

TRANSMITTAL MEMO



TO: Board of County Commissioners

FROM: Stephanie Schulz, Associate City Planner

MEMO DATE: January 24, 2011

PUBLIC HEARING DATE: February 7, 2011

SUBJECT: Ordinance No. PA 1277 In The Matter Of Amending The Springfield Local Wetland Inventory, the Springfield Inventory Of Natural Resource Sites, and the Springfield Natural Resources Study, to Include Newly Identified Wetland and Riparian Sites and to Update the Boundaries of Known Sites Within the Glenwood Area; and Adopting a Severability Clause. (File No. PA 10-6053)

The Ordinance with exhibits and packet for the upcoming joint hearing with Springfield City Council was distributed to the Board prior to the first reading held on January 19, 2011.

This complete copy of Attachment 2, the City Staff Report, contains an executive summary of the process used to determine protection measures and site identification, as well as the Findings of Fact that are in the County Ordinance Findings as well.

Copies of the existing Springfield Natural Resources Study, Wetland Inventory and Natural Resources Site Inventories are in the Public Record Cabinet in the lobby of County Administration, for your reference as necessary.

Springfield Natural Resources Study Glenwood Update--Staff Report



Project Name: Springfield Natural Resources Study: Glenwood Update

Project Proposal: To amend the "Springfield Local Wetland Inventory," the "Springfield Inventory of Natural Resource Sites," and the "Springfield Natural Resources Study" to add newly identified sites and to update the boundaries for previously inventoried Glenwood sites. In most cases the newly identified wetland and riparian sites are already protected under existing provisions of the Springfield Natural Resources Study, the Springfield Stormwater Management Program or the Glenwood Refinement Plan. The proposed protective setbacks for the newly identified sites are the same as those applied to other Glenwood wetlands and riparian sites.

Case Number: LRP2010-00002

Attachments:

Exhibit A: Proposed Amendments to the Springfield Local Wetland Inventory

Exhibit B: Proposed Amendments to the Springfield Inventory of Natural Resource Sites

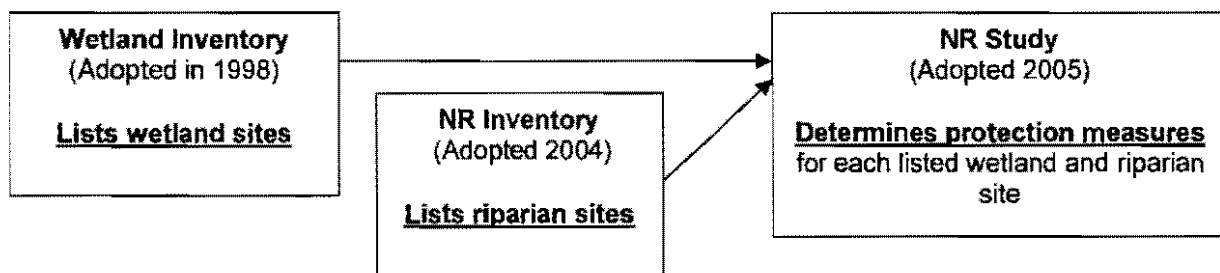
Exhibit C: Proposed Amendments to the Springfield Natural Resources Study

Exhibit D: *Local Wetlands and Riparian Corridor Assessment for the Glenwood Area of Springfield*, Pacific Habitat Services, December 2009

Exhibit E: *Glenwood Natural Resource Wildlife Habitat Assessment 2010*, Springfield Environmental Services Division

I. Executive Summary

In 2005, the Springfield Natural Resources Study (NR Study) was adopted by the City Council to comply with the mandate of Statewide Planning Goal 5. The NR Study addresses the protection of locally significant wetland and riparian resources that were adopted as part of the Springfield Local Wetland Inventory (Wetland Inventory) in 1998 and the Springfield Inventory of Natural Resources (NR Inventory) that was adopted by in 2004. The NR Study, Wetland Inventory and the NR Inventory are Springfield-specific refinement plans that supplement the Metro Plan (Metro Plan pg. I-5).



In 2009, Lane Council of Governments (LCOG) was contracted to coordinate the completion a new wetland and riparian inventory for the Glenwood area in preparation for an update to the Glenwood Refinement Plan. LCOG and the consulting firm, Pacific Habitat Services have completed the inventory work. **Through this work, three new riparian sites were identified in Glenwood and are proposed for addition to the NR Inventory. Four new wetland sites were also identified and are proposed for addition to the Wetland Inventory.**

The three riparian sites were determined to be locally significant using criteria adopted by the City and County in 2004. The four wetland sites were determined to be “locally significant” by application of the Oregon Freshwater Wetland Assessment Methodology (OFWAM), a state mandated assessment tool. This new riparian and wetland information is the basis for the proposed amendments to update the NR Study.

The focus of the NR Study and the recommended protections for riparian and wetland areas is on “locally significant” sites. There were two additional wetland sites (W-25 and W-26) identified in Glenwood that failed the significance test. The final authority for allowing development of wetland and riparian areas rests with the US Army Corps of Engineers and the Oregon Department of State Lands. These agencies are more likely to allow non-significant wetlands to be filled and developed than those which pass the OFWAM significance test.

Adding the new Glenwood wetland and riparian information to the NR Inventory, Wetland Inventory and the NR Study requires the city to follow a refinement plan amendment procedure as described in Chapter IV of the Metro Plan and in Section 5.6-100 of the Springfield Development Code (SDC). This report addresses the criteria for approving refinement plan amendments found in SDC Section 5.6-115.

The tables and maps below show the new Glenwood riparian and wetland sites as well as updated information for the existing sites. This information and additional data for each site is proposed for insertion into the Wetland and NR Inventories and into the NR Study. The tables provide summary information and the existing or recommended protection (setback) for each one.

The approach recommended by staff is to assign the same protections to the new Glenwood sites as those used recommended by the 2005 NR Study for similar sites. Many of the Glenwood sites are already protected by 50-foot setbacks provided by the City’s stormwater management program that was adopted in 2002. Sites not protected by the stormwater program tend to be smaller and are recommended for 25-foot setbacks. This is consistent with the protections applied to Springfield’s wetlands and riparian sites in 2005.

The amendments proposed by this action include the following:

- Amendment of the Springfield Local Wetland Inventory (Wetland Inventory) to include the new Glenwood wetland sites and to add updated information concerning the existing Glenwood wetland site that is identified as W-20.

- Amendment of the Springfield Inventory of Natural Resources (NR Inventory) to include the new Glenwood riparian sites and to add updated information about the existing Glenwood sites identified as E-39 (Glenwood Slough). The designation E-39 is proposed to be changed to S-25. The E-39 designation is a hold over from Eugene’s jurisdiction over Glenwood.
- Amendment of the Springfield Natural Resources Study (NR Study) to include “insert sheets” that provide an ESEE analysis and a recommendation for protection for each of the Glenwood sites, new and existing. The inserts add new information developed by Pacific Habitat Services (PHS) as part of their contracted work. The ESEE analysis is a comparison of the Economic, Social, Environmental and Energy impacts of allowing development to impact each wetland or riparian site.

Table 1 shows the acreage of the wetland and riparian sites that are the focus of these amendments. The sites cover a total of 23.03 acres. The acreage totals 58.54 acres when the existing and recommended new setbacks are added.

Table 1. Acreage Affected by Glenwood Wetland and Riparian Amendments

Site ID	Site Acres	Existing and Recommended New Setbacks	Site Acres Including Setbacks
S-25	12.30	Existing 50-ft.	28.38
S-26 (New)	1.56	Existing 50-ft.	5.79
S-27 (New)	.33	Recommended 25-ft.	.76
S-28 (New)	.73	Recommended 25-ft.	1.35
W-20	3.73	Existing 50-ft.	8.66
W-21 (New)	.47	Existing 50-ft.	1.71
W-22 (New)	2.53	Existing 50-ft.	6.30
W-23 (New)	.87	Existing 50-ft.	4.62
W-24 (New)	.51	Recommended 25-ft.	.97
Total Acres	23.03	Total Acres	58.54

Many of the resource sites are located within or adjacent to right-of-ways for Franklin Blvd., I-5 and the Union Pacific Railroad in Glenwood. These right-of-ways (ROWs) are not buildable lands and protection of these areas does not affect the supply of buildable land in Glenwood.

