

STAFF NOTES

LANE COUNTY LOCAL GOVERNMENT BOUNDARY COMMISSION

(99 East Broadway, Suite 400, Eugene, OR 97401-3111)

Eugene City Hall Council Chamber
777 Pearl Street, Eugene

February 2, 2006
7:00 p.m.

Annexation of Territory to the City of Eugene (Jeffries/River Ridge Ltd/N Delta Highway/Ayres Road)

IV.F. BC File C EU 06 – 10

Initiated by property owner petition

Action under ORS 199.490(1)(c) of the boundary commission law

Received January 3, 2006

Action to be taken by April 3, 2006

Description

The annexation area includes two partial tax lots and portions of N Delta Highway and Ayres Road located in the Willakenzie region of north Eugene, north of Ayres Road, and west of N Delta Highway—the portion of N Delta Highway included in the annexation area is adjacent to tax lot 306 and is north of Ayres Road and the portion of Ayres Road included is located bisects tax lot 306 and is west of N Delta Road

Property owners: Eric and Deborah Jefferies (3800 N Delta Hwy, Eugene) and River Ridge Ltd (3800 N Delta Hwy, Eugene)

Tax lots: part of 305 and part of 306, T17S R03W S07

Acres: ± 31.97 (± 29.14 acres in T1s 305 and 306; ± 2.83 acres in rd r/w)

Estimate of existing population: 4 (three residential units)

Existing land use: Residential, golf course, and road right-of-way

Existing zoning in Lane County: R-1/UL, low-density residential with urbanizable lands overlays

Applicable comprehensive plan: Eugene-Springfield Metropolitan Area General Plan (acknowledged in August 1982 and has been subsequently amended)

Existing public services to the property: Police (Oregon State Police, Lane County Sheriff), schools (Eugene School District 4J), roads (Lane County), water (onsite systems), fire (partially in the Willakenzie RFPD), wastewater (individual subsurface sewage disposal systems)

Reason for Annexation

The property owners are requesting annexation in order to sell the properties for the future development of a regional hospital facility. Existing road rights-of-way are included to facilitate the provision of urban services to developing properties inside the City of Eugene. The Eugene-Springfield Metropolitan Area General Plan requires properties to annex in order to receive urban services.

Notice

As required by ORS 199.463(1), notice of a public hearing must be published in a newspaper of general circulation not more than 25 days nor less than 15 days before the hearing. *In this case, notice of the public hearing was advertised in The Register-Guard on January 13, 2006.* A second notice may be published in a newspaper of general circulation or notice of the hearing may be mailed to each owner of land in the affected territory not more than 15 days before the hearing. “Affected territory” as defined by ORS 199.415(3) means the territory described in the petition. The “petition” includes a resolution, order, or any other form of initiatory action for a boundary change [ORS 199.415(14)]. The petition or resolution, as required by ORS 199.490(4) also includes a legal description, which must meet the requirements of ORS 308.225 [OAR 191-006-0000(3)]. *In this case, notice of the hearing was sent to the affected property owners (Eric and Deborah Jeffries and River Ridge Ltd, owners of the private properties proposed for annexation and initiators of this annexation request) on January 20, 2006.* The final notice required by the boundary commission law is the posting of a notice of the public hearing in the affected city, district, or territory at least 15 days before the hearing. *In this case, notice of the public hearing was posted in the area of the annexation, at the Eugene city hall, and at the Lane County courthouse on January 18, 2006.*

In conformance with OAR 191-005-0065(3), these staff notes are incorporated as part of the record of the boundary commission public hearing of February 2, 2006.

This annexation proposal was filed with the boundary commission in accordance with ORS 199.490(1)(c), initiated by the property owners—Eric and Deborah Jeffries (tax lot 305) and River Ridge Ltd (tax lot 306). Deborah Jeffries consented on behalf of River Ridge Ltd. The annexation area includes a portion of two privately owned tax lots and portions of N Delta Highway and Ayres Road. The written consents from the owners initiated the annexation request, which included portions of their tax lots and existing road rights-of-way. The proposal was filed on January 3, 2006, and boundary commission action must occur by April 3, 2006 (90-day statutory time frame).

When property owners initiate an annexation, the affirmative decision of the boundary commission made at a public hearing is subject, if requested, to a remonstrance within the affected territory. If, within 45 days of the commission’s action, 10 percent or 100 whichever is lesser, of the electors in the affected territory sign a remonstrance petition, an election will be conducted within the territory. “Affected territory” as defined by ORS 199 means the territory described in the petition. In this case, it is portions of tax lots 305 and 306, T17S R03W S07 and N Delta Highway and Ayres Road rights-of-way. The end of the 45-day remonstrance period on this annexation request, if approved, is March 20, 2006. At the time of submittal, there were two electors registered within the annexation area.

The proposed annexation area includes a portion of two tax lots (part of tax lots 305 and 306, T17S R043 S07) totaling approximately 29.14 acres in size and N Delta Highway and Ayres Road rights-of-way totaling approximately 2.83 acres (refer to Maps No. IV-F-1 and IV-F-2). The portion of tax lot 305 not included in the annexation serves as access to the River Ridge golf

complex. The most northerly portion of tax lot 306 is not included in the annexation because it contains a portion of the River Ridge golf complex parking lot. The portion of tax lot 306 located south of Ayres Road and west of N Delta Highway is located outside the urban growth boundary and cannot be annexed.

The annexation area totals approximately 31.97 acres and is currently developed with three residential units, portions of the River Ridge golf course, and existing road rights-of-way. The privately owned portion of the annexation area is owned by Eric and Deborah Jeffries (tax lot 305) and River Ridge Ltd (tax lot 306). With the consent of the property owners, portions of N Delta Highway and Ayres Road (County Road No. 302) rights-of-way were included in the annexation area. The property owners are requesting annexation in order to sell the properties after being annexed for development of a regional hospital facility.

The annexation area is contiguous to the main body of the City of Eugene. Existing road rights-of-way are included in the annexation area to facilitate the provision of urban services to properties annexing to the city.

The annexation area is located within the urban growth boundary (UGB). The UGB is located along the southerly boundary of the annexation area, 1,217 feet to the north, and varying distances to the west of the annexation area. The UGB is located along the westerly property line of tax lot 305. The private properties within the annexation area are designated low-density residential in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). The Willakenzie Refinement Plan designates the properties as park/open space. The Metro Plan designation prevails because the refinement plan designation has not incorporated into the Metro Plan. The private properties are zoned R-1/UL, low-density residential with urbanizable lands overlays, in Lane County. Upon the effective date of the annexation, the urbanizing fringe overlay will automatically be removed and the private properties will be zoned R-1 consistent with the plan designation.

The city recently reviewed its annexation practices and determined that inclusion of rights-of-way in annexation applications would further the implementation of the fundamental growth management principles of the Metro Plan of annexing out to the urban growth boundary. The city reviews all annexation requests to determine the appropriateness of including existing road right-of-way. The city determined that it was appropriate to include a portion of N Delta Highway and a portion of Ayres Road in this annexation application. N Delta Highway is adjacent to tax lot 306 along its easterly property line and Ayres Road bisects tax lot 306. Ayres Road and the portion of tax lot 306 to the north of it are within the urban growth boundary. The portion of tax lot 306 south of this segment of Ayres Road is outside the urban growth boundary.

