

FILED

DEC 16 1992

BOOK 151 PAGE 1759

COUNTY CLERK
BY *Doris Roberts* BEFORE THE BOARD OF COUNTY COMMISSIONERS OF LANE COUNTY, OREGON

ORDINANCE PA 1027) IN THE MATTER OF AMENDING THE EUGENE/SPRINGFIELD
) METROPOLITAN AREA GENERAL PLAN AND THE RIVER
) ROAD-SANTA CLARA URBAN FACILITIES PLAN TO APPLY A LOW
) DENSITY RESIDENTIAL LAND USE DESIGNATION TO A 77-ACRE
) SITE LOCATED WITHIN THE EUGENE URBAN GROWTH BOUNDARY,
) AND ADOPTING A SAVINGS AND SEVERABILITY CLAUSE

WHEREAS, the Board of County Commissioners of Lane County has received from the City of Eugene a citizen-initiated proposal ("Johnson et al property") to amend the Eugene Springfield Metro Area General Plan ("Metro Plan") and the River Road Santa Clara Urban Facilities Plan ("RR-SC UFP") to change the land use designation of a 77-acre site at Irving Road and Beltline Highway from Industrial designation to a Low Density Residential designation, and make associated text and graphics amendments to the RR-SC UFP; and

WHEREAS, the Lane County Planning Commission, following public hearing on the proposal on September 29, 1992, in regular meeting of October 20, 1992, did recommend approval of the request; and

WHEREAS, evidence exists within the record indicating that the proposal meets the requirements of Lane Code Chapter 12, and the requirements of applicable state and local law; and

WHEREAS, the Board of County Commissioners has conducted public hearings and is now ready to take action;

NOW, THEREFORE, the Board of County Commissioners of Lane county ordains as follows:

Section 1. The Metro Plan Diagram land use designation for the site identified as the "Johnson et al property" (tax lots 3400, 3401, 3500, 3600, 3700, 3701, 3800 and 3900 of map 17-04-10) is amended from "Light Medium Industrial" to "Low-Density Residential," as depicted on Exhibit "A," copy attached to and incorporated herein by this reference.

Section 2. The River Road-Santa Clara Urban Facilities Plan Land Use Diagram for the site identified as the "Johnson et al property" (tax lots 3400, 3401, 3500, 3600, 3700, 3701, 3800 and 3900 of map 17-04-10) is amended from "Industrial" to "Low-Density Residential," as depicted on Exhibit "B," copy attached to and incorporated herein by this reference.

1 - IN THE MATTER OF AMENDING THE EUGENE/SPRINGFIELD METROPOLITAN AREA GENERAL PLAN AND THE RIVER ROAD-SANTA CLARA URBAN FACILITIES PLAN TO APPLY A LOW DENSITY RESIDENTIAL LAND USE DESIGNATION TO A 77-ACRE SITE LOCATED WITHIN THE EUGENE URBAN GROWTH BOUNDARY, AND ADOPTING A SAVINGS AND SEVERABILITY CLAUSE

Section 3. The text and graphics of the River Road-Santa Clara Urban Facilities Plan are amended as cited on Exhibit "C," copy attached to and incorporated herein by this reference.

Although not a part of this Ordinance, the Board of County Commissioners adopts the Findings set forth in attached Exhibit "D," in support of this action.


The prior designations repealed by this Ordinance shall remain in full force and effect to authorize prosecution of persons in violation thereof prior to the effective date of this Ordinance.

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

ENACTED this 9th day of December, 1992.



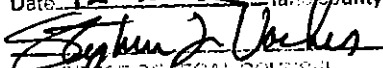
Chair, Lane County Board of County Commissioners



Recording Secretary for this meeting of the Board

APPROVED AS TO FORM

Date 12-10-92 Lane County


OFFICE OF LEGAL COUNSEL

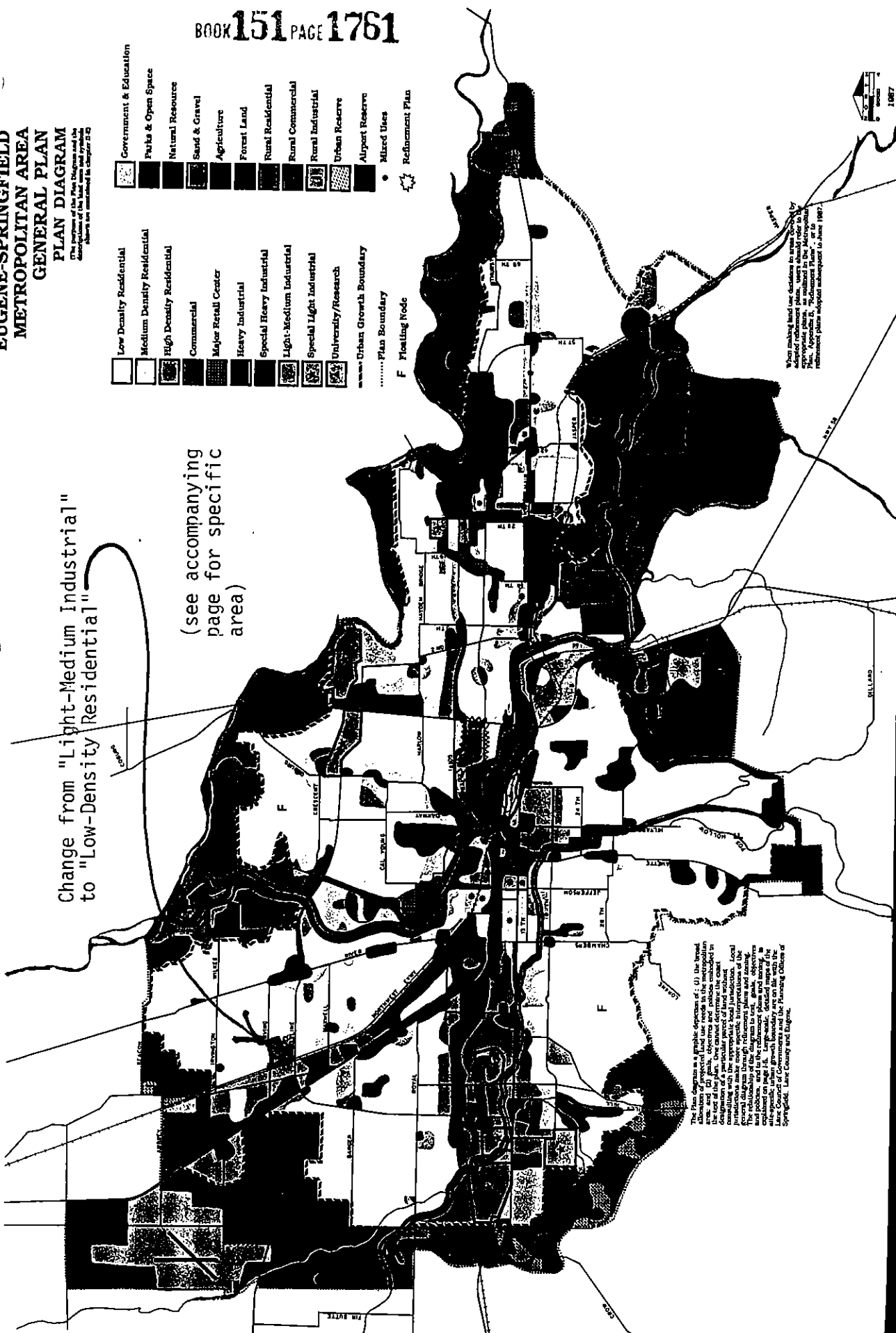
2 - IN THE MATTER OF AMENDING THE EUGENE/SPRINGFIELD METROPOLITAN AREA GENERAL PLAN AND THE RIVER ROAD-SANTA CLARA URBAN FACILITIES PLAN TO APPLY A LOW DENSITY RESIDENTIAL LAND USE DESIGNATION TO A 77-ACRE SITE LOCATED WITHIN THE EUGENE URBAN GROWTH BOUNDARY, AND ADOPTING A SAVINGS AND SEVERABILITY CLAUSE

**EUGENE-SPRINGFIELD
METROPOLITAN AREA
GENERAL PLAN
PLAN DIAGRAM**

The purpose of the Plan Diagram and the description of the land use and symbols are set forth in Chapter 17.6 of the Eugene-Springfield Metropolitan Area General Plan.

Low Density Residential	Government & Education
Medium Density Residential	Parks & Open Space
High Density Residential	Natural Resource
Commercial	Sand & Gravel
Major Retail Center	Agriculture
Heavy Industrial	Forest Land
Special Heavy Industrial	Rural Residential
Light-Medium Industrial	Rural Commercial
Special Light Industrial	Rural Industrial
University/Research	Urban Reserve
Urban Growth Boundary	Airport Reserve
Plan Boundary	Mixed Uses
F Floating Node	Refinement Plan

Change from "Light-Medium Industrial" to "Low-Density Residential" (see accompanying page for specific area)