Table 2 shows that 24.47 acres of the land affected by these amendments are within ROWs and 34.07 acres of affected land are outside of ROWs. **Table 2 also shows that only about 10.87 acres of affected land outside of ROWs is vacant or redevelopable.** Redevelopable in this case is land classified by the Lane County Assessor as “Tract Land.”

Table 2. Affected Acreage Outside of Right-of-Ways

Site ID	Site Acres Including Setbacks	Acres within ROWs	Acres Outside of ROW	Affected Developed Parcel Acres	Affected Vacant or Redevelopable Parcel Acres
S-25	28.38	11.78	16.60	12.85	3.75
S-26 (New)	5.79	4.1	1.69	.39	1.30
S-27 (New)	.76	.02	.74	.07	.67
S-28 (New)	1.35	.71	.64	0	.64
W-20	8.66	2.18	6.48	5.31	1.17
W-21 (New)	1.71	.84	.87	.87	0
W-22 (New)	6.30	.37	5.93	3.67	2.26
W-23 (New)	4.62	4.09	.53	.04	.49
W-24 (New)	.97	.38	.59	0	.59
	58.54	24.47	34.07	23.20	10.87

Most of the affected acreage in Glenwood is already protected by the City's stormwater management standards (SDC Section 4.3-115) that were adopted in 2002. Table 3 shows that only about 3.30 acres of vacant and redevelopable land are proposed for protection by setbacks that are not already enforced by the stormwater management standards. The setback protections are not retroactive and do not require the removal of existing development that may be located within the proposed setbacks. Future development will be governed by the setbacks if they are approved.

Table 3. Impact on Vacant and Redevelopable Acreage Not Protected By Existing Stormwater Management Setbacks

Site ID	Site Acres Including Setbacks	Recommended and Existing Setbacks	Vacant and Redevelopable Acres Affected by Recommended Setbacks			
			Residential	Commercial	Industrial	Total Acres
S-25	28.38	*Existing 50-ft.	0	0	1.36	1.36
S-26 (New)	5.79	Existing 50-ft.	0	0	0	0
S-27 (New)	.76	Recommended 25-ft.	.38	0	.19	.57
S-28 (New)	1.35	Recommended 25-ft.	.38	0	.29	.67
W-20	8.66	Existing 50-ft.	0	0	0	0
W-21 (New)	1.71	Existing 50-ft.	0	0	0	0
W-22	6.30	Existing 50-ft.	0	0	0	0

Site ID	Site Acres Including Setbacks	Recommended and Existing Setbacks	Vacant and Redevelopable Acres Affected by Recommended Setbacks			
			Residential	Commercial	Industrial	Total Acres
(New)						
W-23 (New)	4.62	*Existing 50-ft.	0	0	.68	.68
W-24 (New)	.97	Recommended 25-ft.	.02	0	0	.02
Total Acres	58.54	Total Acres	0.78	0	2.52	3.30

* A small portion of this site is outside of the 50-foot setback and is recommended for protection by a 25-foot setback.

The proposed amendments as well as the report developed by PHS are attached to this report. The numbering system used by PHS to identify the Glenwood wetland and riparian sites in their report is different than the city numbering system. The maps presented as part of the amendment show the PHS identifiers in parenthesis on the maps to allow the reader to reference the PHS report.

Based on the findings presented in this report, staff believes there is an adequate factual basis for the Planning Commissions, the Springfield City Council and the Lane County Board of Commissioners to conclude that the proposed Glenwood additions to the Wetland Inventory, the NR Inventory and to the NR Study meet the criteria for approving refinement plan amendments found in Section 5.6-110 of the Springfield Development Code.

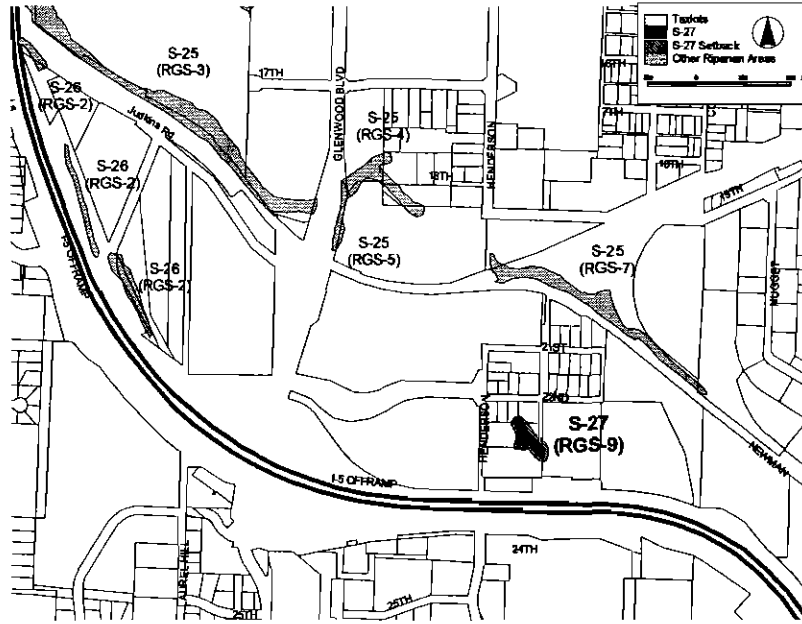
The diagrams below show the location of the Glenwood riparian and wetland sites that are proposed for inclusion in the NR Inventory, Wetland Inventory and the NR Study by these amendments.

Glenwood Riparian Sites

<p>Site ID</p> <p>S-25 (Formerly E-39) 12.30 Acres</p>		<p>Setback Protection</p> <p>Existing 50-ft. setback</p>
<p>Site ID</p> <p>S-26 (New) 1.56 Acres</p>		<p>Setback Protection</p> <p>Existing 50-ft. setback</p>