Inclusion of the existing road rights-of-way will include in the city a logical segment of road infrastructure in an area where new development will and has been occurring. Road improvements will be required as new development occurs and having the roads within the jurisdiction of the City of Eugene will facilitate the coordination of those improvements.

After submittal of this annexation application to the boundary commission, it was determined that a segment of the northerly 10 feet of Ayres Road—east of N Delta Highway about 600 feet

and south of tax lot 1211, and a segment of the westerly 10 feet of N Delta Highway—south of Ayres Road about 260 feet, are not within the City of Eugene. At the request of the City of Eugene (refer to Exhibit IV-F-1), the boundary commission is being asked to modify the original annexation area to include these two segments of road rights-of-way to ensure that these urban transportation infrastructures are within the city.

The site of this annexation request is the proposed location of a new full service hospital for the McKenzie Willamette Medical Center. On behalf of the property owners, Satre Associates submitted the application to the boundary commission. Part of the application packet included supplemental information about the proposed annexation, which is attached as Exhibit IV-F-2. Attachments referenced in the supplemental information are available in the boundary commission office.

On behalf of the City of Eugene, Kurt Yeiter submitted a memorandum to the boundary commission (attached as Exhibit IV-F-3) providing additional information regarding the annexation and proposed development. Included in this exhibit are comments from Lane County transportation planning staff that are addressed in Mr. Yeiter's memo.

BOUNDARY COMMISSION REFERRALS

Boundary commission referrals were sent to the Lane County Land Management Division, Lane County Environmental Health Division, Lane County Board of Commissioners, and Willakenzie Rural Fire Protection District (RFPD).

No referral responses were received as of January 25, 2006.

BOUNDARY COMMISSION STANDARDS - STAFF ANALYSIS

In this section of the staff notes, each applicable boundary commission standard is addressed. These standards are derived from ORS 199 and the boundary commission's policy administrative rule (OAR 191, Division 30).

Provide an impartial forum for resolution of local jurisdictional questions. Consider the effects of the boundary change on other units of governments. ORS 199.410(1)(b) and 199.410(3)(c)

This annexation request was filed in accordance with provisions in ORS 199 and was determined to be a valid filing in accordance with OAR 191-006 (adopted administrative rule on boundary commission filing requirements). The item was placed on the boundary commission's agenda for February 2, 2006. Notice of the boundary commission's public hearing has been published in accordance with Oregon law. Any person may attend and will be given a reasonable opportunity to be heard.

The majority of the original annexation area is within the Willakenzie RFPD, as is the segment of Ayres Road requested for inclusion. A small portion of tax lot 305 (approximately 0.08 acres) is not within the fire district and currently has no fire protection. The segment of N Delta

Highway requested for inclusion is also outside of the fire district boundaries, which are located along the centerline of the portion of Ayres Road west of N Delta Highway.

The fire district contracts with the City of Eugene for fire services within its boundaries. Upon the effective date of the annexation, the portion of the annexed area, either as originally submitted or as modified, that is within the fire district will be automatically withdrawn from the district in accordance with ORS 199.510(2)(a). The city will provide fire services directly to the entire annexed area. A city fire station is located less than two miles east of the proposed annexation at 697 Goodpasture Island Road.

Upon annexation, the area will be annexed automatically into the Lane County Metropolitan Wastewater Service District [ORS 199.510(2)(c)]. This special district was formed to provide the financing for the regional wastewater treatment plant serving wastewater users within the cities of Eugene and Springfield and other users within the urbanizable area.

This request, as originally submitted or as modified, is consistent with this standard.

Consider the orderly determination and adjustment of local government boundaries to best meet the needs of Lane County and Oregon. Consider alternative solutions where intergovernmental options are identified and make decisions based on the most effective long-range option among identified alternatives. ORS 199.410(1), 199.410(2), and 199.410(3)(a) and (e)

The area in this annexation request, as originally submitted or as modified, is located within the acknowledged urban growth boundary (UGB) of the Metro Plan. The annexation area, as originally submitted or as modified, is south, east, and north of the urban growth boundary. The UGB is coterminous with the annexation area along its southerly boundary and along the westerly property line of tax lot 305.

Territory within the UGB ultimately will be within the City of Eugene. Eugene is the unit of government identified in the Metro Plan to provide urban services to territory in this area. The proposed annexation is contiguous to the main body of the City of Eugene. Annexation of tax lotted properties and existing road rights-of-way (in this case, N Delta Road and Ayres Road) fulfills the policies adopted in the Metro Plan of annexing out to the urban growth boundary.

The incremental process of annexation causes short-term boundaries to be established. The acknowledged comprehensive plan identifies the City of Eugene as the unit of government that will provide urban services to this urbanizable area within the UGB. In the long term, territory within this geographic area will be annexed to Eugene. Including existing road rights-of-way in the annexation area will connect together other transportation infrastructure already in the city.

This annexation is consistent with boundary commission administrative rule implementing policies (1), (2), (5), and (7) which recognize annexation to an existing city as the preferred method of servicing urbanizable land.

- (1) This policy recognizes cities as the logical providers of urban levels of service within urban growth boundaries when consistent with the comprehensive plan.
- (2) This policy expresses the commission's preference for providing urban services through annexation to a city in order to provide urban services to urbanizable lands.
- (5) This policy encourages the provision of urban levels of service within urban growth boundaries.
- (7) This policy expresses the commission's preference for annexation to an existing city over all other alternatives as a means of extending services to urbanizable lands.

Implementing policy (3) recognizes that in order to meet the long-term objectives of annexing out to an acknowledged urban growth boundary, short-term boundaries are created which are logical within the context of the future service boundary.

This proposal to annex territory to the City of Eugene, as originally submitted or as modified, is consistent with boundary commission policies and this standard.

Make boundary commission determinations which are consistent with acknowledged local comprehensive plans. Assure an adequate quality and quantity of public services required in the comprehensive plan to meet existing and future growth. For major boundary changes, there must be assurance that the proposed unit of government is financially viable. ORS 199.410(1)(d), 199.410(3)(b) and (d)

The proposal, as originally submitted or as modified, is within the Metro Plan urban growth boundary. The Metro Plan was acknowledged by the Land Conservation and Development Commission (LCDC) in August 1982 and has been subsequently amended. The Metro Plan recognizes annexation as the highest priority for extending the minimum level of key urban facilities and services to urbanizable areas (policies #8 and #10, page II-B-4) and recognizes that ultimately, all territory within the urban growth boundary will be annexed to an existing city (policy #16, page II-B-6).

The privately owned portion of the annexation area is designated low-density residential in both the Metro Plan and the River Road-Santa Clara Urban Facilities Plan. If the annexation is approved, the tax lotted portion of the annexation area will be rezoned to city R-1, low-density residential, zoning district consistent with the plan designation. The City of Eugene indicates that before the hospital facility can be built, the city must approve a Metro Plan amendment, a refinement plan amendment, a zone change, and, possibly, a conditional use permit, and amendments to interior property lines. The logical first step is annexation, which will determine whether the site is appropriate for urbanization, who will provide urban services, and will facilitate the development process by bringing the site and adjacent street network into the city.

The annexation area will take advantage of urban service delivery systems that are already in place to serve this area. Inclusion of existing road rights-of-way will help fulfill the policies in the Metro Plan of annexing out to the urban growth boundary. It will also facilitate with the provision of urban facilities and services to territory already in the city and territory that is in the process of annexing to the city.

