

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 ta 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 Setback s	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

Exhibit A: Springfield Local Wetland Inventory Report
Strikeout text is removed. Shaded text is added.

[Insert at pg. "Local Wetland Inventory Summary-9"]

Wetland W19 is 41.65 acres and is classified as POW/PFO. The wetlands were determined through on- and off-site methods. The wetlands are adjacent to the Springfield sheriff's pistol range and the portion of the Mill Race that has been widened to create a log pond for a mill. Soils were dark in color with mottles. Hydrology was indicated by the dominance of hydrophytic vegetation and presence of surface water in depressions. The wetland limits were determined where the vegetation changed and there were no longer indicators of hydrology and through use of black and white and infrared aerial photo interpretation and are limited to TOB.

[W19 was inadvertently left off of the original Local Wetland Inventory descriptions]

~~Wetland W20 is 3.39 acres and classified as PSS/PAB. The wetland is adjacent to Glenwood Slough and the railroad tracks. Overstory dominant species include Oregon ash, Oregon white oak (*Quercus garryana*) and big leaf maple. Understory dominant was willow (*Salix* sp.). Herbaceous dominants were yellow flag iris (*Iris pseudoacorus*), spreading rush (*Juncus patens*) and marsh horsetail (*Equisetum arvense*). Soils were dark in color with mottles. Seasonal hydrology was indicated by the dominance of hydrophytic vegetation and presence of surface water in depressions. The wetland limits were determined where the vegetation changed and there were no longer indicators of hydrology.~~

Wetland W20 is 3.73 acres and is classified a Palustrine Shrub-Scrub wetland. The wetland is adjacent to Glenwood Slough and the railroad tracks. It is part of the Glenwood Slough. It flows northwest into W-21 prior to being culverted and flowing into the Willamette River. W-20 is bisected by Glenwood Blvd, but is still hydrologically connected by a culvert. The Slough is a topographic bowl. Hydrologic sources include stormwater from adjacent impervious surfaces, in addition to groundwater and upslope surface water. A portion of W-20 was previously delineated (WD96-0375).

The dominant wetland vegetation includes Oregon Ash, Sitka Willow, Red-Osier Dogwood, Field Mint, Begger's Tick, Soft Rush and Short Scale Sedge.

Soil types include: Chehalis silty clay loam.

Wetland W21 Wetland W-21 is .47 acres and is classified as a Palustrine Shrub-Scrub (PSS) wetland. The wetland is located under and east of the Interstate 5 Bridge just south of Franklin Blvd. W-21 was delineated in 2003 (WD2003-0273) as part of the ODOT's I-5 bridge project and Willamette River trail. The west portion was impacted by construction of the I-5 temporary detour bridge. W-21 is bounded to the south by railroad tracks. Glenwood Slough flows through the wetland as do several ditches used to convey stormwater. The wetland is less than one-half acre and is a judged locally significant wetland because of its hydrologic connection to the Willamette River. It is also connected to W22 and W23.

The dominant wetland vegetation includes Oregon Ash, Pacific Willow, Black Cottonwood, Red-Osier Dogwood, Slough Sedge, and Creeping Buttercup.

Soil types include: Chehalis silty clay loam, Pengra-Urban land complex.

Wetland W22 is 2.53 acres and is classified as a Palustrine Forested wetlands (PFO). W-22 is a PFO system located with a drainage that flows through the southern portion. Portions of the wetland have been previously delineated (WD's 03-0273, 00-0102, 98-0051). PHS did not have access to the easternmost and southern portions of W-22 and boundaries were determined through off-site observations, previous delineations, and aerial photography.

The dominant wetland vegetation includes Oregon Ash, Pacific Willow, Black Cottonwood, Red Alder, Clustered Wild Rose, Red-Osier Dogwood, Slough Sedge, Nipplewort and Soft Rush.

Soil types include Chehalis silty clay loam.

Wetland W23 is .87 acres and is classified as Palustrine Emergent (PEM) wetland. W-23 is a series of small PEM wetlands located within the ODOT ROW and on private property. The wetlands were delineated in 2007 for the I-5 bridge project (WD08-0140). The wetlands are located at the bottom of a steep slope. Hydrology from the wetlands flows into a channel that drains to the northwest into the Willamette River. The wetlands located in the ODOT ROW are mowed and maintained.

The dominant wetland vegetation includes Black Cottonwood, Wild Mint, Begger's Tick, Soft Rush, Sawbeak Sedge, Soft Brome, Common Velvet Grass, English Plantain, Tall Fescue, and Bluegrass species.

Soils types include: Dixonville-Philomath-Hazelair Complex

Wetland 24 is .51 acres and is classified as a Palustrine Forested wetland (PFO). W-24 is located at the bottom of surrounding steep slopes. There is a narrow intermittent drainage channel that flows through the middle of the wetland. This drainage continues east through a long culvert under McVay Hwy. and the railroad and out to the Willamette River. W-24 is located between I-5 and McVay Hwy. with residential land uses to the north and south.

The dominant wetland vegetation includes Black Cottonwood, Pacific Willow, Red-Osier Dogwood, Reed Canary Grass, Water-Parsley, Stinging Nettles, Slough Sedge and Field Horsetail.

Soil types include: Dixonville-Philomath-Hazelair Complex.

Wetland W25 is 4.31 acres in size and is a Palustrine Forested wetland (PFO) area bounded on all sides by railroad tracks. PHS was able to view the wetland from adjacent road ROWs and the Franz bakery property to the east. It is surrounded by adjacent commercial properties. There is a drainage located along the southern portion of the wetland. It flows northwest into a large culvert

located within the ROW of Glenwood Boulevard that is believed to flow into GS-3/Glenwood Slough.

Adjacent upland species: *Acer macrophyllum*, *Pseudotsuga menziesii*, *Rubus discolor*, *Corylus cornuta*, *Carex leptopoda*, *Convolvulus sp.*, *Hedera helix*, *Agrostis stolonifera*, *Symphoricarpos albus*

Soil types include: Chehalis silty clay loam

Wetland 26 is .86 acres in size and is a mosaic of 50% wetland and 50% upland located on undeveloped land north of I-5 at the top of a steep slope. It is relatively flat and appears to have been significantly disturbed in the past by scraping. Plant species include a mixture of upland and wetland species. Several areas had mottling and oxidized rhizospheres, despite the general lack of dark chroma soils. Deep tire ruts bare evidence of seasonally wet conditions.

Adjacent upland species: *Rhus diversilobum*, *Crataegus monogyna*, *Rubus discolor*, *Festuca arundinacea*, *Daucus carota*, *Hypericum perforatum*, *Cirsium vulgare*, *Chrysanthemum leucanthum*, *Centaurea pratensis*

Soil types include: Urban land-Hazelair-Dixonville complex

The tables below summarize the size and classification of the wetland areas within Springfield's Urban Growth Boundary.

