



Type IV Amendment to the Springfield Development Code Exhibit A - Staff Report & Findings

Project Name: EDSPM Land Use Regulation Amendment

Nature of Application: Move text and images from Appendix 1A of EDSPM to Development Code by Council Ordinance.

Case Number: 811-17-000137-TYP4

Project Location: Glenwood Refinement Plan Phase I legislative action

Date of Initiation: October 20, 2017

Date of DLCD Notice of Proposed Amendment: February 13, 2018

Date of Newspaper Notice: February 28, 2018, April 27, 2018

Date of Mailed Notice: February 28, 2018

Date of Hearings: March 20, 2018 (Planning Commission), May 7, 2018 (City Council)

Executive Summary

In 2012, the City Council approved amendments to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) diagram, Glenwood Refinement Plan (GRP) text and diagram, Springfield Development Code, and Springfield Zoning Map for the Glenwood Riverfront. The Glenwood amendment package was ultimately acknowledged by the Department of Land Conservation and Development (DLCD) in 2014.

To implement the GRP policies, the Council approved amendments to the City's Engineering Design Standards and Procedures Manual (EDSPM), including specific design standards for the Glenwood Riverfront internal street network (Resolution 2012-23). These Glenwood-specific street standards comprise Appendix 1A of the EDSPM.

In adopting the ordinance and resolution, Council is relocating the Glenwood Riverfront Street Cross-Section Standards from the EDSPM into the Springfield Development Code so that future changes to provisions in the EDSPM can be made by Council Resolution instead of through the amendment process required for land use regulations under ORS 197.610 et seq. Thus, the text and images in Appendix 1A of the EDSPM are relocated to Springfield Development Code (SDC) Section 3.4-200, Glenwood Riverfront Mixed-Use Plan District.

SDC Section 5.6-115 includes the following criteria to be used in approving an amendment to the SDC: "In reaching a decision on the adoption or amendment of refinement plans and this Code's text, the City Council shall adopt findings that demonstrate conformance to the following: The Metro Plan; applicable

State statutes; and, applicable Statewide Planning Goals and Administrative Rules. Based on findings found later in this report in response to these criteria, the amendments to SDC Section 3.4-200 are consistent with these criteria.

Nature of Request

The Springfield Development Code (SDC) is the acknowledged land use implementation ordinance for Springfield. The SDC and its development review provisions are periodically reviewed, updated, or revised to meet changing circumstances and conditions. City staff initiated this request pursuant to the City Attorney Office's recommendation to adopt Appendix 1A of the Engineering Design Standards and Procedures Manual (EDSPM) into the Springfield Development Code by ordinance in accordance with the Post-Acknowledgement Plan Amendment procedures outlined in Oregon Revised Statutes 197.610-197.620.

In accordance with SDC 5.6-110, amendments of the Development Code are reviewed under Type IV procedure as a legislative action. Type IV procedures as defined in SDC Section 5.1-140 require: 1) review and a recommendation by the Springfield Planning Commission; and 2) adoption of ordinance by the Springfield City Council.

Springfield City Council approves the subject amendments to SDC Section 3.4-200, Glenwood Riverfront Mixed-Use Plan District, to relocate the text and images from Appendix 1A of the EDSPM to the Springfield Development Code so that they may be acknowledged as a land use regulation.

Overview of Text Amendment

The Springfield Development Code (SDC) provides the following role for Glenwood Riverfront Mixed-Use Plan District (Section 3.4-200): "The Glenwood Riverfront Mixed-Use Plan District takes policies from the Glenwood Refinement Plan and establishes and implements development standards and building design standards specifically applicable to this Plan District." Thus, Section 3.4-200 is the appropriate location for the Glenwood Riverfront street design standards.

The subject amendment modifies SDC Section 3.4-200 (specifically Subsections 3.4-230 and 3.4-270), as depicted in Exhibit B, to incorporate the street design standards text and images previously located in Appendix 1A of the Engineering Design Standards and Procedures Manual into the Glenwood Riverfront Mixed-Use Plan District.

Notification and Written Comments

In accordance with the Oregon Administrative Rules 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 submitted electronically to the DLCD on February 13, 2018, which is more than 35 days prior to the Planning Commission public hearing on the matter.

