Staff Report and Findings
Metro Plan Type II Amendment- Type IV (Legislative) Procedure
Springfield Transportation System Plan Implementation

Project Name: Springfield 2035 Transportation System Plan (TSP) Implementation

Project Proposal: Amend the Metro Plan and the Springfield TSP to add a Conceptual Street Map (CSM); and
Amend the Springfield TSP project list and descriptions.

City of Springfield Case Number: 811-17-000166-TYP4 Plan Amend.
Lane County Case Number: PA 1359
DLCD Notification Date: December 19, 2017 & October 15, 2019 (revised)
Joint City of Springfield and Lane County Planning Commissions Hearing: January 23 and February 6, 2018
Lane County Board 1st Reading: October 15, 2019
Joint City Council and Board of County Commissioners Hearing: November 4, 2019

I. EXECUTIVE SUMMARY PROJECT DESCRIPTION AND BACKGROUND

COMPONENTS

1. Metro Plan Amendment
   a. TSP Amendment – Update TSP project list and figures

The Springfield Transportation System Plan (TSP) was jointly adopted by the City of Springfield and Lane County in March of 2014. Through that process the City of Springfield determined how the transportation system is currently used and how it should change to meet the long-term (20-year) needs of Springfield’s residents, businesses, and visitors. Through coordination with community members and affected public agencies, the City of Springfield developed a TSP for improvements of all modes of transportation in Springfield, including the roadway, bicycle and pedestrian, transit, and rail networks. The plan also includes a transportation improvement and financing plan.

Chapter 2 of the TSP contains Goals, Policies, and Action Items to provide direction for the next 20 years. The TSP Goals reflect the community’s vision for Springfield’s future transportation system and offer a framework for policies and action items. The policies, organized by goal, provide high-level direction for the City’s policy and decision-makers and for City staff. The policies will be implemented over the life of the Plan.
II. BACKGROUND

The progress of this update was guided by the Project Management Team (PMT) made up of City of Springfield staff, under the direction of the project Oversight Team. The project Oversight Team is comprised of managers from various divisions within the Development and Public Works Department. The project was also guided by a Technical Review Team (TRT), Stakeholder Sounding Board (SSB), the Planning Commission, and the City Council.

The TRT provided guidance on technical aspects and consisted of representatives from affected governmental entities and regional partners. The SSB ensured that the needs of people in the community of Springfield were incorporated in the process. The SSB consisted of Springfield residents and other community stakeholders who provided input throughout the draft amendments development process.

After a thorough planning process involving the general public, stakeholders, other agency staff, and local and regional appointed and elected officials, staff prepared this report evaluating the changes. The report includes findings which address relevant approval criteria as described in this report. These findings provide a basis for concluding that the adoption of the changes meets the approval criteria found in SDC Sections 5.6-115 and 5.14-135 (as described below) and Lane County Code Section 12.225.

III. FINDINGS

Procedural Requirements

Finding: The Eugene-Springfield Metropolitan Area General Plan (Metro Plan) describes itself as a framework plan that is intended to be supplemented by more detailed city-specific plans, programs, and policies (Metro Plan p. I-6).

Finding: The proposal includes amendments to the TSP and amendments to the Springfield Development Code (SDC). The TSP is a single subject plan that is a type of functional plan of the Metro Plan. The procedural requirements for amending the Metro Plan are provided in Metro Plan Chapter IV and SDC 5.14-100. Because the amendments apply only within Lane County and the City of Springfield, this Metro Plan amendment is a “Type II” amendment under SDC 5.14-115, requiring approval by the governing bodies of the City of Springfield and Lane County. Springfield is the “home city” for this amendment. Lane County is included because the amendments may apply to unincorporated land within the Springfield urban growth boundary (UGB).

Finding: The Metro Plan and code amendments were initiated by the City of Springfield Development and Public Works Director (Director). The amendments are not site-specific and therefore are a legislative action.

Finding: SDC 5.14-130.A requires the City to provide notice to other relevant governing bodies. Notice was given to the City of Eugene and Lane County on December 19, 2017.

Finding: SDC Section 5.2-115 and Lane County Code Section 12.040 require legislative land use decisions be advertised in a newspaper of general circulation, providing information about the legislative action and the time, place, and location of the hearing. Notice of the public hearing concerning this matter was
Finding: The Director is required to send notice to the Department of Land Conservation and Development (DLCD) as specified in OAR 660-18-0020. A “DLCD Notice of Proposed Amendment” was submitted in accordance with DLCD submission guidelines via the FTP website to the DLCD on December 19, 2017 alerting the agency to the City’s proposal to amend the Metro Plan by amending the Springfield 2035 TSP, to adopt the Conceptual Street Map into the Springfield 2035 TSP, and to amend the Springfield Development Code. The notice was mailed more than 35 days in advance of the first evidentiary hearing as required by ORS 197.610 (1). A revised notice was provided to DLCD in accordance with the DLCD submission guidelines via the Post Acknowledgement Plan Amendment (PAPA) website on October 15, 2019 describing the changes made by the Planning Commissions after their public hearing and the Council Alternatives that Springfield City Council developed to put out for public hearing alongside the Planning Commissions’ Recommendation during the November 4, 2019 joint public hearing.

Finding: ORS 227.186 requires the local government to mail a notice to every landowner whose property is proposed to be “rezoned” as a result of adoption or amendment of a proposed ordinance (also known as “Ballot Measure 56” notice). Property is “rezoned” under ORS 227.186 when a city adopts or amends an ordinance in a manner that limits or prohibits land uses previously allowed in the affected zone. The TSP and development code amendments may physically reduce the amount of land available for private uses in some circumstances and therefore may “rezone” property under ORS 227.186. The City mailed a notice complying with ORS 227.186 to every land owner within the City of Springfield urban growth boundary on December 14, 2017.

1. METRO PLAN AMENDMENT – APPROVAL CRITERIA

Springfield Development Code Section 5.14-135 and Lane County Code Section 12.225 list the criteria to be used in approving or denying the Metro Plan amendment, which consists of amendments to the TSP project lists and figures and adopting the Conceptual Street Map as a new Figure in the TSP, showing existing and planned arterials, collectors, and multi-use paths. The Lane County Board of Commissioners and the Springfield City Council must each adopt findings that demonstrate conformance to the applicable criteria:

(1) The amendment shall be consistent with the relevant Statewide planning goals; and
(2) Adoption of the amendment shall not make the Metro Plan internally inconsistent.

METRO PLAN AMENDMENT CRITERION #1: SDC 5.14-135 A., and LANE CODE 12.225 (1); CONSISTENCY WITH RELEVANT STATEWIDE PLANNING GOALS

Statewide Planning Goal 1 – Citizen Involvement:
This goal outlines the citizen involvement requirement for adoption of Comprehensive Plans and changes to the Comprehensive Plan and implementing documents.
Finding: An extensive and significant public outreach process occurred during the TSP update project that contributed to the Goals and Policies which were eventually adopted in the TSP and are now being used for the basis of this implementation process. For this implementation process this goal has been met through additional public outreach and an involvement process.

A Public Involvement Program for the implementation of the TSP was developed in preparation of the Project. This Program was reviewed and endorsed by the Committee for Citizen Involvement (i.e. the Springfield Planning Commission). The Program outlined the information, outreach methods, and involvement opportunities available to the citizens during the process.

The outreach and public involvement process included the following engagement opportunities:

- Involvement on the Stakeholder Sounding Board
- Involvement of the Springfield Bicycle and Pedestrian Advisory Committee
- Information conveyed through the project website
- Mailed notice to every property owner in the Springfield UGB
- Public open house for stakeholders to see proposed changes, learn more, and provide feedback
- Published notice in the newspaper prior to both the public hearings held by the City and County Planning Commissions and the City Council and Lane County Board of Commissioners
- Public hearing process at the Planning Commissions
- Public hearing process at the City Council and Lane County Board of Commissioners

As a result of this public involvement process, the amendments meet the requirements of Goal 1.

Some community members expressed concerns about opportunities for public engagement at time of project development, in particular before construction of local streets or TSP projects that would be built by developers at time of development. The Springfield Development Code states, “The Director shall provide mailed notice to the property owners and occupants within 300 feet of the property being reviewed” for both Type II Applications (Administrative) and Type III Applications (Quasi-Judicial) (Springfield Development Code Section 5.1-130). These code requirements ensure additional community involvement at time of development.

Statewide Planning Goal 2 – Land Use Planning:
This goal outlines the land use planning process and policy framework. The Metro Plan and TSP have been acknowledged by DLCD as being consistent with the statewide planning goals.