Table 1.
City of Springfield Wetlands—McKenzie River Basin Wetlands

Site Number	**OFWAM Significance	Acres	USFWS Classification(s)	"Other" Created Waters (Acres)
M1		4.94	RLP	
M2		3.12	PEM	10.50
M3		2.73	PEM/PFO	
M4	Locally Significant Wetlands Special Interest for Protection	5.02	PEM	
M5	Locally Significant Wetlands	9.13	PFO/PSS/PEM	
M6		4.05	PEM/PSS	
M7		0.2	PEM	
M8*		0.2	PSS	
M10*		2.72	RIN	
M11*		1.01	POW	
M12		1.22	PEM	
M14	Locally Significant Wetlands	33.45	PEM/PFO	
M15		6.41	PEM	

Site Number	**OFWAM Significance	Acres	USFWS Classification(s)	"Other" Created Waters (Acres)
M16	Locally Significant Wetlands	8.44	PFO/POW/RLP/PEM	
M17		3.15	PEM	
M18*		40.72	POW/PSS	16.75
M19		0.37	PFO	
M20	Locally Significant Wetlands	0.52	RLP	
M21		0.39	PEM	
M22		0.1	PEM	
M23		0.19	PEM	
M24		0.51	PEM	
M25		24.0	PEM	
M26	Locally Significant Wetlands	1.85	PFO/PEM/PSS	
M27		8.28	PEM/PFO	
M28	Special Interest for Protection- Mitigation Site	1.51	PEM	
M29	Locally Significant Wetlands Special Interest for Protection	1.08	PFO/PEM	
M30		6.49	PFO/PEM/POW	
M31		0	POW	8.06
M32		3.39	PEM	
M33		13.75	POW/PSS/RLP	116.17
M34		0.8	PFO	
M35		4.91	PEM	
M36		0.75	PEM	
M37		0.4	PEM	
M38		0.08	PEM/PFO	
M39*		1.88	PEM	
M40		16.51	RLP	
	Total	214.27		151.48

*denotes off-site wetland determination and mapping

** Subsequent to the adoption of the Springfield Local Wetland Inventory, a state mandated analysis was completed to determine which wetlands were "locally significant" under state law. The results of the analysis are added to the summary information found in Tables 1 and 2. The term **OFWAM** stands for the Oregon Freshwater Wetland Assessment Methodology which by state mandate, is the analytical tool that is used to determine if a wetland is "significant."

Table. 2
City of Springfield Wetlands—Willamette River Basin Wetlands

Site Number	OFWAM Significance	Acres	USFWS Classification(s)	“Other” Created Waters (Acres)
W1*		4.14	RLP	
W2	Locally Significant Wetlands, Special Interest for Protection	0.90	PEM	
W3		1.27	PFO/PEM/POW	
W4	Locally Significant Wetlands	0.97	PFO/PEM	
W5		5.6	POW/PFO/PEM	
W6		5.63	PFO	
W7*		0	POW	36.02
W8*		1.22	POW	
W9		0.22	PEM	
W11		0.67	PSS	
W12	Locally Significant Wetlands	1.42	PFO	
W10		2.25	PSS	
W13		2.24	PFO	
W14		0.97	PEM	
W15		0.79	PFO	
W16	Locally Significant Wetlands	1.46	PFO	
W17		17.21	RLP	
W18 A-C	Locally Significant Wetlands	131.99	PEM/PFO	
**W-19	Locally Significant Wetlands	41.65	POW, PFO	
W-20	Locally Significant Wetlands	3.73	PSS/PUB	
W-21	Locally Significant Wetlands	.47	PSS	
W-22	Locally Significant Wetlands	2.53	PFO	
W-23	Locally Significant Wetlands	.87	PEM	
W-24	Locally Significant Wetlands	.51	PFO	
W-25		4.31	PFO	
W-26		.86	PEM	
	Total	188.99 233.88		36.02

*denotes off-site wetland determination and mapping

**W-19 was inadvertently left off of this table in the original Springfield Local Wetland Inventory report. Wetlands W-20 through W-26 are the revised resource sites in the Glenwood area.

Table 3
City of Springfield Wetlands—Total Acreage

	Jurisdictional Wetlands	“Other” Created Waters
McKenzie Basin	214.27	151.48
Willamette Basin	189.99 269.90	36.02
Total Acres	404.13 484.17	187.50

Exhibit B: Springfield Inventory of Natural Resource Sites
Strikeout text is removed. Shaded text is added.

[Insert at pg. 18]

Site: ~~_____~~ E39 (Glenwood Slough)

Type: ~~_____~~ Riparian

Acres: ~~_____~~ 23.8

WHA score: ~~_____~~ 46-47

WHA source: Ester Lev, 1990

Area map(s): ~~_____~~ 5

Description: Site E39 consists of several sloughs, wetlands, and riparian strips near or adjacent to Interstate 5 and the Southern Pacific Railroad tracks in the Glenwood area. Vegetation includes willows (*Salix* spp.), black cottonwood (*Populus trichocarpa*), sedge (*Carex* spp.), rush (*Juncus* spp.), cattails (*Typha latifolia*), and reed canarygrass (*Phalaris arundinacea*). Interspersion with other natural areas is limited by I-5 and other adjacent roads, but the site's proximity to the Willamette River may increase the number of wildlife species in the area. The Division of State Lands has determined that a portion of this site is a regulated wetland.

Site: S25 (Formerly E39)

Type: Riparian

Acres: 12.3

WHA score: 46-47

WHA source: Ester Lev, 1990

Area map(s): 6,7

Description: Site S-25 (formerly E-39) consists of segments of the Glenwood Slough near or adjacent to Interstate 5, Franklin Boulevard, Glenwood Boulevard and the Union Pacific Railroad tracks in the Glenwood area. S-25 is generally surrounded by industrial uses, railroad tracks and a highway.

The western portion of S-25 wraps around the Glenwood solid waste transfer station. At its west end, the slough passes under the Willamette River I-5 overpass. This western portion has been channelized with cement sides.

The portions of S-25 on either side of Glenwood Boulevard are more natural and contain significant riparian vegetation including willows (*Salix* spp.), black cottonwood (*Populus trichocarpa*), sedge (*Carex* spp.), rush (*Juncus* spp.), cattails (*Typha latifolia*), and reed canarygrass (*Phalaris arundinacea*). Interspersion with other natural areas is limited by I-5 and other adjacent roads, but S-25's proximity to the Willamette River may increase the number of

wildlife species in the area. The Division of State Lands has determined that portions of this site are regulated wetlands (W-20, W-21, and W-22).

The dominant riparian tree species include Oregon Ash, Sitka Willow, Red-Osier Dogwood, Black Cottonwood, Black Locust and Oregon Maple.

No fish survey was conducted for S-25 and it is not shown on ODFW maps of fish-bearing streams. The proximity and open connectivity to the Willamette River also suggests that fish are present in the Slough.

Site: S26

Type: Riparian

Acres: 1.56

WHA score: 17-57

WHA source: Washburn

Area map(s): 6, 7

Description: Site S-26 is a perennial stream that varies in width between 2-5 feet. It is bordered to the west by I-5. Much of the stream and the defined impact area are located within ODOT right-of-way adjacent to I-5 and beneath the Willamette I-5 Bridge. S-26 is segmented, with a 462-foot culvert dividing the northern and southern segments of the stream. The northern segment of S-26 daylights under the Willamette I-5 Bridge before continuing north to the Willamette River.

The dominant riparian tree species include Oregon Ash, Sitka Willow, Red-Osier Dogwood, Black Cottonwood, Black Locust, Oregon Maple, and Pacific Willow.

No known fish survey was been conducted for S-26. The stream is not shown on ODFW maps of fish-bearing streams. There is an unnamed perennial drainage that begins on the west side of I-5 (in Eugene) and is culverted under the freeway where it converges with the culverted portion of S-26. The Eugene drainage that connects to S-26 has been documented by ODFW as having cutthroat trout. The presence of cutthroat in the Eugene drainage suggests that S-26 is also fish-bearing. The proximity and connectivity to the Willamette River also suggests that fish are present in S-26.