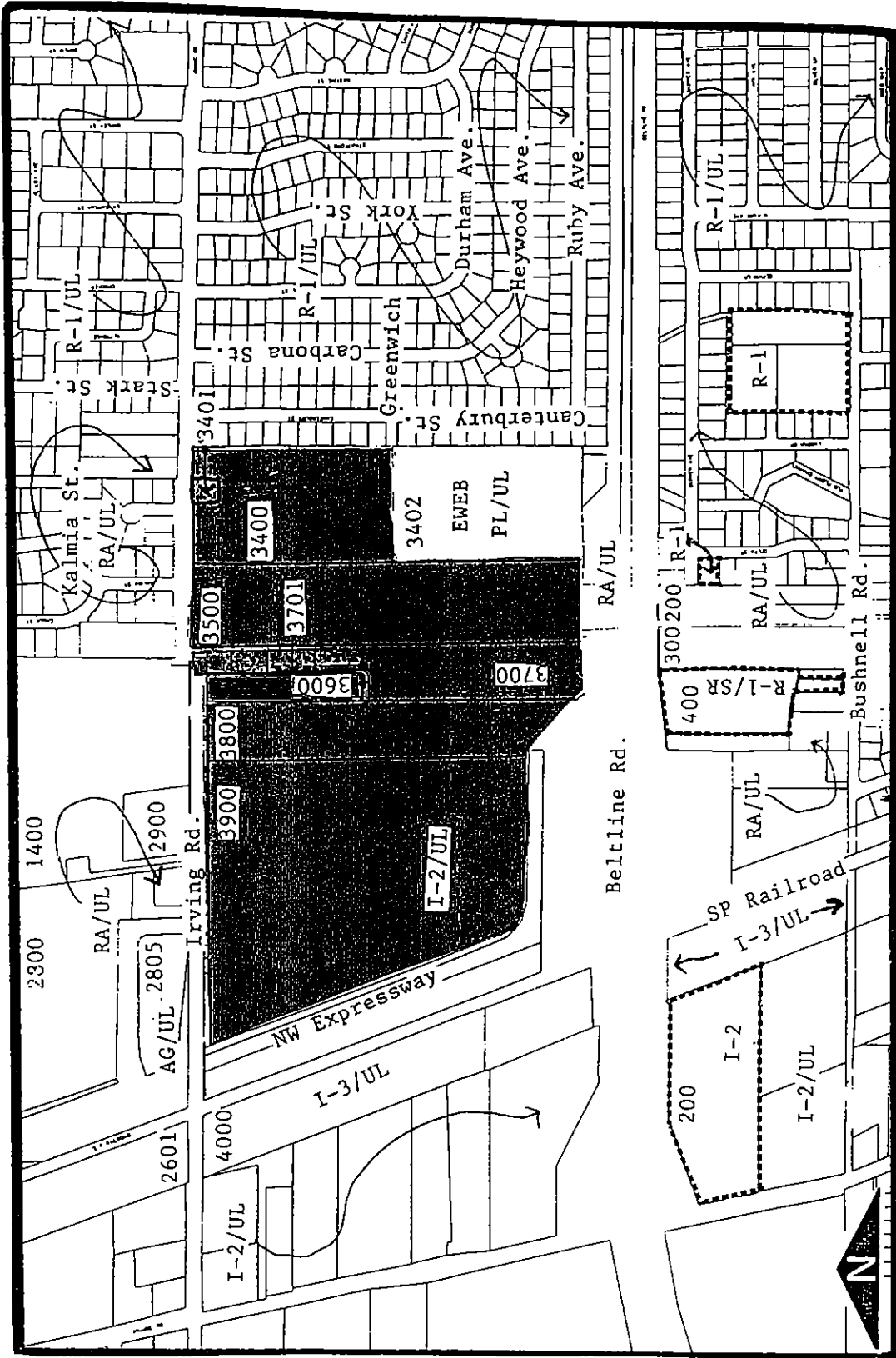


The Plan Diagram is a graphic expression of (1) the broad area and (2) projected land use needs in the metropolitan area and (3) the manner in which these needs are to be met in the future. The Plan Diagram is a graphic expression of the general pattern of land use and land use intensity, including such things as the location, size, and character of land use areas. The Plan Diagram is a graphic expression of the relationship of the various land use areas to each other and to the natural resources of the area. The Plan Diagram is a graphic expression of the relationship of the various land use areas to each other and to the natural resources of the area. The Plan Diagram is a graphic expression of the relationship of the various land use areas to each other and to the natural resources of the area.

This plan is based on the Eugene-Springfield Metropolitan Area General Plan, as amended by the Metropolitan Area Council, and the Eugene-Springfield Metropolitan Area General Plan, as amended by the Metropolitan Area Council, and the Eugene-Springfield Metropolitan Area General Plan, as amended by the Metropolitan Area Council.



Assessor's Map 17-04-10-0 0; Tax Lots 3400, 3401, 3500, 3600, 3700, 3701, 3800, and 3900



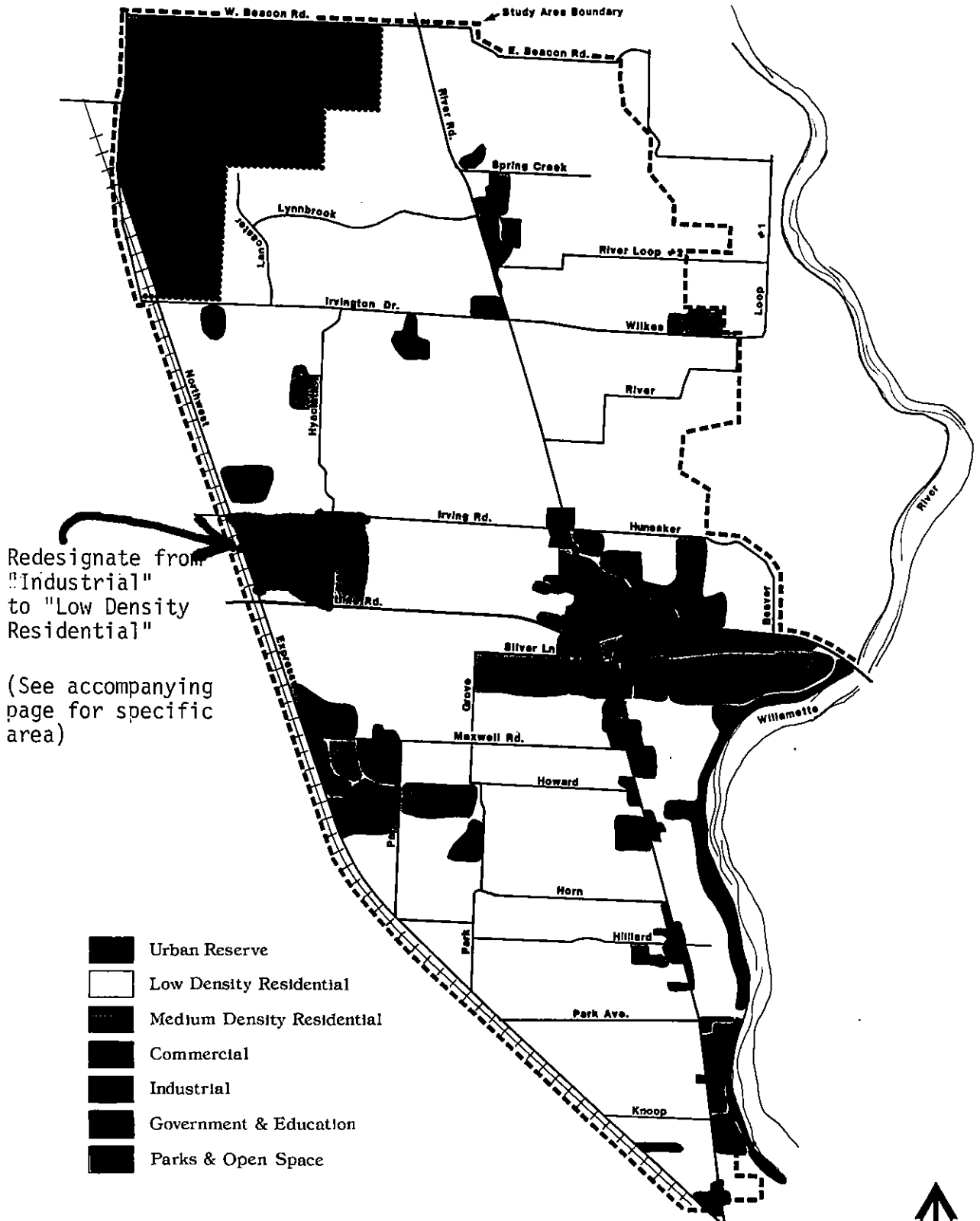
Area of Request

City Limits

Johnson, et al (MA 92-2) and (RA 92-2)








Amendment to the Metropolitan Area General Plan and the River Road-Santa Clara Urban Facilities Plan

Land Use Diagram



Redesignate from
"Industrial"
to "Low Density
Residential"

(See accompanying
page for specific
area)