The following facilities and services are either available or can be extended to this annexation area.

Water – The city indicates that water service is available to the developing properties from a 12-inch water main located at the intersection of Ayres Road and N Delta Highway. This main must be extended to and through the site as described in the Eugene Water & Electric Board (EWEB) policies and procedures. EWEB will require looping of the system to an existing 8-inch water main located in Meadow View Drive east of the annexation area. Any main extension costs must be borne by the developer.

Electricity – EWEB provides electric service to this area of north Eugene. New development in the annexation area will be served by EWEB.

Police services – Police protection can be extended to the area upon annexation consistent with service provision throughout the city. Police currently provide service to other properties in this general area already inside the city. Service will be provided to the annexation area consistent with the call and response method used by the city. After annexation, this annexed area will receive police services on an equal basis with properties inside the city. Infill annexations and development in this area will increase the efficiency of service delivery.

Fire and emergency services – Fire protection is currently provided to the majority of the annexation area by the Willakenzie RFPD. This fire district contracts with the City of Eugene for fire services for properties within its boundaries. If approved and upon the effective date of the annexation, the portion of the annexed area within the district will be withdrawn automatically from the fire district in accordance with ORS 199.510(2)(a). The city will provide fire protection to the entire annexed area, as originally submitted or as modified. The portions of the annexed area currently without fire protection services will receive these services after annexation to the city. A city fire station is located less than two miles east of the annexation area at 697 Goodpasture Island Road.

Emergency medical transport (ambulance) services are provided on a regional basis by Eugene, Springfield, and Lane Rural Fire/Rescue to central Lane County. The annexation area, as originally submitted or as modified, will continue to receive this service consistent with the adopted ambulance service area (ASA) plan. Mutual aid agreements have been adopted by the three regional ASA providers (Eugene, Springfield, and Lane Rural Fire/Rescue) to provide backup coverage for each other's jurisdictions.

Parks and recreation – A minimum level of park services can be provided to the proposal area as prescribed in the Metro Plan. Delta Ponds is a nearly 100-acre open space area located south of the annexation site along Delta Highway, Cal Young Sports Park is located southeast of the site

at the corner of Crescent Avenue and Gilham Road. The Willamette Greenway bicycle and pedestrian trail can be accessed from N Delta Highway at Green Acres Road.

Other regional park and recreation facilities are located throughout the metropolitan area. City of Eugene parks, recreation, and cultural services programs are available to city residents throughout the city.

Schools – Eugene School District 4J serves this area. Existing schools—Gilham elementary, Cal Young middle and Sheldon high—serve this neighborhood and will continue to do so after annexation.

Wastewater – The city indicates that wastewater facilities are in close proximity to the annexing properties. An existing 6-inch wastewater line located to the east at Ayres Road and Meadow Drive is potentially available for upgrading and extension to the annexing area. Another 6-inch wastewater line is located to the south near the intersection of N Delta Highway and Stapp Drive that connects to an 8-inch line in Delta Pines Drive. A 15-inch line is located in N Delta Highway near Green Acres Road that could be extended north to the annexation area. An existing 8-inch line east of the annexation area in Sand Trap Lane could be extended through intervening properties with the appropriate off-site public utility easement. Costs of upgrading and extensions will be borne by the developer. Upon the annexation effective date, the area will be annexed automatically to the Lane County Metropolitan Wastewater Service District [ORS 199.510(2)(c)].

Stormwater – Site plans for all new development must provide for drainage to an approved system consistent with the adopted Comprehensive Stormwater Management Plan (CSWMP). The city indicates that during the development process an acceptable stormwater proposal will be required. An existing stormwater pipe is located east of the annexing area that outfalls to an open ditch that flows west under N Delta Highway onto the subject site. Dodson Slough meanders westerly through the southern portion of tax lot 306. If on-site retention is used, the developer will be responsible for development of an acceptable stormwater proposal. If needed, private drywells may be an option, provided that the applicant: has a civil engineer certify the use and design with supporting information such as field-verified soil types and percolation rates; and registers the drywells as an underground injection control facility with the Department of Environmental Quality (DEQ).

Streets – The tax lotted portion of the annexation area is adjacent to N Delta Highway along its westerly boundary and Ayres Road along its southerly boundary. Lane County public works staff indicates that Ayres Road and N Delta Highway are local access roads within the urban growth boundary and if annexed, will automatically transfer to City of Eugene jurisdiction. Public works staff raises concerns about the impacts the development of a regional hospital facility will have on other county and state transportation systems in the area—namely Delta Highway (a county facility) and Beltline Road (a state facility). County staff suggests that an annexation agreement addressing off site infrastructure impacts should be in place before action on the annexation request is taken.

In response to these comments from Lane County, Eugene planning staff responds that the city does not yet have a development proposal that can be used as the basis of a traffic impact analysis. The appropriate level of development, mitigation measures, and needed transportation improvements will be determined through the development review process. Other needed actions—such as the Metro Plan amendment, refinement plan amendment, and conditional use permit—will require a traffic impact analysis. It makes sense that the traffic impact analysis is integrated into the development review decision process.

Eugene public works staff indicates that N Delta Highway, located south of Ayres Road, is classified as a major collector street within the City of Eugene. It is jurisdictionally the responsibility of Eugene and is maintained by the city. It is not designated on the city's adopted Street Right of Way Map; however, the existing right-of-way width appears to range from 80 feet to 120 feet, exceeding the maximum width of 75 feet prescribed by Eugene Code. North of Ayres Road, N Delta Highway is classified as an unimproved local street and includes a westerly roadside ditch. Street improvements and/or right-of-way dedications may be required when new development occurs. If the section of N Delta Highway north of Ayres Road is annexed to Eugene, the jurisdictional responsibility for this local street will transfer automatically to the city and it will be maintained by the city.

Ayres Road, east of N Delta Highway, is inside the city limits and is classified as a major collector street under the city's jurisdiction. This right-of-way was recently improved and meets the prescribed width of 75 feet for collector streets. The portion of Ayres Road (County Road No. 302), west of N Delta Highway, is an unimproved local street that bisects tax lot 306. If annexed to the city, the jurisdictional responsibility of this section of Ayres Road will transfer automatically to the City of Eugene. It will remain unimproved and not maintained by the city until development plans are submitted and it is determined that road improvements, including the dedication of additional right-of-way, is needed. The urban growth boundary is coterminous with the outside edge (southerly edge) of this segment of Ayres Road. A private road easement exists in the general location of this segment of Ayres Road, which provides access to the portions of tax lot 306 to the north and south and to other properties located at the westerly terminus of the county road. The private easement is located in the vicinity of the county road and tax lot 306 and is included in the annexation area. Access to the properties served by this private road easement will not be impacted by this annexation.

Eugene public works staff requests and supports the inclusion of the northerly 20 feet of Ayres Road right-of-way, east of its intersection with N Delta Road about 600 feet, be included in the annexation area (approximately 0.33 acres). The remainder of Ayres Road east of N Delta Road is already in the city. Public works staff also requests and supports the inclusion of the westerly 10 feet of N Delta Road, south of Ayres Road approximately 260 feet, in the annexation area (approximately 0.06 acres). The remainder of N Delta Road at this intersection is already in the city. The urban growth boundary is coterminous with the outside edge of N Delta Road and it is appropriate for the entire right-of-way to be in the city.