Site: S27

Type: Riparian

Acres: .33

WHA score: 45

WHA source: Washburn

Area map(s): 6,7

Description: Site S-27 is a perennial stream segment that conveys water from the Moon Mt. area south of I-5. The stream is largely culverted from I-5 to the Glenwood slough, with

occasional daylighting along the watercourse. S-27 is one of those daylighted segments which opens into a 40 foot wide riparian feature. The stream segment is about 274 feet in length and is bounded to the north and west by industrial and residential development. Some land to the south and east is undeveloped, but the stream is culverted as it passes beneath that area.

S-27 is a dense thicket, dominated by Pacific Willow, Black Cottonwood, Maple species, Alder species, and Hazelnut trees. At the time the stream was assessed (July 2009) the feature was sufficiently shrouded by vegetation that the consultants noted that they "could not see the bottom of the drainage due to a steep slope and Salix sp. thicket."

No known fish survey was been conducted for S-27. It is not shown on ODFW maps of fish-bearing streams. The distance and lack of open connection to the Glenwood Slough and the Willamette River argue against this being classified as a fish-bearing stream.

Site: S28

Type: Riparian

Acres: .73

WHA score: 61

WHA source: Washburn

Area map(s): 6, 7

Description: S-28 is a narrow stream that meanders through a wetland area that is vegetated by willow thickets and Reed Canary grass. It is sandwiched between the ODOT right-of-ways for the I-5 and McVay Hwy. The system is fed by a storm culvert from under the freeway and exits through a storm culvert under McVay Hwy. and into the Willamette River.

The dominant riparian tree species include Oregon Ash, Douglas Fir, Red-Osier Dogwood, Black Cottonwood, Indian Plum, White Oak, and Oregon Maple.

Springfield Inventory of Natural Resource Sites

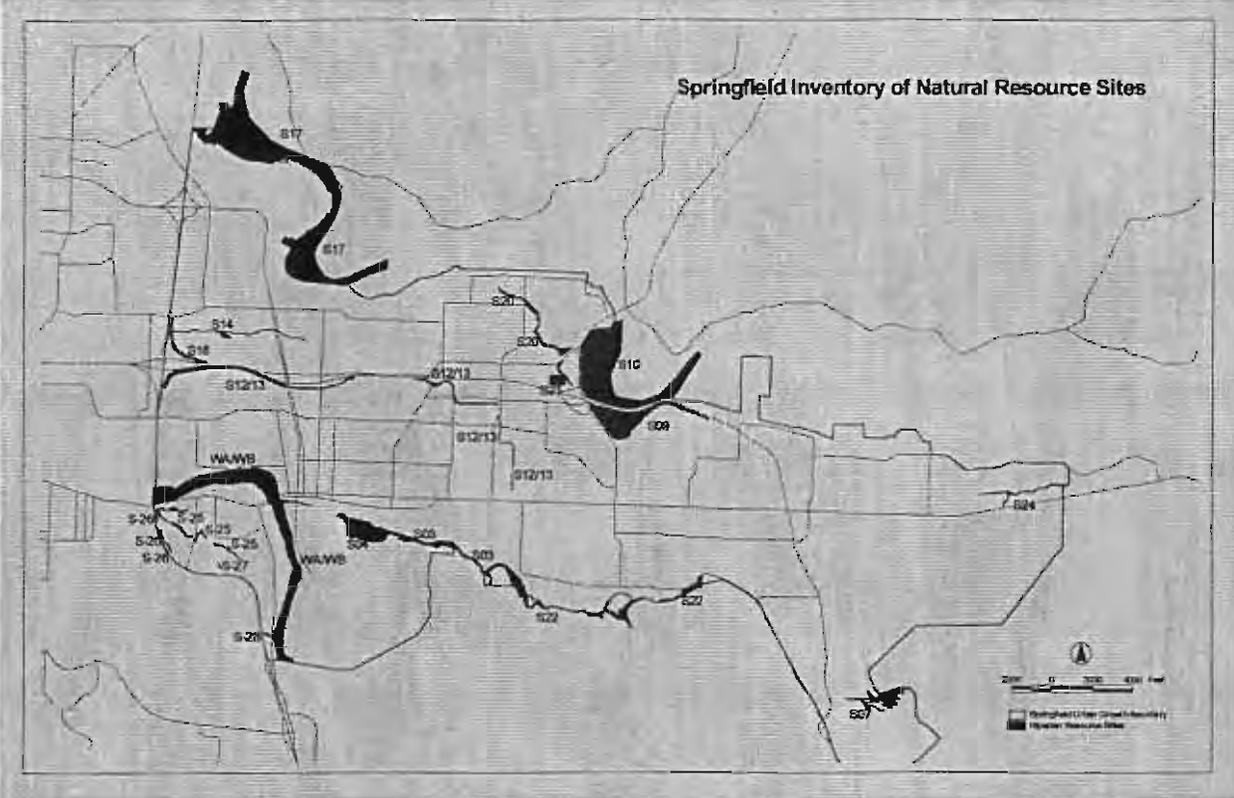


Exhibit C: Page Inserts for the Springfield Natural Resources Study

Table 3-1. Springfield Inventory of Natural Resource Sites [Insert at pg. 22]

Site #	Acres	Tier 1 Significance Criteria Met	Tier 2 WHA Score	Quality Ranking	Site Name
S03 ¹	29.7	1,2,3,4	61-62	High	Mill Race A (Rural)
S04	42.9	2,3,4,6	40-41	Moderate	Mill Race B (Urban)
S07	23.9	1,2	34	Moderate	Brand S/Natron
S09	71.9	1,2,4	50	High	Weyerhaeuser B
S10 ¹	195.0	1,4,6	70	High	Weyerhaeuser A
S12/13	39.1	2,4	45 (Trees) 36 (No Trees)	High Moderate	Q Street Ditch
S14	2.4	2,4	35	Moderate	Guy Lee
S17 ¹	347.2	1,2,4,6	67	High	Maple Island Slough/ McKenzie River
S18	13.4	2,4	22-23	Moderate	SCS Channel #6
S20	19.6	1,2,4	67	High	Irving Slough North
S21	13.7	1,2,4	47	High	South Irvine Slough and Pond
S22 ¹	44.9	1,2,4	67	High	Jasper Road Slough
S24	8.0	2,3,4	55	High	Gray Creek
WA/WB	628.2	1,2,3,4,6	72-74 (Natural) 64-66 (Urban)	High	Willamette River
E39	23.8	1,4,5	46-47	High	Glenwood Slough
S25	12.30	1,4,5	46-47	High	Glenwood Slough
S26	1.56	1,4	17-57	High	Riverview/Augusta Channel
S27	.33	4	45	High	Petersen Equipment Daylighted Culvert
S28	.73	1,4	61	High	S. McVay Hwy. Channel
Total	1518.62				