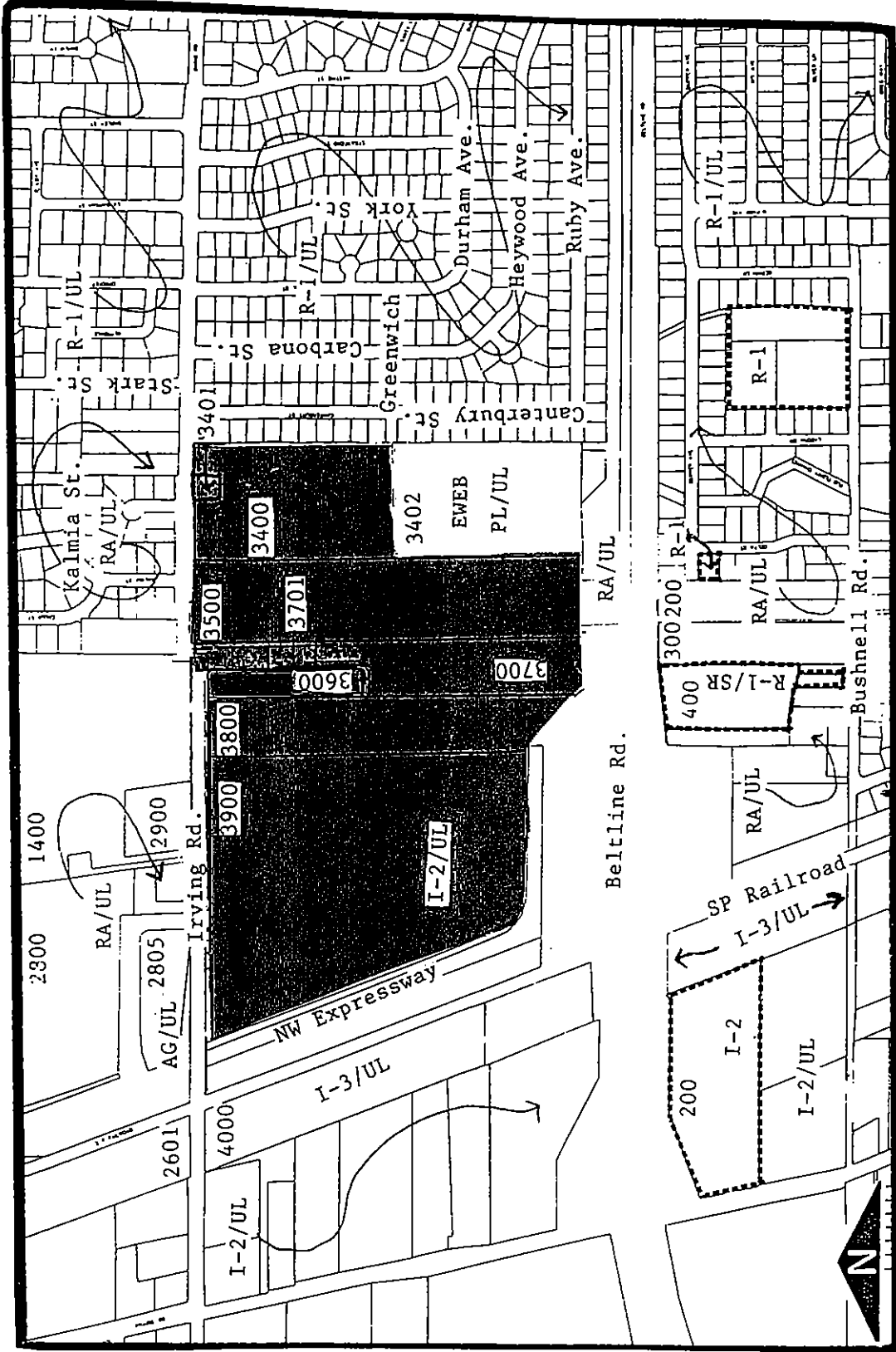
-  Urban Reserve
-  Low Density Residential
-  Medium Density Residential
-  Commercial
-  Industrial
-  Government & Education
-  Parks & Open Space

December 1984

River Road-Santa Clara Urban Facilities Plan



Assessor's Map 17-04-10-0 0; Tax Lots 3400, 3401, 3500, 3600, 3700, 3701, 3800, and 3900



Area of Request

Johnson, et al (MA 92-2) and (RA 92-2)

City Limits

Amendment to the Metropolitan Area General Plan and the River Road-Santa Clara Urban Facilities Plan

Exhibit "C"

Ord PA 1027

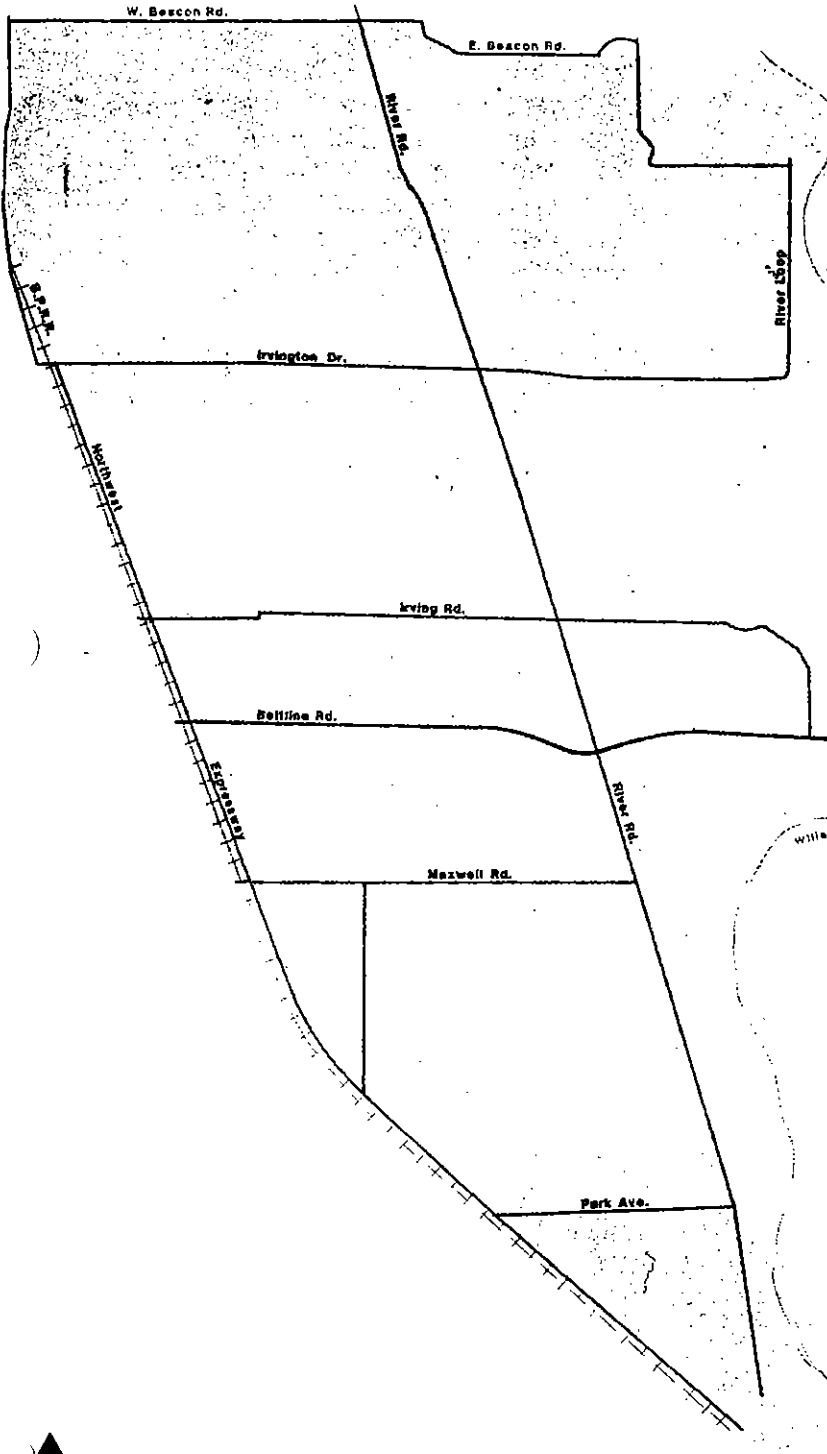
Changes to River Road-Santa Clara Urban Facilities Plan Text and Graphics

Attached sheets display changes to pages 2-13, 2-16, 2-23 and 2-33 of the document, in annotated form. Where deletions remove a sequential number or letter, subsequent entries in the sequence are to be adjusted accordingly.

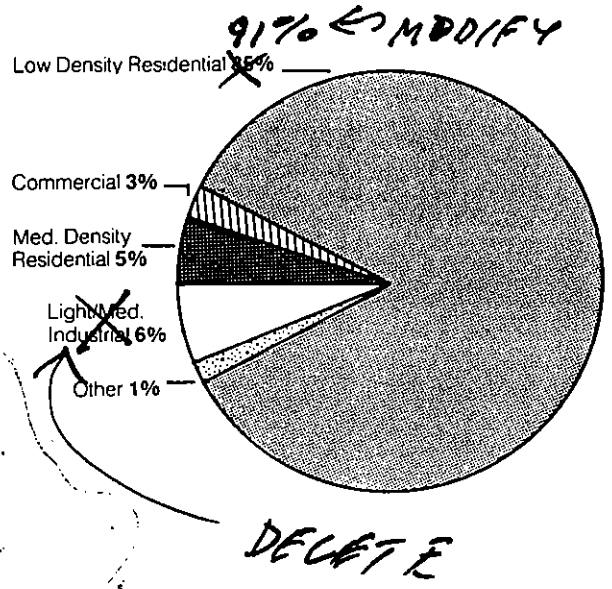
Figure 2.2

Metro Plan Land Use Designation for Private Vacant Land Within the Urban Growth Boundary