Finding: The Metro Plan amendment is being undertaken to amend the TSP project lists and adopt the new Conceptual Street Map Figure in a manner consistent with adopted policies and community values that were established through the adoption of the TSP in 2014. Some of the changes to the TSP project lists and figures are needed to maintain consistency between the TSP and the Regional Transportation Plan. The amendments are being processed as a Type II Metro Plan amendment, which requires any applicable statewide planning goals, federal or state statutes or regulations, Metro Plan regulations, comprehensive plan policies, and City’s implementing ordinances be addressed as part of the decision-making process. As explained under Goal 1, all noticing requirements have been met. All applicable review criteria have been addressed within this staff report. Therefore, the requirements of Goal 2 have been met.
Statewide Planning Goals 3 & 4: Agricultural Lands and Forest Lands

Finding: These statewide planning goals relate to agricultural and forest lands in Oregon and are not applicable to this amendment.

Statewide Planning Goal 5 – Natural Resources
This goal requires the inventory and protection of natural resources, open spaces, historic areas, and sites.

Finding: The City is currently in compliance with the State’s Goal 5. The amendments do not alter the City’s acknowledged Goal 5 inventories or land use programs. No changes will occur to current natural resource protections. Individual transportation project impacts are required to conduct a Goal 5 analysis during each project development phase. As a result, the amendments are in compliance with Goal 5 process requirements.

Statewide Planning Goal 6: Air, Water, and Land Resources Quality
To maintain and improve the quality of the air, water, and land resources of the state.

Finding: The City is currently in compliance with Statewide Planning Goal 6. The amendments do not alter the City’s acknowledged land use programs regarding water quality and flood management protections. The Springfield 2035 Transportation System Plan was developed following the rules and guidance found in Oregon Revised Statute 660-012 and the Central Lane MPO Regional Transportation Plan (RTP). Both outline strategies for decreasing vehicle miles traveled and single-occupancy vehicle trips, which are intended to help improve air quality in the Central Lane MPO Area. The amendments do not alter these policies within the TSP. As a result, the amendments are in compliance with Goal 6.

Statewide Planning Goal 7 – Areas Subject to Natural Hazards
To protect people and property from natural hazards.

Finding: The City is currently in compliance with Goal 7. The amendments do not alter the City’s acknowledged land use programs regarding potential landslide areas and flood management protections. The City is currently a participant in the National Flood Insurance Program administered by the Federal Emergency Management Agency. The amendments do not alter the City’s participation. As a result, the amendments meet the requirements of Goal 7.

Statewide Planning Goal 8 – Recreational Needs
This goal requires the satisfaction of the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Finding: The City is currently in compliance with Goal 8. The TSP amendments include facility improvements, both on-street and off-street, intended to provide improved connectivity for pedestrians and bicyclists. The anticipated off-street improvements were coordinated with Willamalane Park and Recreation District’s updated Parks Master Plan and will provide improved access to a variety of destinations within the planning area. The TSP amendments, including the Conceptual Street Map, include some individual off-street path projects, such as the Glenwood Riverfront Path, that meet a recreational need in addition to a transportation need. The TSP amendments are consistent with Goal 8.
Statewide Planning Goal 9: Economic Development
To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon’s citizens.

**Finding:** The City is currently in compliance with Goal 9. The adoption of the Springfield 2035 Transportation System Plan did not alter the City’s compliance with Goal 9. The amendments do not alter adopted TSP policies to provide a multi-modal transportation system to meet the needs of the community into the future, including accommodating economic growth. The amendments are consistent with this goal.

Statewide Planning Goal 10: Housing
To provide adequate housing for the needs of the community, region, and state.

**Finding:** The City is currently in compliance with Goal 10. The adoption of the Springfield 2035 Transportation System Plan did not alter the City’s compliance with Goal 10. The amendments do not alter the adopted TSP policies to provide a multi-modal transportation system to meet the needs of the community into the future, including accommodating its housing needs. The amendments are consistent with Goal 10.

Statewide Planning Goal 11: Public Facilities and Services
To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

**Finding:** The City is currently in compliance with Goal 11 through its acknowledged Comprehensive Plan. This includes an adopted Transportation System Plan, the Springfield 2035 Transportation System Plan. The amendments do not alter the policies in the adopted TSP for providing timely, orderly, and efficient public facilities and services. Additionally, adoption of the Conceptual Street Map Figure assists with infrastructure planning and construction as identified in the PFSP project lists, because the Conceptual Street Map Figure includes as-yet dedicated and constructed streets that provide infrastructure corridors for planned stormwater, sanitary sewer, water and electricity facilities. As a result, the amendments are in compliance with Goal 11.

Statewide Planning Goal 12: Transportation
To provide and encourage a safe, convenient, and economic transportation system.

**Finding:** The City is currently in compliance with Goal 12 and the Central Lane Regional Transportation Plan (RTP) through its acknowledged Comprehensive Plan (i.e. Metro Plan) and the Central Lane Regional Transportation System Plan as required by Oregon Administrative Rule 660-012 (Transportation Planning Rule). The amendments to the Springfield 2035 Transportation System Plan add a Conceptual Street Map Figure and update the existing TSP project list and figures, which is being amended following the requirements of the Transportation Planning Rule. As a result, the amendments are in compliance with Goal 12. The table below provides specific findings discussing compliance with individual sections of the TPR.

<table>
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<th>TPR Requirements</th>
<th>Springfield TSP Compliance</th>
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Springfield Transportation System Plan (TSP) Implementation
City of Springfield Case Number 811-17-000166-TYP4 Plan amendment; and Lane County Case Number PA 1359
Page 6 of 33
### 660-012-0015 Preparation and Coordination of TSPs

<table>
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<th>(3) Cities and counties shall prepare, adopt and amend local TSPs for lands within their planning jurisdiction in compliance with this division:</th>
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<td>(a) Local TSPs shall establish a system of transportation facilities and services adequate to meet identified local transportation needs and shall be consistent with regional TSPs and adopted elements of the state TSP;</td>
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The Transportation planning toolbox (Chapter 4) and the Transportation Plan (Chapter 5) include facilities and services to meet identified transportation needs. Needs are identified in Volume 3 Appendix C, No Build Analyses and Volume 3 Appendix D, 20-year Needs Analysis. The amendments update the project lists in Chapter 5 of the adopted TSP consistently with the needs identified in Volume 3.

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<th>(5) The preparation of TSPs shall be coordinated with affected state and federal agencies, local governments, special districts, and private providers of transportation services.</th>
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The Stakeholder Sounding Board (SSB) and Technical Review Team (TRT) included a wide range of stakeholders and representatives from City of Springfield, Oregon Department of Transportation (ODOT), DLCD, Lane Council of Governments (LCOG), Lane Transit District, Willamalane Park and Recreation District, Springfield Utility Board, University of Oregon, City of Eugene, and Lane County. Project information was sent to public utility providers that operate within Springfield’s UGB.

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<th>(6) Mass transit, transportation, airport, and port districts shall participate in the development of TSPs for those transportation facilities and services they provide. These districts shall prepare and adopt plans for transportation facilities and services they provide. Such plans shall be consistent with and adequate to carry out relevant portions of applicable regional and local TSPs. Cooperative agreements executed under ORS 197.185(2) shall include the requirement that mass transit, transportation, airport and port districts adopt a plan consistent with the requirements of this section.</th>
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The TRT included representatives from Lane Transit District (LTD).

### 660-012-0016 Coordination with Federally-Required Regional Transportation Plans in Metropolitan Areas

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<th>(1) In metropolitan areas, local governments shall prepare, adopt, amend and update transportation system plans required by this</th>
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The City of Springfield has been a part of LCOG’s Regional Transportation Plan (RTP) Process. The amendments are consistent with the 2040 RTP.
division in coordination with regional transportation plans (RTPs) prepared by MPOs required by federal law. Insofar as possible, regional transportation system plans for metropolitan areas shall be accomplished through a single coordinated process that complies with the applicable requirements of federal law and this division. Nothing in this rule is intended to make adoption or amendment of a regional transportation plan by a metropolitan planning organization a land use decision under Oregon law.

### 660-012-0020 Elements of TSPs

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<th>The TSP Shall include the following elements</th>
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<td>(a)</td>
<td>A determination of transportation needs as provided in OAR 660-012-0030</td>
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<td>(b)</td>
<td>A road plan for a system of arterials and collectors and standards for the layout of local streets and other important non-collector street connections. Functional classifications of roads in regional and local TSP’s shall be consistent with functional classifications of roads in state and regional TSPs and shall provide for continuity between adjacent jurisdictions. The standards for the layout of local streets shall provide for safe and convenient bike and pedestrian circulation necessary to carry out OAR 660-012-0045(3)(b). New connections to arterials and state highways shall be consistent with designated access management categories. The intent of this requirement is to provide guidance on the spacing of future extensions and connections along existing and future streets which are needed to provide reasonably direct routes for bicycle and pedestrian travel.</td>
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The standards for the layout of local streets shall address:

- (A) Extensions of existing streets

The amendments do not alter and are consistent with the transportation needs included in Appendix C, No Build Analysis and Appendix D, 20-year Needs Analyses.

The new TSP Figure 12: Conceptual Street Map is being adopted as the TSP’s road plan for arterials and collectors and is consistent with the functional classifications in the RTP. The Conceptual Street Map also includes off-street multiuse path projects to provide for safe and convenient bike and pedestrian circulation.