Inclusion of N Delta Highway and Ayres Road will assist in fulfilling the growth management policies of the Metro Plan of annexing out the urban growth boundary and are an appropriate and logical segment of the existing urban transportation system serving this area to be in the city.

Solid waste management – Private firms and individuals collect and transport solid waste to the Lane County administered landfill.

Communication facilities – Various providers offer both wire and wireless communication services in the Eugene-Springfield metropolitan area. Existing providers and those entering the market have the capability to provide service to future development in this area.

Land use controls – The area, as originally submitted or as modified, is within Eugene’s portion of the urban growth boundary. Through an intergovernmental agreement between Lane County and the City of Eugene, the city already has planning and building jurisdiction for this property. The city will continue to administer land use controls after annexation.

The minimum level of key urban facilities and services, as defined on page V-3 of the Metro Plan, are either immediately available or can be provided within a reasonable future time frame as needed. This request, as submitted or modified, is consistent with this standard.

Consider the comprehensive plan’s economic, demographic, and sociological trends and projections and its environmental policies, pertinent to the proposal. ORS 199.410(3)(d) and 199.462(1)

The annexation proposal, as originally submitted or as modified, is consistent with the Metro Plan, as it is an incremental step in implementing the long-range plan for this area. The urban growth boundary, land uses, and policies in the Metro Plan were developed to meet the future needs of the metropolitan community. If needed, amendments to the applicable plans will be made to accommodate the development of a regional hospital facility. If unsuccessful, development with residential uses is consistent with the long-range plan for the area. Annexing existing road right-of-way will facilitate the provision of urban facilities and services to fulfill the growth policies in the Metro Plan and in Oregon law.

This request is consistent with this boundary commission standard.

STAFF RECOMMENDATION

The boundary commission has the following options regarding this annexation request.

1. The commission can approved the annexation as submitted. The area annexed would include portions of tax lots 305 and 306, T17S R03W S07, owned by Eric and Deborah Jeffries (tax lot 305) and River Ridge Ltd (tax lot 306) and portions of N Delta Highway and Ayres Road.
2. The commission can modify the original annexation area to include a 600 foot segment of Ayres Road (the northerly 20 feet of right-of-way) east of N Delta Road and a 260 foot segment of N Delta Highway (the westerly 10 feet of right-of-way) south of Ayres Road. This option would include in the city the remaining segments of Ayres Road and N Delta Highway at this intersection.

The boundary commission staff recommends that the boundary commission modify the annexation area to include the additional right-of-way outlined in option 2 above and then approved the modified annexation to the City of Eugene (BC File C EU 06 – 10) based on the following findings and reasons.

The findings are organized to respond to boundary commission standards outlined in ORS 199, the boundary commission law. The following findings and reasons are based on modification to add additional road right-of-way and approval of the request as modified. If the boundary commission does not modify or denies the proposal, the findings and reasons would need to be adjusted.

Findings:

1. This proposal was initiated with the Lane County Local Government Boundary Commission by the property owner on January 3, 2006, in accordance with ORS 199.490(1)(c). The proposal was found to be a valid filing under OAR 191-006.
2. The proposed annexation, as submitted, included portions of two tax lot (T17S R03W S07 part of tax lots 305 and 306), which comprised about 29.14 acres and was owned by Jeff and Deborah Jeffries and River Ridge Ltd. The area was developed with three single-family residences and a portion of the River Ridge golf course and was contiguous to the main body of the City of Eugene. Portions of N Delta Road and Ayres Road rights-of-way (approximately 2.83 acres) were included in the annexation area, as submitted. The annexation included a total of approximately 31.97 acres.
3. At the request of the City of Eugene, the original annexation area was modified to include additional N Delta Highway right-of-way (south of Ayres Road) and additional Ayres Road right-of-way (east of N Delta Highway), totaling approximately 0.33 acres. Inclusion of this additional right-of-way ensured that these urban transportation systems were within the City of Eugene. As modified, the annexation area totally about 32.30 acres.
4. The land use designation for the modified annexation area was low-density residential in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). The Willakenzie Refinement Plan designated the tax lotted portion of the annexation area as park/open space. The Metro Plan was the prevailing document since the refinement plan designations were not incorporated into the Metro Plan. Following annexation, amendments to the Metro Plan and the Willakenzie Refinement Plan were anticipated to accommodate the development of a regional hospital facility within the annexed area. If the amendments were not accomplished, low-density residential development would be consistent with the plan designation in the Metro Plan.
5. The tax lotted portion of the annexation area was zoned R-1/UL, low-density residential with urbanizable lands subdistrict, in Lane County. After the annexation effective date, the tax lotted property would be rezoned to R-1 consistent with the land use designation.

If needed, zone changes would be processed by the City of Eugene to accommodate the development of a regional hospital facility.

Provide an impartial forum for resolution of local jurisdictional questions. Consider the effects of the boundary change on other units of government. ORS 199.410(1)(b) and 199.410(3)(c)

6. The boundary commission held a public hearing on February 2, 2006. Notice of the public hearing was given in accordance with ORS 199 provisions. All interested parties were given a reasonable opportunity to be heard.
7. Upon the annexation effective date, the portion of the modified annexation area within the Willakenzie Rural Fire Protection District was withdrawn from the district [ORS 199.510(2)(a)] and fire services were provided directly by the City of Eugene.
8. Upon the effective date of the annexation, the modified area was annexed automatically to the Lane County Metropolitan Wastewater Service District in accordance with ORS 199.510(2)(c).
9. This request was consistent with this standard.

Consider the orderly determination and adjustment of local government boundaries to best meet the needs of Lane County and Oregon. Consider alternative solutions where intergovernmental options are identified and make decisions based on the most effective long-range option among identified alternatives. ORS 199.410(1), 199.410(2), and 199.410(3)(a) and (e)

10. Annexation to the City of Eugene was identified in the acknowledged Metro Plan as the preferred method for providing key urban facilities and services to the Willakenzie area in policies in Chapter II, section B.
11. Annexation to an existing city was the method for extending urban facilities and services to urbanizable land in the boundary commission's policy administrative rule, implementing policies (1), (2), (5), and (7).
12. The proposed annexation was the means of boundary change outlined in the Metro Plan and the boundary commission administrative rules for ultimately providing urban facilities and services to this territory. Annexation of tax lotted properties and existing road rights-of-way fulfilled the Metro Plan policies of annexing out to the urban growth boundary.
13. This request was consistent with boundary commission policies and this standard.

Make boundary commission determinations which are consistent with acknowledged local comprehensive plans. Assure an adequate quality and quantity of public services required in the comprehensive plan to meet existing and future growth. For major boundary changes,

there must be assurance that the proposed unit of government is financially viable. ORS 199.410(1)(d), 199.410(3)(b), and (d)

14. The modified annexation area was within the urban growth boundary of the acknowledged Metro Plan [Land Conservation and Development Commission (LCDC) action in 1982 and as subsequently amended]. Annexation of the tax lotted properties and existing road rights-of-way assisted in fulfilling the Metro Plan policies of annexing out to the urban growth boundary.
15. The Metro Plan recognized annexation to the City of Eugene as the highest priority for extending the minimum level of key urban facilities and services to urbanizable areas.
16. Future residential development would be consistent with the policies in the Metro Plan requiring urban levels of development within the urban growth boundary. To accommodate a regional hospital facility, amendments to the Metro Plan and Willakenzie Refinement Plan were anticipated after annexation to the city.
17. The City of Eugene indicated that the required services outlined in Metro Plan policy #8, page II-B-4 and defined on page V-3, were either available or could be provided in a timely manner.
18. This request was consistent with this standard.