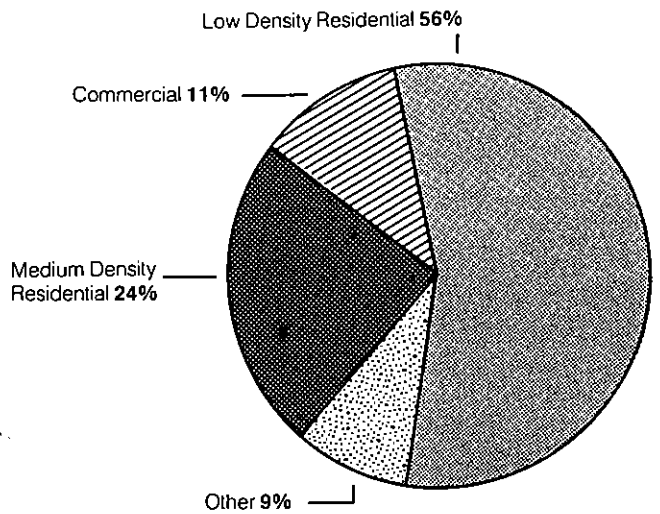
BOOK 151 PAGE 1766



Santa Clara — 965 Acres Total



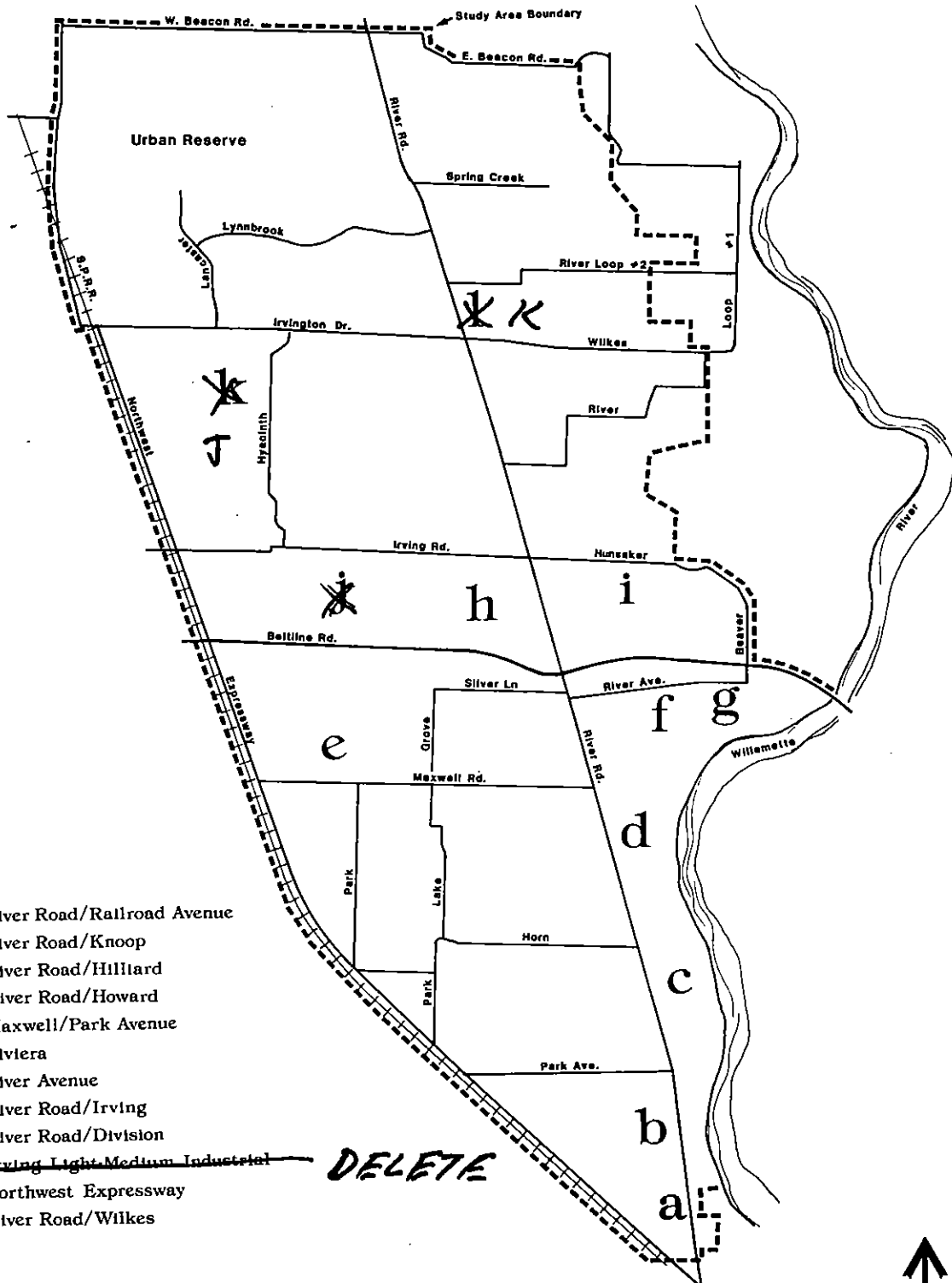
River Road — 342 Acres Total



2.3 COMMERCIAL AND INDUSTRIAL LAND USEFindings

1. Three general types of commercial development exist in the River Road-Santa Clara area. These are:
 - a. Community commercial uses, which serve the general area and permit a wide range of sales and service businesses; for example, the existing development at Belt Line and River Road.
 - b. Neighborhood commercial uses, which serve their immediate area and permit a limited range of business; for example, the neighborhood market located at the corner of North Park and Beebe.
 - c. Strip commercial uses, which are located along River Road and include neighborhood and community commercial types of businesses; for example, the existing strip development along south River Road.
2. Particular concerns exist regarding commercial-industrial development in specific areas. These areas include:
 - a. River Avenue commercial-industrial area
 - b. Strip commercial development along River Road
 - c. Maxwell commercial area
 - ~~d. Irving Road light medium industrial site~~
 - ~~e. River Road/Belt Line Road commercial area~~
 - ~~f. Commercial agriculture within the plan area~~
 - ~~g. Agriculture and mining activities along the urban fringe~~
3. Strip commercial development patterns create a variety of land use problems due to their shape. Some of these are:
 - a. Increasing the traffic load on the street where the strip is located
 - b. Increasing traffic hazards due to individual business access points
 - c. Creating potential conflicts in appearance, light, and noise with adjacent residential uses
4. Almost all existing commercial development is located along River Road, requiring residents to visit the area regularly to purchase necessary goods and services.
5. Based on existing and projected residential development, the Metropolitan Plan allocated approximately 23 additional acres of community commercial development to the Santa Clara area. Approximately 15 acres of this allocation was assigned to the area north of Division Avenue and east of River Road, while the remaining eight acres was allotted to undeveloped land adjacent to the

Subareas



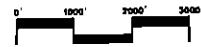
- a. River Road/Railroad Avenue
- b. River Road/Knoop
- c. River Road/Hilliard
- d. River Road/Howard
- e. Maxwell/Park Avenue
- f. Riviera
- g. River Avenue
- h. River Road/Irving
- i. River Road/Division

~~Irving Light-Medium Industrial~~
 T Northwest Expressway
 K River Road/Wilkes

DELETED

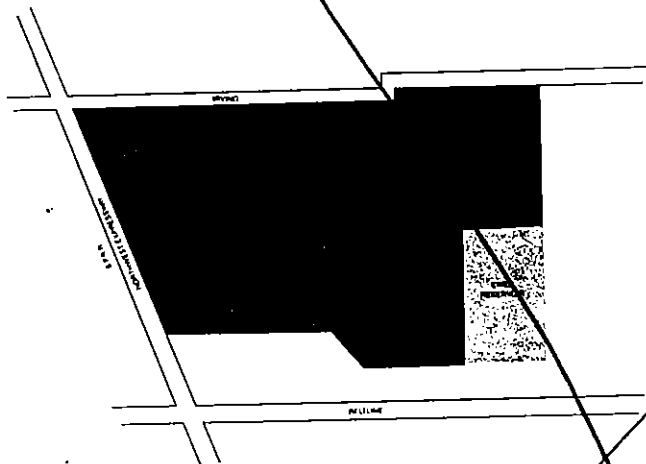
River Road-Santa Clara

Urban Facilities Plan



RE-LETTER
 ON PAGES
 2-34 + 2-35

j. Irving Light-Medium Industrial



Description

This subarea is mostly undeveloped. It contains an EWEB reservoir in its southeast corner. The Metropolitan Plan designation for the area is light-medium industrial. The majority of land in the area was zoned for future industrial use in 1982. Provision of urban level services will be needed before intensification of development can occur. Principle access to the site is from Irving Road.

Recommendation

1. Use Planned Unit Development procedures to mitigate impacts on existing adjacent low-density residential development upon rezoning to industrial.
2. Only industrial developments, making unified use of ten or more acres shall be allowed in the area.
3. Consider amending the Plan designation to Special-Light Industrial.
4. Amend the Eugene City Code Special Industrial District to include mention of the industrially designated site on Irving.

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ANALYSES AND FINDINGS IN SUPPORT OF ADOPTION OF THE ORDINANCE

IRVING ROAD PROPERTY
Metropolitan Plan and River Road-Santa Clara Plan Amendments

A. Introduction

The Irving Road property, identified as Site #29 in Subregion 1 of the draft Metropolitan Industrial Lands Special Study [MILSS], is located south of Irving Road and east of the Northwest Expressway. The property is currently designated for light-medium industrial use in the Metropolitan Plan. The MILSS recommends that the designation be changed to a special light/campus industrial designation.

Site #29 encompasses the following parcels, all mapped on Assessor's Map 17-04-10:

<u>Tax Lot</u>	<u>Owner</u>	<u>Area (acres)</u>	<u>Development Status</u>
3400	Winger	9.64	Residence
3401	Petersen	0.32	Residence
3500	Sherman	14.75	Residence
3600	Hebard	1.91	Residence
3700	Sherman	7.07	Residence
3701	Sherman	0.46	Residence
3800	Burbee	9.12	Residence
3900	Johnson	35.36	Vacant

The owners of all of the parcels included in Site #29 believe that a change to low-density residential is a more appropriate than a change to special-light/campus industrial. Since the MILSS already recommends a change to the designation of this site, the owners ask that the Planning Commissions, City Councils, and Board of Commissioners consider the following information and apply a residential rather than industrial designation to this property.

The nature of existing land uses surrounding the Irving Road site is depicted on the aerial photograph attached as Exhibit A. Briefly summarized, those uses include the following:

1. An EWEB water reservoir is located at the southeast corner of the site, on property identified as Tax Lot 3402 of Map 17-04-10.
2. From the EWEB reservoir north to Irving Road, the eastern boundary of

the property is bordered by 11 homes located in the 8th and 9th Additions to Firmont subdivision.

3. Land north of Irving Road, across from Tax Lots 3400, 3401, 3500, and 3700 of the parcels included in this application, is developed with a residential subdivision [Third Addition to Strassmaier Acres]. Land north of Irving Road, across from the central part of the area proposed for redesignation, consists of a vacant tract and several houses on larger lots. The Eagles on the Green golf course is located across from the northwest corner of the site.
4. An EWEB 115KV transmission line and the Northwest Expressway run along the western side of the subject property.
5. Beltline Road forms the southern boundary of this site.