Site ID

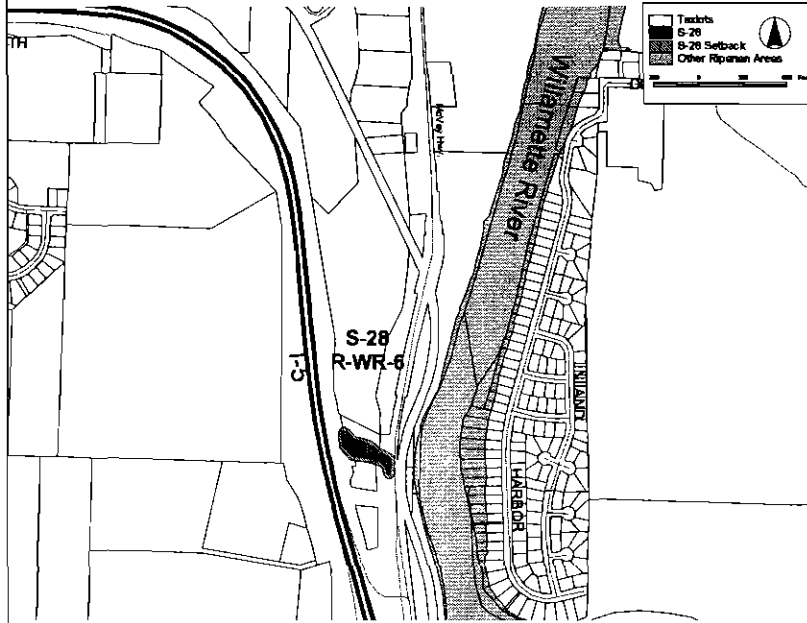
S-27
(New)
.33 Acres



Recommended
25-ft. setback

Site ID

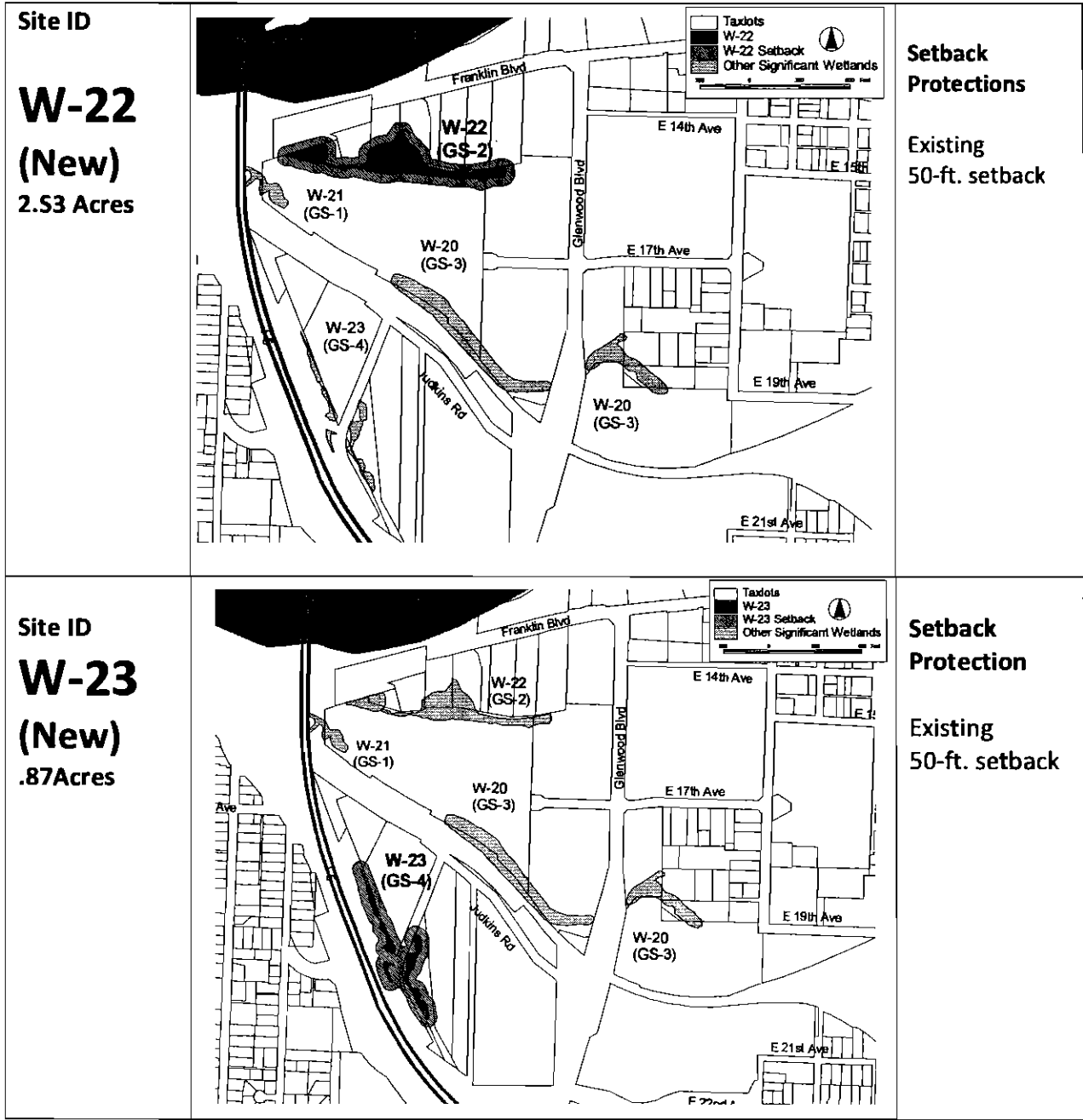
S-28
(New)
.73 Acres

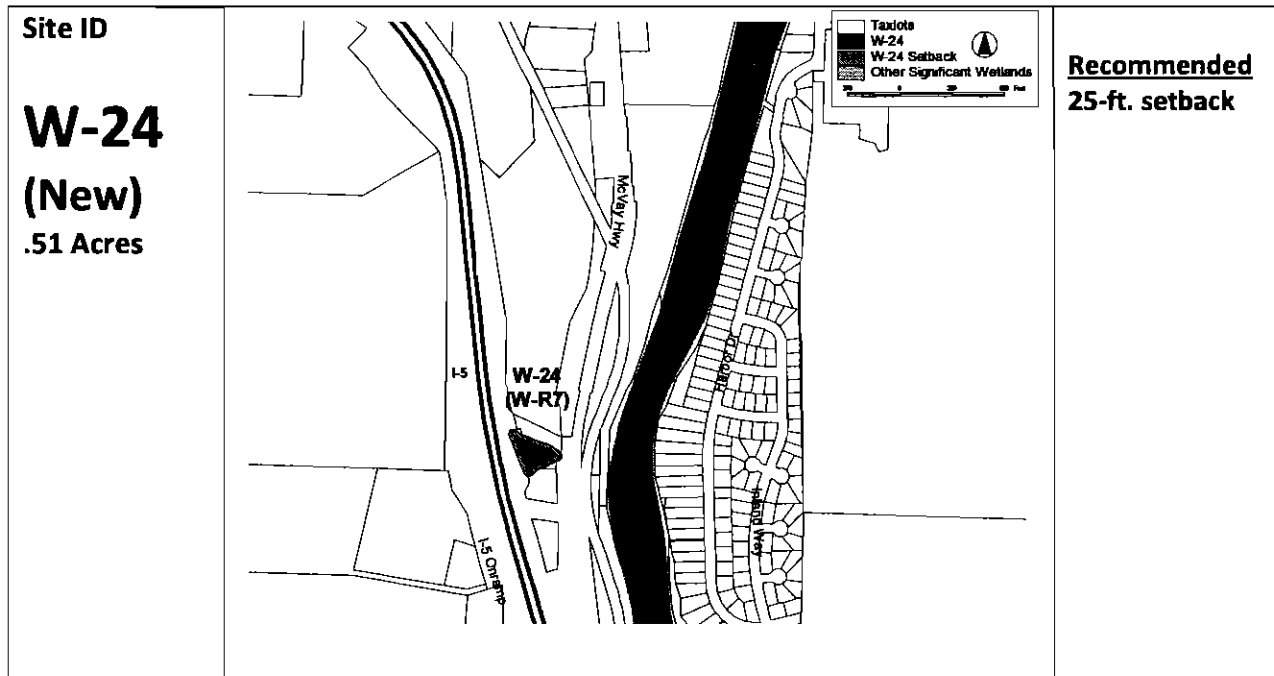


Recommended
25-ft. setback

Glenwood Wetland Sites

<p>Site ID</p> <p>W-20</p> <p>3.73 Acres</p>	<p>The map shows a street grid with Franklin Blvd at the top, Glenwood Blvd running vertically, and E 14th Ave, E 17th Ave, E 19th Ave, E 21st Ave, and E 22nd Ave running horizontally. Taxlots are outlined in black. Wetland areas are shaded: W-20 (GS-3) in dark grey, W-21 (GS-1) in light grey, W-22 (GS-2) in medium grey, and W-23 (GS-4) in stippled grey. A legend in the top right corner identifies Taxlots, W-20 Setback, and Other Significant Wetlands. A north arrow and scale bar are also present.</p>	<p>Setback Protections</p> <p>Existing 50-ft. setback</p>
<p>Site ID</p> <p>W-21 (New)</p> <p>.47 Acres</p>	<p>This map is similar to the one for W-20, showing the same street grid and taxlots. It highlights a new wetland area, W-21 (GS-1), in light grey, which is located along the western boundary of the site. Other wetland areas W-22 (GS-2), W-23 (GS-4), and W-20 (GS-3) are also shown. The legend and north arrow/scale bar are included.</p>	<p>Setback Protections</p> <p>Existing 50-ft. setback</p>





II. Background

In 1998, Council approved the Springfield Local Wetland Inventory (Wetland Inventory). The inventory lists all known Springfield wetlands and uses state criteria to identify which ones are “locally significant.”

