



# Oregon

Theodore R. Kulongoski, Governor

**Department of Land Conservation and Development**

635 Capitol Street, Suite 150

Salem, OR 97301-2540

(503) 373-0050

Fax (503) 378-5518

[www.lcd.state.or.us](http://www.lcd.state.or.us)

## NOTICE OF ADOPTED AMENDMENT

December 13, 2006

TO: Subscribers to Notice of Adopted Plan  
or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: City of Springfield Plan Amendment  
DLCD File Number 014-06



The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Copies of the adopted plan amendment are available for review at DLCD offices in Salem, the applicable field office, and at the local government office.

Appeal Procedures\*

### **DLCD ACKNOWLEDGMENT OR DEADLINE TO APPEAL: December 27, 2006**

This amendment was not submitted to DLCD for review prior to adoption. Pursuant to OAR 660-18-060, the Director or any person is eligible to appeal this action to LUBA under ORS 197.830 to 197.845.

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

**\*NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE DATE SPECIFIED ABOVE.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist  
Marguerite Nabeta, DLCD Regional Representative  
Gary M. Karp, City of Springfield

<paa>

NR07

# 2 Notice of Adoption

THIS FORM MUST BE MAILED TO DLCD  
WITHIN 5 WORKING DAYS AFTER THE FINAL DECISION  
PER ORS 197.610, OAR CHAPTER 660 - DIVISION 18

DATE STAMP	DEPT OF
	DEC 07 2006
	LAND CONSERVATION AND DEVELOPMENT
	For DLCD Use Only

Jurisdiction: City of Springfield Local file number: LRP2006-00026  
 Date of Adoption: 12/4/2006 Date Mailed: 12/4/2006  
 Date original Notice of Proposed Amendment was mailed to DLCD: N/A

- |   |   |
|---|---|
| <input type="checkbox"/> Comprehensive Plan Text Amendment        | <input type="checkbox"/> Comprehensive Plan Map Amendment |
| <input checked="" type="checkbox"/> Land Use Regulation Amendment | <input type="checkbox"/> Zoning Map Amendment             |
| <input type="checkbox"/> New Land Use Regulation                  | <input type="checkbox"/> Other: _____                     |

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached".

The amendment of SDC Section 36.135, which allows RVs as temporary living quarters for persons requiring care or care providers, still specifically limits the use to a one year initial approval, but now limits extensions to no more than two, with a limitation of six months each. Each extension request requires public notice and compliance with any initial conditions of approval. This Section was also reformatted similar to other recent SDC amendments.

Describe how the adopted amendment differs from the proposed amendment. If it is the same, write "SAME". If you did not give Notice for the Proposed Amendment, write "N/A".

N/A  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Plan Map Changed from: N/A to: N/A

Zone Map Changed from: N/A to: N/A

Location: N/A Acres Involved: N/A

Specify Density: Previous: N/A New: N/A

Applicable Statewide Planning Goals: None

Was an Exception Adopted?  YES  NO

DLCD File No.: 014-06 (NOA)

Did the Department of Land Conservation and Development receive a Notice of Proposed Amendment.....

Forty-five (45) days prior to first evidentiary hearing?  Yes  No

If no, do the statewide planning goals apply?  Yes  No

If no, did Emergency Circumstances require immediate adoption?  Yes  No

Affected State or Federal Agencies, Local Governments or Special Districts:

None

Local Contact: Gary M. Karp Phone: (541) 726-3777 Extension: \_\_\_\_\_

Address: 225 Fifth Street City: Springfield, OR

Zip Code + 4: 97477- Email Address: gkarp@ci.springfield.or.u

### ADOPTION SUBMITTAL REQUIREMENTS

This form **must be mailed** to DLCD **within 5 working days after the final decision**  
per ORS 197.610, OAR Chapter 660 - Division 18.

1. Send this Form and TWO (2) Copies of the Adopted Amendment to:

**ATTENTION: PLAN AMENDMENT SPECIALIST  
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT  
635 CAPITOL STREET NE, SUITE 150  
SALEM, OREGON 97301-2540**

2. Submit **TWO (2) copies** the adopted material, if copies are bounded please submit **TWO (2) complete copies** of documents and maps.

3. Please Note: Adopted materials must be sent to DLCD not later than **FIVE (5) working days** following the date of the final decision on the amendment.

4. Submittal of this Notice of Adoption must include the text of the amendment plus adopted findings and supplementary information.

5. The deadline to appeal will not be extended if you submit this notice of adoption within five working days of the final decision. Appeals to LUBA may be filed within **TWENTY-ONE (21) days** of the date, the Notice of Adoption is sent to DLCD.

6. In addition to sending the Notice of Adoption to DLCD, you must notify persons who participated in the local hearing and requested notice of the final decision.

7. **Need More Copies?** You can copy this form on to 8-1/2x11 green paper only; or call the DLCD Office at (503) 373-0050; or Fax your request to:(503) 378-5518; or Email your request to [mara.ulloa@state.or.us](mailto:mara.ulloa@state.or.us) - ATTENTION: PLAN AMENDMENT SPECIALIST.

