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February 6, 2003

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Honorable Sidney Leiken, Mayor of Springfield  
Springfield City Council  
225 N. Fifth St.  
Springfield, OR 97477

Re: Metro Plan and Gateway Refinement Plan Map and Text Amendments  
Jo. Nos. 2002-08-243 and 2002-08-244 / PeaceHealth

Dear Mayor Leiken and Members of the Springfield City Council:

As a partner in the Eugene-Springfield Metropolitan Area General Plan ("Metro Plan"), Lane County wishes to comment on the above-referenced applications. The location of a regional medical center is a significant regional land use decision. Indeed, the Metro Plan identifies health services as a key countywide urban service (III-G-1).

As we have reviewed the applications, we have become concerned that the absence of a complete master plan for this project severely reduces our ability to evaluate its impact on our institutions and citizens. We believe the applications raise the issue of sequence and coordination under Statewide Planning Goal 2, Land Use Planning. We are also concerned that the ultimate transportation system for this area has not yet been completed and that premature action could jeopardize the required coordination of our transportation plans.

It appears the applicant does not intend to seek a Metro Plan amendment for the ultimate decision to site its regional hospital facility on land designated for residential development in the Metro Plan. Because we are concerned about the regional impact of that decision, as well as its consistency with the Metro Plan language itself, we are reserving our right to inter-governmental review of future decisions which could have county-wide implications for the Metro Plan. We are not, however, asserting a right to approve the current Metro Plan map amendment proposal to redesignate approximately 33 acres from medium density residential to community commercial, since it appears the applicant does not, in fact, intend to locate the hospital facility on that portion of the site.

Nonetheless, we do believe it essential that certain key concerns of our citizens and the institutions of county government be addressed at this point in the process.

#### Metro Plan issues:

1. Wouldn't it be better to first determine the mix and allocation of uses for the Gateway area that would be consistent with the Transportation and Residential elements of the Metro Plan? Will you be able to ensure the availability of adequate supplies of land appropriate for residential development with the redesignation of 33 acres now, prior to completion of the nodal development plan and the master plan for this area? Specifically, what prohibits Springfield from processing the applicant's master plan, the city's nodal development plan for the area, and the required Metro Plan re-designations simultaneously?
2. Is there not a risk that, without a comprehensive traffic circulation system for the Gateway MDR site, your decision now on the 33-acre redesignation could create traffic circulation problems in the future? (Note that our more specific transportation concerns are detailed below.)
3. In the event that either the master plan or nodal development plan results in inconsistencies with these currently proposed amendments, are you planning to again revise the Metro Plan designation or the Gateway Refinement Plan provisions? It appears your staff has recommended a "floating" map amendment, which doesn't fix the exact location of the 33 acres until the nodal development plan is finalized. It also appears the Planning Commission has recommended that rezoning and other changes to the Springfield Development Code and maps would occur upon approval of the master plan and that, should the master plan not be approved, the current Metro Plan redesignation would "sunset." Given that your own staff and Planning Commission seem uncomfortable with the sequence of the planning actions, it should not surprise you that we also are uncomfortable with putting this redesignation ahead of the master plan and the nodal development plan.

#### Transportation issues:

We have questions about several of the projects in the vicinity of this development proposal. Keep in mind that the City of Eugene, City of Springfield, Lane County and the Lane Transit District have shared transportation planning responsibilities for the Metro area. In general, our concern is that certain downstream transportation impacts may trigger the need for TransPlan amendments, a process not solely within Springfield's jurisdiction but one shared with the other governmental entities. We have concerns about both "constrained" improvements, for which there is a practical plan to provide funding through identified funding or through reasonable assumptions about revenue sources, including county sources, and "future" improvements, for which funding means have not been identified.