Areas to the north, east, and south of the subject property are designated for low-density residential use in the Metropolitan Plan, with the exception of the EWEB reservoir site which has a government and education designation. Land west of Northwest Expressway and the Southern Pacific rail lines is designated for light-medium industrial use.

B. Classification of the Proposed Amendment

Assuming that the Planning Commissions agree that the designation of the Irving Road property should be changed, a determination needs be made as to whether a particular amendment should be classified as an update amendment, a major amendment, or a minor amendment.

A plan update amendment is defined in Section 9.015 of the Eugene Code as "Any change to the Metropolitan Plan which (1) changes the urban growth boundary or the jurisdictional boundary of the Plan; (2) requires a goal exception be taken under statewide planning goal 2; (3) amends a fundamental principle, metropolitan goal or policy set out in Chapter II of the Plan; or (4) requires a substantial diversion of budgeted planning resources from the approved work programs of affected city departments." Changing the designation of the Irving Road site does not qualify as an update amendment for the following reasons:

1. The proposed amendment does not require or involve a change to either the urban growth boundary or the jurisdictional boundary established in the current Metropolitan Plan.
2. The proposed amendment does not require an exception to any of the statewide planning goals. This conclusion will be further substantiated in

a subsequent section of this report which addresses the statewide planning goals in detail.

3. The proposed amendment modifies the diagram designation applied to approximately 78 acres of property; it does not require or involve any change to a fundamental principle, metropolitan goal or policy set forth in Chapter II of the Plan.
4. A determination as to whether an amendment requires a substantial diversion of budgeted resources is most appropriately made by the planning director or the governing body. However, the MILSS already recommends that the designation of Site #29 be changed in the Metropolitan Plan. Further, this report addresses all applicable standards for evaluation of an amendment and review by affected city departments should require no greater time commitment than any other changes recommended in the draft MILSS.

Granted the amendment should not be classified as an update amendment, a further determination is required as to whether it is a major or minor amendment. Since a minor amendment is defined Eugene Code Section 9.015 as a change that is not a major or update amendment, the real question is whether this particular change is a major amendment. A major plan amendment is defined as "A change to the Metropolitan Plan which (1) amends the text of the Plan; (2) is a substantial diagram amendment; (3) requires an ESEE analysis under statewide planning goal 5; (4) requires another plan amendment to maintain plan consistency; or (5) substantively affects the City of Eugene, the City of Springfield, and Lane County." This amendment does not affect the text of the Metropolitan Plan, nor does it require any other amendment to the Metropolitan Plan to maintain consistency. It also does not require an ESEE analysis. However, changing the designation of approximately 78 acres does represent a substantial diagram amendment; therefore, the amendment is appropriately classified as a major amendment.

C. Relationship to River Road-Santa Clara Urban Facilities Plan - Land Use Element

The subject property is also designated for industrial use in the River Road-Santa Clara Refinement Plan and that designation should be changed if the Metropolitan Plan is amended as requested here. The text of the refinement plan would also need to be amended at pages 2-13 and 2-29. The nature of the needed text amendments will be discussed in greater detail subsequently in this report.

The procedures for amending the Metropolitan Plan recognize that refinement plans may need to be adjusted also. Section 9.136(3) of the Eugene Code provides that: "Final adoption of a Metropolitan Plan amendment (no matter how initiated)

which is not consistent with an adopted refinement plan shall also be deemed to be an initiation of a corresponding refinement plan amendment under Section 9.139 of this code." It is possible to combine both processes so that amendment to the Metropolitan Plan and River Road-Santa Clara Refinement Plan can occur simultaneously.

D. Applicable Standards

The following criteria for evaluation of an amendment to the Metropolitan Plan are set forth in Section 9.128(2) of the Eugene Code:

1. The amendment must be consistent with the relevant statewide planning goals adopted by the Land Conservation and Development Commission;
2. Adoption of the amendment must not make the Metropolitan Plan internally inconsistent; and
3. The amendment is not a plan update amendment, unless the amendment has been initiated by the governing bodies of the City of Eugene; City of Springfield, and Lane County under Section 9.120(1)(c) of this code.

The criteria for evaluation of an amendment to a refinement plan are specified in Section 9.145(2) of the Eugene Code and include the following standards:

1. The plan amendment is consistent with the Metropolitan Area General Plan;
2. The plan amendment is consistent with remaining portions of the refinement plan; and
3. The plan amendment is found to address one or more of the following: (a) an error in the publication of the plan; (b) a change in circumstances in a substantial manner not anticipated in the plan; (c) incorporation into the plan of new inventory material which relates to a statewide goal; or (d) a change in public policy.

E. Metropolitan Plan Amendment Evaluation

The following information and evaluation address the criteria set forth in Section 9.128 of the Eugene Code.

Section 9.128(2)(a): The amendment must be consistent with the relevant

statewide planning goals adopted by the Land Conservation and Development Commission.

The statewide goal having the most relevance to designation of the Irving Road property is Goal #9, Economy of the State. Goal #10, Housing, also has some relevance. However, each statewide planning goal is addressed in the following evaluation.

1. Goal #1 - Citizen Involvement

Goal #1 essentially requires that citizens be afforded the opportunity to be involved in all phases of the planning process, including amendments to adopted plans. The procedures for amending the Metropolitan Plan include provision for notice to affected citizens and neighborhood organizations. The procedures also provide, in the case of major amendments, for hearings before the Planning Commissions and governing bodies of all three local jurisdictions. Those procedures have received acknowledgement of compliance as satisfying the requirements of Goal #1. Adherence to those procedures in review of this amendment will ensure that Goal #1 has been satisfied. Consideration of this change in the context of review of a special area study provides additional opportunities of citizen involvement beyond that normally associated with a simple plan amendment.

2. Goal #2 - Land Use Planning

Goal #2 is a process goal that describes a comprehensive plan and how such a plan is to be developed and adopted. This goal does recognize that major and minor revisions to comprehensive plans will be needed over time. One substantive element of Goal #2, the exceptions process, is not applicable to this amendment because no exception to a statewide planning goal is required.

The MILSS provides a comprehensive review of the existing inventory of industrially designated land in the Eugene-Springfield area and includes a variety of projected absorption rates. That information is referred to subsequently in this report and provides the factual basis for assessing the implications of changing the designation of this property. One of the procedural requirements of Goal #2 is that changes be supported by facts.

3. Goal #3 - Agricultural Lands

This goal is not applicable to the proposed amendment because the property involved is within an acknowledged urban growth boundary.

Therefore, it is, by definition, not classified as rural agricultural land.

4. Goal #4 - Forest Lands

Goal #4 is also not applicable to the proposed amendment, again because the property is within an acknowledged urban growth boundary, designated for urban use, and not located within a rural area.

5. Goal #5 - Open Spaces, Scenic and Historic Areas, and Natural Resources

A slough, known as Flat Creek, crosses the subject property in a north-south direction. The slough is classified as a riparian ditch in the *Preliminary Inventory of Eugene & Springfield Wetland, Riparian & Upland Areas for Wildlife Habitat Value* (revised February 1990), which provides the following discussion of such areas:

"These sites tend to be long, though sometimes intermittent, channels consisting of old stream beds, ditches or sloughs that usually run through residential subdivisions. A few are relatively short segments of once longer channels. The sites tend to be steep-banked, narrow channels with Himalayan blackberry as the dominant understory vegetation with an overstory of Oregon ash, black cottonwood and bigleaf maple (*Acer macrophyllum*). Water levels vary seasonally. There was little to no water present in these sites during the inventory. These sites provided limited wildlife habitat value due to their relative isolation.

"Human and domestic animal use is high, affecting wildlife habitat use. These small ditches are isolated remnants of drainageways that once ran continuously through the metropolitan area. As development pressure increases, these drainageways continue to be filled and culverted. Although they provide only limited wildlife habitat value, these small islands of vegetation are important as more open space is developed." [Preliminary Inventory, pages 16-17]

The Flat Creek Channel is also addressed in the *Metropolitan Natural Resources Study* with the following language:

"NORTH FLAT CREEK, E59a

Description: This three mile section of Flat Creek in the western portion of the Santa Clara neighborhood is designated low density residential in the Metropolitan Plan. Adjacent uses include residential and agricultural and Flat Creek flows adjacent to Irving

Elementary School. This intermittent creek lies within the 100 year floodway fringe. Flat Creek flows northward and joins the Willamette River north of the metropolitan region, but is outside the Willamette River Greenway boundary. The site serves flood retention and open space functions. It has relatively high wildlife value with a rating of 38. The creek is bordered by riparian vegetation and agricultural uses; the predominant tree species is Oregon ash.

"Flat Creek is part of Eugene's storm drainage system and is slated for channel 'improvements' in the draft EADMP, Vol. V, Figs. 4-2 and 4-5. The creek is on non-hydric soils and is designated as a wetland on the NWI. It is given special policy protection in the River Road-Santa Clara Urban Facilities Plan, Environmental Design Element, p. 4-2. Vegetated sloughs, in general, are addressed in two policies on p. 4-7. These two policies are quoted in Appendix D of this report (City of Eugene, 1974).

"This portion of Flat Creek serves stormwater and flood conveyance functions. Portions of it are classified as wetland on the NWI and it is given policy protection in the River Road-Santa Clara Plan. It provides an important open space function in the Santa Clara neighborhood.

"Conclusion: This three mile section of Flat Creek in western Santa Clara flows adjacent to Irving Elementary School. This creek lies within the 100 year floodway fringe and flows northward and joins the Willamette River north of the metropolitan region. The site serves flood retention and open space functions and has relatively high wildlife value. The creek is bordered by riparian vegetation and agricultural uses. Flat Creek is part of Eugene's storm drainage system and is designated as a wetland on the national inventory. It is given special policy protection in the River Road-Santa Clara Urban Facilities Plan, Environmental Design Element (City of Eugene, 1974).