In 2004, Council adopted the Springfield Inventory of Natural Resource Sites (NR Inventory) which listed riparian areas and applied local criteria for identifying locally significant riparian sites. In the adopting ordinance for the NR Inventory, the Wetland Inventory was incorporated into the NR Inventory.

In 2005, the Council adopted the Springfield Natural Resources Study (NR Study) which created a plan for protecting wetlands and riparian areas. Council chose to use the “standard process” for determining how best to protect Springfield’s resources as described in OAR 660-23-090 and 100. The standard process allows cities to exercise more flexibility in protecting resource sites, but requires site by site analysis of the impacts that might exist on each site. The standard process leads to a decision about how to protect resource sites in a way that weighs the Economic, Social, Environmental, and Energy (ESEE) consequences of the protection measures.

The NR Study is a 300-page document that contains the ESEE analysis required by OAR 660-23-090 for the “standard process” and recommends a program for protecting sites on the NR and Wetland Inventories. The NR Study has served to protect the city’s wetland and riparian resources to date.

Under the standard process, cities are required to make a decision to 1) prohibit conflicting uses (development); 2) limit conflicting uses; or 3) allow conflicting uses. A decision to prohibit conflicting uses would fully protect resource sites, in many cases not even allowing passive recreational trails or paths. Limiting conflicting uses allows some development, but seeks to protect the most important functions and values of each resource site. A decision to allow conflicting uses would provide no protection for resource site.

Based on the ESEE analysis conducted for each site on the Wetland Inventory and the NR Inventory, this NR Study proposed a protection program based on a decision to “limit conflicting uses.” Keep in mind that this study only addressed “locally significant” wetlands and riparian corridors that are listed on the NR and Wetland Inventories. The focus on significant wetlands and riparian sites is mandated by state planning rules. There are several lower quality wetlands and watercourses which were not protected by the policies adopted in the NR Study. These sites that were not protected by the study are still under the jurisdiction of the Oregon Department of State Lands and or the Corps of Engineers. These agencies continue to be the sole authority for issuing permits to impact wetlands and streams. The City’s natural resource protections are supplemental to the authority of these agencies.

To implement a “limited” protection program, the NR Study took the following approach:

1. It supported the existing protections implemented through Springfield’s Stormwater Quality Management Program. The adopted Goal 5 limited protection program deferred to existing stormwater management policies detailed in Section 4.3-115 of the Springfield Development Code (SDC) and in particular those provisions which support the City’s response to state and federal regulations concerning surface and subsurface discharging stormwater management systems. Sites protected by the Stormwater Management Program were not recommended for additional protection.
2. It established 25-foot development setbacks from inventoried wetlands and riparian resource sites that are not already protected by stormwater policies. The 50 and 75 foot setbacks established by the Stormwater Quality Management Program would be retained.
3. Protection policies were applied to new development. Developed properties were not required to retroactively comply with the adopted policies. The provisions of SDC Section 5.8-100—Non-Conforming Uses, provide “grandfather” protections to existing development. Expansion of existing development is not allowed where such expansion is outside of the resource area.
4. Site plan review was required for all commercial, industrial and multi-family residential development within 150-feet of resource sites. SDC Sections 4.3-115 and 4.3-117 describe wetland and riparian protections that are applied in the site plan review process to help reduce the impact of development. This requirement coincides with the defined 150-foot impact area recommended by this study and the 150-foot site plan review area already required for many of Springfield’s resource areas by the Stormwater Quality Management

Program. Construction of a single-family home within an existing subdivision would not require site plan review.

5. The adopted protection program primarily affects vacant land and future development. Existing uses and structures within the proposed 25-foot setbacks are allowed to continue. Expansion of such uses is permitted outside the setback. Development within the 50 and 75-foot setbacks established under Springfield's Stormwater Quality Management Program would be subject to the policies of that program.
6. Where the proposed 25-foot setback renders a property unbuildable for the purposes for which it was zoned, a hardship variance may be requested to assist the owner to achieve a viable development design. Such a hardship variance is required under state administrative rules (OAR 660-023-0090 (8) (d) and 660-023-0100(4) (b) (d)).

The proposed amendments are designed to insert the new Glenwood wetland and riparian information into the existing Wetland and NR Inventories and to add the required conflicting use and ESEE analysis to the NR Study to support the recommended protection for the sites.

III. Procedural Requirements

The Wetland Inventory, the NR Inventory and the NR Study were products of the state mandated periodic review process that Eugene, Springfield and Lane County jointly undertook in the 1990's. Periodic review was concluded in 2005. The Wetland and NR Inventories and the NR Study were Springfield-specific products that were adopted as "refinement plans" to the Metro Plan.

Procedural requirements for refinement plan and Metro Plan amendments are described in Chapter IV of the Plan. The amendment procedures for refinement plans and the Metro Plan are also described in Sections 5.2-115, 5.4-135 and 5.4-140 of the Springfield Development Code (SDC).

Finding #1. Metro Plan Chapter IV, Policy 3 and SDC Section 5.14-115 include definitions for two types of amendments to the Metro Plan. Section 5.14-115 (C.) describes a Type II amendment as one "which is not otherwise a Type I plan amendment and which changes the Plan Diagram; or is a site specific Plan Text amendment."

Finding #2. The proposed amendments are restricted to specific sites within the Glenwood area. The amendments do not change the Urban Growth Boundary and do not require a Goal exception. Each site is within Springfield's planning jurisdiction. The proposed amendments fit the definition of a Type II amendment as described in the Metro Plan Chapter IV and the Springfield Code.

Finding #3. This amendment was initiated by the Director as allowed by SDC Section 5.6-105 on November 9, 2010.

Finding #4. The substance of the proposed Glenwood amendments was presented in an open house held on January 11, 2010. Property owners and residents within 300 feet of the Glenwood riparian and wetland sites were sent mailed notice of the open house. Maps showing the identified Glenwood wetland and riparian sites were presented and potential protections were discussed.

Finding #5. Prior to formal initiation of the amendment process, on February 25, 2010, owners and residents within 300 feet of the newly identified riparian and wetland sites in Glenwood were invited to an Open House to hear the findings of the Glenwood Wetland and Riparian Corridor Study that was completed by Lane Council of Governments. The study identified the wetlands and riparian areas that are the subject of the proposed amendments. The discussion included potential protection measures that might be applied to the new sites and their impact on property owners.

Finding #6. A Landowner Wetland Notification letter was mailed to affected Glenwood property owners and residents alerting them to the presence of wetlands on their properties on August 17, 2010 (as per instructions provided by the Oregon Department of State Lands). The letter informed owners and residents that hearings would be held in the future concerning the protections to be applied to the identified wetlands in the area.

Finding #7. A Notice of Proposed Amendment was filed with the Oregon Department of Land Conservation and Development on November 19, 2010, more than 45 days in advance of the first evidentiary hearing concerning the amendments as required by state planning rules.

Finding #8. SDC 5.14-135 (1) states that to become effective, "Metro Plan Type II amendment inside the city limits shall be approved by the Home City [Springfield]."

Finding #9. SDC 5.14-135 (2) states that to become effective, "a Metro Plan Type II amendment between the city limits and the Plan Boundary shall be approved by the Home City and Lane County."

Finding #10. The wetland and riparian sites that are the subject of the proposed amendments are located both inside and outside of the Springfield city limits. All of the subject sites are located within the Metro Plan Boundary. The proposed Type II amendments shall require the approval of both the City of Springfield and Lane County for all of the amendments to be approved.

