing units within the range for the MDR land use designation in the Metro Plan and Gateway Refinement Plan. In addition to meeting the standards of the SDC, at the time of master plan approval, the City Council may attach specific conditions on all development within the MS or MUC zones including but not limited to building height and setbacks.*

The area proposed for rezoning is within the City limits and is being included in the RiverBend Master Plan and CC land use designation, as identified in the concurrently submitted Master Plan amendment and Plan diagram amendment. Approval of the proposed zone change still allows for development of a suitable number of housing units at required MDR densities, as established in the original Master Plan approval.

### Commercial Element

**Policy 5**      *Provide for future appropriately planned Mixed Use, Community Commercial and nodal development designated areas east of Game Farm Road, within the City Limits at the McKenzie-Gateway MDR site as identified in TransPlan as potential nodal development sites."*

Consistent with the above policy, the proposed MS zoning will implement the Community Commercial designation requested concurrently for the same subject 3.5 acres, which is located east of Game Farm Road and within the Springfield city limits in the McKenzie-Gateway MDR site.

**Implementation Action 5.1**      *Rezoning of land within the city limits at the McKenzie-Gateway MDR site to Mixed Use Commercial ("MUC") and Medical Services ("MS") shall be allowed to implement the Mixed use and/or Community Commercial plan designations. Zone changes shall demonstrate the ability to meet the demand for commercial lands identified in the Springfield Commercial Lands Study (SCLS) policy 1-B. Commercial uses allowed in zoning districts pursuant to GRP Policy 5.0 above shall be subject to Master Plan approval and shall be planned in a manner to minimize traffic, noise, and lighting conflicts with adjacent residential uses.*

The adopted SCLS identified a deficit of at least 158 acres of commercial lands needed to meet demand through the year 2015. Prior approval of redesignation and rezoning at the

## **Exhibit A**

RiverBend site reduced, but did not eliminate that deficit. SCLS Policy I-B allowed for the designation of “up to 99 acres of Community Commercial and Mixed Use in the McKenzie-Gateway Subarea within the City of Springfield to accommodate a transit supported mix of uses including residential, commercial and regional health service uses.” Approval of the requested rezoning for 3.5 acres within the City limits in the McKenzie-Gateway subarea, concurrently with the requested redesignation for this same acreage and amendment to the RiverBend Master Plan, is consistent with the above GRP policy and SCLS policy. The combined acreage redesignated and rezoned on the RiverBend site remains less than 99 acres, yet will help further reduce the City’s deficit of needed commercial lands. Approval of the proposed zone change will also support the development of a mix of uses on the RiverBend campus, including regional health center uses, as part of an approved Master Plan, also consistent with applicable GRP and SCLS policies.

### **Industrial Element**

Nothing in this application is in conflict with any aspect or policy of the Industrial Element.

### **Natural Assets, Open Space/Scenic Areas and Recreation Element**

The approved RiverBend Master Plan is predicated on the establishing a healing and wellness community, and not solely the development of a hospital building. Even though there are no Natural Assets identified in the GRP located on the proposed zone change area, incorporation of this 3.5 acres into the RiverBend Master Plan along with other amendments to the Master Plan submitted concurrently does not alter the prior approved Master Plan’s consistency with the GRP’s Natural Assets Element.

### **Historic Resources Element**

Because there are no historic resources on the area subject to the proposed rezone as inventoried in the GRP or listed as significant Goal 5 historic resources, this section of the GRP is not relevant to the proposal.

### **Transportation Element**

Approval of the RiverBend Master Plan and associated Traffic Impact Analysis demonstrated the project’s consistency and planned future uses with goals and policies in the GRP Transportation Element. Consistent with the originally approved Master Plan and as required by the City (i.e, Conditions of Approval #34 and 35), the concurrently submitted Master Plan amendment includes extensions and an intersection of RiverBend Drive and St. Joseph Place. The 3.5-acre area proposed for rezoning is east of the RiverBend Drive extension and, as demonstrated in the amended Master Plan, the proposed parking facilities on the rezoned area do not result in any greater traffic impact than had been projected in the original Master Plan or additional trips beyond that allowed for Phase I development in the established trip cap. Therefore, the requested zone change is consistent with the GRP’s Transportation Element goals and policies.