CITY OF SPRINGFIELD  
DEVELOPMENT SERVICES DEPARTMENT  
225 FIFTH STREET  
SPRINGFIELD, OREGON 97477

NOTICE OF DECISION  
SPRINGFIELD CITY COUNCIL

MAILING DATE OF NOTICE: December 6, 2006  
DATE OF DECISION: December 4, 2006  
EFFECTIVE DATE: January 3, 2007  
JOURNAL NUMBER: LRP2006-00026  
APPLICANT: City of Springfield

NATURE OF REQUEST

AN ORDINANCE AMENDING THE SPRINGFIELD DEVELOPMENT CODE, SECTION 36.135  
TEMPORARY USE – EMERGENCY MEDICAL HARDSHIP; AND ADOPTING A SEVERABILITY  
CLAUSE.

PURPOSE OF THE AMDNEMENTS

The amendment of SDC Section 36.135, which allows RVs as temporary living quarters for persons requiring care or care providers, still specifically limits the use to a one year initial approval, but now limits extensions to no more than two, with a limitation of six months each. Each extension request requires public notice and compliance with any initial conditions of approval. This Section was also reformatted similar to other recent SDC amendments.

PROCEEDINGS AND DECISION

On September 19, 2006, the Planning Commission held a work session on this issue. The Planning Commission directed staff to maintain the current 12-month initial approval timeline and place a limit on timeline extensions - allowing up to two 6-month extension opportunities that can be processed at the staff level. The intent was to define "temporary" as 24 months. However, since there may still be requests for additional timeline extensions at the staff level due to the duration of the patient's incapacity, a process was established where the applicant could go directly to the City Council which would have had the option to extend the timeline at its discretion using the same criteria as staff at a public hearing. On October 17, 2006, the Planning Commission held another work session and a public hearing on this issue. The Planning Commission made some minor text revisions and voted 4-2, with one absent to forward the SDC amendment to the City Council. Property owners and residents of the three active applications referenced above were mailed notice of the proposed SDC amendment. There was no public testimony at the Planning Commission hearing. The City Council held a work session on this issue on November 13, 2006. On November 20, 2006 the City Council held a public hearing and first reading of the Ordinance. Staff explained that the Ordinance was revised to reflect the City Council's desire to limit the initial approval timeline to one year with up to two six month approved extensions, and to delete the City Council extension option. The initial approval and any extension require Type II staff review with notice. Type II appeals go to the Planning Commission. There was no public testimony at the City Council hearing. There were no written comments and no oral testimony; the City Council voted 6 to 0 to approve the Ordinance on December 4.

ADDITIONAL INFORMATION

If you have questions concerning the amendments or the decision of the City Council in this matter, please contact Gary M. Karp, Senior Planner at 541.726.3777. E-mail address: [gkarp@ci.springfield.or.us](mailto:gkarp@ci.springfield.or.us). The adopting ordinance, along with supporting staff report and documents, are available for review between 8:00AM and 4:00PM, at the Development Services Department counter, Springfield City Hall, at 225 Fifth Street. These documents can be e-mailed to interested parties if an e-mail address is provided.

APPEAL

All parties are advised that a *Notice of Intent to Appeal* conforming to the requirements of the Oregon Revised Statutes 197.830(9) shall be filed on or before the 21st day after the mailing date of this notice. All parties are further advised to consult an attorney or land use consultant regarding their appeal.

ORDINANCE

ORDINANCE NO. 6186 (General)

**AN ORDINANCE AMENDING THE SPRINGFIELD DEVELOPMENT CODE, SECTION 36.135 TEMPORARY USE – EMERGENCY MEDICAL HARDSHIP; AND ADOPTING A SEVERABILITY CLAUSE.**

**THE CITY COUNCIL OF THE CITY OF SPRINGFIELD FINDS THAT:**

**WHEREAS**, the Springfield Development Code (SDC) was adopted by the Springfield City Council on May 5, 1986, and amendments thereto were subsequently adopted by Ordinance; and

**WHEREAS**, Article 8 of the SDC sets forth procedures for the amendment of this document; and

**WHEREAS**, the Planning Commission directed staff to amend the SDC regarding the “temporary” approval status for Emergency Medical Hardship Living Quarters; and

**WHEREAS**, on September 19, 2006, the Springfield Planning Commission held a work session on this SDC amendment application (Case Number LRP 2006-00026).

**WHEREAS**, on October 17, 2006, the Springfield Planning Commission held another work session and a public hearing on this SDC amendment application and voted 4 to 2, with one absent to recommend approval of these amendments to the City Council based upon findings in support of adoption of this amendment to the SDC as set forth in the Staff Report and the Recommendation to the Council incorporated herein by reference; and

**WHEREAS**, on November 13, 2006, the Springfield City Council held a work session on this SDC amendment application.

**WHEREAS**, on November 20, 2006, the Springfield City Council held a public hearing and is now ready to take action on this matter based upon the above recommendation and the evidence and testimony already in the record as well as the evidence and testimony presented at this public hearing held in the matter of adopting this ordinance amending the SDC.