"This water would benefit from clean-up to improve storm and flood flows. It also serves an important open space function in the Santa Clara neighborhood.

"Recommendations: **Limit conflicting uses (3C)**
 #2a Waterside Protection
 #5 Clean-up, Restoration and Education
 #6 Stormwater Planning"

[Metropolitan Natural Resources Special Study, Pages 158-159]

As indicated in the materials cited above, Flat Creek is protected under both policies contained in the River Road-Santa Clara Urban Facilities Plan and recommendations of the Metropolitan Natural Resources Special Study. Those protections exist regardless of the land use designation applied to adjoining property. It might be noted that the discussion of Flat Creek in the Metropolitan Natural Resources Special Study which was quoted above appears to assume that the adjoining land use is low-density residential.

Based upon prior inventories conducted in conjunction with adoption of the Metropolitan Plan, there are no other Goal #5 resources located on this property.

6. Goal #6 - Air, Water and Land Resources Quality

Any development of this property, whether for industrial or residential uses, must comply with applicable state and federal air and water quality requirements. Sanitary sewers can be extended to the property and will be required for any new development.

It is relevant to note that the Lane Regional Air Pollution Authority has expressed some concern about an industrial designation of this property during review of the River Road-Santa Clara Refinement Plan. In a letter dated October 9, 1984, LRAPA stated:

"Current regulations affecting new industrial sources and large commercial developments require that each facility undergo a permit review process prior to construction that will minimize air pollution emissions. The process is designed to permit growth within an area without adversely affecting the general air quality. However, in most instances, even with the best controls that existing technology can provide, there are still emissions of air pollutants. Although the permit requirements provide protection against future air quality standard violations, there still can be a measurable impact which is most apt to occur in areas near the source. There are a number of examples of this problem already existing in this community and we would like to avoid creating additional problem areas.

"As a result, we are concerned with the proposed Irving Light-Medium Industrial Area which is bordered on three sides by low density residential zoning. Policies 1.0 and 2.0 and Suggested Action 2.1 under Section 2.3 Commercial and Industrial Land Use, recognizes some of the potential problems from these developments. However, in some instances, due to the close proximity of

residences to the industrial source, and even with so-called 'clean industries', landscaping and building placement will not be adequate to solve air quality problems.

"We believe that in some cases extensive buffer zones may be necessary to minimize the problem. As a result, we strongly urge you to provide for this possibility in this planning document. We encourage you to add language that notes the potential for air quality problems and provides for extensive buffer strips where needed."

The need for extraordinary measures such as the extensive buffer strips mentioned by LRAPA would be eliminated by applying a residential designation to this property. The need to apply such measures also makes the property less attractive for industrial users.

7. Goal #7 - Areas Subject to Natural Disasters and Hazards

The Flat Creek drainage channel and low areas immediately adjacent to it are classified as within the 100-year floodway fringe; no other portions of the site are within the 100-year floodplain. Floodplain regulations will apply to any development adjacent to the channel, regardless of the land use designation applied.

The property is not subject to any of the other natural disasters or hazards itemized in this goal.

8. Goal #3 - Recreational Needs

The property is not identified as needed for recreational purposes in the Parks Master Plan. Residential development of the property will contribute to further park development through recently enacted systems development charges established for that specific purpose. A parks system development charge is not levied on industrial development.

9. Goal #9 - Economy of the State

Goal 9 has more relevance to an evaluation of this plan amendment than most of the statewide planning goals. Goal 9 and its related administrative rule generally require local jurisdictions to prepare forecasts of demand for industrial and commercial land and to prepare inventories that assess the quantity and quality of lands allocated for those purposes. Since the property is now designated for light-medium industrial use, it is part of the metropolitan area's allocation of land for industrial development. The issue that arises is whether redesignation of the land

for residential use adversely affects the area's ability to accommodate either new industrial development or expansion of existing industry.

Redesignation of the subject property will not have an adverse effect of the area's overall ability to attract new industry or accommodate expansion of existing industry. That position is premised on the contention that the property is inappropriately designated for industrial use and does not offer a particularly viable site for industrial development. The following summary of planning actions related to the property supports this contention:

- a. The 1990 General Plan, predecessor to the present Metropolitan Plan, designated this property for low-density residential use. The version of the Metropolitan Plan adopted in 1980 changed that designation to special-light industrial.
- b. Because the three jurisdictions did not adopt a common plan in 1980, an Industrial Study Task Force was formed to recommend ways to resolve differences over industrial land allocations. The Task Force recommended that the designation of this property be changed to light-medium industrial. The primary reason for that recommendation was proximity of the property to the railroad switching yards and concern about the possible negative impact of vibration for certain types of high technology uses. When a common version of the Metropolitan Plan was adopted in 1982, the designation of the property was changed as recommended by the Task Force.
- c. The status of this property was next examined when the Land Use Element of the River Road-Santa Clara Urban Facilities Plan was developed and adopted in June, 1985. The refinement plan notes that concern existed about potential industrial development of the Irving Road property [Finding 2(d), page 2-13]. That finding was based, in part, upon public testimony submitted concerning the draft refinement plan. The following testimony from the November 27, 1984 hearing of the Eugene and Lane County Planning Commissions is illustrative:

"Ed Phelps, 2734 Kalmia, . . . stated that he has lived in the Santa Clara area since 1962 and enjoyed the residential nature of the area. He stated he was alarmed at the prospect of having an industrial area placed into a residential area. Having attended the last two meetings of the Citizen Advisory Team, he said most of the testimony regarding the

proposed light-medium industrial zoning had been negative, most people wishing to retain the residential zoning. Stating that he was a building contractor, Mr. Phelps recognized the need for an industrial area existed and that people wanted to have clean industry in Eugene; however, he stressed that it should not be placed in a residential neighborhood." [Minutes, November 27, 1984, Page 2]

"Jack Danby, 1151 Irving Road, . . . stated that he has lived in Santa Clara for 30 years and owned a 300-foot frontage on Irving Road. He said he was previously told that the Southern Pacific railroad tracks were the boundary between the industrial and residential areas." [Minutes, November 27, 1984, Page 2]

In response to these concerns, the text of the refinement plan includes the following recommendations concerning development of this property:

- Use planned unit development procedures to mitigate impacts on existing adjacent low-density residential development upon rezoning to industrial.
 - Only industrial developments making unified use of ten or more acres shall be allowed in the area.
 - Consider amending the Plan designation to Special-Light Industrial.
- c. The property was most recently examined in the Metropolitan Industrial Lands Special Study which was published in March, 1991. The Draft Policy Recommendation Report makes specific reference to this property, suggesting that it be considered for future business park development with the following recommendation: "The site currently has a Light Medium Industrial designation and zoning. This designation may not provide the protection needed to preserve this site for future business park development. Additional study should be conducted to determine whether Special Light Industrial is more appropriate for this site." [Draft Policy Recommendation Report, page 47].

As the summary provided above indicates, both the River Road-Santa Clara Refinement Plan and the Metropolitan Industrial Lands Special Study clearly suggest that the current light-medium industrial designation of this property is inappropriate and that a special light designation

should be applied. The River Road-Santa Clara plan also recommends that development of the property occur under the planned unit development process, a procedural requirement not imposed on any other industrial site in the Eugene portion of the metropolitan area.

The concept of designating the Irving Road property for special light or campus industrial use is inconsistent with the criteria originally used for identification of such sites. The 1982 version of the Metropolitan Plan indicated that sites identified for special light industrial use should have five or fewer owners, recognizing the difficulty created by multiple ownerships when assembling land for campus development.

The Irving Road property consists of eight (8) parcels in six (6) different ownerships. Equally problematic for campus industrial development is the fact that seven (7) of the parcels have residences on them. No other site designated for special light industrial use in the metropolitan area has that number of residences located on it.

The Irving Road property is physically separated from any other industrial uses. A golf course and low-density residential uses exist to the north and east of the site. Beltline Road runs along the southern boundary of the site, with low-density residential areas located south of that highway. Land west of the Irving Road site is designated for light-medium industrial use, but the site is separated from that area by the Northwest Expressway, an EWEB transmission line, and the Southern Pacific switching yards. The most common form of adjacent land use is low-density residential.

Granted the characteristics of the Irving Road property, it is worthwhile to compare the site with the industrial firm site requirements discussed in the MILSS [Inventory Report].

- a. The MILSS Inventory Report [page 39] notes that the majority of firms locating in the metropolitan area are small (50 employees or less). It then goes on to state:

"Small firms are primarily interested in locating in an existing building in an industrial park with high quality setting, services in place, adjacent uses screened with landscaping and restaurants close by. Small firms have a short timeframe and often prefer to be operational in as little as 6 months. An established industrial park makes this possible. Large firms and industrial park developers are attracted to large green field sites (flat areas of undeveloped land that is serviceable)."

The MILSS Inventory Report [page 40] also contains the following discussion concerning industrial parks:

"Larger firms and industrial park developers prefer parcels within a larger, undeveloped area so that the environment can be controlled. The total size of the industrial park should be within the range of 50 to 200 acres, in order to provide the flexibility in the size of firms that could locate there. One owner is preferred, but, lacking that, the fewer owners the better. Multiple ownerships are more acceptable to industrial park developers who are more comfortable with assembling land from multiple owners."

Compared against these standards, the Irving Road property is within the general size range of 50 to 200 acres, although at the lower end of the scale with approximately 67 undeveloped acres (it is less than 67 acres if the Flat Creek drainage channel is excepted). The site compares poorly in terms of the number of owners, with a greater number of owners than any other special light/campus industrial site designated in the Metropolitan Plan.