Consider the comprehensive plan's economic, demographic, and sociological trends and projections and its environmental policies, pertinent to the proposal. ORS 199.410(3)(d) and 199.462(1)

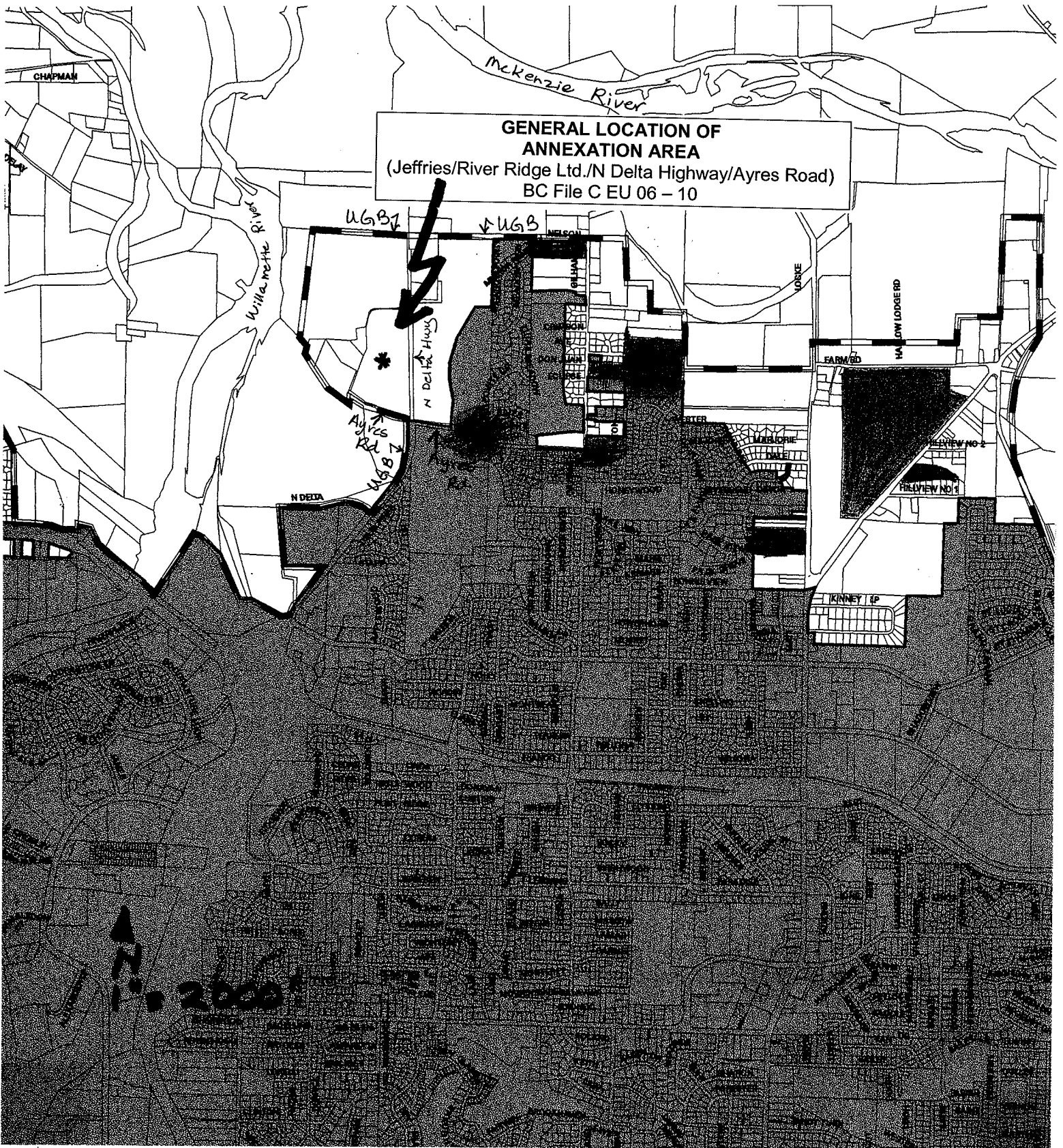
19. The modified annexation proposal was consistent with the Metro Plan, as it was an incremental step in implementing the long-range plan for this area. The urban growth boundary, land uses, and policies in the Metro Plan were developed to meet the future needs of the metropolitan community. Future residential uses were consistent with the long-range plan for the area. Development of a regional hospital facility would require plan amendments prior to development advancing. Annexing existing road rights-of-way facilitated the provision of urban facilities and services to fulfill the growth policies in the Metro Plan and in Oregon law.
20. This request was consistent with this standard.

Reasons:

1. The proposal was supported by the City of Eugene and the property owners.
2. The proposal was consistent with the LCDC acknowledged Metro Plan.
3. The services required in the Metro Plan were either available or could be provided in a timely manner when needed.

4. The proposal was consistent with past boundary commission actions supporting annexation of territory to the City of Eugene.
5. The proposal was consistent with boundary commission administrative rule policies.

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Last Saved: January 28, 2006