## Exhibit A

Specific implementation of these policies through planned transportation improvements is reflected in the Master Plan amendment submittal.

### **Public Facilities Element**

PeaceHealth's annexation agreement and SDC provisions require the development of all necessary public infrastructure to support future development, which is assessed through the required master plan process – in this case review of the proposed Master Plan amendment. Nothing in this zone change application conflicts with any aspect, policy or implementation action of the Public Facilities Element in the GRP.

### *TransPlan*

The proposed zone change occurs in an area identified in the Trans Plan as Nodal Development Area 7B. The requested zone change from MDR to MS will enable PeaceHealth to proceed with implementation of the required Master Plan through an amendment to allow the efficient development of structured parking for the approved medical center. Consistent with the applicable goals and objectives of TransPlan, the proposed zone change, and amended Master Plan, reflect the continued provision of a mix of land uses, mass transit service, multi-modal transportation facilities, safe and efficient use of existing and proposed infrastructure, accessibility for the alter-abled, maintenance of established levels of service, and protection of the environment.

The area proposed for rezoning abuts an extension of RiverBend Drive, which is programmed for extension in TransPlan (Project #756), identified in the GRP, and required by PeaceHealth's annexation agreement with the City and in the original Master Plan approval (Conditions #34 and 35). The required extension of this roadway abutting the proposed rezone area is illustrated in the amended RiverBend Master Plan.

### *Springfield Commercial Lands Study*

LCDC acknowledged the Springfield Commercial Lands Study (SCLS) as the City's adopted plan demonstrating compliance with Statewide Planning Goal 9 (Economic Development). Table 3-8 on page 32 of the SCLS shows a deficit of 158 acres between the supply and demand for commercial land through the year 2015 planning horizon. Earlier approved zone changes on the RiverBend site reduced, but did not eliminate this deficit. Approval of the requested zone change will further reduce the identified deficit of needed commercial lands, and support the planned medical center consistent with other SCLS policies, and therefore Statewide Planning Goal 9, as outlined below.

**Policy 1-A**     *Maintain a mixed supply of large and small commercial sites through strategies such as rezoning or annexation to serve Springfield's future population.* (CLS, pg. 34)

The purpose of this application is to rezone 3.5 acres from MDR to MS, and add this same acreage to the RiverBend Master Plan and subdivision Lot 8, which includes the medical center under construction. Approval of the requested rezone would allow for efficient layout of medical buildings and structured parking on Lot 8, thereby creating a

## Exhibit A

suitably sized and configured site to accommodate the medical center on a lot zoned MS and designated Community Commercial (presuming approval of the concurrently submitted Metro Plan and GRP diagram amendments) consistent with the above policy.

**Policy 1-B**     *Ensure that an adequate amount of commercial land is designated in undeveloped identified nodes such as Jasper/Natron and McKenzie/Gateway to accommodate a portion of the demand for commercial acreage, and to implement the policies and objectives of the TransPlan.*  
(CLS, pg. 34)

Approval of the requested zone change, though only for 3.5 acres, will ensure that an adequate amount of commercially designated (and MS-zoned) land is available for efficient layout of medical office buildings and parking structures integral to the planned medical center. Consistent with the above SCLS policy and TransPlan policies, the rezone will support the mix of uses, including medical services, contained in the RiverBend Master Plan and required by earlier City Council Plan amendment approvals.