- b. The MILSS Inventory Report [Page 40] indicates that: "Large firms and industrial park developers are attracted to large, well-drained, flat areas with services at or close by the site, and land still in large parcels." The Irving Road property is well-drained and flat. However, the land is not in large parcels. The Johnson ownership is the largest with approximately 35 acres; the next largest parcel in single ownership is 22.28 acres (with two residences), while the smallest is 0.32 acre.
- c. The MILSS Inventory Report [page 41] states that: "Some firms do not want to locate in an area that is close to residential areas because there has been a tradition of residents having an adverse response to industrial development close by homes. However, in other parts of the state with more industrial development in place, mixed uses are becoming more common." Residential development borders the Irving Road site on its eastern and northern sites. Even assuming that resistance to industrial development of the site from those adjoining residential areas could be overcome, it is extremely unusual to find a grouping of existing residences within the central portion of an industrial park. However, that is the situation that exists on the Irving Road property.
- d. The MILSS Inventory Report [page 41] indicates that: "Firms want convenient commercial uses and support services (day care, banks,

athletic clubs, doctors, etc.) close by and sit-down restaurants within the park." The Irving Road site is isolated from commercial uses and support services, with the closest supporting commercial area being located to the east, at Beltline and River Road. Isolation from supporting commercial uses may not be such a serious problem on a 200-acre site where there is sufficient area and potential mass to justify some commercial uses. Attempting to provide those services on a small site lacks the employment base to support such uses and detracts from the already limited area available for industrial development.

The Irving Road property obviously has some of the characteristics desired for an industrial park site. It is flat, well-drained, and has good access via Northwest Expressway and Beltline Road. On the other hand, it has a number of attributes that make it undesirable for industrial park development. It is at the low end of the minimum size range, existing residences border the site on two sides, it has multiple owners, it has residences within the central portion of the site, and is physically isolated from other industrial and commercial areas. On balance, the negative attributes appear to definitely outweigh the positive ones.

Because neither a light-medium nor a special light industrial classification is appropriate for this property, application of a low-density residential designation represents a reasonable alternative that is consistent with the predominant adjoining land use pattern. That change will remove 78.63 acres from the inventory of industrially designated land. [Note: There is some discrepancy in the acreage figures for the Irving Road site. The figure of 78.63 acres comes from Assessor's records. The Metropolitan Industrial Land Special Study indicates that the site contains 67.2 acres (matrix at page 22), although the map for subregion #1 appears to indicate that several residentially developed parcels in the center of the site were excluded from the computation.] The implications of that change in terms of overall land supply are mitigated by several factors, including the following:

- a. There are a variety of figures available concerning the amount of industrially designated property in the metropolitan area. A conservative figure is found at Table 8 of the draft Inventory Report of the Metropolitan Industrial Lands Special Study which lists serviceable, constraint-free industrial acres at 1,581.02. Redesignation of this property results in a reduction of 4.2 to 4.9 percent (depending upon which acreage figure is used for the site) of the supply of serviceable, constraint-free industrial land. That reduction is insignificant when compared with the most likely projected 20-year demand for industrial land of 650 gross acres, or

even the highest projected demand of 1,172 gross acres [draft Policy Recommendations Report, page 8].

- b. Even under the best of circumstances, the Irving Road site is listed as "long-term site" in the Metropolitan Industrial Lands Site Evaluation Matrix. The matrix indicates that adjoining residential use and multiple ownerships are two of the factors considered for classifying this property as a long-term site. The draft Policy Recommendations Report [page 11] recommends that the Metropolitan Plan be amended to include a policy that discourages the redesignation of industrial sites defined as short-term in the Matrix to nonindustrial designations without providing services to other industrial land (long-term sites in the Matrix) or allocating comparable industrial land. The Report does not suggest a similar requirement for redesignation of sites identified as long-term.
- c. The Metropolitan has been amended to change the designation of approximately 48 acres of property on the north side of Chad Drive from medium-density and low-density residential to special light industrial. That property was rezoned to an I-1/SR zone on March 16, 1992. The 48 acres involved in that plan amendment and rezoning is far more suitable for industrial park development than the Irving Road property for a variety of reasons. The property is in single ownership and is vacant. There are no residences to remove. The property is contiguous with other industrially zoned property that is now being developed. It is in an area where industrial activity is already occurring. The property is immediately adjacent to commercial services. Finally, the property has no wetland limitations or other significant natural features to consider.
- d. The draft Policy Recommendations Report [page 6] also acknowledges that some sites now designated for industrial use may also be suitable for residential use with the following language: "Some sites suitable for industrial use appear to suit the needs of both potential users of high quality business park settings and some residential developments." The Irving Road property [Site #29 in Region 1] is specifically identified as such a site.

The two most recent studies of the Irving Road property both indicate that the present light-medium industrial classification applied to it should be changed. The 1985 River Road-Santa Clara Refinement Plan recommends changing the classification to special light industrial. The 1991 Metropolitan Industrial Lands Special Study also that a special light industrial designation may be appropriate and states that the site needs further study.

The suggestion in both documents to consider a special light industrial designation is not appropriate based upon multiple ownerships of the site and the number of residences found within the site. Both factors make it an unrealistic industrial site. Redesignation of the property to low-density residential will not adversely affect the inventory of land actually available for industrial use and, consequently, would not be inconsistent with Goal #9.

10. Goal #10 - Housing

Goal #10 is relevant to the proposed amendment insofar as the proposed redesignation would increase the inventory of land available for low-density residential use. The amount of increase is very minor. Table 21 of the Supply and Demand Analysis, Eugene-Springfield Metropolitan Area Residential Land Study indicates that there are 9,324 acres of undeveloped land designated for low-density use in the metropolitan area. Adding 78.63 acres to that total represents an increase of .008 percent.

The proposed change for the Irving Road site also partially offsets the loss of residential land when the designation of the Chad Drive property was changed. Approximately 10 acres of medium-density land and 38 acres of low-density land was converted to industrial in that change.

The positive and negative attributes of the Irving Road property in terms of industrial development were discussed under Goal #9. Some of the factors that make the site attractive for industry also make it attractive for residential development. Those factors include the absence of physical constraints (i.e., flat and well-drained) and the availability of services.

A number of the site characteristics that are negative in terms of industrial development are not negative for residential development. Having a variety of parcel sizes and owners is not an impediment to residential development as it is for industrial park development. Residential development in the Eugene-Springfield area generally occurs on a variety of parcel sizes. The largest parcel in the site with 35 acres represents a relatively large residential development for this area. There is no need to assemble multiple ownerships to develop this site residentially. Similarly, the presence of residences, either on the site or adjacent to it, does not constitute any impediment to further residential development. Many of the conditions that indicate the site is poorly suited for industrial use are positive factors for residential development. Again, a balancing of these factors appears to indicate that the Irving Road property should be designated for low-density residential use in the same

manner as the surrounding area.

11. Goal #11 - Public Facilities and Services

Goal #11 has no direct relevance to the proposed amendment. Policies in the Metropolitan Plan specify that a minimum level of key urban facilities and services must be available prior to development, whether for industrial or residential purposes. All key urban facilities and services can be extended to this property.

12. Goal #12 - Transportation

Goal #12 sets general standards for what is to be included in the transportation element of a comprehensive plan and has little direct relevance to a specific diagram amendment. Access to the property is provided by Irving Road, an arterial street. Northwest Expressway runs along the west side of the property and provides access to Beltline Road and other portions of the metropolitan area.

13. Goal #13 - Energy Conservation

This goal is not applicable to a specific diagram amendment.

14. Goal #14 - Urbanization

Goal #14 sets standards for establishment of urban growth boundaries and for transition from urbanizable to urban land. The property is within the acknowledged urban growth boundary of the Metropolitan Plan and, at a minimum is classified as urbanizable land. Under policies in the Metropolitan Plan, the transition from urbanizable to urban land for undeveloped property normally occurs at the time of annexation, when a minimum level of key urban facilities and services become available. That principle applies, regardless of whether the property is designated for light-medium industrial or low-density residential use.

15. Goal #15 - Willamette River Greenway

The property is outside the boundaries of the Willamette River Greenway; consequently, the goal is not applicable.

Based upon the information summarized above, it can reasonably be concluded that changing the Metropolitan Plan designation of the Irving Road property from light-medium industrial to low-density residential conforms with all applicable statewide planning goals. Goal #9 has the most applicability to the amendment, granted the property's current designation. However, both the River Road-Santa Clara

Refinement Plan and the Metropolitan Industrial Lands Special Study recommend that the current light-medium industrial designation be changed. The option suggested in those studies of applying a special-light industrial classification does not correspond to the original criteria for identification of special-light industrial sites due to the multiplicity of ownerships found here. Application of that designation is also complicated by the number of residences located on the Irving Road property, a number greater than found at any other designated special-light industrial site. The characteristics of this property and the surrounding area indicate that a low-density residential designation is more appropriate than either a light-medium or special light industrial classification.

Section 9.128(2)(b): Adoption of the amendment must not make the Metropolitan Plan internally inconsistent.

There appear to be several ways that adoption of a diagram amendment could possibly make the Metropolitan Plan internally inconsistent. The amendment could result in a serious imbalance between projections of demand and allocation of land to meet projected needs. Alternatively, a particular amendment could conflict with Plan policies to the extent that internal inconsistency occurs.

As discussed previously in the analysis under Goal #9, this particular change does reduce the inventory of land available for industrial use in the metropolitan area. The significance of that reduction is moderated by several factors. Data contained in the MILSS Inventory Report suggest that the existing inventory of industrially designated is adequate to meet projected demand. Elimination of the Irving Road site from the inventory will not create a situation where projected demand exceeds available supply. Consideration also needs to be given to the inherent suitability of the site for industrial use, particularly special-light or campus industrial use as suggested by the River Road-Santa Clara Refinement Plan and the MILSS. As pointed out previously, the characteristics of this site are more suitable for residential than for industrial use.