4.4 Springfield's Locally Significant Wetlands [Insert at pg. 26]

McKenzie River Basin Wetlands

Site Number	OFWAM Significance Rationale	Acres	USFWS Classification(s)
M4	Special Interest for Protection: Wetland inhabited by a species listed federally as threatened or endangered, or state listed as sensitive, threatened or endangered.	5.02	PEM
M5	Provides diverse wildlife habitat and hydrologic control function is intact.	9.00	PFO/PSS/PEM
M14	Provides diverse wildlife habitat.	33.45	PEM/PFO
M16a-c	M16a: Water quality and hydrologic functions are intact. M16b: Hydrologic function is intact. M16c: Hydrologic Function is intact	13.96	PFO/POW/RLP/PEM
M20	Provides diverse wildlife habitat and water quality is intact	0.52	RLP
M26	Provides diverse wildlife habitat; provides recreational and educational opportunities;	1.85	PFO/PEM/PSS
M28	Special Interest for Protection- Mitigation Site	1.51	PEM
M29	Special Interest for Protection- Wetland inhabited by a species listed federally as threatened or endangered, or state listed as sensitive, threatened or endangered.	1.08	PFO/PEM
M30	Water quality function is intact	6.49	PFO/PEM/POW
M33a	Hydrologic control function is intact	3.39	PEM
	McKenzie Basin Acres	76.27	

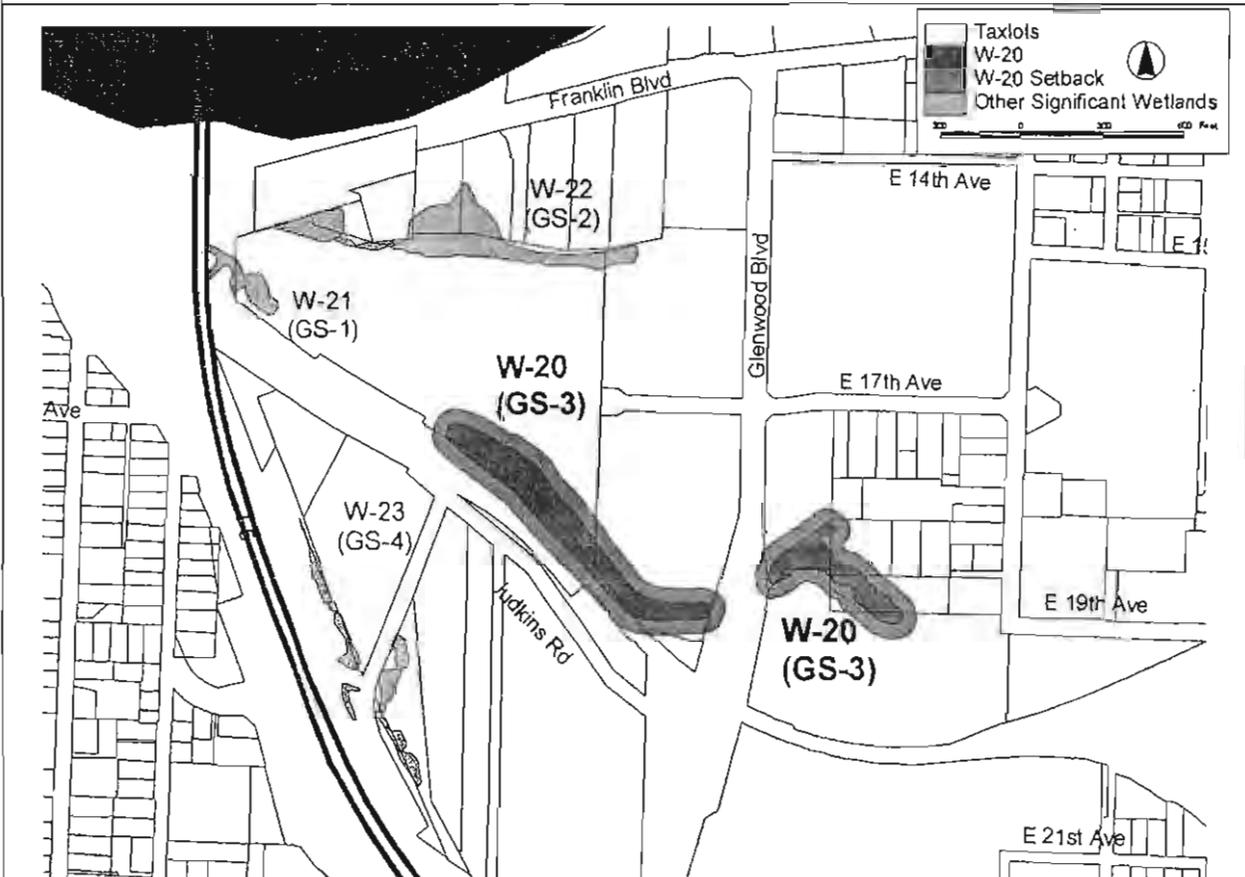
Willamette River Basin Wetlands

Site Number	OFWAM Significance	Acres	USFWS Classification(s)
W2	Special Interest for Protection -Wetland inhabited by a species listed federally as threatened or endangered, or state listed as sensitive, threatened or endangered.	0.90	PEM
W3a	Water quality function is intact	15.30	RLP
W4a	Water quality function is intact	.67	PFO
W12	Water quality and hydrologic functions are intact	1.42	PFO
W16	Water quality and hydrologic functions are intact	1.46	PFO/PEM
W18a	Water quality and hydrologic functions are intact	128.80	PEM/PFO
W19	Hydrologic control function is intact	41.65	POW/PFO
W20	Water quality and hydrologic functions are intact	3.39	PSS/PAB
W20	Water quality and hydrologic functions are degraded	3.73	PSS/PUB
W21	Water quality and hydrologic functions are degraded	.47	PSS
W22	Water quality and hydrologic functions are degraded	2.53	PFO
W23	Water quality and hydrologic functions are degraded	.87	PEM
W24	Water quality and hydrologic functions are degraded	.51	PFO
	Willamette Basin Acres	201.7	
	Total acreage for all Locally Significant Wetlands	277.97	

[Insert W-20 through W-24 at pg. 190]

Site: W-20 (GS-3)	Acres: 3.73	OFWAM: Locally Significant	Associated Inventoried Riparian Resource?
	Cowardin Class: Palustrine Scrub-Shrub (PSS), Wetland with <30% canopy cover of shrubs or small trees Palustrine Unconsolidated Bottom (PUB) Wetland with <30% vegetation cover and a surface with >25% of the particles smaller than stones.	Wetland is within ¼ mile of DEQ 303 (d) listed water body Wetland has a direct surface water connection to a salmonid stream Moderate Quality Wetlands	Yes: S-25 WHA Score: 46-47 High Quality Resource

Goal 5 Recommendation: Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-20 is associated with the Glenwood Slough (S-25, formerly E-39). The Slough is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the Slough also protects W-20. Any portion of W-20 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under the provisions of SDC 4.3-117.



Description:

W-20 is a Palustrine Shrub-Scrub wetland. It is part of a system known as the Glenwood Slough. It flows northwest into W-21 prior to being culverted and flowing into the Willamette River. W-20 is bisected by Glenwood Blvd, but is still hydrologically connected by a culvert. The Slough is a topographic bowl. Hydrologic sources include stormwater from adjacent impervious surfaces, in addition to groundwater and upslope surface water. A portion of W-20 was previously delineated (WD96-0375).