**Policy 3-A**     *Redesignate and rezone portions of industrial land or residential land within identified Employment Centers, Neighborhood Center, Commercial Center nodes to Mixed Use Commercial to Achieve the objectives of TransPlan, Transportation Planning Rule 12, and to incorporate higher intensity development in conjunction with residential and employment opportunities.”* (CLS, pg. 34)

PeaceHealth’s proposal, which would result in rezoning of only 3.5 acres from MDR to MS, yet will help provided space needed for structure parking to serve the planned medical center. The medical center will provide an employment center that supports and is complementary with residential and other mixed commercial uses on the RiverBend campus, consistent with the above policy.

**Implementation Strategy 1-B(2)**     *Consistent with the Gateway Refinement Plan and Metro Plan, designate up to 99 acres of Community Commercial and Mixed Use within the city limits at the McKenzie-Gateway MDR Subarea to accommodate a transit supported mix of uses including residential, commercial, employment and major health services uses.*

This application is consistent with the above by allowing a minor addition of 3.5 acres already in the Springfield city limits to the MS zone to accommodate parking facilities needed for the planned medical center. The concurrently submitted application to redesignate this same 3.5 acres to Community Commercial on the Metro Plan and GRP diagrams will result in less than 99 acres designated CC or MU, and a total of only 90.5 acres zoned MS or MUC in the GRP’s McKenzie-Gateway Subarea. The requested zone change facilitates medical center development, while still allowing for other medical and general office uses, small-scale commercial retail and support services, and residential uses outlined in the approved RiverBend Master Plan in a manner that efficiently utilizes nodal development strategies and is compatible with surrounding land uses.

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**Implementation Strategy 3A(1)** *Evaluate inventories based on demonstrated need for planning period. Initiate rezoning or resignation of surplus land uses where appropriate for commercial, consistent with the Metro Plan.* (CLS, pg. 36)

The Eugene-Springfield Residential Land Study concluded that the metropolitan area has a surplus of 3,646 MDR-designated units through the planning horizon. The request to change 3.5 acres of MDR to MS will still leave a surplus of residential dwelling units and acreage of available MDR land. Moreover, consistent with GRP policies (i.e., Residential Element Implementation Action 12.6) the approved RiverBend Master Plan was required to demonstrate that an adequate number of dwelling units will be provided to support MDR densities projected for the site in the metropolitan Residential Lands Study. Approval of the requested zone change of only 3.5 acres retains the existing surplus in the housing inventory, and the proposed amendments to the RiverBend Master Plan do not affect continued compliance with the above SCLS implementation strategy. Rather, consistent with the above policy, the rezoning would reduce the existing commercial lands deficit identified in the SCLS.

### *Springfield Development Code*

This application has been made in accordance with SDC Article 12, which governs the procedures and requirements for zoning district changes. Future development proposed as a result of this application will be consistent with Articles 22: *Medical Services District*, Article 27 *Floodplain Development Overlay Zone*, Article 37: *Master Plans*, and Article 17: *Drinking Water Overlay Zone*.

### **Article 22: Medical Services District**

The Medical Services District is designed to provide for hospital development and associated facilities. The proposed zone change will enable the efficient layout and development of parking and medical office facilities integral to the planned medical center, as illustrated on the concurrently submitted Master Plan amendment. SDC 22.010(3) outlines locational criteria as to where the MS zoning district can be applied. This code citation allows the MS district to be applied to sites on collector or arterial streets where Community Commercial, Major Retail Commercial, Mixed Use, Medium Density Residential or High Density Residential Metro Plan designations exist. As required by these locational standards, the proposed zone change will add 3.5 acres to the MS district in an area concurrently redesignated with the CC Plan designation. The subject area has frontage onto a collector street (the required extension of RiverBend Drive).

Code requires MS zoning to be applied to sites of three or more acres, and by including the 3.5 acres proposed for rezoning with the larger MS-zoned Lot 8 in the RiverBend Master Plan, this minimum site size requirement will be greatly exceeded. GRP text amendments previously adopted by the City acknowledge that the MS district is appropriate in the McKenzie-Gateway MDR site.