In accordance with Springfield Development Code Section 5.2-115.B, Type IV legislative land use decisions require notice in a newspaper of general circulation. Notification of the Planning Commission public hearing was published in the legal notices section of *The Register Guard* on February 28, 2018. Notice of the City Council public hearing on the proposal was published in the legal notices section of *The Register Guard* on April 27, 2018.

In accordance with Oregon Revised Statutes 227.186, Ballot Measure 56 notice was mailed to all landowners within the Glenwood Riverfront (Phase I) boundary on February 28, 2018, which is more than 20 days but less than 40 days before the first public hearing.

Brief History of Phase I Glenwood Refinement Plan

- On February 25, 2008, the Springfield City Council directed staff to proceed with updating the Glenwood Refinement Plan in phases.
- For the Phase I (Glenwood Riverfront) update, City staff, along with partner agencies and a 20-member Citizen Advisory Committee, developed a package of amendments to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) diagram, Glenwood Refinement Plan diagram and text, Springfield Development Code, and Springfield Zoning Map.
- On June 18, 2012, the Phase 1 Update was adopted by the Springfield City Council, Ordinance 6279.
- On September 5, 2012, the Phase 1 Update was co-adopted by the Lane County Board of Commissioners, Ordinances PA 1288 and No. 3-12.
- On September 28, 2012, Shamrock Homes, LLC filed a Notice of Intent to Appeal to the Land Use Board of Appeals (LUBA).
- On July 12, 2013, LUBA rendered its decision. LUBA required Springfield and Lane County to take additional action with regards to Goal 9 (Economic Development); Goal 10 (Housing); Goal 12 (Transportation); and Goal 15 (Willamette River Greenway).
- On April 7, 2014, the response to the LUBA Remand by Springfield was adopted by the Springfield City Council, Ordinance 6316.
- On April 14, 2014, the response to the LUBA Remand by Lane County was adopted by the Lane County Board of Commissioners, Ordinances PA 1306 and No. 13-07.
- On May 9, 2014, the Phase 1 Update, including all adopted Ordinances, was acknowledged by the Oregon Department of Land Conservation and Development.

Criteria of Approval

Springfield Development Code (SDC) Section 5.6-115A. describes the criteria to be used in approving an amendment to the SDC. It states that in reaching a decision, the Planning Commission and the City Council must adopt findings that demonstrate conformance with 1) the Metro Plan, 2) applicable State statutes, and 3) applicable Statewide Planning Goals and Administrative Rules.

Findings of Fact

Conformance with the Metro Plan

The *Eugene-Springfield Metropolitan Area General Plan (Metro Plan)* is Springfield's prevailing comprehensive plan. The *Springfield 2030 Residential Land Use and Housing Element* was adopted in 2011 through Springfield Ordinance 6268 and Lane County Ordinance No. PA. 1274 as a refinement to the Metro Plan. Amendments to the Development Code must be considered within the context of Springfield's adopted policies. Thus, any amendments must be consistent with the Metro Plan and the *Springfield 2030 Residential Land Use and Housing Element*. The *Springfield 2035 Transportation System Plan* adopted in 2014 by Springfield Ordinance 6314 and Lane County Ordinance No. PA 1303 is a

functional plan of the Metro Plan. Applicable policies and findings of fact showing compliance with those policies are presented below.

Finding: The street design standards that are the subject of the Development Code amendment implement the adopted and acknowledged policies of the Phase I Glenwood Refinement Plan (GRP) Transportation Chapter, which were found to be in conformance with the *Metro Plan* and *Springfield 2030 Residential Land Use and Housing Element* through the Phase I GRP adoption process.

The following *Metro Plan* policies from the Environmental Design Element are implemented by the subject amendments to the Development Code and therefore provide substantive confirmation that the proposal is consistent with the Metro Plan.

E.4. Public and private facilities shall be designed and located in a manner that preserves and enhances desirable features of local and neighborhood areas and promotes their sense of identity.

Finding: The street design standards support the design and construction of a local street network in the Glenwood Riverfront that meets Springfield's adopted vision and policies for riverfront redevelopment.

E.6. Local jurisdictions shall carefully evaluate their development regulations to ensure that they address environmental design considerations, such as, but not limited to, safety, crime prevention, aesthetics, and compatibility with existing and anticipated adjacent uses.