4. TransPlan project #606 – I-5 at Beltline Rd.; Financially Constrained List at \$53,300,000. The region is looking at making significant investments in this project. We are concerned that our investment will be negated by the increased traffic from the commercial and hospital development, in addition to all the housing development already planned for the area. Can you document how the proposed "trip caps" will be codified, verified, and

enforced? Since the caps apparently do not apply to the housing portions of the development, which, under the proposed "density bonus" amendments to the Gateway Refinement Plan, may be master planned at higher densities than modeled in TransPlan, we are concerned that the actual traffic counts would exceed the capacity of the project.

5. TransPlan project #768 – Pioneer Parkway Extension, Harlow Rd. to Beltline Rd.; Financially Constrained List at \$8,500,000. The applicant's traffic study shows the need for two southbound left turn lanes and an exclusive right turn lane southbound. The study mentions that this may exceed the right-of-way plan for the Pioneer Parkway Extension. Has your staff determined whether additional right-of-way may be needed, and is there funding available or any additional cost to Lane County?
6. Hayden Bridge Way, Pioneer Parkway to Fifth St. TransPlan does not include improvement of this section of Hayden Bridge Way. This is a two-lane urban collector with parking. How will a single eastbound lane on Hayden Bridge Way accommodate traffic from the two southbound to eastbound left turn lanes on Pioneer Parkway Extension? Will improvements be needed on this and other County roads to the east?
7. TransPlan project #737 – Game Farm Rd., Harlow Rd. to Beltline Rd.; Financially Constrained List at \$1,395,000. This project is a two-lane urban standards project. Will the current proposal cause changes to this project or any cost to Lane County?
8. TransPlan project #727 – Eugene-Springfield Highway (SR-126), Pioneer Parkway / Q Street; Future List at \$15,000,000. This project is a major interchange improvement. While this project is currently on the TransPlan Future List (Beyond 20 Years), the applicant's Traffic Impact Analysis determines that a portion of this project is necessary for satisfying mobility standards. Even if the applicant provides funding, can this project on the Future List be constructed without requiring a TransPlan amendment to first move it to the Financially Constrained List?

Community concerns:

In addition to these coordination, land use, and transportation questions, we also have a general concern about the accessibility and costs of hospital services for all Lane County residents, as well as the County's direct cost of medical insurance for our employees. Inappropriately sited hospitals could result in significantly higher medical costs for our citizens and employees. Both PeaceHealth and McKenzie-Willamette hospitals are looking to build new facilities, and the location of each of those facilities is going to be affected, in large part, by the location of the other. To make a decision on the siting of PeaceHealth's facility necessarily forecloses other decisions on the siting of McKenzie-Willamette's facility.

Further, Lane County is responsible for establishing Ambulance Service Areas. The timely and efficient provision of these emergency medical services is critical to our citizens. It appears neither staff nor the applicant conducted any analysis to determine whether there will be any degradation of these services. In fact, such an analysis can not credibly be made without knowing where

McKenzie-Willamette's new facility would be located, should PeaceHealth's proposal be approved.

We understand the difficulty of making quasi-judicial land use decisions that are highly contentious and that have long-term significant regional consequences. We ourselves have, in similar situations in the past, expressed a desire to have another way to solve such problems – a process without constrained criteria, statutory deadlines, and the requirement to either make the proposal satisfy all the legal constraints or deny it.

Hospital facility locations entail large public and private expenses and will impact community health care costs, health care accessibility, public infrastructure costs, and our regional land use plans for many decades. The public has relevant economic and social concerns which justify substantially greater public involvement than has occurred or is presently scheduled to occur. We thus express our support for and request the formation of a multi-jurisdictional commission to comprehensively evaluate the impacts and ramifications of specific locations within Lane County for new hospital facilities for both PeaceHealth and McKenzie-Willamette. Such a commission could then make recommendations to elected officials of both cities and the county.

If you and the applicant would prefer to go through a less controversial, more methodical and inclusive process, where we would search together for the best location for new hospital facilities in our community, Lane County stands ready to work with you and to share this significant responsibility.

Sincerely yours,

Peter Sorenson,  
Chair, Lane County Board of Commissioners