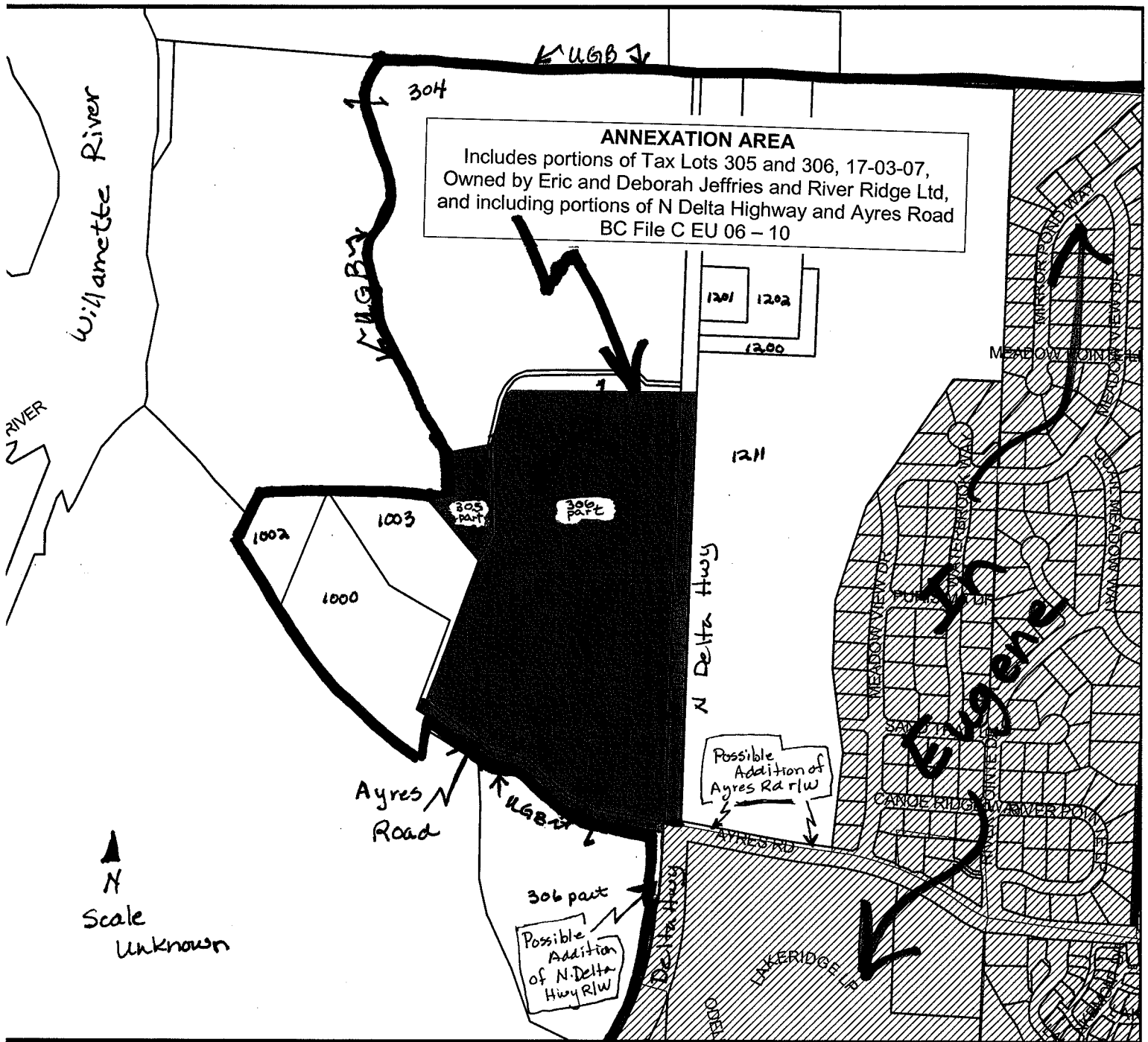


Exhibit IV-F-1

Modification request from Eugene
Annexation to Eugene (Jeffries/River Ridge
Ltd/N Delta Hwy/Ayres Rd)
C EU 06 – 10

From: KEPPLER Peggy A
Sent: Wednesday, January 25, 2006 2:25 PM
To: DOWELL Jackie M
Cc: FASSBENDER Tim H; TAYLOR Paula L; KREGER Deanna N; MORGAN Bill F
Subject: Rationale: Ayres Road, Delta Highway

The City of Eugene is requesting annexation of the Ayres Road and Delta Highway rights of way adjacent to tax map/lot 17 03 07 00 306 and 1211. These portions of rights of way are small remaining segments surrounded by existing right of way within the city limits. Annexation of rights of way adjacent to developable property under consideration for annexation to the City of Eugene is consistent with the following principles identified in the Eugene-Springfield Metro Plan:

The Metropolitan Plan is based on the premise that Eugene and Springfield, the two existing cities, are the logical providers of services accommodating urban levels of development within the urban growth boundary, and

To be meaningful, the Plan requires cooperation by all general purpose, special district, and special function agencies in the community. This reflects its comprehensive nature encompassing physical land use, social, and economic implications for the metropolitan area. Examples where cooperation are essential include planning and implementation of a transportation system, development of a metropolitan-wide energy plan, metropolitan-wide analysis and resolution of certain housing issues, and planning for areas outside the urban growth boundary and within the Plan.

While the principles listed above are central to the Plan, Metropolitan Goals (p.II-A-2) further provides that Transportation services: Serve the existing and future arrangement of land uses with efficient safe, convenient, and economic transportation systems for the movement of people and goods.

Annexation of these rights of way is appropriate and logical segments of the existing transportation and stormwater systems serving this area.

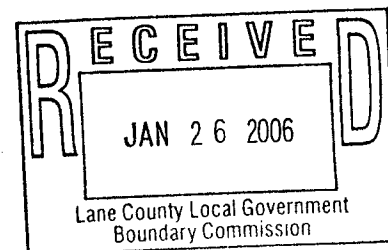


Exhibit IV-F-2

Letter from Satre Associates
Annexation to Eugene (Jeffries/River Ridge
Ltd/N Delta Rd/Ayres Rd)
C EU 06 – 10



SATRE ASSOCIATES, P.C.
Planners, Landscape Architects and Environmental Specialists
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(541) 465-4721 • Fax (541) 465-4722 • 1-800-662-7094
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January 3, 2006

APPLICATION FOR ANNEXATION TO THE CITY OF EUGENE

Owner/Applicant: (Tax Lot 305)

Eric and Deborah Jeffries
3800 North Delta Highway
Eugene, Oregon 97401
(541) 484-7389
Attn: Eric and Deborah Jeffries

Owner/Applicant: (Tax Lot 306)

River Ridge, Ltd
3800 North Delta Highway
Eugene, Oregon 97401
(541) 345-9160
Attn: Eric and Deborah Jeffries

Applicant's Representative:

Satre Associates, P.C.
Planners, Landscape Architects and Environmental Specialists
132 East Broadway, Suite 536
Eugene, Oregon 97401
(541) 465-4721 fax (541) 465-4722
Attn: Richard M. Satre, AICP, ASLA

Note: The information in this application is intended to supplement the required information of the *Annexation Information and Forms Packet: Urban Transition Area* (Attachment A). Please refer to the packet for additional information.

I. Land Use Request

Eric and Deborah Jeffries hereby submit an application for annexation of approximately 32 acres of property to the City of Eugene. Specifically, this request is for annexation approval at the next hearing February 2, 2006.

The property is located in the Willakenzie area of North Eugene, north of Ayres Road and west of North Delta Highway. The proposed annexation area is immediately northwest and adjacent to an area previously annexed to the City of Eugene (Attachment B - Vicinity Map). The annexation site is within the boundaries of the Willakenzie Area Plan (WAP).

The subject property is within the urban growth boundary and is able to be served by the orderly extension of key urban services. The property is the site of McKenzie-Willamette's planned medical center. The site's opportunities and constraints will be thoroughly analyzed during the design process.

II. Site Information

Required Application Information

Under ORS 199.490 proposals for annexation of territory to the City of Eugene may be initiated before the Lane County Local Government Boundary Commission by a property owner. Per Eugene City Council Resolution No. 4358 (adopted January 25, 1993) the applicant is pursuing the Boundary Commission annexation process.

Location

The property subject to this application lies west of North Delta Highway and north of Ayres Road. The proposed annexation area is immediately northwest and adjacent to an area previously annexed to the City of Eugene. The following tax lots are included in the annexation request, and are shown on Attachment C – Assessor's Map.

Map Number	Tax Lot Numbers
17-03-07-00	305, 306
Tax Lot Acreage Sub-Total	+/- 41.65 acres
Acreage excluded*	+/- 12.51 acres
ROW included**	+/- 2.83 acres
Total Acreage of Request	+/- 31.97 acres

*Excluded area includes area south of Ayres Road, existing access road to TL 305 and area of RiverRidge Golf Complex parking lot at tip of TL 306

**ROW includes all of Ayres Road and North Delta Highway abutting annexation area

The southern 12.05 acres of Tax Lot 306 are located outside of the Urban Growth Boundary and are not included in this application. The existing "Handle" portion of pan handle-shaped Tax Lot 305, and existing north edge of Tax Lot 306 are also not included in this application as they contain the entrance drive and some of the parking lot for RiverRidge Golf Complex. Two Property line adjustment applications have been submitted to ensure that the annexed area contains legal lots (Attachment J). In addition to the included parts of Tax Lots 305 and 306

north of Ayres Road, the entire right-of-ways of North Delta Highway and Ayres Road adjacent to the subject site are included in this application.