The TSP project list amendments do not alter the adopted TSP policies that provide standards for the layout of local streets including extensions of existing streets, connections to existing or planned streets, or connections to neighborhood destinations planned within the 20-year TSP timeline. The already adopted connectivity policies and associated development code amendments will implement these standards.

The findings for applicable projects in project list and figures amendments that are consistent with adopted and acknowledged TSP Policies are incorporated by reference (see page 16).
| (B) | Connections to existing or planned streets, including arterials and collectors; and |
| (C) | Connections to neighborhood destinations. |

| (c) | A public transportation plan which: |
| (A) | Describes public transportation services for the transportation disadvantaged and identifies service inadequacies; |
| (B) | Describes intercity bus and passenger rail service and identifies the location of terminals; |
| (C) | For areas within an urban growth boundary which have public transit service, identifies existing and planned transit trunk routes, exclusive transit ways, terminals and major transfer stations, major transit stops, and park-and-ride stations. Designation of stop or station locations may allow for minor adjustments in the location of stops to provide for efficient transit or traffic operation or to provide convenient pedestrian access to adjacent or nearby uses. |

| (d) | A bicycle and pedestrian plan for a network of bicycle and pedestrian routes throughout the planning area. The network and list of facility improvements shall be consistent with the requirements of ORS 366.514; |

| (e) | An air, rail, water and pipeline transportation plan which identifies where public use airports, mainline and branchline railroads and railroad facilities, port facilities, and major regional pipelines and terminals are located or planned |

The amendments do not alter the adopted multimodal improvement projects in Chapter 5 that include planned transit lines and stops. Some of the additional pedestrian and bicycle projects (PB-53 through PB-56) enhance walking and/or biking routes to transit stops.

The amendments do not alter the adopted transportation planning toolbox in Chapter 4 that provides for enhancing and increasing non-auto travel modes for bicycle and pedestrian route networks. The amendments include amendments to multi-modal improvement projects in Chapter 5 to enhance the bicycle and pedestrian network routes in the City. TSP Figure 12: Conceptual Street Map includes several new planned multi-use path connections that will enhance bicycle and pedestrian network routes.

The amendments do not alter the adopted projects in Chapter 5 that include rail, air, pipeline, and surface water transportation plans.
within the planning area. For airports, the planning area shall include all areas within airport imaginary surfaces and other areas covered by state or federal regulations;

| (f) | For areas within an urban area containing a population greater than 25,000 persons a plan for transportation system management and demand management; | The amendments do not alter the Chapter 4 Transportation Planning Toolbox that includes Transportation System Management and Demand Management sections. |
| (g) | A parking plan in MPO areas as provided in OAR 660-012-0045(5)(c) | The amendments do not alter the adopted TSP Goals and Policies regarding parking in chapter 2. |
| (h) | Policies and land use regulations for implementing the TSP as provided in OAR 660-012-0045; | The TSP amendments do not alter the adopted TSP Implementation and Policy language. |
| (i) | For areas within an urban growth boundary containing a population greater than 2,500 persons, a transportation financing program as provided in OAR 660-012-0040. | Chapter 6, Funding and Implementation includes the estimated revenue stream and a comparison of the cost of the 20 year needs, along with potential funding sources. The TSP project list amendments update some of the project cost estimates based on 2013 dollars to be consistent with existing TSP projects, but do not alter the estimated revenue stream of potential funding sources. |

(3) Each element identified in subsections (2)(b)–(d) of this rule shall contain:

(a) An inventory and general assessment of existing and committed transportation facilities and services by function, type, capacity and condition:

(A) The transportation capacity analysis shall include information on:

(i) The capacities of existing and committed facilities;

(ii) The degree to which those capacities have been reached or surpassed on existing facilities; and

(iii) The assumptions upon which these capacities are based.

(B) For state and regional facilities, the transportation capacity analysis shall be consistent with standards of facility.
performance considered acceptable by the affected state or regional transportation agency;

(C) The transportation facility condition analysis shall describe the general physical and operational condition of each transportation facility (e.g., very good, good, fair, poor, very poor).

(3)(b) A system of planned transportation facilities, services and major improvements. The system shall include a description of the type or functional classification of planned facilities and services and their planned capacities and performance standards;

The amendments to the project lists in Chapter 5 include descriptions of the projects to be amended.

(3)(c) A description of the location of planned facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. This shall include a map showing the general location of proposed transportation improvements, a description of facility parameters such as minimum and maximum road right of way width and the number and size of lanes, and any other additional description that is appropriate.

The amendments to the project lists and figures in Chapter 5 show general locations of planned roadways and other transportation improvements. Facility parameters are provided in the project description or will be determined through application of the Springfield Development Code’s minimum standards for right of way and paving width by functional classification.

(3)(d) Identification of the provider of each transportation facility or service.

Chapter 5 of the TSP identifies the provider of each type of planned facility or service.

### 660-012-0025 Complying with the Goals in Preparing TSPs

(1) Except as provided in section (3) of this rule, adoption of a TSP shall constitute the land use decision regarding the need for transportation facilities, services and major improvements and their function, mode, and general location.

The amendments were processed by the City as a Type IV legislative land use decision.

(2) Findings of compliance with applicable statewide planning goals and acknowledged comprehensive plan policies and land use regulations shall be developed in conjunction with the adoption of the TSP.

Specific findings are contained in this staff report.

### 660-012-0030 Determination of Transportation Needs

(1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation system plan.

The amendments do not alter the determination of transportation needs adopted in Volume 3, Appendices B, C, and D. The amendments do not alter the determination of transportation needs adopted in Volume 3, Appendices B, C, and D.
transportation network being planned including:

(a) State, regional, and local transportation needs;

(b) Needs of the transportation disadvantaged;

(c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development).

(2) Counties or MPO's preparing regional TSP's shall rely on the analysis of state transportation needs in adopted elements of the state TSP. Local governments preparing local TSP's shall rely on the analyses of state and regional transportation needs in adopted elements of the state TSP and adopted regional TSP's.

(3) Within urban growth boundaries, the determination of local and regional transportation needs shall be based upon:

(a) Population and employment forecasts and distributions that are consistent with the acknowledged comprehensive plan, including those policies that implement Goal 14. Forecasts and distributions shall be for 20 years and, if desired, for longer periods; and

(b) Measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.

(4) In MPO areas, calculation of local and regional transportation needs also shall be based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile.

660-012-0035 Evaluation and Selection of Transportation System Alternatives

(1) The TSP shall be based upon evaluation of potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology. The following shall be alter the TSP’s acknowledged compliance with this rule.

The amendments are consistent with and do not alter the adopted Alternatives Evaluation Process in Volume 3, Appendix E, that includes consideration and evaluation of potential impacts of system alternatives.
evaluated as components of system alternatives:

| (a) Improvements to existing facilities or services; | Improvements to existing facilities and services were considered before new facilities, and are high priorities in this TSP for all modal elements. |
| (b) New facilities and services, including different modes or combinations of modes that could reasonably meet identified transportation needs; | New facilities included in these amendments and changes to new facilities already adopted in the TSP were evaluated based on their ability to include all modes or combinations of travel modes to meet identified transportation needs. |
| (c) Transportation system management measures; | The amendments do not alter the adopted Transportation System Management measures in the Chapter 4 Transportation Planning Toolbox. |
| (d) Demand management measures | The amendments do not alter the adopted Transportation Demand Management measures in Chapter 4 Transportation Planning Toolbox. |
| (e) A no-build system alternative required by the National Environmental Policy Act of 1969 or other laws. | The amendments do not alter the adopted No Build Analyses in Volume 3, Appendix C. |

(3) The following standards shall be used to evaluate and select alternatives:

| (a) The transportation system shall support urban and rural development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan; | The amendments do not alter the No Build Analyses in Volume 3, Appendix C or the 20-year needs analyses in Appendix D, which document the anticipated land uses and the TSP projects including consideration of these land uses in determining an appropriate transportation system. |
| (b) The transportation system shall be consistent with state and federal standards for protection of air, land and water quality including the State Implementation Plan under the Federal Clean Air Act and the State Water Quality Management Plan; | The amendments do not alter adopted TSP policies that support modes other than the single-occupancy vehicle to help reduce transportation related air-quality impacts. The TSP amendments include consideration for environmental and ecological impacts, such as nearby wetlands, which informed facility type and alignment decisions. |
| (c) The transportation system shall minimize adverse economic, social, environmental and energy consequences; | The TSP amendments include consideration for minimizing economic, social, environmental, and energy consequences. |
| (d) The transportation system shall minimize conflicts and facilitate connections between modes of transportation; and | The TSP amendments include an evaluation of projects for ability to minimize conflicts and facilitate connections between transportation modes. |
### (e) The transportation system shall avoid principal reliance on any one mode of transportation by increasing transportation choices to reduce principal reliance on the automobile. In MPO areas this shall be accomplished by selecting transportation alternatives which meet the requirements in section (4) of this rule.