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### **Article 27: Floodplain Development Overlay Zone**

PeaceHealth completed analysis of pre-development and post-development conditions in the RiverBend area, and were required through the prior approved Master Plan to use a “worst case” of either the Corrected Effective Model floodplain elevations developed by PeaceHealth’s consultants, or the established FEMA floodplain elevations when determining the applicability of SDC Article 27. Because a portion of the area proposed for rezoning is within this “flood hazard boundary,” future development will be required to comply with requirements in Article 27.

### **Article 37: Master Plans**

The purpose of a master plan is to provide preliminary approval for an entire development area in relation to land uses, range of minimum to maximum potential intensities and densities, arrangement of uses, and the location of public facilities and transportation systems. In addition, it is to assure individual phases of a development will be coordinated. The proposed zone change incorporates the subject 3.5 acres into the amended RiverBend Master Plan to ensure the proposed uses in the MS zone are compatible with other surrounding uses and meet other requirements of Article 37, as illustrated in the concurrently submitted Master Plan amendment application.

### **Article 17: Drinking Water Protection Overlay Zone**

The primary objective of the DWP overlay zone is to ensure protection of groundwater resources. Because the subject area is within the 2-5 year Time of Travel Zone for the Springfield Utility Board’s Sports Way wellfield, future development will have to submit application demonstrating conformance to the applicable standards in SDC Article 17.

### **SDC 12.030(3)(c)**

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

PeaceHealth was obligated by its annexation agreement with the City (dated 5/29/02) to provide a significant amount of on-site and off-site improvements that support any future development plans for the original 160-acre Master Plan area, and to prepare a master plan for the entire RiverBend site then owned by PeaceHealth. The annexation agreement for property including the subject area (dated 7/1/02) included similar provisions for on-site and off-site improvements to support future development and also required that the property be included in a Master Plan pursuant to SDC Article 37, either as “a component of PeaceHealth’s Master Plan or a separate” master planning effort (Section 1.1A, pg. 2).

The 3.5-acre area subject to rezoning will be incorporated into the amended Master Plan area, and the subject area will be served with transportation access via the proposed (and required) extensions of St. Joseph Place and RiverBend Drive. Other utilities as may be necessary to serve the subject area can be extended from the south.

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### SDC 12.030(3)(d)

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

- 1. Meet the approval criteria specified in Article 7 of this Code; and**
- 2. Comply with Oregon Administrative Rule (OAR) 660-012-0060, where applicable.**

The proposed 3.5-acre zone change is submitted concurrently with a quasi-judicial amendment to the Metro Plan and GRP diagrams. Findings demonstrating that the proposed rezoning of the subject 3.5 acres is consistent with the requirements of SDC Article 7 (Metro Plan Amendments), and with the specific approval criteria in SDC 7.070(3) – i.e., consistency with applicable statewide planning goals - are outlined below. Findings demonstrating the requested zone change's consistency with the state Transportation Planning Rule (OAR 660-012-0060, as amended by LCDC) are outlined below under the heading of Goal 12 (Transportation).

#### **4.3.1 Consistency with Statewide Planning Goals**

SDC 7.030(3)(a) and ORS 197.625(3)(b) require that land use decisions such as the proposed zone map amendment include findings addressing goals applicable to the concurrently submitted Plan diagram amendments. The City previously determined that the earlier Plan amendments and zone changes supporting the approved RiverBend Master Plan complied with relevant Statewide Planning Goals. Since this proposal is for a minor (3.5-acre) zone map amendment to include the subject area within the Master Plan, its rezoning and redesignation is also demonstrated to be consistent with the prior approvals and applicable Goals.

#### **Goal 1 - Citizen Involvement**

Springfield has an acknowledged citizen involvement program (CIP) and process for securing citizen input on all proposed zone changes and plan amendments. Notice of the zone map amendment will be sent pursuant to the City's acknowledged procedures in compliance with the City's CIP. Because the City's notice procedures will be followed, interested parties have an opportunity to participate in the process, and the amendment does not modify the City's CIP, the proposal is consistent with Goal 1.