Ownership

The properties involved in the annexation are currently owned by Eric and Deborah Jeffries (Tax Lot 305) and River Ridge, Ltd (Tax Lot 306). Adjacent land owned by River Ridge, Ltd is not included in this application for annexation.

Designation and Use

The adopted Metropolitan Area General Plan Map designates the properties as Low-Density Residential, north of Ayres Road (inside the UGB) and Agricultural south of Ayres Road (outside the UGB). The properties are designated as Park/Open Space in the Willakenzie Area Plan (WAP; September, 1992), with the exception of the area of Tax Lot 306 south of Ayres Road, which is outside of the WAP planning area, outside the UGB, and outside of the area proposed for annexation. Tax Lot 305 is developed with a single-family residence and Tax Lot 306 is developed as a golf course (containing 8 holes of a current 18 hole course) and contains two dwellings (one is vacant and used for storage, the other is a rental unit); single family residences exist on adjacent lots to the west (TL's 1000, 1002, and 1003); to the southwest is a sand and gravel mining operation (TL 800); to the southeast is a manufactured home park; to the east, on land owned by Bunker, LLC, are two nine hole executive golf courses; north of the site is another sand and gravel mining operation; adjacent to the site to the north and west is the continuation of the RiverRidge golf course (ten holes; TL 304); to the northeast are several single-family residences.

The annexation area includes two electors according to Lane County Elections (Attachment D – Certification of Registered Voters). The subject property will be master planned and designed as one development site. City services are available to serve the site and will be extended concurrent with future development.

Waste Water

Attachment E, shows that existing nearby sanitary sewer lines terminate at Sand Trap Lane (approximately 765 feet to the east), the intersection of Ayres Road and Meadow View Drive (approximately 800 feet to the east) and at the intersection of North Delta Highway and Stapp Drive (approximately 1,000 feet south). A five year pavement cutting moratorium on North Delta Highway and Ayres Road shall expire in 2006, thereby allowing the possibility of extending the sanitary sewer within the right-of-way. All extensions will have sufficient capacity to serve the site. Neither the North Delta Highway nor Ayres Road extension projects have been listed in the City's Capital Improvements Program.

Solid Waste Management

Sanipac and Lane Apex provide service for this area of the City of Eugene. Adequate capacity is provided at regional disposal sites and at Short Mountain Landfill. The provision of solid waste management services to the annexation area will be orderly and efficient.

Water Service

Water service is currently provided via a private system. Upon annexation, Eugene Water and Electric Board will provide water service. Water mains will be brought to the site in conjunction with the planned improvements to North Delta Highway. An existing 12-inch ductile iron water main extends to the intersection of North Delta Highway and Ayres Road (Attachment F – Water Service Map). Although the capacity of the line has not been field tested it should be capable of meeting the needs of this site (a minimum of 3,500 gallons per minute at 20 pounds per square inch). The extension of water service to the hospital site, along North Delta Highway, will be provided in an orderly and efficient manner.

Fire and Emergency Medical Services

Fire Station #9 is located at 697 Goodpasture Island Road, south of the annexation area. Upon annexation, the City will provide fire and emergency medical services to the area. The property is within the 4-minute response time area. Therefore, the provision of this key urban service will be provided in an orderly and efficient manner.

Police Protection

Police protection and response to priority calls can be provided to this site upon annexation, consistent with service provision throughout the city. This key urban service will be provided in an orderly and efficient manner.

Electric Service

EWEB provides electric service to this area of the City of Eugene. There is no extra electric feeder capacity at the intersection of North Delta Highway and Ayres Road. A new feeder, with a capacity of 5MVA, will likely be needed for the future development. The Cal Young electric substation has the capacity, including an extra feeder position, to serve future development in the area. Electric service is already provided to the site (Attachment G – Electric Service Map). As the area develops further, electric service will be provided in an orderly and efficient manner.

Natural Gas

Northwest Natural serves all development in the City of Eugene. There is an existing four-inch natural gas pipeline at the intersection of North Delta Highway and Ayres Road. This key urban service will be provided in an orderly and efficient manner.

Communication Facilities

Fiber optic services are provided by Qwest and EWEB in the vicinity of the annexation area. EWEB's fiber network extends to the intersection of North Delta Highway and Ayres Road, and Qwest's network ends several hundred feet south of the intersection. Numerous wireless communication providers also serve the area. This key urban service is available and will be provided in an orderly and efficient manner.

Public Schools

The annexation area is served by Eugene School District 4J, by Gilham Elementary, Cal Young Middle, and Sheldon High Schools. Thus, this service will be provided in an orderly and efficient manner.

Improved Streets and Storm Water Control

The annexation area is currently served by North Delta Highway and Ayres Road. North Delta Highway is paved, however, it is not fully improved north of Ayres Road. An irrevocable petition for public improvements to North Delta Highway exists for the site (Attachment H – Irrevocable Petition). At the time of future development the petition calls for the installation of curbs, gutters, and paving for North Delta Highway. Ayres Road, west of North Delta Highway, is located at the southern terminus of the annexation area. This section of Ayres Road is not yet fully improved. It provides access to adjacent Tax Lots 1000, 1002 and 1003 as well as subject Tax Lot 306. Both North Delta Highway and Ayres Road south and east of the subject area are fully improved public streets. The City has indicated that a traffic signal would likely be warranted at the intersection of North Delta Highway and Ayres Road.

Storm water facilities will be designed during the planning process to meet City of Eugene objectives; including optimizing the use of open water courses and water bodies within the development site to detain and infiltrate runoff (the City anticipates having stormwater quality development standards codified by June 2006).

Pedestrian and bicycle facilities will be included as necessary to meet the City's adopted standards.

III. Conclusion

Satre Associates is available to answer questions regarding this application as necessary. The site is within the urban growth boundary and can be served by the orderly and efficient extension of key urban services, as demonstrated above.

Attachments:

- Attachment A – Annexation Information and Forms Packet: Urban Transition Area
- Attachment B - Vicinity Map
- Attachment C – Assessor's Map (reduced)
- Attachment D – Certification of Registered Voters
- Attachment E – Sanitary/Stormwater Map
- Attachment F - Water Service Map
- Attachment G – Electric Service Map
- Attachment H - Irrevocable Petition for Public Improvements
- Attachment I – Legal Description of Annexation Area
- Attachment J – Legal Description and Maps (reduced) of Property Line Adjustments
- Attachment K – Annexation Map (reduced)

Map:


Assessor's Map 17-03-07-00 with Annexation Area Highlighted



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Planning**

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MEMORANDUM

Date: January 3, 2006
To: Lane County Boundary Commission
From: Kurt Yeiter, Principal Planner 
Subject: Annexation for McKenzie Willamette Medical Center (City file A 05-44)

The development of a new full service hospital is a complicated thing, and is of great interest to the Eugene community. As I am sure you are aware, after an exhaustive search for a suitable, competitive site, the McKenzie Willamette Medical Center is proposing to begin this task on the property currently occupied by the RiverRidge golf course and a single family home, located at the northwest corner of North Delta Highway and Ayres Road, Eugene. We do not have an actual development proposal at this time.

The site is within the Eugene Urban Growth Boundary, and is proximate to existing streets, water lines, sanitary sewer, and other urban services. As noted in the application, utilities can be extended to McKenzie Willamette using existing rights-of-way that are within the incorporated portions of the City of Eugene.