The TSP amendments do not alter the adopted multimodal transit projects, and increase the bicycle and pedestrian multi-modal projects to further increase transportation choices and reduce reliance on the automobile. TSP amendments that increase transportation choices and reduce reliance on the automobile include TSP projects PB-53, PB-54, PB-55, PB-56, R-27, R-39, R-52, S-17, US-1, and US-19.

### (4) In MPO areas, regional and local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reducing reliance on the automobile. Adopted standards are intended as means of measuring progress of metropolitan areas towards developing and implementing transportation systems and land use plans that increase transportation choices and reduce reliance on the automobile. It is anticipated that metropolitan areas will accomplish reduced reliance by changing land use patterns and transportation systems so that walking, cycling, and use of transit are highly convenient and so that, on balance, people need to and are likely to drive less than they do today.

The amendments do not alter the adopted TSP or RTP standards for increasing transportation choices and reducing reliance on the automobile. The amendments to the TSP project lists include amendments to multimodal projects to further increase transportation choices to reduce reliance on the automobile. TSP amendments that increase transportation choices and reduce reliance on the automobile include TSP projects PB-53, PB-54, PB-55, PB-56, R-27, R-39, R-52, S-17, US-1, and US-19.

### (7) Regional and local TSPs shall include benchmarks to assure satisfactory progress towards meeting the approved standard or standards adopted pursuant to this rule at regular intervals over the planning period. MPOs and local governments shall evaluate progress in meeting benchmarks at each update of the regional transportation plan. Where benchmarks are not met, the relevant TSP shall be amended to include new or additional efforts adequate to meet the requirements of this rule.

The amendments do not alter any benchmarks adopted in the TSP or the RTP.

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### 660-012-0040 Transportation Financing Program

1. For areas within an urban growth boundary containing a population greater than 2,500 persons, the TSP shall include a transportation

The TSP project list amendments update the cost estimates for amended projects but do not significantly alter the financing plan included in
| (2) | A transportation financing program shall include the items listed in (a)-(d): |
|     | Volume 2, Detailed Cost Estimates and Funding Analyses. |
| (a) | A list of planned transportation facilities and major improvements; |
|     | The TSP amendments include updates to the list of planned transportation facilities and major improvements in the multimodal improvement projects section in Chapter 5. |
| (b) | A general estimate of the timing for planned transportation facilities and major improvements; |
|     | The TSP amendments to Chapter 5 continue to organize the multimodal improvements into general time frames. |
| (c) | A determination of rough cost estimates for the transportation facilities and major improvements identified in the TSP; and |
|     | The TSP project list amendments to Chapter 5 include updates to the rough cost estimates for new or amended projects. |
| (d) | In metropolitan areas, policies to guide selection of transportation facility and improvement projects for funding in the short-term to meet the standards and benchmarks established pursuant to 0035(4)-(6). Such policies shall consider, and shall include among the priorities, facilities and improvements that support mixed-use, pedestrian friendly development and increased use of alternative modes. |
|     | Per the findings in 660-012-0035(4) and (7), the amendments do not alter and are consistent with the adopted needs, projects, and policies in the Springfield TSP. |

| (3) | The determination of rough cost estimates is intended to provide an estimate of the fiscal requirements to support the land uses in the acknowledged comprehensive plan and allow jurisdictions to assess the adequacy of existing and possible alternative funding mechanisms. In addition to including rough cost estimates for each transportation facility and major improvement, the transportation financing plan shall include a discussion of the facility provider's existing funding mechanisms and the ability of these and possible new mechanisms to fund the development of each transportation facility and major improvement. These funding mechanisms may also be described in terms of general guidelines or local policies. |
|     | The TSP amendments do not alter the 20-year estimated revenue stream or potential funding sources identified in Chapter 6. |

| (5) | The transportation financing program shall provide for phasing of major improvements to encourage infill and redevelopment of urban lands prior to facilities and improvements which would cause premature development of urbanizable lands or conversion of rural lands |
|     | The TSP amendments include the ability to phase, and are consistent with the evaluation criteria used to select future transportation projects provided in Volume II, Appendix E. |
TSP Project List and Figures Findings:

Changes were made to the following projects to reflect accurate names, provide clarification on project extent descriptions, or correct typos: PB-13, PB-31, R-3, R-6, R-23, S-2, US-7.


The following projects were added or changed to reflect approved development or already constructed projects: PB-28, PB-29, PB-40, PB-42, R-42, R-45, R-46.

PB-4 (Wayside Loop/Manor Drive to Riverbend Path): During the November 4, 2019 joint City Council and Lane County Board of Commissioners’ public hearing, a Springfield property owner who lives on Ann Court expressed concern about the existing TSP project PB-4 in relation to his property. The project name and extent shown on TSP Figures 6, 11, and 12 are being modified to provide flexibility for the alignment of a future multi-use path connection between the neighborhood to the south of Riverbend Hospital and the existing multi-use path at Riverbend Hospital. TSP project PB-4 helps implement TSP policies 3.2, 3.4, 3.5, and 3.7 that articulate the need for a comfortable and safe walking and biking connection between the McKenzie River and Martin Luther King Jr. Pkwy. Martin Luther King Jr. Pkwy does not have walking facilities and the bike lanes are not comfortable for many people riding bikes given the 45 MPH posted speed and high traffic volumes. With the project changes, the alignment of the future multi-use path would be determined at time of project development, including additional public outreach and opportunity to comment.

PB-28 (South 2nd Street to South B Street): The project extent is modified to reflect connections between the already built Mill Race Path and PB-27 planned project that has an eastern extent of South 2nd Street. The amendments change this project to “As development occurs” to reflect likelihood of developing the project in partnership with other development in the area within the next 20 years. TSP Volume 3 Appendix E defines “As development occurs projects” as those that are likely to be needed as properties in the city develop or redevelop. They are projects that are not likely to be advanced by the city in the absence of this development. This project is not likely to advance without partnership with private development given the that the City of Springfield does not own all of the land necessary to build the path connection and installation of a wayfinding project that helps people walking and biking navigate the on-street route that fulfills the same connectivity as PB-28.

PB-29 (Mill Race Path): The amendments modify the project extent and description to reflect the constructed Mill Race Path project.

PB-31 (Moe Mountain Path – River Heights Drive to Marcola Road): The amendments change the project name for consistency with the Willamalane 2012 Comprehensive Plan and existing street names. TSP Volume 3 Appendix E developed evaluation criteria to prioritize TSP projects. The amendments change this project to a “20-year projects: Priority project” from a beyond 20-year project. This change is justified based on this project fulfilling the evaluation criterion from TSP Volume Appendix E as well as a few recent activities related to this project. The Moe Mountain Path closes key gaps in the bicycle system, closes key...
gaps in the pedestrian system, addresses a known safety issue (railroad crossing on Marcola Road), and supports multi-modal access to major developable employment centers and redevelopment priorities (Marcola Meadows development). Recent activities related to this project include Willamalane recently acquiring the majority of the property necessary to construct the path and completing a feasibility study for the portion of the project on their property. The City of Springfield and Willamalane have been in communication with Union Pacific Railroad to acquire the remaining land necessary for the project. The City of Springfield in partnership with Willamalane submitted an application during the Statewide Transportation Improvement Program (STIP) Non-Highway Enhance funding cycle through the Lane Area Commission on Transportation for the 2019-2021 STIP.

PB-42 (Main Street/66th Street to 67th Street): The amendments change the project description to match the project as approved by ODOT and constructed in 2019. Based on community input, crash data, signalized intersection operations, and proximity of land uses that attract pedestrian traffic (i.e. schools, parks, bus stops, etc.), the location was shifted from 57th Street to between 66th Street and 67th Street to help better meet the highest needs in the pedestrian network.

PB-43 (Bob Straub Parkway/Daisy Street): The amendments add coordination to the project description to ensure project planning is linked with R-44 for efficiency.

PB-46 (Haul Road path – South 49th Place to UGB): The amendments on the Figures add an arrow to the end of project at the UGB to indicate the opportunity to coordinate with other jurisdictions as part of broader east Lane County bike network connectivity efforts, in alignment with TSP Policy 3.8.

PB-53 (66th Street – Thurston Road to Main Street): The amendments add this project to install bicycle lanes on 66th Street due to its street classification as a minor collector and its location along a key route to and from Ridgeview Elementary School where traffic volumes and speeds can be a barrier to students biking to and from school without a dedicated bicycle facility. 66th Street serves as a key north-south connection in the Springfield bicycle network. This project helps implement TSP Policy 2.3 Action 2.

PB-54 (G Street – 5th Street to 28th Street): The amendments add bicycle lanes on G Street due to its classification as a major collector and its location along a key route to and from Two Rivers – Dos Rios Elementary School and Springfield High School where traffic volumes and speeds can be a barrier to students biking to and from school without a bicycle facility. G Street serves as a key east-west connection in the Springfield bicycle network. This project helps implement TSP Policy 2.3 Action 2.