Finding: In developing specific street type design standards for the Glenwood Riverfront, the City considered the future land use context and environmental design considerations, as outlined in the Phase I GRP.

E.8. Site planning standards developed by local jurisdictions shall allow for flexibility in design that will achieve site planning objectives while allowing for creative solutions to design problems.

Finding: The Development Code amendments include street design standards that provide design options for meeting the Phase I GRP transportation policies in the design and construction of the Glenwood Riverfront local street network.

The following *Springfield 2035 Transportation System Plan* policies under the System Design goal are implemented by the subject amendments to the Development Code and therefore provide substantive confirmation that the proposal is consistent with the Metro Plan (refinements of and functional plans to the Metro Plan are elements of the Metro Plan therefore implementing ordinances must achieve the same consistency with these documents as provided to the Metro Plan.).

3.2 Expand and enhance Springfield's bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion.

Finding: The street design standards included in the Development Code amendment require the provision of bike lanes on collector streets and the installation of shared-roadway facilities, on-street pavement markings, and traffic calming measures along local streets with slow vehicle traffic.

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

Finding: The Development Code amendment includes street design standards that provide design options. In conformance with the Phase I GRP transportation policies, the street designs are intended to reduce vehicular speeds while encouraging safe bicycle and pedestrian travel, allow for provision of mid-block pedestrian crossings, incorporate traffic calming measures, and integrate pedestrian amenities and environmentally sensitive street design.

3.4 Provide for a continuous transportation network with reasonably direct travel routes to destination points for all modes of travel.

Finding: The street design standards included in the Development Code amendment support the implementation of a connected grid network in the Glenwood Riverfront and require provision of wide, setback sidewalks on all streets.

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

Finding: The development of the street design standards that are the subject of the Development Code amendment was coordinated with traffic engineers, fire and life safety personnel, and public works operations staff.

Conclusion: The code amendment complies with applicable policies from the *Metro Plan*, including the *Springfield 2030 Comprehensive Plan Residential Land Use and Housing Element* and the *Springfield 2035 Transportation System Plan*, and therefore meets Criterion A.1.

Conformance with Applicable State Statutes

Finding: Oregon Revised Statutes (ORS) 197.175(2) states that ... “each city and county in this state shall: (a) Prepare, adopt, amend and revise comprehensive plans in compliance with goals approved by the commission; (b) Enact land use regulations to implement their comprehensive plans;...”

Finding: The amendment to SDC 3.4-200 implements the Phase I GRP Transportation Chapter policies and implementation strategies as required by ORS 197.175(2)(b).

Finding: ORS 227.186 requires local governments to mail individual notices (‘Ballot Measure 56 Notice’) to real property owners of pending land use changes that could limit or prohibit previously allowed uses.

Finding: As noted on p.2, Ballot Measure 56 Notice was mailed to all landowners within the GRP Phase I boundary on February 28, 2018 in compliance with ORS 227.186.

Finding: ORS 197.250 requires local government land use regulations to comply with Statewide Planning Goals.

Finding: This application can be deemed in compliance by adoption of findings relating how the application conforms to each of the Statewide Planning Goals, as outlined in the following section.

Finding: ORS 197.610 requires local jurisdictions to submit proposed comprehensive plan or land use regulation changes to the Department of Land Conservation and Development (DLCD).

Finding: As noted on p.2, notice of the proposed amendment was provided to DLCD more than 35 days in advance of the first evidentiary hearing concerning the amendments.

Conclusion: The preceding findings demonstrate this code amendment complies with applicable statutes, therefore Criterion A.2. is met.

Conformance with Applicable Statewide Planning Goals and Administrative Rules

Finding: Goal 1 – Citizen Involvement – calls for “the opportunity for citizens to be involved in all phases of the planning process”. The public has been given extensive opportunities to be involved in the street design standards that comprise the subject Development Code amendment, including the development and adoption of the Phase I Glenwood Refinement Plan (GRP), the adoption of the standards into the Engineering Design Standards and Procedures Manual (EDSPM), and, more recently, through the public process to incorporate these same standards into the Springfield Development Code (SDC).

Finding: The adopted and acknowledged Phase 1 GRP incorporated an extensive citizen involvement process over the course of the 6½-year work task, including the formation of a Citizen Advisory Committee, mailed (Ballot Measure 56) and newspaper notice, and numerous public hearings at the Planning Commission, Springfield City Council, and Lane County Board of Commissioners.