Finding #11. Mailed notice of public hearings associated with a Metro Plan amendment must be sent to property owners and residents within 300 feet of the subject sites (SDC Section 5.2-115 (A), and Section 5.14-140).

Finding #12. Mailed notice of public hearings was sent out on December 30, 2010 to property owners and residents within 300 feet of the Glenwood wetland and riparian sites. The mailing

allowed more than 20 days notice before the first public hearing as required by Section 5.2-115 A of the SDC.

Finding #13. SDC Section 5.2-115 (B) requires that proposed land use actions be advertised in a newspaper of general circulation, providing information about the legislative action and the time, place and location of the hearing.

Finding #14. Notice of the public hearings concerning the proposed amendments was published on January 2, 2011 in the Register Guard, advertising both the hearing before the Springfield Commission on January 19, 2011 and the Joint Elected Officials of Springfield and Lane County on February 7, 2011. The content of the notice followed the direction given in SDC Section 5.2-115 B.

IV. Decision Criteria and Findings

SDC Section 5.6-110 describes the criteria to be used in approving a refinement plan amendment. It states that in reaching a decision, the Planning Commission and the City Council must adopt findings which demonstrate conformance with "1) *the Metro Plan*; 2) *applicable State statutes*; and to 3) *applicable State-wide Planning Goals and Administrative Rules.*"

Criterion #1 "Conformance with the Metro Plan"

Findings

Finding #15. Metro Plan Chapter III—Environmental Resources Element, Policy C.8 states, "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."

Finding #16. The NR Study that was approved in 2005 is a plan developed for the purpose identifying and protecting locally significant wetlands and riparian corridors. The NR Study was acknowledged by the Oregon Department of Land Conservation and Development in 2006. The inventories and protection plan adopted by the NR Study were based on those recommended by the model ordinances found in the Oregon Department of State Lands' publications: *The Oregon Wetlands Planning Guidebook* and *The Urban Riparian Inventory and Assessment Guide*.

Finding #17. The proposed amendments are intended to add protected resources sites in the Glenwood area to the existing Wetland Inventory, NR Inventory and NR Study. The recommended protections for the Glenwood sites conform to the protections offered other sites in Springfield by the NR Study.

Finding #18. Metro Plan Chapter III—Environmental Resources Element, Policy C.9 states, "Each city shall complete a separate study to meet its requirements under the Goal 5 Rule for

wetlands, riparian corridors, and wildlife habitat within the UGB. Lane County and the respective city jointly will adopt the inventory and protection measures for the area outside the city limits and inside the UGB.”

Finding #19. The NR Study is a Springfield-specific study that was approved in 2005 and acknowledged by DLCD as meeting the requirements of Statewide Planning Goal 5. The proposed amendments are intended to add new Glenwood wetland and riparian sites to the NR Study and to provide the required ESEE analysis on which to base a program for protecting those sites.

Finding #20. Metro Plan Chapter III—Environmental Resources Element, Policy C.10 states, “Local governments shall encourage further study (by specialists) of endangered and threatened plant and wildlife species in the metropolitan area.”

Finding #21. Pacific Habitat Services conducted the Glenwood wetland and riparian inventories and analysis. PHS inventoried wetland and riparian plants near the Glenwood sites and consulted with the Oregon Department of Fish and Wildlife (ODFW) concerning fish habitat and which streams might be fish-bearing, in preparing their report.

Finding #22. The NR Study consulted with the Oregon Natural Heritage Program and with the ODFW to identify threatened and endangered plant and wildlife species in Springfield and in Glenwood. This information was used to help craft protection measures for wetland and riparian sites.

Finding #23. Metro Plan Chapter III—Environmental Resources Element, Policy C.11 states, “Local governments shall protect endangered and threatened plant and wildlife species, as recognized on a legally adopted statewide list, after notice and opportunity for public input.”

Finding #24. The proposed amendments provide protections for those streams and wetland areas in Glenwood that are consistent with the safe-harbor protections applied by the state to fish-bearing streams. Public comment was solicited through the course of the Glenwood wetland and riparian study. This public input included written notice that was sent on December 30, 2010 to property owners and residents living within 300-feet of the Glenwood resource sites. The notice identified the Glenwood wetlands and riparian sites that were being considered for inclusion on the Wetland Inventory and the NR Inventory.

Finding #25. On February 25, 2010, owners and residents within 300 feet of the newly identified riparian and wetland sites in Glenwood were invited to an Open House to hear the findings of the Glenwood Wetland and Riparian Corridor Study that was completed by Lane Council of Governments. The study identified the wetlands and riparian areas that are the subject of the proposed amendments. The discussion included potential protection measures that might be applied to the new sites and their impact on property owners.

Finding #26. An Open House was held at the Springfield City Hall on January 6, 2011 to discuss the Glenwood natural resource update project. Invitations to the Open House were included in the mailed notice that was sent to property owners and residents living within 300-feet of identified wetland and riparian sites in Glenwood.

Finding #27. Public hearings concerning the proposed amendments were scheduled before the Springfield Planning Commission and the joint hearing before the Springfield City Council and Lane County Board of Commissioners on January 19, 2011, and February 7, 2011 respectively. Mailed and published notice of the hearings was provided to solicit public input.

Finding #28. Metro Plan Chapter III—Environmental Resources Element, Policy C12 states, “Property owners may pursue efforts to protect natural vegetation and wildlife habitat areas on their land to conserve these areas, e.g., through conservation easements, public acquisition, donation, land trusts, etc.; and local governments are encouraged to assist in these efforts.”

Finding #29. The notice provided to property owners and the Open House presentation was intended to raise the awareness of the Glenwood wetland and riparian resources. No city policy known to staff prevents property owners from protecting wetland or riparian sites on their land.

Finding #30. Metro Plan Chapter III—Environmental Resources Element, Policy C.13 states, “Wetland, riparian corridor, or wildlife habitat sites inside the UGB identified after adoption of the applicable Goal 5 inventory of significant sites, that have not been previously considered for inclusion in the inventory, shall be addressed in the following manner:

- a. The jurisdiction within which the natural resource is located shall study the site according to the requirements in the Goal 5 administrative rule.
- b. Upon the completion of the study, the affected jurisdiction shall determine whether the identified natural resource is significant according to the adopted significance criteria of the affected jurisdiction.
- c. If the newly identified site is determined significant, the affected jurisdiction shall complete the Goal 5 requirements for the site, which includes adoption of protection measures for sites identified for protection.
- d. The affected jurisdiction will notify affected property owners and interested parties throughout the process.”

Finding #31. The Wildlife Habitat Assessment (WHA) criteria for riparian significance were applied to the proposed new riparian sites. This is the same criteria were approved by the Springfield City Council (Ordinance 6085) and used for all other Springfield riparian sites that are included in the original 2005 NR Study.

Finding #32. The criteria for wetland significance are determined by the Oregon Department of State Lands. These criteria were applied by PHS to each of the Glenwood wetland sites as part of their report. Locally significant, non-significant and probable wetlands were all inventoried. The proposed amendments include the same ESEE analysis and program for protection that was applied to each of Springfield's other wetland resource sites.

Finding #33. Springfield Ordinance 6150 adopted the NR Study and the program for protection prescribed for each of Springfield's inventoried wetland and riparian sites. The proposed amendments include the same ESEE analysis and program for protection that was applied to each of Springfield's other riparian resource sites.

Finding #34. Findings #23 through 25 document the citizen outreach and public notice that was part of preparing the proposed amendments.

Conclusion

The proposed amendments are consistent with the Metro Plan in that they are an addition to the same inventory and analysis as the existing NR Study that was adopted in 2005 and approved by the Oregon Department of Land Conservation and Development as meeting Goal 5 requirements.