The City supports this application for annexation. This application meets the City's and the Boundary Commission's criteria for annexation. The application review process revealed some issues, however, that deserve a more thorough explanation in this separate memorandum.

Timing. Development of a new hospital on this site will require a long, thorough process, of which annexation is only the first step. The Eugene-Springfield Metro Plan designates this site for eventual residential use. The Willakenzie Area Refinement Plan acknowledges the current use of the site through the designation of "Parks and Open Space." Before the hospital can be built, the City must approve a Metro Plan amendment, refinement plan amendment, zone change, and, possibly, a conditional use permit and amendments to interior property lines. The logical first step is annexation, which will determine whether this site is appropriate for urbanization (we think it is), who will provide urban services (Eugene), and facilitate the development process by bringing the site and adjacent street network into the City. It would impose a hardship to a developer to complete development plans of this magnitude before these determinations are made in the affirmative through the annexation process.

Transportation Services. Comments from Bill Morgan, Lane County Transportation Planning staff, suggest that traffic impact issues should be addressed prior to annexation approval, and cites Oregon Administrative Rule (OAR) 660-012-0060. First, we do not yet have a development proposal that can be used as the basis of a traffic impact analysis. That the site is served by two streets is sufficient evidence that some level of urbanization can be supported by annexation. The appropriate level of development, mitigation measures, and needed transportation improvements will be determined through the

development review process. The Metro Plan amendment, refinement plan amendment, and conditional use permit *each* would require a traffic impact analysis. It makes sense that the traffic impact analysis is integrated with development review decision process.

OAR 660-012-0060 requires that local governments put in place measures to assure that allowed land uses are consistent with the identified function, capacity, and performance standards (e.g. level of service, volume to capacity ratio, etc.) of the transportation facility. The rule states that a "*plan or land use regulation amendment significantly affects a transportation facility if it would:*

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) As measured at the end of the planning period identified in the adopted transportation system plan:

(A) Allow land uses or levels of development that would result in types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Reduce the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP or comprehensive plan; or

(C) Worsen the performance of an existing or planned transportation facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the TSP or comprehensive plan." (OAR 660-012-0060(1))

This rule will be triggered during one of the future applications, such as the Metro Plan amendment. Annexation of this property will not change the functional classification of an existing or planned transportation facility, change standards implementing a functional classification system, or allow land uses different than those planned for in the street network, reduce the performance of an existing or planned transportation facility, or worsen the performance of an existing or planned transportation facility.

This OAR (subsection 3) also permits a local government to approve an amendment that would significantly affect an existing transportation facility without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility where, in part, development resulting from the amendment will, at a minimum, mitigate the impacts of the amendment in a manner that avoids further degradation to the performance of the facility by the time of the development. This is further evidence that it is appropriate that issues of traffic mitigation are decided concurrently with the development review process, when the development plans can be modified or conditioned to include mitigations.

The County did not object to the inclusion of Delta Highway North, a local access street, and the westerly extension of Ayres Road as part of this application.

Property Lines/Urban Growth Boundary. The northern extent of the proposed annexation (proposed City limit) does not follow existing property lines. The proposed annexation would exclude existing driveway and parking improvements for the RiverRidge Golf Course, which will remain unincorporated. The applicants propose a lot line adjustment that will make the property lines and new City limits contiguous, and provide a new connection between Tax Lot 305, which contains the residence, and Delta Highway, as required by local ordinance. The application for the property line has been submitted to the City and all seems in order.

Recent research by the City indicates that the Urban Growth Boundary should follow the floodplain along the site's western boundary. The UGB and city limits should include the western extension of Ayres Road on the south. The entire width of the Delta Highway right-of-way should be included in this annexation to facilitate development of the site.

What If? In addition to the many local approval processes the hospital has yet to go through, their Certificate of Need application is still pending with the state. What if the hospital plans fall through?

The RiverRidge golf course currently operates without City services; hence, there has been no reason to pursue annexation before now. If, for some reason, the hospital proposal were not approved or dropped after the site is annexed pursuant to this application, the owner would have three options:

1. Pursue other development options;
2. Retain the golf course use inside the city limits, in which case this property would be eligible to receive city services; or
3. Retain the current golf course use, but request that the property be withdrawn from the city to support that long-term use. No city services would be provided to the site if withdrawn.

If the owners' preference were for Option No. 3, the City would support an application to withdraw the property (unincorporated).

Conclusion. The City supports annexation of this property as proposed at this time. The criteria are met. Annexation at this time is logical in terms of answering the basic questions first, allowing the applicants to next develop more detailed plans for coordinated review and analysis at the local level. There is ample future opportunity to address issues related to a specific development proposal when the development proposal can be better analyzed (e.g., subsequent to the Boundary Commission process).

**Land Use Referral
City of Eugene**

Date: 12/30/05

File Number: A 05-44, McKenzie Willamette Medical Center

From: Bill Morgan

Referral Group: Lane County Transportation Planning

Comments from the Lane County Transportation Planning staff:

This property has frontage on Ayres Road and North Delta Highway, both of which are Local Access Roads within the Eugene urban growth boundary. Pursuant to Oregon Revised Statutes and as adopted in Lane Code (LC) 15.010, a Local Access Road is a Public Road that is not a County road, state highway, or federal road. It is our understanding that both of these roads will be annexed, and as such, automatically will fall under City of Eugene jurisdiction.

Upon annexation, the subject property will be within the city limits; and as such, the City of Eugene has land use jurisdiction for this area. But the City does not have complete road jurisdiction for the influence area of the proposed land use. If the property is developed per the application materials as a new Regional Hospital, there will likely be transportation impacts to County and State roads, namely Delta Highway and Beltline Road.

In the application materials, nothing was said about Delta Highway or Beltline Road. Both of these roads are key urban transportation services for this property. We encourage the City and the Boundary Commission to take a wider and more realistic view of the urban transportation servicability of this annexation beyond the two Local Access Roads that are adjacent to the site. We are concerned that the annexation will be approved by the City and the Boundary Commission without understanding and mitigating for the full impacts that the development may have on these roadway systems (key urban services).

A meeting was held on December 21st as requested by McKenzie Willamette to discuss the preliminary scope of a TIA. At this meeting, ODOT staff raised the issue of whether Section 0060 of the State Transportation Planning Rule (TPR) would be triggered at the time of annexation. We agree that this question should be addressed, especially since the application is very clear that the proposed property will likely "significantly affect" transportation facilities (key urban services).

An annexation agreement executed as part of the annexation process should specify traffic impact analysis and transportation dedication and improvement requirements, including, at minimum, the following as part of the plan amendment process:

1. address the transportation rule, OAR 660-012-0060
2. an analysis of:
 - a. where people who will be served by the hospital will be traveling to and from and percentage in and outside of the metro plan boundary;
 - b. number of anticipated employees and traffic impacts of their travel to and from the property;
 - c. emergency vehicle trips and radius of travel, and resulting traffic impacts.
3. impacts on Delta Highway and Beltline Road of anticipated traffic generated by the development
4. specify TransPlan policies that must be addressed to at minimum include TSI System-wide Policies #1 and #4; and TSI Roadways Policies #1, #2 and #3; and Finance Policy #4.
5. Proposed dedications, improvements, transportation demand management, and/or monetary contributions to address traffic and transportation facility impacts.

Bill Morgan, PE

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