The proposed amendment for the Irving Road property also does not create significant conflict with policies contained in the Metropolitan Plan. For instance, none of the fundamental principles or policies of Chapter II of the Plan are affected by the proposed change. There are no policies in other chapters of the Plan specific to this particular property. Depending upon one's perspective, it might be argued that Policy #17 of the Economic Element [page III-B-6] supports retention of an industrial designation with the following language: "Reserve several areas within the urban growth boundary for large-scale, campus-type, light manufacturing uses. (See diagram for locations so designated)." The Irving Road site is not so designated in the current Metropolitan Plan. Alternatively, it might be argued that Policy #11 of the Residential Land Use and Housing Element supports application of a low-density designation to this property with the following language: "Encourage a

mixture of dwelling unit types in appropriate areas." The intent of this amendment is to allow a portion of the site to be developed with a mobile home park. Because there are no policies specific to this site but merely general policies that provide no mandated course of action, the proposed amendment does not create internal inconsistency with any adopted Metropolitan Plan policies.

Redesignation of the Irving Road property conforms with the criteria contained in Section 9.182(2)(b) of the Eugene Code.

Section 9.128(2)(c): The amendment is not an update amendment, unless the amendment has been initiated by the governing bodies of the city of Eugene, city of Springfield, and Lane County under Section 9.120(1)(c) of this code. In determining whether a plan amendment is a plan update amendment, the city council is not bound by the determination of the planning director or Metropolitan Policy Committee made under Section 9.122 of this code.

As the text of this criterion indicates, it is ultimately the governing body of a jurisdiction that determines whether a particular amendment should be classified as a plan update amendment. However, the affected owners believe that amending the designation of the Irving Road property should not be classified as an update amendment for the following reasons:

1. Section 9.015 of the Eugene Code defines as an update amendment any change to the Metropolitan Plan that changes the urban growth boundary or the jurisdictional boundary of the Plan. This particular amendment does not modify either the urban growth boundary or the jurisdictional boundary of the Metropolitan Plan. It also does not indirectly create the need for such a change by causing an expansion of those boundaries to compensate for the reduction in the industrial land inventory.
2. A second factor identified in Section 9.015 that would cause an amendment to be classified as an update amendment is one requiring a goal exception under statewide planning goal two. As detailed in the preceding analysis, changing the land use designation of the Irving Road property does not require an exception to any statewide planning goals.
3. A third factor specified in Section 9.015 that would cause an amendment to be classified as an update amendment is one that changed a fundamental principle, goal, or policy contained in Chapter II of the Metropolitan Plan. As discussed under the analysis of Eugene Code 9.128(2)(b) above, this amendment does not affect any part of Chapter II of the Plan.

4. The fourth and final reason specified in Section 9.015 for classifying an amendment as an update amendment is because processing the change would require a substantial diversion of budgeted resources. A judgment as to what constitutes a "substantial diversion of budgeted resources" must clearly be made by the city council ultimately. However, extensive documentation has been provided with this amendment application to reduce the amount of staff time that must be devoted to its review. It is also relevant to note that the River Road-Santa Clara Refinement Plan, already adopted by the city, calls for a change to the existing land use designation applied to this property in any event. Finally, review of the amendment is occurring within the context of the MILSS, a study already initiated by the governing bodies.

For the reasons outlined above, the Planning Commissions and governing bodies should not classify this amendment as an update amendment.

F. Refinement Plan Amendment Evaluation

Section 9.136(3) of the Eugene Code states that: "Final adoption of a Metropolitan Plan amendment (no matter how initiated) which is not consistent with an adopted refinement plan shall also be deemed to be an initiation of a corresponding refinement plan amendment under Section 9.139 of this code." The Irving Road property is subject to the Land Use Element of the River Road-Santa Clara Urban Facilities Plan [RR-SC UFP] which is classified as a refinement plan. The RR-SC UFP designates the subject property for industrial use and contains text specific to the property.

Assuming that the Metropolitan Plan is amended to apply a low-density residential designation to the Irving Road property, the following elements of the RR-SC UFP should be amended:

1. The land use diagram found following page 2-2 of the plan should be changed to show a low-density rather than an industrial designation for the property.
2. Finding #2 at page 2-16 of the plan presently states: "Particular concerns exist regarding commercial-industrial development in specific areas. These areas include: . . . (d) Irving Road light-medium industrial site." That subparagraph should be deleted and the remaining three areas relettered accordingly.
3. The subarea map found at page 2-23 of the plan should be amended to delete the Irving Road subarea and the Northwest Expressway subarea should be redesignated "J" and the River Road/Wilkes subarea redesignated

nated "K".

3. The Irving Road light-medium industrial site is identified as a separate subarea at page ~~279~~²⁻³³ of the RR-SC UFP. When the land use designation is changed in the Metropolitan Plan, the entire discussion of this subarea can be deleted. This deletion will require that the Northwest Expressway subarea be relettered "J" and the River Road/Wilkes subarea be relettered "K".

Consideration of a refinement plan amendment simultaneously with a Metropolitan Plan amendment prevents needless duplication in processing. If the Metropolitan Plan is amended, it is a foregone conclusion that the refinement plan will be modified to reflect the change to the Metropolitan Plan.

The criteria for evaluation of refinement plan amendments are set forth in Section 9.145 of the Eugene Code. Each criterion is addressed in the following analysis.

Section 9.145(2)(a): The plan amendment is consistent with the Metropolitan Area General Plan.

The proposed amendments to the RR-SC UFP are predicated upon corresponding amendments to the Metropolitan Plan that change the designation of the Irving Road property from light-medium industrial to low-density residential. The proposed diagram and text changes for the refinement plan merely implement the approved Metropolitan Plan amendment for the Irving Road site.

Section 9.145(2)(b): The plan amendment is consistent with remaining portions of the refinement plan.

The RR-SC UFP already calls for an amendment to the Metropolitan Plan by recommending that the designation of the Irving Road property be changed from light-medium industrial to special-light industrial. That recommendation was predicated upon concern about the potential impact of light-medium industrial development on adjoining residential areas. However, documentation was provided in conjunction with the Metropolitan Plan amendment evaluation [Section E above] that showed that a low-density residential designation was even more appropriate than a special-light industrial designation. The diagram and text of the RR-SC UFP are being appropriately amended to reflect that determination.

Deletion of the Irving Light-Medium Industrial subarea simply carries out the intent of the amendment to the Metropolitan Plan. All of the recommendations for that subarea address concerns about potential industrial development which have been obviated by the change to the Metropolitan Plan.

Section 9.145(2)(c): The plan amendment is found to address one or more of the following: (1) an error in the publication of the plan; (2) a change in circumstances in a substantial manner not anticipated in the plan; (3) incorporation into the plan of new inventory material which relates to a statewide planning goal; or (4) a change in public policy.

The amendments related to the Irving Road property two address two of the four criteria listed above:

1. The current treatment of the Irving Road property in the RR-SC UFP was based upon the land use designation applied to that property by the Metropolitan Plan. Even then, the refinement plan indicated that the Metropolitan Plan designation was possibly not appropriate and suggested consideration of an alternative designation. The approved amendment to the Metropolitan Plan for this property represents a substantial change not anticipated when the RR-SC UFP was adopted in 1985. In other words, the RR-SC UFP would not have applied an industrial designation to this property if the Metropolitan Plan had not already done so.
2. The change in the Metropolitan Plan's land use designation for the Irving Road property represents a change in public policy concerning its future use. Amendments to the diagram and text of the RR-SC UFP are necessary to reflect that policy change.

The text and diagram amendments to the RR-SC UFP are necessary to make the refinement plan consistent with the amended Metropolitan Plan for the Irving Road property and conform with the criteria specified in Section 9.145 of the Eugene Code.

G. Summary and Conclusion

Ever since the Metropolitan Plan was first adopted in 1980, there has been a certain uneasiness about the land use designation applied to the Irving Road property. That uneasiness is reflected in the 1982 change from a special-light industrial designation to a light-medium classification and the subsequent recommendations of the River Road-Santa Clara Plan and the Metropolitan Industrial Lands Special Study to revert back once again to a special-light classification. However, the Irving Road property is not particularly suited for a special-light industrial designation for several reasons. The property is in multiple ownerships, with more owners than any other special-light industrial site designated in the Metropolitan Plan and more than the standard suggested in the Plan for that designation. The site also has more existing residences on it than any of the other designated special-light industrial sites. It is surrounded on two sides by existing or planned low-density residential

development. It is separated from any other industrial or commercial areas on the other two sides by facilities such as Beltline Road, the Northwest Expressway, transmission line right-of-way, and the railroad switch yards.

The Irving Road property is also not needed to meet the industrial land use needs of the metropolitan area. That conclusion is based, in part, upon the figures of projected demand and available supply of industrial land documented in the recently published Metropolitan Industrial Lands Special Study. The conclusion is also based upon the factors mentioned above that make the property inherently unattractive for industrial development. Maintaining an industrial designation for this property, whether that be light-medium or special light, contributes little to the community's inventory of attractive, industrial land.

The option of applying a low-density residential land use designation to the Irving Road property appears to offer several advantages. It addresses most directly the concern expressed in the River Road-Santa Clara Plan about potential conflict between industrial use on this property and adjoining residential areas. It offers a more realistic alternative for development granted the characteristics of this site. Finally, it offers a level of protection for the existing residences on the site that is not provided by an industrial designation.

The proposed amendments to the Metropolitan Plan and River Road-Santa Clara Urban Facilities Plan conform with all of the criteria specified for such amendments in Section 9.128 and 9.145 of the Eugene Code. Therefore, the Planning Commissions of Eugene, Springfield, and Lane County are requested to recommend approval of the change from light-medium industrial to low-density residential for the Irving Road property. This action is an appropriate one to take in the context of the Metropolitan Industrial Lands Special Study since the site is better suited for a low-density residential designation than a special light/campus industrial designation.