Finding: The development and adoption of the 2012 EDSPM amendments to incorporate the subject street standards into Appendix 1A, provided opportunities for citizen engagement. Specifically, the updates were posted on the City’s website and three emails were sent to nearly 50 members of the engineering and development community asking for input. A duly noticed Council public hearing was also held on the EDSPM amendments.

Finding: Springfield’s Committee for Citizen Involvement reviewed and approved a Citizen Engagement Plan for the subject land use action on March 6, 2018. This plan builds upon prior citizen involvement opportunities for Glenwood planning efforts and encourages and maintains open channels of communication between the City and affected parties.

Finding: The Development Code amendment is the subject of a legislative decision-making process with public hearings before the City’s Planning Commission and Council.

Finding: The Planning Commission public hearing was advertised in the legal notices section of the *Register-Guard* on February 28, 2018, and notification of the City Council public hearing was published in the *Register-Guard* newspaper on April 27, 2018.

Finding: Public hearing notice and responses to Frequently Asked Questions were mailed to all residents and property owners in the Glenwood Riverfront on February 28, 2018. Planning staff was available to answer additional questions at a general Glenwood Open House sponsored by the City at Roaring Rapids Pizza Company in Glenwood on March 13, 2018.

Finding: Information concerning the subject amendment and the dates of the public hearings were posted on the City of Springfield website. This website routinely includes information about upcoming and continuing planning matters.

Finding: Agenda notice and/or agenda packets are routinely provided (primarily by e-mail) to interested parties who have asked for such notification. Those notified include local media outlets and newspapers, local utilities, school districts and partner agencies, local state representatives, the Eugene and Springfield Chambers of Commerce, the Lane Homebuilders Association, as well as various neighborhood groups and leaders.

Finding: City staff received four emails and three phone calls in response to the hearing notice. In addition to clarification regarding the proposal, comments were submitted that were forwarded to the Planning Commission as part of the record.

Finding: The Planning Commission held a public hearing on the subject amendment on March 20, 2018; two individuals submitted written testimony, and four people presented oral testimony. The Planning Commission determined that the testimony did not directly relate to the Development Code amendment and referred those present to applicable City staff and partner agencies.

Finding: The City Council held a duly noticed public hearing on May 7, 2018. A summary of the written and oral testimony submitted to the Planning Commission and City staff response was presented to the Council at their May 7, 2018 public hearing. No additional written or oral testimony was presented at the Council public hearing.

Finding: 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 conformance with a comprehensive plan, and jurisdictions are to adopt suitable implementation ordinances that put the plan’s policies into force and effect.

Finding: The Springfield Development Code is a key mechanism used to implement the goals and policies of the City’s adopted comprehensive plans, particularly the *Metro Plan*. The purpose of this amendment is to move the street design standards, adopted into the EDSPM in 2012 to implement the Phase I GRP Transportation Chapter polices, to the Development Code. As demonstrated for Criterion A.1. above, the amendment is consistent with the *Metro Plan* and does not affect City ordinances, policies, plans, and studies adopted to comply with Goal 2 requirements.

Finding: Goal 3 – Agricultural Land – applies to areas subject to farm zoning that are outside acknowledged urban growth boundaries (UGBs). 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. Consequently, and as expressed in the text of the Goal, Goal 3 is not applicable.

Finding: 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. The City has an acknowledged UGB and does not have forest zoning within its incorporated area. Consequently, and as expressed in the text of the Goal, Goal 4 is not applicable.

Finding : 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, evaluated and protected as applicable.

Finding: At the March 20, 2018 Planning Commission public hearing, two individuals raised concerns relating to Goal 5. Specifically, concerns were raised regarding a public utility entity complying with environmental protection regulations in developing an electric substation in Glenwood and consideration of the natural environment in developing the GRP and Glenwood Riverfront Street Cross-Section standards.