Dominant Wetland Vegetation			
Trees/ Shrubs		Vines/ Herbs	
<i>Fraxinus latifolia</i>	Oregon Ash	<i>Mentha arvensis</i>	Field mint
<i>Salix sitchensis</i>	Sitka Willow	<i>Biden sp.</i>	Begger's tick.
<i>Cornus stolonifera</i>	Red-Osier Dogwood	<i>Juncus effusus</i>	Soft Rush
		<i>Carex leptopoda</i>	Short-Scale Sedge

Adjacent upland species: *Symphoricarpos albus*, *Rubus discolor*, *Cornus stolonifera*, *Rubus ursinus*, *Corylus cornuta*, *Fraxinus latifolia*, *Carex leptopoda*, *Dipsacus sylverstris*, *Tolmiea menziesii*

Soils—Mapped Series	Chehalis silty clay loam
Hydrologic Source	Groundwater

Wetland and Impact Area Summary

Wetland Acreage	3.73
Impact Area Acreage	11.74
Combined Wetland and Impact Area	15.50
Vacant Acres within the Combined Area	3.73
Number of Parcels Affected	14
Combined Parcel Acreage	51.26

Conflicting Uses by Acre and Zoning District

SITE ID	LDR	PLO	LMI	TOTAL ACRES
W-20	.11	0	2.88	*2.99
W-20 Impact Area	1.07	.89	9.78	11.74
Total	1.18	.92	12.66	14.73

*This number varies from the total wetland acreage since portions of the wetland and its impact area are within railroad and street right-of-way which have no zoning.

Conflicting Uses by Vacant Acre and Zoning District

SITE ID	LDR	PLO	LMI	TOTAL ACRES
W-20	0	0	.13	.13
W-20 Impact Area	0	.89	2.71	3.60
Total	0	.89	2.84	3.73

Existing Protections

Is the site protected by minimum development setbacks and site plan review standards described in Section 4.3-115 of the Springfield Development Code? **Yes.**

W-20 is associated with the Glenwood Slough (S-25, formerly E-39). The Slough is a tributary to a water quality limited watercourse (Willamette River) and is protected by a 50-foot setback and a site plan review requirement.

The Glenwood Refinement Plan includes policies that give direction for environmental design affecting S-25 (formerly E-39). The Refinement Plan states, "Significant wetland areas in Glenwood shall be protected from encroachment and degradation in order to retain their important functions and values related to fish and wildlife habitat, flood control, sediment, and erosion control, water quality control, and ground water pollution control," (Policy 1, pg. 92, Environmental Element).

Site Specific ESEE Analysis for W-20

This section discusses ESEE impacts that are specific to this particular site. For a broader discussion of the ESEE consequences of allowing, limiting or prohibiting conflicting uses on wetlands, see the General ESEE Analysis found in Section 8 of this report.

Environmental Consequences

W-20 is rated as a "Moderate Quality Wetland." The wetland overlaps with a riparian resource site, S-25. S-25 is rated as a "High Quality Resource" site with a WHA score of 46-47. The OFWAM analysis concluded that the wetland's water quality and hydrologic control functions are impacted or degraded. The resource provides habitat for some species, although the fish habitat is degraded. Fully allowing conflicting uses would mean the loss of what little function and habitat that W-20 does provide.

Social Consequences

The OFWAM analysis indicates that W-20 is not aesthetically pleasing, nor is it appropriate for educational or recreational uses. The Willamalane Park and Recreation District Comprehensive Plan shows no anticipated park facilities or natural areas near the resource site. The site has moderate potential for enhancement which may make it more of a community amenity.

Economic Consequences

The OFWAM analysis indicates that the water quality and hydrologic control functions of the resource are already degraded. These functions could be mimicked using engineered facilities at a significant cost. Fully protecting the resource site would mean the loss of 3.73 acres of vacant industrial land within the combined wetland and impact area boundaries.

Energy Consequences

None of note.

Recommended Program for Protection

Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-20 is associated with the Glenwood Slough (S-25, formerly E39). The slough is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the slough also protects W-20. Any portion of W-20 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under provisions of SDC Section 4.3-117.

Impact of Protection Measures on Vacant Acreage and Buildable Land Inventory

Impact on Vacant Acreage by Zoning District

SITE ID	PLO	LMI	TOTAL ACRES
W-20	0	.13	.13
W-20 50-ft. Setback	.03	.67	.70
Total	.03	.80	.83

About .13 acres of W-20 is classified as vacant by the Lane County Assessor's Office. The vacant acreage includes portions of 1 lot. Limiting conflicting uses would allow some development to occur within the wetland area where the developer could show how the essential functions of the wetland could be preserved or enhanced. A 50-foot development setback is already required for the wetland under Section 4.3-115 of the Springfield Development Code. No additional setback is proposed.

A 50-foot setback would affect .67 acres of vacant industrial land. The affect of the setback on buildable land could be reduced by aligning development such that yards and other open space are within the setback. Stormwater management facilities required for development can be placed within the setback under SDC 4.3-115.

Employing low impact development practices within 150 feet of the wetland could reduce the impact of nearby development on the resource. Some low impact development practices are already incorporated into the stormwater quality protection standards found in SDC 4.3-115.

Reduction in the Buildable Land Inventory:

The Commercial Industrial Buildable Lands Study (CIBL) that was completed in 2009 identified a shortage of commercial and industrial lands. The Springfield Residential Lands Study (RLS) that was also completed in 2009 identified a small surplus of residential lands. These inventories include some Glenwood sites and classified each as “Vacant,” or “Redevelopable.” These classifications are not the same used by the Lane County Assessor’s Office. These classifications stem from judgments made by ECONorthwest in collaboration with a steering committee that helped frame assumptions about what is redevelopable and vacant.

Protecting W-20 and its 50-foot setback area from future development effectively reduces the CIBL inventory by a total of .73 acres and the RLS by a total of .44 acres, for a total of 1.17 acres.

Impact of Recommended Protection on Commercial, Industrial and Residential Land Inventories