#### **Goal 2 - Land Use Planning**

Goal 2 requires that local comprehensive plans be consistent with statewide goals, that local comprehensive plans 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 base. Since the subject area is wholly within the Springfield city limits, the City of Springfield is the only affected jurisdiction. The Metro Plan and the SDC, as well as the Statewide Planning Goals and applicable statutes, provide policies and criteria for the evaluation of plan amendments. As discussed elsewhere in these findings, the



## Exhibit A

amendment is consistent with the Metro Plan, the GRP and the City's implementing land use ordinances. Consequently, the proposal is consistent with Goal 2.

### **Goal 3 - Agricultural Lands**

This goal is inapplicable because it applies only to "rural" agricultural lands and the subject property is within an acknowledged UGB (OAR660-15-000(3)).

### **Goal 4 - Forest Lands**

Goal 4 does not apply within urban growth boundaries (OAR 660-06-0020). Because the areas affected by the proposal is inside an acknowledged UGB, Goal 4 is inapplicable.

### **Goal 5 - Open Space, Scenic And Historic Areas, Natural Resources**

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 660-016) require planning jurisdictions, at acknowledgment and as a part of periodic review, to:

- (1) identify such resources;
- (2) to determine their quality, quantity, and location;
- (3) to identify conflicting uses;
- (4) to examine the economic, social, environmental, and energy (ESEE) consequences that could result from allowing, limiting, or prohibiting the conflicting uses; and
- (5) to develop programs to resolve the conflicts.

Because no part of the subject area is on an acknowledged Metro Plan Goal 5 inventory, the zone map amendment has no impact to Goal 5 resources and is, therefore, consistent with Goal 5.

### **Goal 6 - Air, Water, And Land Resources Quality**

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. Applicable state and federal requirements regarding air, water and land resources are either implemented through the standards adopted by the SDC and applicable development standards, or imposed and enforced by state or federal agencies. Because the zone map amendment itself does not authorize any specific development, there can be no direct impact to air, water or land resources. Consequently, the proposal is consistent with Goal 6.

But even considering the use of the property for needed parking as identified in the proposed Master Plan amendment, the future development represents an efficient use of resources consistent with local, state and federal regulations protecting air, water and land resources. For these reasons the zone map amendment is consistent with Goal 6.

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### Goal 7 - Areas Subject To Natural Hazards

Goal 7 requires that development subject to damage or that could result in loss of life not be planned or located in known areas of natural hazards and disasters without appropriate safeguards. The goal also requires that plans be based on an inventory of known areas of natural disaster and hazards. No part of the subject property site contains steep slopes, consequently these findings do not discuss issues related to steep slopes or landslides. With respect to steep slopes and landslides, the amendments are consistent with Goal 7.

All future development on the property must conform to the requirements of the annexation agreement between PeaceHealth and the City, and will be required to comply with SDC Article 27, *Floodplain Overlay District (FP)* regulating development activity within those areas of the City that are designated as an "area of special flood hazard." PeaceHealth has developed a flood hazard boundary representing the "worst case" of FEMA flood elevations or those flood elevations established by David Evans & Associates as the "Corrected Effective Measurement" (CEM). To the extent that any future development is planned within the flood hazard boundary, that development must comply with applicable standards set forth in SDC Article 27, which has been acknowledged by the Land Conservation and Development Commission as being consistent with Goal 7.

### Goal 8 - Recreational Needs

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." Responsible governmental agencies must plan to meet these needs (1) in coordination with private enterprise; (2) in appropriate proportions; and (3) in such quantity, quality and locations as is consistent with the availability of the resources to meet such requirements." (OAR 660-015-000(8))

Advisory guidelines for meeting Goal 8 encourage planners to give priority in meeting such needs "to areas, facilities and uses that

- "(a) meet recreational needs requirements for high density population centers,
- "(b) meet recreational needs of persons of limited mobility and finances,
- "(c) meet recreational needs requirements while providing the maximum conservation of energy both in the transportation of persons to the facility or area and in the recreational use itself,
- "(d) minimize environmental degradation,
- "(e) are available to the public at nominal cost, and
- "(f) meet needs of visitors to the state."