PB-55 (48th/G/52nd – High Banks Road to Aster Street): The amendments add this multi-use path project to specify the type of walking and bicycling facility to be provided in conjunction with US-16, US-17, and US-18. Due to the adjacent land uses (storm water facility on west side of 48th Street and north side of G Street and neighborhood residential on east/south side of the streets), a multi-use path on the residential side will reduce the number of times someone walking or bicycling would need to cross the street to access and use the facility. This project helps implement TSP Policies 2.4, 3.2, 3.3, 3.5, and 3.7.

PB-56 (Holly Street to Rocky Road): This new multi-use bridge project fills a key walking and biking gap between the Thurston and other eastern Springfield neighborhoods and the Clearwater Park Middle Fork Path Trailhead that leads to the Mill Race Path, downtown Springfield, and Eugene. This project helps implement TSP Policies 3.2, 3.4, and 3.7.
R-9 (Laura Street to Pioneer Parkway): The amendments clarify the role of PB-7 within this roadway project to ensure sidewalk and bikeway elements are built at time of roadway construction or sooner.

R-27 (Yolanda Avenue to 35th Street): The amendments modify the project extent by extending it to the east two blocks to connect with the existing sidewalks east of 35th Street to create a continuous, connected sidewalk network. This project, in conjunction with R-26, will serve as a key bike route connection for the surrounding neighborhood to and from Yolanda Elementary School and Briggs Middle School. Parents and grandparents of students in this neighborhood have expressed concern about the existing routes to school and have requested better walking and biking infrastructure connections to the school. A dedicated bike facility and continuous sidewalks will provide more access to people with a broader range of abilities and ages. This project helps implement TSP Policy 3.7 and Policy 3.8 Action 2.

R-34 (Centennial Boulevard/Industrial Avenue – 28th Street to 35th Street): The amendments adjust Figure 10 to match project extent in originally adopted (2014) project name.

R-39 (Extend South 48th Street to Daisy Street): The amendments change this project from a three-lane cross section to a two-lane cross-section to match South 48th Street south of Daisy Street. The two-way left turn lane to the south of Aster Street on South 48th Street is not necessary based on the limited number of access points and lack of developable land to the east of the street. A multi-use path has been added to provide a walking and biking facility to match PB-55 and the Booth Kelly Haul Road multi-use path (PB-38). A roundabout intersection has been added to provide traffic calming along the Virginia-Daisy Bikeway corridor (PB-36). This project is needed to provide a necessary secondary access for future development and to balance traffic impacts via the connection to Main Street. Previous developments to the south of Daisy Street have already contributed to this project through the development process. The project was changed from “20-year projects: Priority projects” to “20-year projects: As development occurs” because a development subdivision came in that would rely upon the project being built in order to develop. Since the TSP was originally adopted in 2014, the Weyerhaeuser Haul Road that was previously private property is now public right-of-way and development is contingent upon using that right-of-way for secondary access and to complete the transportation network as planned in the area. Developers in the area have contributed financially to the future project. TSP Volume 3 Appendix E defines “As development occurs projects” as those that are likely to be needed as properties in the city develop or redevelop. They are projects that are not likely to be advanced by the city in the absence of this development. Given the establishment of the public right-of-way and recent subdivision application, this project more appropriately fits in the “20-year projects: As development occurs” category.

R-41 (South 54th Street – Main Street to Daisy Street): The South 54th multi-use path from Main Street to Daisy Street was constructed in 2018 in the South 54th Street right-of-way to implement the walking and biking connection components of this project. The complete collector street is not as urgent an issue with the completed path connection so the project can be postponed to beyond 20 years and other more urgent projects can be prioritized for funding sooner. TSP Volume 3 Appendix E developed evaluation criteria and categorizes TSP projects. The recently built multi-use path project partially addresses the rationale for the project by improving north-south connectivity between Main Street and Daisy Street and addresses the evaluation criteria of balancing impacts to developable parcels with system and community needs and supporting multi-modal access to major developable employment centers and redevelopment priorities.
R-42 (Holly Street – South 48th Street to South 57th Street): The amendments change the project name for consistency with the segment from Daisy Street to South 49th Place that has already been developed. The street alignment was changed due to geotechnical findings of a landslide hazard in the extension of Glacier Drive when the development occurred (see development application TYP214-00004).

R-44 (Daisy Street crossing of Bob Straub Parkway): The Virginia-Daisy Bikeway project (PB-36) will likely increase the volumes of bicycle and pedestrian traffic crossing Bob Straub Parkway at Daisy Street. Since the Virginia-Daisy Bikeway is in the design process and will be constructed in the next few years, the need for crossing improvements is becoming more urgent. TSP Volume 3 Appendix E developed evaluation criteria to categorize TSP projects. The amendment of this project from “Beyond 20 year projects” to “20-year projects: Priority projects” is justified by its fulfillment of the roadway project evaluation criteria to address known safety issues, support or enhance the ability to implement key state or regional projects, and support multi-modal access to major developable employment centers and redevelopment priorities. The project also fulfills the pedestrian-bicycle project evaluation criteria to close key gaps in the bicycle system, close key gaps in the pedestrian system, address known safety issue, and address pedestrian and bicycle connectivity gaps and safety issues that affect key routes to schools. The rationale for prioritizing this project is to close a gap in the pedestrian and bicycle system from the Virginia-Daisy Bikeway corridor to the Thurston neighborhood.

R-45 (Improvements within the Jasper-Natron Area): The Conceptual Street Map (Figure 12) matches current development conditions of an already built stubbed street’s dimensions, sewer trunk line connection, and allows the Street Network Standards in the Springfield Development Code to determine the necessary street network at time of the development to the east of Jasper Road.

R-46 (Bob Straub Parkway to Mountaingate Drive and Future Local) and R-47 (Haul Road – Quartz Avenue to UGB): There are two conservation easements totaling 316 acres and an 80-acre Community Forest, which restricts development to primarily soft-surface trails and trail amenities that precludes the development of this area as residential property with associated installation of collector streets. On October 2, 2017 the City Council approved a plan diagram amendment and zone change in the southeast Thurston Hills area (File numbers TSP417-00001 and TYP317-00003, Ordinance #6373) which redesignated land from low density residential (LDR) to parks and open space. The land that was formally planned for residential is no longer suitable for residential development and the street network needs have changed from serving future residential development to more limited access for connectivity and public safety purposes. Figures 6, 10, and 12 are being modified accordingly.

R-51 (Gateway Street/Harlow Road): This project is being added as a new project since it is listed in the Central Lane MPO 2016-2040 Regional Transportation Plan (RTP project #785). The addition is for consistency with the regional plan in accordance with OAR 660-012-0016(2).

R-52 (Main Street/48th Street): The amendments add traffic control improvements at the intersection to address additional trips through the intersection. R-42 extends a new collector from the south up to connect at Main Street and PB-55 connects a regional multi-use path facility, which will add more multimodal trips to this intersection. The additional trips will further increase safety problems along Main Street without the addition of a traffic control improvement.

S-17 (Study street connectivity and traffic calming improvements in I-5/Harlow Rd/Laura St/Hwy 126 area that would retain motor vehicle diversion at the intersection of Don St and Lochaven Ave): The existing
neighborhood connectivity is not in line with TSP Policy 3.4 to provide reasonably direct travel routes to destination points within the neighborhood for all modes of travel. This study will evaluate options to provide connectivity within the residential neighborhood while maintaining a separation from the industrial zoning area to the south that attracts truck traffic. Truck traffic through the neighborhood does not support walking and biking in the residential area as well as to and from Guy Lee Elementary School. This study will help further implement TSP Policy 3.8 Action 2 that states, “Coordinate with Springfield Public Schools to provide key bicycle, pedestrian, and transit facilities near schools to ensure safe, convenient, and well-connected routes to schools.”

US-1 (Game Farm Road South – Mallard Avenue to Harlow Road): The amendments add sidewalks since the project description did not include a walking facility previously. Cost revisions reflect the addition of sidewalks and correct miscalculations in initial order of magnitude estimate.

US-3 (Aspen Street – Centennial Boulevard to West D Street): The amendments change the project description from a three-lane to a two-lane cross section. Traffic volumes are not anticipated to require a two-way left turn lane since most sites in the area are already developed and the street functions without a two-way left turn lane. Aspen Street does not connect to any major automobile streets or trip generators at the southern extent of the street. These modifications enable the project to be built in a more cost effective way while still fulfilling the transportation system needs. This amendment supports implementing TSP Policy 4.1.

US-7 (South 28th Street – South F Street to South M Street): The amendments change the project’s southern extent to South M Street since the UGB expansion was in process to be acknowledged during this project. However, this project has not completed transportation planning for the UGB expansion area since the UGB expansion was not acknowledged at the time the public hearings started.