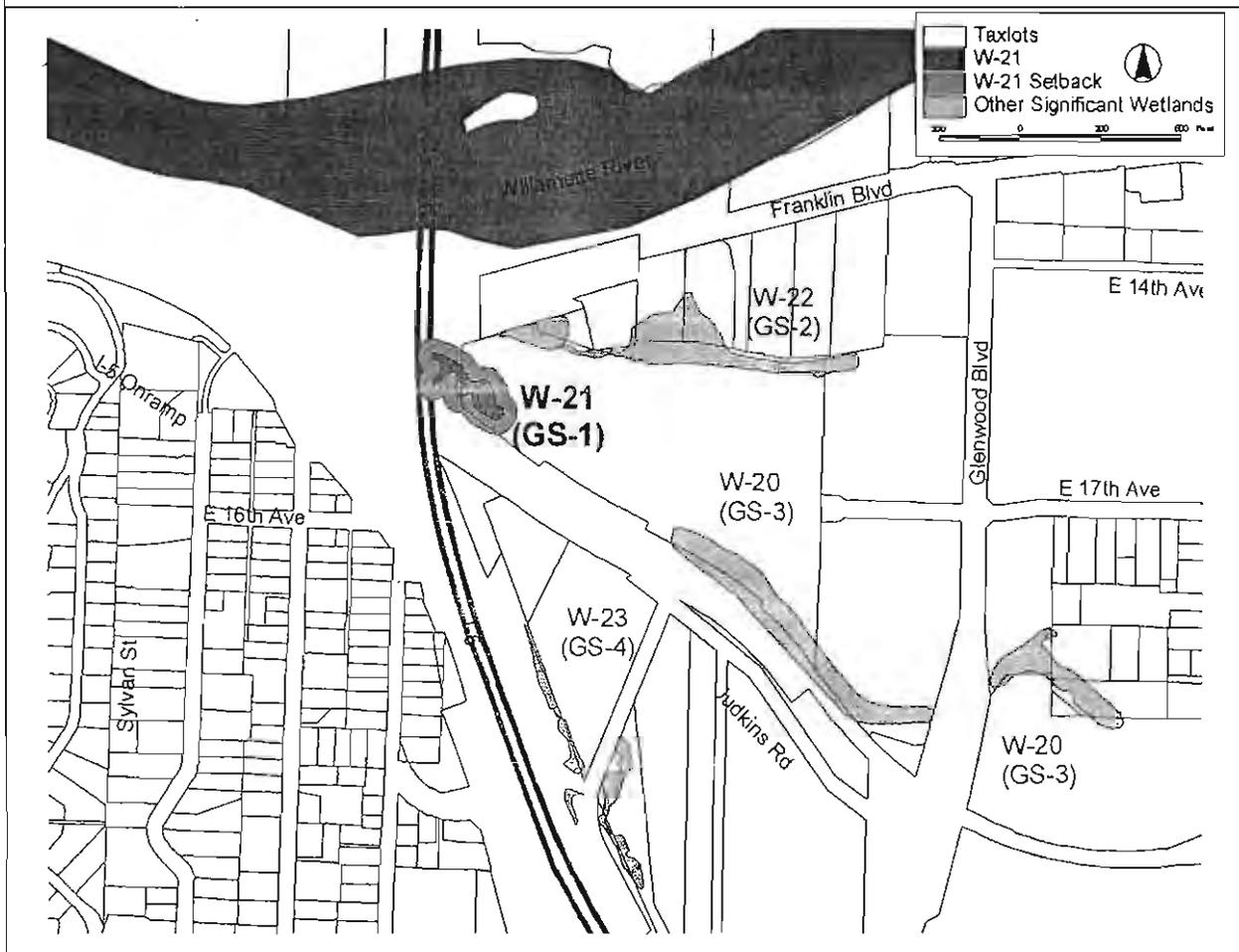
Site W-20 Zoning	Redevelopable	Vacant	Total Acres
LDR	.44	0	.44
LMI	.71	.02	.73
Total Acres	1.15	.02	1.17

The cumulative effect of fully protecting all commercial and industrial lands that are impacted by riparian or wetland resources could increase the need for UGB expansion to meet land needs.

A 50-foot development setback is required under stormwater provisions of the Springfield Development Code, and thus the 1.17 impact of protecting W-20 with the setback is not attributed to this report.

Site: W-21 (GS-1)	Acres: .47	OFWAM: Locally Significant	Associated Inventoried Riparian Resource?
	Cowardin Class: Palustrine Scrub Shrub (PSS) Wetland with <30% canopy cover of shrubs or small trees.	Wetland is within ¼ mile of DEQ 303 (d) listed water body Wetland has a direct surface water connection to a salmonid stream Moderate Quality Wetlands	Yes: S-25 WHA Score: 46-47 High Quality Resource

Goal 5 Recommendation: Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-21 is associated with the Glenwood Slough (S-25). The slough is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the slough also protects W-21. Any portion of W-21 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under the provisions of SDC 4.3-117.



Description:

Wetland W-21 is .47 acres and classified as a Palustrine Shrub-Scrub (PSS) wetland. The wetland is located under and east of the Interstate 5 Bridge just south of Franklin Blvd. W-21 was delineated in 2003 (WD2003-0273) as part of the ODOT's I-5 bridge project and Willamette River trail. The west portion was impacted by construction of the I-5 temporary detour bridge. W-21 is bounded to the south by railroad tracks. Glenwood Slough flows through the wetland as do several channels used to convey stormwater. The wetland is less than one-half acre and is a judged locally significant wetland because of its hydrologic connection to the Willamette River. It is also connected to W22 and W23.

Dominant Wetland Vegetation			
Trees/ Shrubs		Vines/ Herbs	
<i>Fraxinus latifolia</i>	Oregon Ash	<i>Carex obnupta</i>	Slough Sedge
<i>Populus trichocarpa</i>	Black Cottonwood	<i>Ranunculus repens</i>	Creeping Butter-Cup
<i>Cornus stolonifera</i>	Red-Osier Dogwood		
<i>Salix lasiandra</i>	Pacific Willow		

Adjacent upland species: *Populus trichocarpa*, *Alnus rubra*, *Fraxinus latifolia*, *Cornus stolonifera*, *Robinia pseudoacacia*, *Rubus discolor*, *Cytisus scoparius*, *Festuca arundinaceae*, *Plantago lanceolata*, *Lathyrus latifolius*, *Daucus carota*, *Cirsium arvense*, *Dipsacus sylvestris*, unidentified mixed grasses

Soils—Mapped Series	Chehalis silty clay loam, Pengra-Urban land complex
Hydrologic Source	Groundwater

Wetland and Impact Area Summary

Wetland Acreage	.47
Impact Area Acreage	4.54
Combined Wetland and Impact Area	5.01
Vacant Acres within the Combined Area	0
Parcels Affected (Including Impact Area)	2
Combined Parcel Acreage	43.54

Conflicting Uses by Acre and Zoning District

SITE ID	LMI	TOTAL ACRES
W-21	.31	*.31
W-21 Impact Area	4.54	4.54
Total	4.85	4.85

*Portions of the wetland fall within right-of-way which has no zoning designation; thus this figure is less than that shown above for wetland acreage.

Conflicting Uses by Vacant Acre and Zoning District

SITE ID	LM	TOTAL ACRES
W-21	0	0*
W-21 Impact Area	0	0*
Total	0	0*

*W-21 lies within County owned land that has been developed as a Solid Waste Transfer Site. The wetland is located within ODOT and Union Pacific right-of-way that bisects the County property. What appears to be vacant resource land within the County parcel is in fact committed for transportation uses.

Existing Protections

Is the site protected by minimum development setbacks and site plan review standards described in Section 4.3-115 of the Springfield Development Code? **Yes.**

W-21 is associated with the Glenwood Slough. The Slough is a tributary to a water quality limited watercourse (Willamette River) and is protected by a 50-foot setback and a site plan review requirement. This 50-foot setback also protects W-21. Any portion of W-21 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under provisions of SDC Section 4.3-117.

The Glenwood Refinement Plan includes policies that give direction for environmental design affecting S-25 (formerly E-39). The Refinement Plan states, "Significant wetland areas in Glenwood shall be protected from encroachment and degradation in order to retain their important functions and values related to fish and wildlife habitat, flood control, sediment, and erosion control, water quality control, and ground water pollution control," (Policy 1, pg. 92, Environmental Element).

Site Specific ESEE Analysis for W-21

This section discusses ESEE impacts that are specific to this particular site. For a broader discussion of the ESEE consequences of allowing, limiting or prohibiting conflicting uses on wetlands, see the General ESEE Analysis found in Section 8 of this report.

Environmental Consequences

W-21 is rated as a "Medium Quality Wetlands." The wetland overlaps with a riparian resource site, E-39. E-39 is rated as a "High Quality Resource" site with a WHA score of 46-47. The OFWAM analysis indicates that the wetland's water quality and hydrologic control functions are degraded. The resource provides habitat for some species, although the fish habitat is degraded. Fully allowing conflicting uses would mean the loss of what little function and habitat that W-21 does provide.