"Conformance with Applicable State Statutes"

Findings

Finding #35. ORS 197.175(2)(a) states that, " each city and county in this state shall: (a) Prepare, adopt, amend and revise comprehensive plans in compliance with [Statewide Planning] goals approved by the commission; (b) Enact land use regulations to implement their comprehensive plans"

Finding #36. The NR Study was prepared in response to Statewide Planning Goal 5. The Study contains analysis that supports a program decision for protecting riparian and wetland resource sites as well as specific protection measures that will be adopted to implement that decision. The proposed amendments include an ESEE analysis and a recommended program for protecting each of the Glenwood wetland and riparian sites.

Conclusion

The NR Study conforms to applicable state statutes.

"Conformance with Statewide Planning Goals and Rules and Administrative Rules"

Findings

Goal 1 – Citizen Involvement. Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process."

Finding #37. Findings #23 through 25 document the citizen outreach and public notice that was part of preparing the proposed amendments.

Goal 2 – Land Use Planning. Goal 2 outlines the basic procedures of Oregon's statewide planning program. It says that land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted.

Finding #38. The Eugene-Springfield Metropolitan Area General Plan (Metro Plan) is the acknowledged comprehensive plan that guides land use planning in Springfield. Findings #14-32 document the consistency of the proposed amendments with the Metro Plan. The amendments, if adopted will afford the identified Glenwood wetland and riparian sites the protection approved by Ordinance #6150 which implements the City's program for protecting wetland and riparian sites.

Goal 3 – Agricultural Land. Goal 3 defines "agricultural lands." It then requires counties to inventory such lands and to "preserve and maintain" them through farm zoning.

Finding #39. This goal does not apply within adopted, acknowledged urban growth boundaries. The City of Springfield does not have any agricultural zoning districts. These amendments do not apply outside the urban growth boundary and, because of limitations on commercial and industrial development without full urban services, generally do not apply outside the city limits. All land in the City's urban transition area carries City zoning. An exception to this goal was taken in 1982 when the comprehensive plan was acknowledged.

Goal 4 – Forest Land. This goal defines forest lands and requires counties to inventory them and adopt policies and ordinances that will "conserve forest lands for forest uses."

Finding #40. This goal does not apply within adopted, acknowledged urban growth boundaries. The City of Springfield does not have any forest zoning districts. These amendments do not apply outside the urban growth boundary and, because of limitations on commercial and industrial development without full urban services, generally do not apply outside the city limits. All land in the City's urban transition area carries City zoning. An exception to this goal was taken in 1982 when the comprehensive plan was acknowledged.

Goal 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources. Goal 5 covers more than a dozen natural and cultural resources such as wildlife habitats and wetlands. It establishes a process for each resource to be inventoried and evaluated.

Finding #41. In 1998, the City of Springfield adopted, and the Oregon Division of State Lands (DSL) acknowledged, the Springfield Local Wetland Inventory (Wetland Inventory). DSL funded the application of the Oregon Freshwater Wetlands Methodology (OFWAM) to the Wetland Inventory and identified those wetland sites that qualified as “locally significant wetlands. Identifying the locally significant wetlands completed the first step in the Goal 5 planning process for wetlands.

Finding #42. In 2004 the City of Springfield adopted the Springfield Inventory of Natural Resource Sites (NR Inventory). The NR Inventory used the Wildlife Habitat Assessment (WHA) methodology to identify “locally significant” riparian areas. This methodology was developed in conjunction with technical staff from the City of Beaverton, Portland Audubon Society, EPA, Corps of Engineers, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife and the Wetlands Conservancy. It has been used in Washington County, Gresham and in the entire Portland metropolitan area, including the Willamette Greenway.

The adoption of the NR Inventory completed the first step in the Goal 5 planning process for riparian areas.

Finding #43. In 2005 the Springfield Natural Resources Study (NR Study) was adopted. The Study concluded the Goal 5 planning process for both riparian and wetland areas by conducting the required ESEE analysis and adopting a program for protecting the identified sites on the NR Inventory and the Wetland Inventory. Many of the riparian and wetland sites overlapped and were listed on both inventories. The ESEE analysis and the development of a program for protecting both resource types were combined in the NR Study. The combined approach allowed coordination of the protections recommended for those resources that overlap. In many places statistical information for wetlands and riparian areas are broken out separately to provide the reader with information specific to each resource type.

Finding #44. Pacific Habitat Services (PHS) was hired in 2009 to conduct a new inventory of wetland and riparian areas within the boundary of the Glenwood Refinement Plan in preparation of the update of that plan.

Finding #45. PHS completed its inventory work and submitted a report, “*Local Wetlands Inventory and Riparian Corridor Assessment for the Glenwood Area of Springfield*,” that identified three new riparian sites and four new wetland sites in the Glenwood area that were not part of the Wetland Inventory or the NR Inventory.

Finding #46. The PHS report was approved by the Oregon Department of State Lands (DSL) in April 2010. The report identified “locally significant” wetlands in Glenwood using state mandated criteria.

Finding #47. The PHS report provided information that allowed the Springfield Environmental Services staff to administer the WHA tool to identify which of the new riparian met the criteria to be classified locally significant riparian sites.

Finding #48. The proposed amendments add newly identified sites to the NR and Wetland Inventories and to the NR Study. The amendments include the inventory descriptions and ESEE analysis to complete the “standard process” for determining appropriate resource protections for locally significant sites under OAR 660-023-040.

OAR 660-023-0040 describes the ESEE analysis and decision making process. The NR Study includes the analysis and conclusions required by the process prescribed in the administrative rule. The rule states:

“(1) Local governments shall develop a program to achieve Goal 5 for all significant resource sites based on an analysis of the economic, social, environmental, and energy (ESEE) consequences that could result from a decision to allow, limit, or prohibit a conflicting use. This rule describes four steps to be followed in conducting an ESEE analysis, as set out in detail in sections (2) through (5) of this rule. Local governments are not required to follow these steps sequentially, and some steps anticipate a return to a previous step. However, findings shall demonstrate that requirements under each of the steps have been met, regardless of the sequence followed by the local government. The ESEE analysis need not be lengthy or complex, but should enable reviewers to gain a clear understanding of the conflicts and the consequences to be expected. The steps in the standard ESEE process are as follows:

- (a) Identify conflicting uses;*
- (b) Determine the impact area;*
- (c) Analyze the ESEE consequences; and*
- (d) Develop a program to achieve Goal 5.”*

Identify Conflicting Uses

Finding #49. The existing NR Study includes chapters that document the steps listed above and provides sufficient information to support a program decision for each resource site on the NR Inventory and Wetland Inventory. The “Conflicting Use Analysis” assesses the potential development conflicts that exist with each of the resource sites. A generic conflicting use analysis describes the common conflicts that residential, commercial and industrial land uses

may have with wetland and riparian resources. The Study also provides a specific breakdown of the potential conflicting land uses that affect each specific site.

Finding #50. The proposed amendments include a conflicting use analysis for each of the Glenwood wetland and riparian sites that follows the format of the existing NR Study. The amendments will become "insert sheets" that will add to the list of site specific analysis already found in the NR Study.

Determine the Impact Area

Finding #51. The NR Study establishes a scientific foundation for recommending a 150-foot impact area that was used in the conflicting use analysis.

Finding #52. The proposed amendments to the NR Study utilize a 150-foot impact area for use in conducting the required conflicting use analysis.

Analyze the ESEE Consequences

Finding #53. The ESEE analysis, like the conflicting use analysis includes both a generic component and a site-specific component. The analysis considered the economic, social, environmental and energy consequences of prohibiting, limiting and allowing conflicting land uses to impact wetland and riparian resource sites.

Finding #54. The proposed amendments to the NR Study include a site specific analysis of the ESEE consequences of prohibiting, limiting and allowing conflicting land uses to impact wetland and riparian resource sites identified in Glenwood.