US-8 (35th Street – Olympic to Commercial Avenue) and US-9 (Commercial Avenue – 35th to 42nd Street): The amendments move these projects from “Beyond 20-year projects” to “20-year projects: Priority projects” based on their support of the following evaluation criteria from TSP Volume 3 Appendix E: support connectivity between major activity centers and closing key gaps in the bicycle system and closing key gaps in the pedestrian system. Additionally, the poor pavement conditions of 35th Street and Commercial Avenue will trigger street re-construction sooner than 20 years from now. For efficiency, urban standards should be completed at time of pavement preservation or full street reconstruct. The Oregon Bike Bill will require bike facilities at time of reconstruction since 35th Street is a major collector. These projects help implement TSP Policies 3.2 and 3.4.

US-10 (36th Street – Commercial Avenue to Main Street): The amendments move this project from “Beyond 20-year projects” to “20-year projects: Priority projects” based on its support of the following evaluation criterion from TSP Volume 3 Appendix E: supports enhanced connectivity between major activity centers, closes key gaps in the bicycle system, and closes key gaps in the pedestrian system. Additionally, the poor pavement conditions of 36th Street will trigger street re-construction sooner than 20 years from now. For efficiency, urban standards should be completed at time of pavement preservation or full street reconstruct.

US-16 (48th Street – Main Street to G Street), US-17 (G Street – 48th Street to 52nd Street), and US-18 (52nd Street – OR 126E to G Street): The amendments add these projects to define the elements of the urban standard improvements for these facilities to better connect with the regional multi-use path system and
support adjacent residential land uses on the path side of the street and industrial uses on the west/north sides of the streets. By separating PB-55 from US-16, the walking and biking facilities may be able to be funded and built sooner or the full US-16 project could be built at the same time as PB-55. R-39 connecting South 48th Street to Main Street will increase traffic volumes to and from the 52nd Street interchange with Hwy 126 to the north and stress the already poor pavement conditions further.

US-19 (Oakdale Avenue – Pheasant Boulevard to Game Farm Road): The amendments add sidewalks to ensure sidewalk network connectivity from the existing sidewalks on Oakdale Avenue to US-1 (Game Farm Road South).

TSP Figure 2 Amendments Findings:

- Beltline east of I-5: The amendments change the ODOT owned and managed portion of Beltline east of I-5 to the Gateway intersection to red, indicating Major Arterial street classification, to reflect existing conditions.

- Aspen Street near West D Street: the amendments clean up Figure 2 so that the section of Aspen St that connects to West D Street is still shown as Minor Collector, but the section that includes a parking lot/driveway area for Heron Playground and the boat ramp and parking lot along the Northbank Path is no longer shown as Minor Collector.

Statewide Planning Goal 13: Energy Conservation

Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based on sound economic principles.

Findings: The City is currently in compliance with Goal 13 through its acknowledged Comprehensive Plan. The amendments to the City of Springfield 2035 Transportation System Plan do not alter the City’s compliance with Goal 13. The TSP provides direction for the City regarding transportation improvements, including strategies to reduce vehicle miles traveled and single occupancy vehicle trips. Included in the TSP is direction to plan, fund, and develop a multi-modal transportation system that meets the needs of the community and region. The TSP amendments include facility improvements, both on-street and off-street, intended to provide improved connectivity for pedestrians and bicyclists. The facilities will provide improved access to a variety of destinations within the planning area. The Springfield 2035 Transportation System Plan also includes policy direction and facility improvements intended to provide improved high frequency public transit efficiency and connectivity. All of these improvements and strategies are intended to reduce energy consumption associated with the transportation system. As a result, the amendments are consistent with this goal.

Statewide Planning Goal 14: Urbanization

To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Findings: Ordinance 6361 (adopted December 5, 2016) expands the Springfield urban growth boundary to include additional land for industrial and commercial employment and for parks and open space. The ordinance was approved by LCDC on March 5, 2019, after the TSP amendments were initiated. Ordinance 6361 provides that the TSP will be revised at a later date to provide for transportation system
improvements intended to serve the UGB expansion areas. The TSP amendments, including the new TSP Figure 12: Conceptual Street Map, pertain only to the urban growth boundary that was acknowledged at the time the project was initiated. Therefore, the TSP amendments are consistent with Goal 14.

Statewide Planning Goal 15: Willamette River Greenway
To protect, conserve, enhance, and maintain the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

Finding: Nearly all of projects in the Springfield 2035 Transportation System Plan are located outside of the Willamette River Greenway area. As required by Goal 15 and implemented through the City’s adopted and acknowledged Willamette Greenway Overlay District standards, individual transportation projects that are located in the Willamette River Greenway are required to conduct an individual analysis of Goal 15 compliance during the project development phase of work. The amendments implement and are consistent with the adopted TSP and therefore are consistent with this goal.

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

Finding: These statewide planning goals relate to coastal lands in Oregon and are not applicable to the amendments.

CONCLUSION: Based on the analysis above, the Metro Plan amendment is consistent with the applicable Statewide Planning Goals. SDC 5.14-135 Criteria A is met.

METRO PLAN AMENDMENT CRITERION #2: SDC 5.14-135 B., and LANE CODE 12.225 (2); Adoption of the amendment shall not make the Metro Plan internally inconsistent

Finding: The Springfield TSP, a functional plan of the Metro Plan is being amended to adopt the TSP Figure 12: Conceptual Street Map and update the previously adopted project list and figures in Chapter 5. Both these items are consistent with the Metro Plan. The amendments to the TSP project lists and figures are consistent with the adopted goals and policies in the TSP. Chapter 2, Policy 3.1 of the TSP directs the City to adopt and maintain the Conceptual Street Map. The street alignments and classifications depicted on TSP Figure 12: Conceptual Street Map are consistent with the TSP projects identified in Chapter 5, or amendments to the project list are included to provide consistency.

Finding: Chapter III of the Metro Plan contains eleven specific elements that address a comprehensive list of topics, including: (A) Residential Land Use and Housing Element; (B) Economic Element; (C) Environmental Resources Element; (D) Willamette River Greenway, River Corridors, and Waterways Element; (E) Environmental Design Element; (F) Transportation Element; (G) Public Facilities and Services Element; (H) Parks and Recreation Facilities Element; (I) Historic Preservation Element; (J) Energy Element; and (K) Citizen Involvement Element. The goals and policies of the TSP were found to be consistent with the policies of the Metro Plan and Springfield Comprehensive Plan for each element noted above when the TSP was adopted in 2014. The amendments to the TSP project lists and figures do not alter these adopted TSP goals and policies.
Finding:

A. Metro Plan Residential Land Use and Housing Element

On June 20th 2011, the City of Springfield Council adopted Ordinance 6268 amending the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to adopt the Springfield 2030 Refinement Plan Residential Land Use and Housing Element and the Springfield Residential Land and Housing Needs Analysis. This Residential Land Use and Housing Element and Residential Land and Housing Needs Analysis contains the following relevant housing policies related to the Springfield 2035 Springfield TSP: H.3, H.5, H.10, H.13.

H.3 – Support community-wide, district-wide and neighborhood-specific livability and redevelopment objectives and regional land use planning and transportation planning policies by locating higher density residential development and increasing the density of development near employment or commercial services, within transportation-efficient Mixed-Use Nodal Development centers and along corridors served by frequent transit service.

H.5 Develop additional incentives to encourage and facilitate development of high density housing in areas designated for Mixed Use Nodal Development.

H.10 Through the updating of development of each neighborhood refinement plan, district plans or specific area plan, amend land use plans to increase development opportunities for quality affordable housing in locations served by existing and planned frequent transit service that provides access to employment centers, shopping, health care, civic, recreational and cultural services.

H.13 Promote housing development and affordability in coordination with transit plans and in proximity to transit stations.

In addition to the above stated Metro Plan housing policies, the Springfield 2030 Refinement Plan Residential Land Use and Housing Element and the Springfield Residential Land and Housing Needs Analysis contains land use efficiency measures which were considered and incorporated early and often into the buildable lands analyses. Some examples of these efficiency measures include, but are not limited to:

- Encourage more infill and redevelopment;
- Encourage more development of urban centers and urban villages (Nodal Development);
- Allow more mixed-use development;
- Encourage more transit-oriented design;
- Continue efforts to revitalize Downtown.

The Springfield 2035 TSP contains multiple goals and policies which support the above stated housing policies and land use efficiency measures. These TSP policies include, but are not limited to:

- Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
• Policy 1.3: Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).

• Goal 3: System Design: Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.

• Policy 3.2: Expand and enhance Springfield’s bikeway system and provide bicycle system support facilities to both new development and redevelopment/expansion.

• Policy 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.

• Policy 3.7: Provide for a pedestrian environment that supports adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking by providing direct routes and removing barriers when possible.

• Policy 3.8: Coordinate the design of Springfield’s transportation system with relevant local, regional, and state agencies.

The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Metro Plan policies. The amendments to the TSP project list and the adoption of TSP Figure 12: Conceptual Street Map will further support and enhance the Metro Plan’s Residential Land Use and Housing Element through strengthening multi-modal connections, enhancing bike, pedestrian and transit facilities and target multi-modal infrastructure in higher density, mixed use areas throughout Springfield. The amendments are consistent with this Metro Plan Element.