The GRP is acknowledged as being in compliance with Goal 8. The GRP indicates no proposed park or school is planned to be located on the Gateway MDR site, although the recently adopted Willamalane Park and Recreation Comprehensive Plan identifies

## Exhibit A

potential future park land in the vicinity but not on the subject area. A park needs assessment was prepared by the applicant demonstrating that there is ample land on-site within the boundaries of the previously approved Master Plan available to meet the park and recreational needs of future residents. Willamalane and City staff reviewed this assessment and concurred with its results. Because the amendments do not alter or any way affect the City's Goal 8 resources or otherwise affect the ability of the City to apply its Goal 8 implementing standards, the proposal is consistent with Goal 8.

### **Goal 9 – Economic Development**

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 City's Goal 9 analysis, the Springfield Commercial Lands Study (SCLS) was completed and acknowledged by LCDC as consistent with Goal 9. The SCLS found the City to have a deficit of commercial lands needed to meet supply through the year 2015 planning horizon.

Earlier adoption of amendments to the Metro Plan and the GRP were found to help reduce that deficit and therefore were consistent with Goal 9 and the City's Metro Plan provisions implementing Goal 9 through the SCLS. As a result of amendments to the text of the SCLS, the City allowed Metro Plan and GRP diagram amendments for up to 99 acres within the Gateway MDR site to be mapped for Community Commercial and Mixed Use land use designations, and subsequent rezoning to the Medical Services and/or Mixed Use Commercial districts.

Adding the 3.5 acres proposed to be rezoned, the MUC and MS zoned acreage on the RiverBend site totals only 90.5 acres – well within the proscribed limits in the SCLS, but helping to further reduce the deficit of needed commercially designated or zoned land. Because the requested zone change implements the SCLS, its approval is consistent with prior Plan amendments and with earlier demonstrations of compliance with Goal 9.

### **Goal 10 – Housing**

LCDC's Housing goal requires cities to maintain adequate supplies of buildable lands for needed housing based on an acknowledged inventory of buildable lands. The 1999 Eugene-Springfield Metropolitan Area Residential Land and Housing Study Policy Recommendation Report (RLS) was adopted by the Cities and recognized by DLCD. This report contains a technical analysis which assigns density to the buildable portions of the area subject to the requested zone change. The City's acknowledged refinement plan for the area includes Residential Implementation Action 12.6, which provides: *"...The adopted master plan shall demonstrate that the site will be able to accommodate the number of housing units within the range for the MDR land use designation in the Metro Plan and Gateway Refinement Plan"*.

The earlier approval of the RiverBend Master Plan established consistency with this GRP policy, and with Goal 10, by demonstrating that future residential development would be consistent with expectations in the RLS, as well as policies in the Metro Plan and GRP,

## Exhibit A

and standards in the Springfield Development Code. The requested rezone removes a nominal acreage from residential Plan designation and zoning, but does not affect the Master Plan's continued ability to provide needed housing within the boundaries of the amended Master Plan, and still leaves the majority of the parent tax lot zoned and designated MDR, thus ensuring continued compliance with Goal 10.

### **Goal 11 - Public Facilities And Services.**

This goal requires the provision of a timely, orderly and efficient arrangement of public facilities and services. Annexation agreements with the City ensure that an adequate level of urban services will be provided to serve the property, and require that a master plan be approved prior to development. This zone change request is submitted concurrently with an amendment to the RiverBend Master Plan that incorporates the subject 3.5 acres proposed for rezoning into the Master Plan boundary.

Master Plan approval criteria require a demonstration that the proposed on-site and off-site public and private improvements are sufficient to accommodate the proposed development. Therefore, the requirements contained in the annexation agreement for the subject property, coupled with the master plan criteria of approval, ensure compliance with Goal 11.