Develop a program to achieve Goal 5

Finding #55. The NR Study concludes each site-specific analysis with a recommendation for protection. In each case, a recommendation to limit conflicting uses was chosen, based on the information developed by the ESEE analysis. A specific set of protection policies were adopted (Ordinance 6150) with the NR Study. The policies were based on the model ordinance that is included in the Wetland Planning Handbook published by the Department of State Lands.

Finding #56. The proposed amendments to the NR Study include a site-specific analysis with a recommendation for protection of each Glenwood wetland and riparian resource. In each case, a recommendation to "limit conflicting uses" was chosen, based on the information developed by the ESEE analysis. A specific set of protection policies are also recommended for each Glenwood site that are similar to those applied by the NR Study for other Springfield sites. The protective setbacks range between 25 and 75 feet, depending upon the rate of flow and presence of fish in the streams. These protections parallel the safe harbor setbacks established by the state.

Finding #57. In its report, Pacific Habitat Services used the “Urban Riparian Inventory Assessment and Assessment Guide” (URIAG) for analyzing the Glenwood riparian sites. This approach recommends riparian widths based on the “site potential tree height” which would have established riparian widths ranging between 25 and 120 feet for the Glenwood sites. Setbacks are often suggested to match the riparian widths.

Finding #58. Pacific Habitat concluded in its report: “Based on our review of potential riparian widths within Glenwood’s more urbanized center, the majority of the riparian areas are already developed: houses, industrial development, and impervious surfaces encompass much of the riparian corridors. It is likely that designating up to 120-foot wide riparian corridors (i.e. using the URIAG widths) within already developed areas will not result in additional riparian protection [emphasis added]” (*Local Wetlands Inventory and Riparian Corridor Assessment for the Glenwood Area of Springfield*; Pacific Habitat Services, December 2009, pg. 23)

Goal 6 – Air, Water and Land Resources Quality. This goal requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution.

Finding #59. Compliance with Statewide Planning Goal 5 processes for wetlands, riparian corridors unavoidably involves state and federal regulations for addressing clean air, clean water, safe drinking water, endangered species and other environmental policies.

The ESEE analysis and recommended protections support and enhance provisions of the Springfield Development Code that address the requirements of state and federal regulations including the Clean Water Act, Endangered Species Act, the Magnuson-Stevens Fishery Conservation and Management Act, the Oregon Forest Practices Act, Oregon Endangered Species Rules, and the Oregon Wetlands Regulatory Program.

These established state and federal policies for environmental protection provided the regulatory framework within which the NR Study was developed, but the Goal 5 process was not intended to create detailed protective policy that specifically addresses Goal 6 issues.

Finding #60. The City of Springfield has already taken action to revise its Development Code to respond to National Pollutant Discharge Elimination System (NPDES) Phase II, the Clean Water Act, the Drinking Water Protection Act, and is in the process of devising a response to the Endangered Species Act for listed species in our area. The proposed amendments to not change this response to these federal regulations.

Goal 7 – Areas Subject to Natural Disasters and Hazards. Goal 7 deals with development in places subject to natural hazards such as floods or landslides. It requires that jurisdictions apply “appropriate safeguards” (floodplain zoning, for example) when planning for development there.

Finding #61. All sites within Springfield that are subject to these hazards (floodplain, erosion, landslides, earthquakes, weak foundation soils) are inventoried through a variety of sources. The proposed amendments do not remove or exempt compliance with other Code standards that may apply to development.

Goal 8 – Recreational Needs. This goal calls for each community to evaluate its areas and facilities for recreation and develop plans to deal with the projected demand for them.

Finding #62. Willamalane Park and Recreation District is the entity responsible for park planning, development and maintenance in the urban transition area as well as the city limits. The NR Study used Willamalane’s Park and Recreation Plan (March 2004) to inform the ESEE process and in particular the analysis of the social impacts of allowing conflicting uses to impact wetlands and riparian areas that were identified by the comprehensive plan as future park facilities. Some decisions to limit conflicting uses were based on the desire to preserve the ability of Willamalane to establish low impact recreational facilities near protected resource sites that were part of the Study.

Finding #63. The proposed amendments take into account the Willamalane Park and Recreation Plan in assessing the social element of the ESEE analysis for the Glenwood sites. None of the proposed new wetland or riparian sites are included in Willamalane’s Park and Recreation Plan.

Goal 9 – Economic Development. Goal 9 calls for diversification and improvement of the economy. It asks communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs.

OAR 660-23-070 requires communities to conduct a buildable lands inventory that assesses the impact of protective policies applied to sites on the inventory of buildable land. Where there is a demonstrable impact, the rule requires the City to make adjustments to recover the buildable land that is lost.

Finding #64. The recommended protection measures in the original 2005 NR Study affected the combined Eugene-Springfield inventory of commercial and industrial lands. At the conclusion of each site-specific ESEE analysis, GIS was used to estimate the amount of land that would be removed from these inventories. The amount of acreage protected from development was subtracted from the surplus of buildable land cited in the Springfield Commercial Lands Study (2000) and the Metropolitan Industrial Lands Special Study (March 1991).

1. The Study indicated that about 11.56 acres would be removed from the commercial land supply. That supply is already estimated to be 158 acres short of the estimated demand for commercial land through 2015.

2. The Study estimated that about 71.40 acres would be removed from the industrial land supply by the proposed protection program. There would be a remaining surplus of between 1583 and 2105 acres of industrial land in the Eugene-Springfield area if the protections were implemented.

Finding #65. HB 3337 mandated the establishment of separate inventories of available residential land for Eugene and Springfield. The cities of Eugene and Springfield have since prepared separate inventories of residential, commercial and industrial buildable lands. The Springfield Commercial Industrial Buildable Land Study (CIBL) was adopted in 2009. The Springfield Residential Lands Study (RLS) was also adopted in 2009.

Finding #66. The proposed amendments include recommended protection measures for the Glenwood sites that will have a minor affect on the CIBL and RLS inventories. At the conclusion of each site-specific ESEE analysis, GIS was used to estimate the amount of land that would be removed from the commercial and industrial lands inventories. The estimate was based on vacant residential, commercial and industrially zoned lands.

Table 1 shows the acreage of the wetland and riparian sites that are the focus of this these amendments. The sites cover a total of 23.03 acres. The acreage totals 58.54 acres when the existing and recommended new setbacks are added.

Table 1. Acreage Affected by Glenwood Wetland and Riparian Amendments

Site ID	Site Acres	Existing and Recommended New Setbacks	Site Acres Including Setbacks
S-25	12.30	Existing 50-ft.	28.38
S-26 (New)	1.56	Existing 50-ft.	5.79
S-27 (New)	.33	25-ft.	.76
S-28 (New)	.73	25-ft.	1.35
W-20	3.73	Existing 50-ft.	8.66
W-21 (New)	.47	Existing 50-ft.	1.71
W-22 (New)	2.53	Existing 50-ft.	6.30
W-23 (New)	.87	Existing 50-ft.	4.62
W-24 (New)	.51	25-ft.	.97
Total Acres	23.03	Total Acres	58.54

Many of the resource sites are located within or adjacent to right-of-ways for Franklin Blvd., I-5 or the Union Pacific Railroad in Glenwood. These right-of-ways (ROWs) are not buildable lands and protection of these areas does not affect the supply of buildable land in Glenwood.

Table 2 shows that 24.47 acres of the land affected by these amendments are within ROWs and 34.07 acres of affected land are outside of ROWs. Table 2 also shows that only about 10.87

acres of affected land outside of ROWs is vacant or redevelopable. Redevelopable in this case is land classified by the Lane County Assessor as "Tract Land."