Finding: The public utility property referenced in the aforementioned oral testimony for a future electric substation is owned by the Springfield Utility Board and is annexed. The property contains an approximately .86-acre wetland that has been delineated, and the City's wetland inventory has determined is not locally significant. The need for a future substation in Glenwood is identified in the Phase I GRP and the regional Public Facilities and Services Plan. Development of the substation requires Site Plan Review and thus will be required to conform to the City's tree felling and natural resource protection standards. The Development Code amendments do not alter the City's acknowledged land use regulations regarding public utility facilities or the development of wetlands. The amendments also do not impact the Development Code's acknowledged compliance with Goal 11 requirements regarding Public Facilities and Services as discussed further below.

Finding: Public testimony provided to the Planning Commission also expressed general concerns with the proposed amendments' impact on environmental quality in Glenwood, including concerns related to the Willamette Greenway setback line. One of the overarching GRP goals is to: Restore, enhance, and protect the ecological function of natural resources, and increase public awareness of these resources. The restoration and protection of Glenwood's natural resources were of paramount consideration in the development of the GRP and implementing regulations, as documented in the Statewide Planning Goal findings associated with their development. The subject amendments do not alter the acknowledged Plan District standards for the Willamette Greenway Overlay District in SDC 3.4-280.

Finding: The amendment would not alter any existing code provisions for the protection of natural resources. Therefore, this action does not alter the City's acknowledged compliance with Goal 5.

Finding: 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 amendment to SDC Section 3.4-200 does not repeal, replace or void existing *Metro Plan* policy or Development Code regulations with respect to any identified air, water or land resource issues. Therefore, this action does not alter the City's acknowledged compliance with Goal 6.

Finding: Goal 7 – Areas Subject to Natural Disasters and Hazards – applies to development in areas subject to natural hazards such as floodplains and potential landslide areas. The City has inventoried areas subject to natural hazards, and the amendment to SDC 3.4-200 does not remove or exempt compliance with Code standards that apply to development within these hazard areas. Therefore, this action has no effect on the City's acknowledged compliance with Goal 7.

Finding: Goal 8 – Recreational Needs – requires communities to evaluate their recreation areas and facilities and to develop plans to address current and projected demand. The provision of recreation

services within Springfield is the responsibility of Willamalane Park & Recreation District. Willamalane has an adopted 20-Year Comprehensive Plan for the provision of park, open space and recreation services for Springfield which the City has co-adopted. The amendment to SDC 3.4-200 does not alter or conflict with the policies or provisions in the Park and Recreation Comprehensive Plan or with Willamalane's responsibility to plan for or provide recreational programs or facilities. Therefore, this action has no effect on the City's acknowledged compliance with Goal 8.

Finding: Goal 9 – Economic Development – addresses diversification and improvement of the economy. The amendment to SDC 3.4-200 does not have an impact on the City's supply of industrial or commercial lands, and the amendment does not affect City policies, plans, and studies for economic development. Therefore, this action is consistent with the City's acknowledged compliance with Goal 9.

Finding: Goal 10 – Housing – applies to the planning for and provision of needed housing types.

Finding: At the March 20, 2018 Planning Commission public hearing oral and written testimony was submitted regarding concern over the uncertain future of manufactured home parks in Glenwood, that the proposed street standards and other future actions to implement the GRP would cause gentrification, result in the loss of affordable housing, and not comply Statewide Planning Goal 10 (Housing).

Finding: The future of manufactured home parks in Glenwood and the GRP's conformance with Goal 10 was explored in depth at the time the Phase I GRP was developed and adopted, through the subsequent land use appeal, remand by the Land Use Board of Appeals, and ultimate acknowledgement by the Oregon Department of Land Conservation and Development. The adopted GRP manufactured home park policies are:

- D.2.a. Allow existing residential uses in manufactured home parks to continue under the pre-existing non-conforming use provisions of the Springfield Development Code.
- D.2.b. Rely on State laws and regulations, while responding with applicable referrals to applicable services, to address the needs of individual manufactured home park tenants.
- D.2.c. Consider providing financial assistance for mandated expenses of relocation or displacement of residents from potentially closed manufactured home parks through Springfield Economic Development Agency's tax increment-funded programs, as funding becomes available.
- D.2.d. Explore the feasibility of partnering with a non-profit or for-profit entity to acquire land and develop a new manufactured home park in Springfield or other affordable housing opportunities for relocating potentially displaced manufactured home park tenants.

Finding: The Glenwood Riverfront street standards have no impact on, and are consistent with, the above-listed GRP policies regarding manufactured home parks in the Plan District.