### **Goal 12 - Transportation**

Goal 12 requires local governments to provide and encourage a safe, convenient and economic transportation system. The proposed map amendments for 3.5 acres of property are not the result of any changes to the type or intensity of uses on the site, and will not increase the trip generation for the site as previously considered and approved by the city. The proposed amendments are needed only to make minor revisions to the boundaries of the RiverBend Master Plan in order to accommodate the previously approved medical buildings and parking structure.

Based upon technical analysis from JRH Transportation Engineering, the proposed amendments to the Master Plan, and concurrent changes to the applicable plan designations, will not increase trip generation beyond the identified Phase 1 trip cap (per GRP Residential Element Implementation Action 13.7). The proposed amendments will also provide access and circulation supporting the planned medical center. Further, the JRH traffic analysis demonstrates that the proposed amendment actually can be expected to reduce reasonably anticipated PM peak hour vehicle trips from the subject area by 57 trips.

Because the requested amendments do not alter the trip profile for the proposed development as demonstrated by the JRH Transportation Engineering analysis, the amendment will not result in a "significant effect" on any transportation facility, and the application is consistent with the requirements of the Transportation Planning Rule.

## **Exhibit A**

### **Goal 13 - Energy Conservation**

Goal 13 is a general planning goal and provides limited guidance for site specific zone map amendments. However, the availability of a large employer in proximity to a retail and residential node and centered around a transit station as envisioned by newly adopted Residential Implementation Action 13.6 provided transportation options that will serve to reduce energy consumption. The proposed zone change will allow for parking facilities, including structured parking, that will support the intensive medical center uses approved previously. The ability to provide needed parking proximate to the medical center, and in structure as was desired by the Planning Commission and City Council, provides for greater energy conservation through more efficient site design and circulation, consistent with Goal 13.

### **Goal 14 - Urbanization.**

Goal 14 requires local jurisdictions: "To provide for an orderly and sufficient transition from rural to urban land use." The subject site is within the Springfield UGB and city limits, and within an urbanizing area of the community. The proposed rezoning corresponds to the concurrently submitted Metro Plan and GRP diagram amendment and results in efficient use of the site for urban uses, thereby facilitating the compact urban growth form consistent with the requirements of Goal 14.