Social Consequences

The OFWAM analysis concluded that W-21 is not aesthetically pleasing, nor is it appropriate for educational or recreational uses. The Willamalane Park and Recreation District Comprehensive Plan shows no anticipated park facilities or natural areas near the resource site. The site has high potential for enhancement which may make it more of a community amenity.

Economic Consequences

The OFWAM analysis indicates that the water quality and hydrologic control functions of the resource are already degraded. These functions could be mimicked using engineered facilities, but at a significant cost. Portions of the affected tax lot have been developed as Lane County's Glenwood Solid Waste Transfer Site. The wetland itself is located beneath the Willamette River I-5 Bridge and adjacent to the Union Pacific Railway right-of-way. Fully protecting the resource site would mean no loss to the remaining vacant industrial land within the combined wetland and impact area boundaries.

Energy Consequences

None of note.

Recommended Program for Protection

Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-21 is associated with the Glenwood Slough. The slough is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the slough also protects W-21. Any portion of W-21 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under provisions of SDC Section 4.3-117.

Impact of Protection Measures on Vacant Acreage and Buildable Land Inventory

Impact on Vacant Acreage by Zoning District

SITE ID	LMI	TOTAL ACRES
W-21	0	0
W-21 50-ft. Setback	0	0
Total	0	0

The land containing W-21 is not classified as vacant by the Lane County Assessor's Office. Limiting conflicting uses would allow some re-development to occur within the wetland area where the developer could show how the essential functions of the wetland could be preserved or enhanced. A 50-foot development setback is already required for the wetland under SDC Section 4.3-115. This 50-foot setback protecting the slough also protects W-21. Any portion of W-21 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback.

A 50-foot setback would not affect any vacant industrial land. The affect of the setback on buildable land could be reduced by aligning development such that yards and other open space are within the setback. Stormwater management facilities required for development can be placed within the setback under SDC Section 4.3-115.

Employing low impact development practices within 150 feet of the wetland could reduce the impact of nearby development on the resource. Some low impact development practices are already incorporated into the stormwater quality protection standards found in SDC Section 4.3-115.

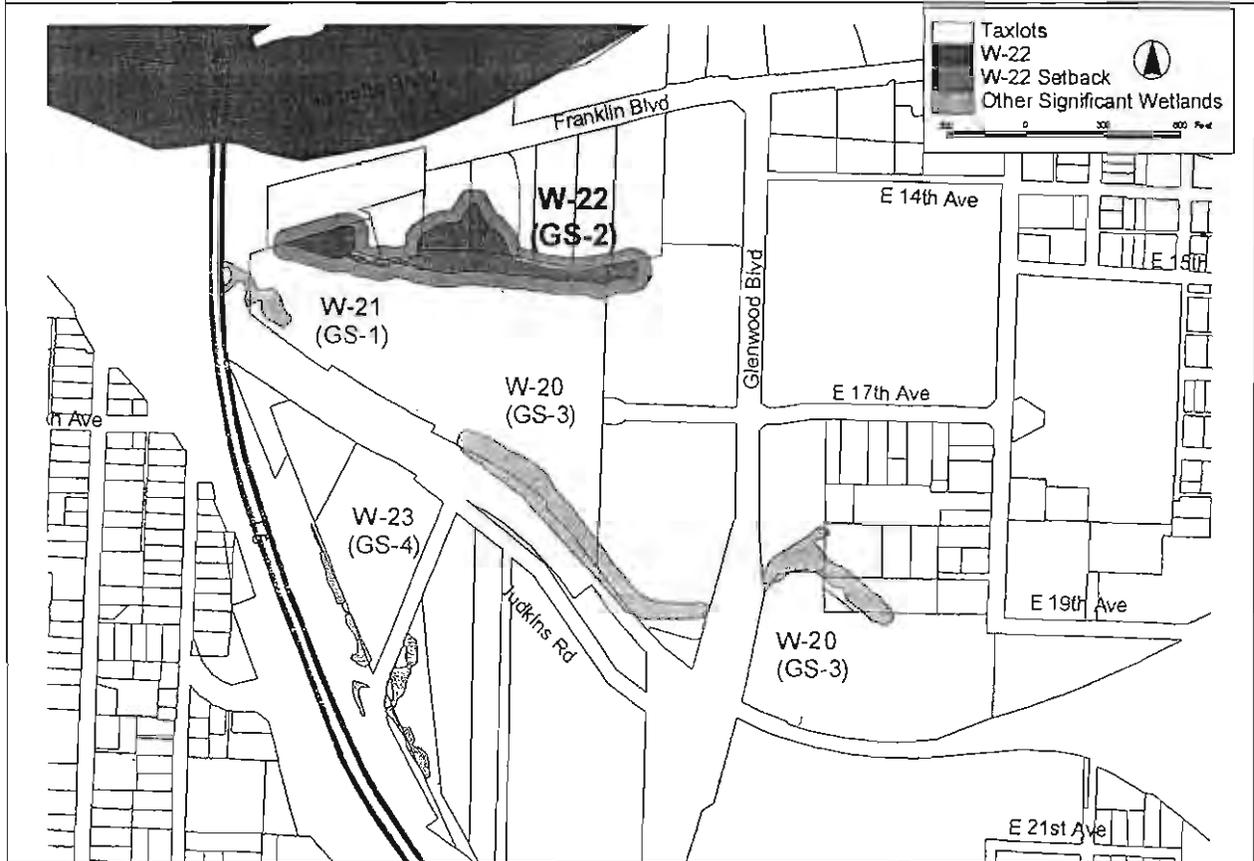
Reduction in the Buildable Land Inventory:

The Commercial Industrial Buildable Lands Study (CIBL) that was completed in 2009 identified a shortage of commercial and industrial lands. The Springfield Residential Lands Study (RLS) that was also completed in 2009 identified a small surplus of residential lands. These inventories include some Glenwood sites and classified each as “Vacant,” or “Redevelopable.” These classifications are not the same used by the Lane County Assessor’s Office. These classifications stem from judgments made by ECONorthwest in collaboration with a steering committee that helped frame assumptions about what is redevelopable and vacant.

Neither the CIBL nor the RLS showed W-21 or its setbacks as inventoried land. Protecting W-21 will not cause a reduction in those inventories.

Site: W-22 (GS-2)	Acres: 2.53	OFWAM: Locally Significant Wetland is within ¼ mile of DEQ 303 (d) listed water body Wetland has a direct surface water connection to a salmonid stream Moderate Quality Wetlands	Inventoried Riparian Resource? Yes: S-25 WHA Score: 46-47 High Quality Resource
	Cowardin Class: Palustrine Forested (PFO) Wetland with trees growing in standing water or saturated soils, or small wetlands entirely beneath an overhanging forest canopy.		

Goal 5 Recommendation: Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-22 is associated with the Glenwood Slough (S-25). The slough is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the slough also protects W-22. Any portion of W-22 not protected by the Glenwood Slough 50-foot setback should be protected by a 25-foot setback under the provisions of SDC 4.3-117.



Description:

Wetland W-22 is 2.53 acres and is classified as a Palustrine Forested wetlands (PFO). W-22 is a PFO system located with a drainage that flows through the southern portion. Portions of the wetland have been previously delineated (WD's 03-0273, 00-0102, 98-0051). PHS did not have access to the easternmost and southern portions of W-22 and boundaries were determined through off-site observations, previous delineations, and aerial photography.