Finding: Goal 10 requires the City to maintain an adequate supply of buildable land to meet the need for housing at all income levels. The Glenwood Riverfront street standards do not alter the City's acknowledged supply of residential buildable lands.

Finding: The amendment does not alter City ordinances, policies, plans, and studies adopted to comply with Goal 10 requirements. Therefore, this action is consistent with the city's acknowledged compliance with Goal 10.

Finding: Goal 11 – Public Facilities and Services – addresses the efficient planning and provision of public services at the appropriate type and level to support planned development. The amendment does not reduce any requirements for the extension or provision of public facilities or services during development review procedures and will have no effect on adopted and acknowledged public facilities plans. Therefore, this action has no effect on the City's acknowledged compliance with Goal 11.

Finding: Goal 12 – Transportation – applies to the provision of a “safe, convenient and economic transportation system”. The Transportation Planning Rule (OAR 660-012-0060) requires that amendments to a comprehensive plan or land use regulation consider potential impacts to existing or planned transportation facilities “unless the amendment is allowed under section (3), (9) or (10) of this rule.”

Finding: OAR 660-012-0060 (10) states that a local government may amend a land use regulation without applying performance standards related to motor vehicle traffic congestion, delay, or travel time if the amendment affects only land entirely within a multi-modal mixed-use area (MMA) and is consistent with the definition and function of the MMA.

Finding: A key objective of the Phase I GRP is to create a highly pedestrian-oriented environment to support future mixed-use development and increase the ease and convenience of walking. Associated policies and implementation strategies to foster this pedestrian-friendly environment are through decreasing automobile speeds in neighborhoods, focusing most through-traffic on arterials, aligning streets to reduce the distance that pedestrians have to walk to a crosswalk to safely cross a street, allowing sight lines and connections to destinations that attract pedestrian activity, and minimizing the real and perceived distances between development, parks, and greenway amenities. Policies also include features such as wide setback sidewalks with minimal interruptions in the flow or grade of pedestrian travel, interesting street furniture and public art, pedestrian-scale lighting, street trees, and other green street elements that also make the pedestrian experience safe, comfortable, and attractive.

Finding: In addressing the LUBA Remand of the Phase I GRP, the City established the MMA designation for the Glenwood Riverfront (Springfield Ordinance 6316), which was acknowledged by DLCD on May 9, 2014. The subject Development Code amendment applies to the streets in the Glenwood Riverfront and thus falls entirely within the MMA boundary. Further, the subject street standards are intended to support the development of an interconnected multi-modal grid network that supports high-density mixed-use development. This street grid will enhance multi-modal circulation, disperse traffic, and facilitate walking and biking with wide, setback sidewalks, bike facilities, pedestrian-oriented street crossings, street trees, pedestrian scale lighting, on street parking. Therefore, the amendment is consistent with the definition and function of the MMA.

Finding: The level of development currently permitted through existing zoning regulations will remain the same as a result of this amendment. Therefore, the amendments are consistent with Statewide Planning Goal 12.

Finding: 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 text amendment does not affect the City's ordinances, policies, plans, or studies adopted to comply with Goal 13 requirements. Therefore, this action has no effect on the City's acknowledged compliance with Goal 13.

Finding: 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 amendment to SDC Section 3.4-200 does not repeal, replace, or void existing *Metro Plan* policy or change land use designations or Development Code regulations with respect to Springfield's growth management or annexation. Therefore, this action has no effect on the City's acknowledged compliance with Goal 14.

Finding: Goal 15 – Willamette River Greenway – establishes procedures for administering the 300 miles of greenway that borders the Willamette River. The text amendment does not change or nullify the requirement for development proposals to comply with the City's existing Willamette River Greenway regulations. Therefore, this action has no effect on the City's acknowledged compliance with Goal 15.

Finding: 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, Goals 16-19 do not apply in Springfield or to land use regulations adopted in Springfield.

Conclusion: The code amendment complies with applicable Statewide Planning Goals and therefore meets Criterion A.3.

Conclusion and Recommendation

Based on the findings above and the criteria of SDC 5.6-115 for approving amendments to the Springfield Development Code, the subject text amendment to Section 3.4-200 is consistent with these criteria, and based on these findings, the City Council may approve the amendment.