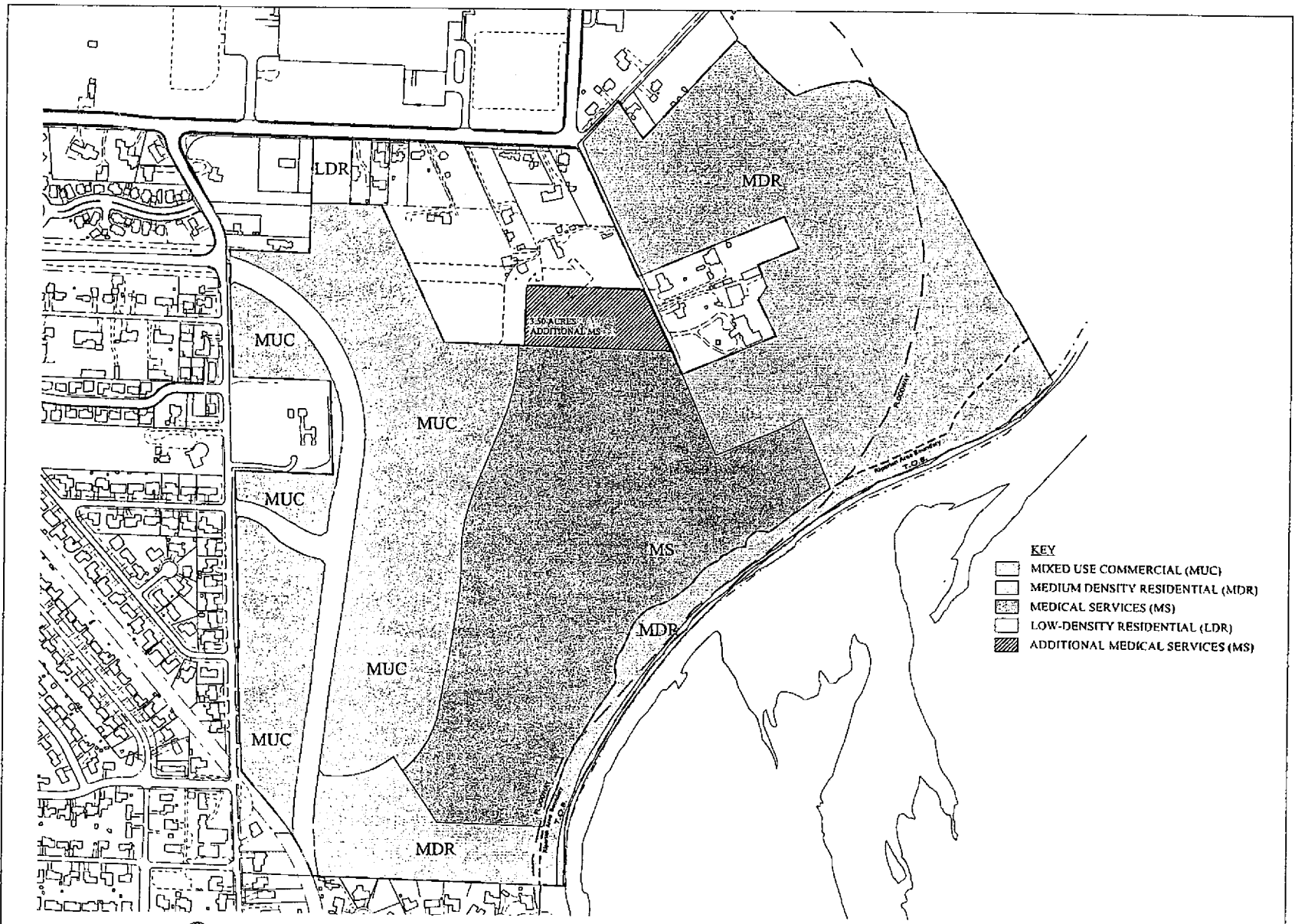
### **Compliance with OAR 660-012-060**

OAR 660-012-060, the state Transportation Planning Rule (TPR), requires amendments to zoning maps or plan diagrams to determine if the amendment "significantly affects" a transportation facility, and if so, sets forth means under Section (2) of the rule to address such an effect. As demonstrated in the accompanying traffic impact analysis, and as reference in the Goal findings above, the proposed zone change does not have a "significant affect" on transportation facilities and therefore does not warrant analysis under the TPR.

The proposed zone change accommodates structured parking and medical buildings accounted for in the original RiverBend Master Plan approval, and as demonstrated in the traffic analysis, traffic generated from the proposed development will not exceed the Phase 1 (or overall) trip cap established through the prior Master Plan approval. Therefore, the proposed zone change complies with the TPR and the above criterion.

WIMBERLEY ALLISON TONG & GOO  
 ANSHEN + ALLEN  
 WALKER MACY  
 KFF CONSULTING ENGINEERS  
 TRU TRANSPORTATION ENGINEERING  
 DAVID EVANS AND ASSOCIATES

EXHIBIT B  
 1st  
 RIM



- KEY**
- MIXED USE COMMERCIAL (MUC)
  - MEDIUM DENSITY RESIDENTIAL (MDR)
  - MEDICAL SERVICES (MS)
  - LOW-DENSITY RESIDENTIAL (LDR)
  - ADDITIONAL MEDICAL SERVICES (MS)

PROJECT	15188
DATE	March 2004
DRAWN	CF
APPROVED	ME
PLAT DATE	
REVISIONS	March 9, 2004
AMENDMENT #1	November 2001
AMENDMENT #2	March 1998

ZONING DIAGRAM