Finding:

B. Metro Plan Economic Element

On December 5, 2016, the City of Springfield Council adopted Ordinance 6361 amending the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to adopt the Springfield 2030 Economic policy element. This Element was approved by LCDC in March 2019. This Economic Element contains the following relevant policies and implementation strategies related to implementing the Springfield 2035 TSP:

Goal EG-1: Broaden, improve, and diversify the state and regional economy, and the Springfield economy in particular, while maintaining or enhancing environmental quality and Springfield’s natural heritage.

Policy E.4: Expand industrial site opportunities by evaluating and rezoning commercial, residential, and industrial land for the best economic return for the community through the process of City refinement planning, review of owner-initiated land use proposals, expanding the urban growth boundary, and other means.
Implementation Strategy 4.6: Increase opportunities for siting employment centers where they can be efficiently served by multiple modes of transportation.

Goal EG-3: Strengthen and maintain strong, connected employment centers and economic corridors to support small, medium, and large businesses.

Policy E.18: Coordinate transportation and land use corridor planning to include design elements that support Springfield’s economic and community development policies and contribute to community diversity and inclusivity.

Implementation Strategy 18.3: Establish preferred design concepts for key intersections along the corridor that integrate vehicle, pedestrian, bicycle and transit needs.

Goal EG-5d: Be prepared—Contribute to development of the region’s physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.

Policy E.38: Strengthen the coordination between infrastructure, planning and investments, land use, and economic development goals to prepare land and physical infrastructure, in a timely fashion, that is necessary to support business development and stimulate quality job creation.

Policy E.39: Provide adequate infrastructure efficiently and distribute cost fairly.

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

Implementation Strategy 40.1: Coordinate capital improvement planning with land use and transportation planning to coincide with Springfield’s Economic Element.

Implementation Strategy 40.2: Provide the necessary public facilities and services as funds become available to foster economic development.

Implementation Strategy 40.4: Ensure that public private development agreements are in effect prior to financing public improvements to ensure cost recovery.

Implementation Strategy 40.5: Explore alternative funding mechanisms in addition to debt service that provide timely completion of ‘connecting’ public facilities (e.g. an unpaved block of a street or missing sections of sewer line).

Implementation Strategy 40.7: Continue to seek funding opportunities and public-private partnerships to construct key urban infrastructure elements that support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.

Policy E.43: Promote and build on the region’s transportation, distribution, and logistics advantages.

Goal E-7: Make development decisions predictable, fair, and cost-effective.
Policy E.47: Enhance, maintain, and market Springfield’s reputation for: rapid processing of permits and applications, maintaining City agreements and commitments, and providing developers with certainty and flexibility in the development process.

Implementation Strategy 47.1: Continually improve development permitting processes to remove regulatory impediments to redevelopment as practical, provide efficient streamlining of permitting processes, create incentives for redevelopment, and provide flexible design standards (clear and objective track plus discretionary track) to build on the community’s strong reputation as a friendly, welcoming and business-friendly city.

Aside from the new Economic Element discussed above, the preexisting Economic Element of the Metro Plan also addresses the economic needs of current and future residents of the metropolitan area. The overarching economic goal of the Metro Plan Element is to, “Broaden, improve, and diversify the metropolitan economy while maintaining or enhancing the environment.”

The Springfield 2035 TSP contains multiple goals and polices which support these economic policies. These TSP policies include, but are not limited to:

- **Goal 1:** Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
- **Policy 1.1:** Manage Springfield’s street, bike, pedestrian, rail, and transit system to facilitate economic growth of existing and future businesses in Springfield (NOTE Action #1 – When evaluating needed roadway improvements, consider the economic viability of existing commercial and industrial areas).
- **Policy 2.2:** Manage traffic operation systems for efficient freight and goods movement along designated freight, truck, and rail routes in Springfield (NOTE Action #2 – Coordinate with rail providers to improve at-grade rail crossing treatments to improve traffic flow and manage conflict points; create grade-separated rail crossings when possible).
- **Policy 2.6:** Manage the on-street parking system to preserve adequate capacity and turnover for surrounding land uses.
- **Policy 2.7** manage the off-street parking system to assure major activity centers meet their parking demand through a combination of shared, leased, and new off-street parking facilities and TDM programs.
- **Goal 3:** System Design – Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.
- **Policy 3.2:** Expand and enhance Springfield’s bikeway system and provide bicycle system support facilities to both new development and redevelopment / expansion.
- **Policy 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.
- **Policy 3.9:** Support provision of rail-related infrastructure improvements as part of the Cascadia High-Speed Rail Corridor project.
- **Policy 4.1:** Support development of a stable and flexible transportation finance system that provides adequate resources for transportation needs identified in the Springfield 2035 TSP.
The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Metro Plan economic policies. The amendments to the TSP project list and the adoption of TSP Figure 12: Conceptual Street Map are consistent with these adopted policies and will further support and enhance the Economic Element through strengthening freight mobility and further supporting freight infrastructure. The implementation of the TSP will help provide a greater range of transportation options for businesses and employees. Implementation of the supporting policies listed above will enhance the on and off-street parking system to promote economic development. The amendments are consistent with this Metro Plan Element.

Finding:

C. Environmental Resources Element

The Environmental Resources Element addresses the natural assets and hazards in the metropolitan area. The policies of this element emphasize reducing urban impacts on wetlands throughout the metropolitan area and planning for the natural assets and constraints on undeveloped lands on the urban fringe.

The Environmental Resources Element of the Metro Plan contains the following relevant policies related to the implementation of the Springfield 2035 Springfield TSP: C.8, C.22, C.23 and C.24.

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

C.22 Design of new street, highway, and transit facilities shall consider noise mitigation measures where appropriate.

C.23 Design and construction of new noise-sensitive development in the vicinity of existing and future streets and highways with potential to exceed general highway noise levels shall include consideration of mitigating measures, such as acoustical building modifications, noise barriers, and acoustical site planning. The application of these mitigating measures must be balanced with other design considerations and housing costs.

C.24 Local governments shall continue to monitor, to plan for, and to enforce applicable noise standards and shall cooperate in meeting applicable federal and state noise standards.

The Springfield 2035 TSP contains goals and polices which support these economic policies. These include, but are not limited to:

- Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
- Policy 1.2: Consider environmental impacts of the overall transportation system and strive to mitigate negative effects and enhance positive features. (NOTE Action #1 – Strive to reduce vehicle-related greenhouse gas emissions and congestion through more sustainable street, bike, pedestrian, transit, and rail network design, location, and management. Action #2 – Coordinate
the transportation network with new alternative energy infrastructure such as electric vehicle charging stations, natural gas, and hydrogen cell fueling stations).

The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Metro Plan environmental policies. The amendments to the TSP project list and the adoption of the Conceptual Street Map are consistent with these adopted policies and will further support and enhance the Metro Plan’s Environmental Resources Element through strengthening environmentally sound transportation options and an overall more sustainable transportation system. The amendments are consistent with this Metro Plan Element.

Finding:

D. Willamette River Greenway, River Corridors, and Waterways Element

The Willamette River Greenway, River Corridors, and Waterways Element address these specific natural assets in the metropolitan area. The policies of this element emphasize reducing urban impacts on these resources throughout the metropolitan area.

The Willamette River Greenway, River Corridors, and Waterways Element of the Metro Plan contain the following relevant policies related to the Springfield 2035 Springfield TSP: D.2, D.3, D.9, and D.11.

D.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 non-automobile transportation; opportunities for residential development; and other compatible uses.

D.3 Eugene, Springfield, and Lane County shall continue to cooperate in expanding water related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors.

D.9 Local and state governments shall continue to provide adequate public access to the Willamette River Greenway.

D.11 The taking of an exception shall be required if a non-water-dependent transportation facility requires placing of fill within the Willamette River Greenway setback.

The Springfield 2035 TSP contains goals and polices which support these Willamette River Greenway, River Corridors, and Waterways policies. These include, but are not limited to:

• Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
• Policy 1.2: Consider environmental impacts of the overall transportation system and strive to mitigate negative effects and enhance positive features.

The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Metro Plan Willamette River Greenway, River Corridors, and Waterways policies. The amendments to the TSP project list and the adoption of TSP Figure 12: Conceptual Street Map are
consistent with these adopted policies and will further support and enhance the Metro Plan’s Willamette River Greenway, River Corridors, and Waterways Element by providing improved access to waterways. The amendments are consistent with this Metro Plan Element.

Finding:

E. Environmental Design Element

The Environmental Design Element is concerned with that broad process which molds the various components of the urban area into a distinctive, livable form that promotes a high quality of life. This Element is concerned with how people perceive and interact with their surroundings.

The Environmental Design Element of the Metro Plan contains the following relevant policies related to the Springfield 2035 Springfield TSP: E.3 and E.4.

E.3 The planting of street trees shall be strongly encouraged, especially for all new developments and redeveloping areas (where feasible) and new streets and reconstruction of major arterials within the UGB.

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.