Table 2. Affected Acreage Outside of Right-of-Ways

Site ID	Site Acres Including Setbacks	Acres within ROWs	Acres Outside of ROW	Affected Developed Parcel Acres	Affected Vacant or Redevelopable Parcel Acres
S-25	28.38	11.78	16.60	12.85	3.75
S-26 (New)	5.79	4.1	1.69	.39	1.30
S-27 (New)	.76	.02	.74	.07	.67
S-28 (New)	1.35	.71	.64	0	.64
W-20	8.66	2.18	6.48	5.31	1.17
W-21 (New)	1.71	.84	.87	.87	0
W-22 (New)	6.30	.37	5.93	3.67	2.26
W-23 (New)	4.62	4.09	.53	.04	.49
W-24 (New)	.97	.38	.59	0	.59
	58.54	24.47	34.07	23.20	10.87

Most of the affected acreage in Glenwood is already protected by the City's stormwater management standards (SDC Section 4.3-115) that were adopted in 2002. Table 3 shows that only about 3.30 acres of vacant and redevelopable land are proposed for protection by setbacks that are not already enforced by the stormwater management standards. The setback protections are not retroactive and do not require the removal of existing development that may be located within the proposed setbacks. Future development will be governed by the setbacks if they are approved.

Table 3. Impact on Vacant and Redevelopable Acreage Not Protected By Existing Stormwater Management Setbacks

Site ID	Site Acres Including Setbacks	Recommended and Existing Setbacks	Vacant and Redevelopable Acres Affected by Recommended Setbacks			
			Residential	Commercial	Industrial	Total Acres
S-25	28.38	*Existing 50-ft.	0	0	1.36	1.36
S-26 (New)	5.79	Existing 50-ft.	0	0	0	0
S-27 (New)	.76	Recommended 25-ft.	.38	0	.19	.57
S-28 (New)	1.35	Recommended 25-ft.	.38	0	.29	.67

Site ID	Site Acres Including Setbacks	Recommended and Existing Setbacks	Vacant and Redevelopable Acres Affected by Recommended Setbacks			
			Residential	Commercial	Industrial	Total Acres
W-20	8.66	Existing 50-ft.	0	0	0	0
W-21 (New)	1.71	Existing 50-ft.	0	0	0	0
W-22 (New)	6.30	Existing 50-ft.	0	0	0	0
W-23 (New)	4.62	*Existing 50-ft.	0	0	.68	.68
W-24 (New)	.97	Recommended 25-ft.	.02	0	0	.02
Total Acres	58.54	Total Acres	0.78	0	2.52	3.30

* A small portion of this site is outside of the 50-foot setback and is recommended for protection by a 25-foot setback.

Goal 10 – Housing. This goal specifies that each city must plan for and accommodate needed housing types, such as multifamily and manufactured housing.

OAR 660-23-070 requires communities to conduct a buildable lands inventory that assesses the impact of protective policies applied to sites on the inventory of buildable land. Where there is a demonstrable impact, the rule requires the City to make adjustments to recover the buildable land that is lost.

Finding #67. The recommended protections for the Glenwood sites will have a negligible affect the inventory of residential lands. Table 3 shows the recommended protections will affect about 1.04 acres of vacant residential land that is not already protected by stormwater setbacks adopted in 2002.

Goal 11 – Public Facilities and Services. Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection.

Finding #68. The Eugene-Springfield Metropolitan Public Services and Facilities Plan (PFSP) is a refinement plan of the Metro Plan that guides the provision of public infrastructure, including water, sewer, storm water management, and electricity. Some of the inventoried Glenwood riparian and wetland resource sites are also public stormwater facilities. The Glenwood Slough and 19th Street Channel, and the Riverview/Augusta Channel (S-26) are important stormwater facilities that are listed in the PFSP. If the recommended protection policies will preserve and support existing stormwater protection policies that are applied to riparian and wetland sites that are on the Water Quality Limited Watercourse list. In addition, wetlands and riparian areas that are not protected under the stormwater policies will receive protection.

Finding #69. The proposed Glenwood protection measures allow for the development and maintenance of public infrastructure. As such the protection policies will not have a negative effect on Goal 11 public facilities and services. Other public services such as police and fire protection are not likely to be impacted by the approval of the protection policies.

Goal 12 – Transportation. The goal aims to provide "a safe, convenient and economic transportation system."

Finding #70. The protection policies recommended by the 2005 NR Study did not directly impact the approved transportation system plan for the Springfield area, TransPlan. Development standards that may be approved in the future as part of a Low Impact Development Design Handbook recommended by the NR Study may have an impact on street design standards. Some communities have chosen to allow narrower streets in hillside residential areas to reduce the amount of impervious surface areas. Those same narrow street designs are being championed as an effective measure for traffic calming.

Finding #71. The proposed amendments add to and update the wetland and riparian inventories to include newly identified Glenwood sites. No new protection policy initiatives are recommended that are not already part of the 2005 NR Study.

Goal 13 – Energy Conservation. Goal 13 declares that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Finding #72. The ESEE analysis considered the likely energy consequences of allowing conflicting uses to impact resource areas for the Glenwood sites. Approval of the recommended protection measures is not likely to have a direct impact on efforts to conserve energy. As such this goal is not applicable to evaluation of proposed Glenwood amendments.

Goal 14 – Urbanization. This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs.

OAR 660-23-070 requires communities to conduct a buildable lands inventory that assesses the impact of the natural resource inventory and the protective policies applied to sites on the inventory of buildable land. Where there is a demonstrable impact, the rule requires the City to make adjustments to recover the buildable land that is lost.

Finding #73. The proposed new amendments will have a negligible affect on the inventory of buildable lands. Table 3 shows that about 3.30 acres of vacant land will be affected by the Glenwood amendments and the proposed protection for the identified new wetland and riparian sites. Keep in mind that many of the Glenwood sites are already protected by existing stormwater management policies. The estimated impact in terms of acres lost from the residential, commercial and industrial inventories is discussed above under Goals 9 and 10. The

findings of the Study indicate that the impact on residential and industrial lands would not exceed the available surplus. The supply of commercial lands is already insufficient to meet projected demands, and the findings of this study indicate that the protections may further exacerbate the shortage, but to a negligible degree.

Goal 15 – Willamette River Greenway. Goal 15 sets forth procedures for administering the 300 miles of greenway that protects the Willamette River.

Finding #74. That portion of the Willamette River that flows through the Springfield/Glenwood area is an inventoried resource site (site WA/WB). The Willamette is already protected with under provisions of Springfield’s Stormwater Quality Management Program and as such is not recommended for further protection by the proposed Glenwood amendments. Adoption of the proposed Glenwood amendments and protection measures do not change the City’s existing standards for protection with respect to the Willamette River Greenway.

Goals 16 through 19 – Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources.

Finding #75. There are no coastal, ocean, estuarine, or beach and dune resources within the City’s jurisdiction. These goals do not apply in Springfield.

Conclusion

The findings shown above demonstrate that the proposed Glenwood amendments to the Springfield Local Wetland Inventory, the Springfield Inventory of Natural Resources Sites, and the Springfield Natural Resources Study and the recommended protection policies to achieve Goal 5 are in substantial conformance with Oregon’s Statewide Planning Goals.

V. Conclusion and Recommendation of Staff

Based on the findings of this report, the proposed Glenwood amendments to the Springfield Local Wetland Inventory, the Springfield Inventory of Natural Resources Sites, and the Springfield Natural Resources Study and the recommended protection policies for the Glenwood Sites meet the criteria for approving refinement plan amendments that is found in SDC Section 5.6-110.

VI. Attachments

- Attachment 1: Proposed Amendments to the Springfield Local Wetland Inventory
- Attachment 2: Proposed Amendments to the Springfield Inventory of Natural Resource Sites
- Attachment 3: Proposed Amendments to the Springfield Natural Resources Study
- Attachment 4: *Local Wetlands and Riparian Corridor Assessment for the Glenwood Area of Springfield*, Pacific Habitat Services, December 2009

**Attachment 5: *Glenwood Natural Resource Wildlife Habitat Assessment 2010*, Springfield
Environmental Services Division**