Dominant Wetland Vegetation			
Trees/ Shrubs		Vines/ Herbs	
<i>Fraxinus latifolia</i>	Oregon Ash	<i>Carex obnupta</i>	Slough Sedge
<i>Populus trichocarpa</i>	Black Cottonwood	<i>Biden sp.</i>	Begger's tick.
<i>Cornus stolonifera</i>	Red-Osier Dogwood	<i>Juncus effusus</i>	Soft Rush
<i>Salix lasiandra</i>	Pacific Willow	<i>Lapsana communis</i>	Nipplewort
<i>Alnus Ruba</i>	Red Alder		
<i>Rosa piscocarpa</i>	Clustered Wild Rose		

Adjacent upland species: *Acer macrophyllum*, *Fraxinus latifolia*, *Populus trichocarpa*, *Rubus discolor*, *Symphoricarpos alba*, *Corylus cornuta*, *Cytisus scoparium*, *Holodiscus discolor*, *Hypericum perforatum*, *Festuca arundinacea*, mowed unidentified grasses

Soils—Mapped Series	Chehalis silty clay loam
Hydrologic Source	Groundwater

Wetland and Impact Area Summary

Wetland Acreage	2.53
Impact Area Acreage	12.22
Combined Wetland and Impact Area	14.75
Vacant Acres within the Combined Area	2.84
Parcels Affected (Including Impact Area)	12
Combined Parcel Acreage	67.43

Conflicting Uses by Acre and Zoning District

SITE ID	LMI	TOTAL ACRES
W-22	2.53	2.53
W-22 Impact Area	12.22	12.22
Total	14.75	14.75

Conflicting Uses by Vacant Acre and Zoning District

SITE ID	LM	TOTAL ACRES
W-22	.56	.56
W-22 Impact Area	2.28	2.28
Total	2.84	2.84

Existing Protections

Is the site protected by minimum development setbacks and site plan review standards described in Section 4.3-115 of the Springfield Development Code? **Yes.**

W-22 is associated with the Glenwood Slough-North Channel (S-25). The channel is a tributary to a water quality limited watercourse (Willamette River) and is protected by a 50-foot setback and a site plan review requirement.

The Glenwood Refinement Plan includes policies that give direction for environmental design affecting S-25 (formerly E-39). The Refinement Plan states, "Significant wetland areas in Glenwood shall be protected from encroachment and degradation in order to retain their important functions and values related to fish and wildlife habitat, flood control, sediment, and erosion control, water quality control, and ground water pollution control," (Policy 1, pg. 92, Environmental Element).

Site Specific ESEE Analysis for W-22

This section discusses ESEE impacts that are specific to this particular site. For a broader discussion of the ESEE consequences of allowing, limiting or prohibiting conflicting uses on wetlands, see the General ESEE Analysis found in Section 8 of this report.

Environmental Consequences

W-22 is rated as a "Moderate Quality Wetland." The wetland overlaps with a riparian resource site, S-25. S-25 is rated as a "High Quality Resource" site with a WHA score of 46-47. The OFWAM analysis concluded that W-22's water quality and hydrologic control functions are impacted or degraded. The resource provides habitat for some wildlife species, although the fish habitat is degraded. Fully allowing conflicting uses would mean the loss of what little function and habitat that W-22 provides.

Social Consequences

The OFWAM analysis indicates that W-22 is not aesthetically pleasing, nor is it appropriate for educational or recreational uses. The Willamalane Park and Recreation District Comprehensive Plan shows no anticipated park facilities or natural areas near the resource site. The site has moderate potential for enhancement which may make it more of a community amenity.

Economic Consequences

The OFWAM analysis indicates that the water quality and hydrologic control functions of the resource are already degraded. These functions could be mimicked using engineered facilities at a significant cost. Fully protecting the resource site would mean the loss of 2.84 acres of vacant industrial land within the combined wetland and impact area boundaries.

Energy Consequences

None of note.

Recommended Program for Protection

Limit conflicting uses and employ low impact development practices when developing within 150 feet of the wetland. W-22 is associated with the Glenwood Slough-North Channel (S-25, formerly E39). The channel is protected by a 50-foot development setback described in SDC Section 4.3-115 and the site plan review standards described in SDC Section 5.17-100. This 50-foot setback protecting the channel also protects W-22.

A small portion of W-22 (about .06 acres) is not protected by the 50-ft setback provided by the stormwater WQLW standards found in SDC Section 4.3-115. This unprotected segment of W-22 should be covered by a 25-foot development setback and the protections afforded by SDC Section 4.3-117. Any portion of W-22 not protected by the Glenwood Slough-North Channel 50-foot setback should be protected by a 25-foot setback.

Impact of Protection Measures on Vacant Acreage and Buildable Land Inventory

Impact on Vacant Acreage by Zoning District

SITE ID	LMI	TOTAL ACRES
W-22	.56	.56
W-22 25 to 50-ft. Setback	.79	.79
Total	1.35	1.35

About .56 acres of W-22 is classified as vacant by the Lane County Assessor's Office. The vacant acreage includes portions of 3 lots. Limiting conflicting uses would allow some development to occur within the wetland area where the developer could show how the essential functions of the wetland could be preserved or enhanced. A 50-foot development setback is already required for the wetland under SDC Section 4.3-115. A small portion of W-22 (about .05 vacant acres) is not protected by the 50-ft setback, but is protected by a 25-foot setback under the provisions of SDC Section 4.3-117. A 25-foot setback applied to the unprotected wetland area affects about .09 acres of the total setback acres shown for W-22.

A 25 to 50-foot setback would affect .79 acres of vacant industrial land. The affect of the setback on buildable land could be reduced by aligning development such that yards and other

open space are within the setback. Stormwater management facilities required for development can be placed within the setback under SDC Section 4.3-115.

Employing low impact development practices within 150 feet of the wetland could reduce the impact of nearby development on the resource. Some low impact development practices are already incorporated into the stormwater quality protection standards found in SDC Section 4.3-115.

Reduction in the Buildable Land Inventory:

The Commercial Industrial Buildable Lands Study (CIBL) that was completed in 2009 identified a shortage of commercial and industrial lands. The Springfield Residential Lands Study (RLS) that was also completed in 2009 identified a small surplus of residential lands. These inventories include some Glenwood sites and classified each as “Vacant,” or “Redevelopable.” These classifications are not the same used by the Lane County Assessor’s Office. These classifications stem from judgments made by ECONorthwest in collaboration with a steering committee that helped frame assumptions about what is redevelopable and vacant.

Protecting W-22 and its 25-50 foot setback area from future development effectively reduces the CIBL inventory by a total of 2.26 acres.

**Impact of Recommended Protection on
Commercial, Industrial and Residential Land Inventories**

Site W-22 Zoning	Redevelopable	Vacant	Total Acres
LMI	.91	1.35	2.26
Total Acres	.91	1.35	2.26

The cumulative effect of fully protecting all commercial and industrial lands that are impacted by riparian or wetland resources could increase the need for UGB expansion to meet land needs.

A 50-foot development setback is already required under stormwater provisions of the Springfield Development Code, and thus the 2.26 acre impact of protecting W-22, including its setback, is not attributed to this report.