The Springfield 2035 TSP contains goals and polices which support these Environmental Design policies. These include, but are not limited to:

- Goal 3: System Design – Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.
- Policy 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.
- Policy 3.7: Provide for a pedestrian environment that supports adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking by providing direct routes and removing barriers when possible.

The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Environmental Design policies. The amendments to the TSP project list and the adoption of TSP Figure 12: Conceptual Street Map are consistent with these adopted policies and will enhance the pedestrian environment for new and redeveloped properties, creating a more livable community. The amendments are consistent with this Metro Plan Element.

Finding:

F. Transportation Element

The Springfield 2035 TSP used the TransPlan goals, policies, and objectives as a starting point for updating the policy set in the new TSP. Similar to TransPlan, the structure of the Springfield 2035 TSP includes four overarching categories. The TSP goals have subsequent policies and action items categorized beneath them. The four goals found in the Springfield 2035 TSP are:
• Goal 1: Community Development – Provide an efficient, sustainable, diverse and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
• Goal 2: System Management – Preserve, maintain, and enhance Springfield’s transportation system through safe, efficient, and cost-effective transportation system operations and maintenance techniques for all modes.
• Goal 3: System Design – Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.
• Goal 4: System Financing – Create and maintain a sustainable transportation funding plan that provides implementable steps towards meeting Springfield’s vision.

Some specific TransPlan policies are highlighted in this Finding to illustrate consistency between TransPlan policies and those of the Springfield 2035 TSP. These include F.4, F.8, F.11, F.14, F.18, F.22, F.26, and F.34.

• Metro Plan / TransPlan Land Use Policy F.4: Require improvements that encourage transit, bicycles, and pedestrians in new commercial, public, mixed use, and multi-unit residential development.
• Metro Plan / TransPlan TDM Policy F.8: Implement TDM strategies to manage demand at congested locations.
• Metro Plan / TransPlan Transportation System Improvement, System Wide Policy F.11: Develop or promote intermodal linkages for connectivity and ease of transfer among all transportation modes.
• Metro Plan / TransPlan Transportation System Improvement, Roadway System F.14: Address the mobility and safety needs of motorists, transit users, bicyclists, pedestrians, and the needs of emergency vehicles when planning and constructing roadway system improvements.
• Metro Plan / TransPlan Transportation System Improvement, Transit System F.18: Improve transit service and facilities to increase the system’s accessibility, attractiveness, and convenience for all users, including the transportation disadvantaged population.
• Metro Plan / TransPlan Transportation System Improvement, Bicycle System F.22: Construct and improve the region’s bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion.
• Metro Plan / TransPlan Transit System Improvement, Pedestrian System F.26: Provide for a pedestrian environment that is well integrated with adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking.
• Metro Plan / TransPlan Finance Policy F.34: Operate and maintain transportation facilities in a way that reduces the need for more expensive future repair.

The Springfield 2035 TSP contains multiple goals and policies which are being implemented through the amendments. These TSP policies include, but are not limited to:

• Policy 1.3: Policy 1.3: Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).
• Policy 3.8: Coordinate the design of Springfield’s transportation system with relevant local, regional, and state agencies. (NOTE Action #3 – Partner with LTD to provide frequent transit...
network connections along major corridors. Frequent transit network should connect to local neighborhood bus service and major activity center to provide viable alternatives to vehicle trips).

The above stated TSP goals, policies and implementation measures show consistency between the Springfield 2035 TSP and the Metro Plan / TransPlan Transportation Element policies. The amendments to the TSP project list and the adoption of TSP Figure 12: Conceptual Street Map are consistent with these adopted policies and will further support multi-modal transportation and its nexus to mixed use development. The amendments are consistent with this Metro Plan Element.

Finding:

G. Public Facilities and Services Element

This element incorporates the findings and policies in the Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (Public Facilities and Services Plan), adopted as a refinement to the Metro Plan. The Public Facilities and Services Plan provide guidance for public facilities and services, including planned water, wastewater, storm water, and electrical facilities. Transportation findings and policies are not part of the Eugene-Springfield Metropolitan Area Public Facilities and Services Plan, but rather are located in the TSP and TransPlan. Relevant Metro Plan policies are discussed in the previous Transportation Element section.

Finding:

H. Parks and Recreation Facilities Element

This Metro Plan Element addresses Parks and Recreation Facilities in the Metro Area. In Springfield, Willamalane Park and Recreation District is responsible for parks and recreation facilities and planning. There are no transportation specific Parks and Recreation Facilities Element policies in the Metro Plan that directly relate to the 2035 Springfield Transportation System Plan. However, some TSP multiuse path projects overlap with those in the Willamalane Parks Comprehensive Plan. The amendments to the TSP project lists include amendments for consistency with the Willamalane Parks Comprehensive Plan and Willamalane facilities as constructed, including updating the name of the Moe Mountain Path and amending the project extent of the Mill Race Path. The planning for these and other similar projects has been closely coordinated with Willamalane staff.

One example of consistency between this 2035 Springfield TSP and the Willamalane Park and Recreation Comprehensive Plan is TSP Policy 2.4 and its supporting Action #1. They state:

- Policy 2.4 - Maintain and preserve a safe and efficient bike and pedestrian system in Springfield.
- Action #1 – Coordinate with Willamalane Park and Recreation District to maintain and preserve the off-street path system.

The amendments to the TSP project list and figures, including the adoption of TSP Figure 12: Conceptual Street Map, are consistent with these adopted policies and do not alter compliance with the Parks and Recreation Facilities Element of the Metro Plan, and are consistent with this Metro Plan Element.
Finding:

I. Historic Preservation Element

This Element of the Metro Plan is written to preserve historic structures in the Metro area. There are no transportation specific Historic preservation Element policies in the Metro Plan that directly relate to the 2035 Springfield Transportation System Plan. However, individual projects in the TSP that use Federal funding must go through a National Environmental Policy Act (NEPA) process during project development. The NEPA process includes requirements for historic preservation which the City will adhere to. These amendments do not alter compliance with the Historic Preservation Element of the Metro Plan, and are consistent with this Metro Plan Element.

J. Energy Element

The Energy Element of the Metro Plan deals with the conservation and efficient use of energy in the metropolitan area and is meant to provide a long-range guide to energy-related decisions concerning physical development and land uses.

The Energy Element of the Metro Plan contains the following relevant policies related to the Springfield 2035 Springfield TSP: J.2, J.7, and J.8.

J.2 Carefully control, through the use of operating techniques and other methods, energy related actions, such as automobile use, in order to minimize adverse air quality impacts. Trade-offs between air quality and energy actions shall be made with the best possible understanding of how one process affects the other.

J.7 Encourage medium- and high-density residential uses when balanced with other planning policies in order to maximize the efficient utilization of all forms of energy. The greatest energy savings can be made in the areas of space heating and cooling and transportation. For example, the highest relative densities of residential development shall be concentrated to the greatest extent possible in areas that are or can be well served by mass transit, paratransit, and foot and bicycle paths.

J.8 Commercial, residential, and recreational land uses shall be integrated to the greatest extent possible, balanced with all planning policies to reduce travel distances, optimize reuse of waste heat, and optimize potential on-site energy generation.

The Springfield 2035 TSP contains goals and polices which support these Energy Element policies. These include, but are not limited to:

- Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.
- Policy 1.2: Consider environmental impacts of the overall transportation system and strive to mitigate negative effects and enhance positive features. (NOTE Action #1 – Strive to reduce vehicle-related greenhouse gas emissions and congestion through more sustainable street, bike, pedestrian, transit, and rail network design, location, and management, and Action #2 –
Coordinate the transportation network with new alternative energy infrastructure such as electric vehicle charging stations, natural gas, and hydrogen cell fueling stations.

- **Policy 1.3:** Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).

The above stated TSP goals and policies are examples of consistency between the Springfield 2035 TSP and relevant Energy policies. The amendments to the TSP project list and figures, including the adoption of TSP Figure 12: Conceptual Street Map, are consistent with these adopted policies and will further support and enhance the Metro Plan’s Energy Element by considering environmental impacts and energy usage when planning and implementing Springfield’s transportation system. The amendments will also enhance the pedestrian environment for new and redeveloped properties, create a more livable community and support mixed uses with high frequency transit. The amendments are consistent with this Metro Plan Element.

**K. Citizen Involvement Element**

The Citizen Involvement Element of the Metro Plan recognizes that active, on-going, and meaningful citizen involvement is an essential ingredient to the development and implementation of any successful planning program. A Public Involvement Program for the update of the 2035 Springfield Transportation System Plan was developed in preparation of the Project. This Program was reviewed and endorsed by the Committee for Citizen Involvement (i.e. the Springfield Planning Commission). The Program outlined the information, outreach methods, and involvement opportunities available to the citizens during the process. Details of the process are included in the Statewide Planning Goal 1 finding of this report. The amendment is consistent with the Metro Plan Element.

**CONCLUSION:** Based on the findings above, the TSP amendments do not make the Metro Plan internally inconsistent. SDC Section 5.14-135 Criterion B is met.