**NOW THEREFORE, THE CITY OF SPRINGFIELD ORDAINS AS FOLLOWS:**

**Section 1: Section 36.135 is hereby amended to read as follows:**

**“36.135 TEMPORARY USE - EMERGENCY MEDICAL HARDSHIP.**

- (1) Purpose.
  - (a) The Emergency Medical Hardship allows the placement of temporary living quarters, on a lot/parcel with a habitable primary dwelling, for a person who is determined by a licensed physician as specified in Subsection (4)(b)1. of this Section, to be either:
    1. Terminally ill; or

2. Recuperating from an illness, surgery or injury; and
  3. The person is not physically or mentally capable of self maintenance and is dependent upon a care provider being on site for assistance.
- (b) Temporary means a period of 24 months, unless otherwise permitted in Subsection (7) of this Section. The 24 month period includes an approval time line of 12 months with an opportunity to obtain up to two 6 month time line extensions at the staff level.
- (c) Temporary living quarters means a road worthy, licensed and insured recreational vehicle (RV) as defined in Article 2 of this Code.
- EXCEPTION:** Tent trailers shall not be permitted as a temporary living quarters.
- (d) The temporary living quarters shall be occupied only by the person requiring medical assistance or the care provider.
- (e) The care provider is a person who lives on-site, either in the primary dwelling or the temporary living quarters and provides necessary medical procedures, monitoring and attention to the person requiring that care on a 24-hour basis.
- (2) Applicability. The Emergency Medical Hardship process shall be permitted only on lots/parcels designated Low Density Residential (LDR) and zoned LDR within the city limits or LDR/UF-10 within the City's urban services area.
- (3) Review.
- (a) The initial application and any time line extensions shall be reviewed under Type II procedure.
  - (b) A complete application together with all required materials shall be accepted by the Director prior to staff review of the application as specified in Section 3.050, Application Submittal.
- (4) Submittal Requirements.
- (a) The application shall include a plot plan, drawn to scale, showing:
    1. Existing structures on the lot/parcel and their setbacks from property lines;
    2. The proposed location of the temporary living quarters and its setback from property lines and other structures on the lot/parcel;
    3. The required utility connections for the temporary living quarters; and
    4. The location of proposed fences to screen the temporary living quarters that face public rights-of-way.

5. For those applications within the City's urban service area, the plot plan shall also show the location of any wells, septic tanks and drain fields.
- (b) The application shall also include:
1. A written medical report from a licensed physician on official letterhead that includes:
    - a. The nature of the patient's medical condition and whether the patient is terminally ill or recuperating from an illness, surgery or injury;
    - b. A statement explaining why the patient is not physically or mentally capable of self-maintenance and is, therefore, dependent upon a care provider being on-site for assistance; and
    - c. Additional supporting documentation from other medical practitioners who may be treating the patient, when applicable.
  2. A statement from the applicant addressing:
    - a. Whether the person requiring medical assistance or the care provider will reside in the temporary living quarters;
    - b. The type of temporary living quarters proposed, either: a motor home, residential trailer, a travel trailer, truck camper or other RV as defined in Article 2 of this Code, unless excepted in this Section;
    - c. Proof that the temporary living quarters is licensed and insured; and
    - d. A statement explaining why the circumstances are temporary in nature (estimated at 12 months or less) and what steps are being undertaken to address the circumstances prior to the elapsing of 12 months, or any extension thereof.
- (5) Criteria. The Director shall grant approval of the emergency medical hardship application if all of the following criteria are met, including any conditions imposed in accordance with Subsection (6) of this Section.
- (a) The licensed physician's written medical report shall address the information required in Subsection (4)(b)1. of this Section.
  - (b) The temporary living quarters shall house either the person requiring medical assistance or the care provider.
  - (c) The temporary living quarters shall be located on the same legal lot/parcel as the primary dwelling. Only one temporary living structure shall be allowed on a lot/parcel.

- (d) The temporary living quarters shall not be permitted within the front yard or street side yard setback.
  - (e) All residential trailers and other similar units used as temporary living quarters shall be connected to sewer, water and electrical services as proscribed by the Oregon State Building Code as adopted by the City.
  - (f) All travel trailers and other similar units used as temporary living quarters shall have utility connections consistent with State law requirements for such units as in RV parks.
- (6) Conditions.
- (a) The Director shall impose the following conditions of approval for all medical hardship applications:
    - 1. There shall be no change in occupancy of the temporary living quarters under the permit; either the person requiring care or the care provider shall reside within the temporary living quarters.
    - 2. The temporary living quarters use shall be limited to the use permitted in this Section and is not transferable to other persons or property. Under no circumstance shall temporary living quarters be used as a rental unit.
    - 3. The temporary living quarters use shall cease upon the occurrence of the first of the following events:
      - a. The medical hardship no longer exists; in this case, the temporary living quarters shall be removed within 30 calendar days of cessation of the provision of care; or
      - b. Within 12 months of the date of application approval, unless there is an approved extension as specified in Subsection (7) of this Section.
  - (b) The Director may impose additional conditions of approval to the extent necessary to satisfy the criteria of Subsection (5) of this Section, to comply with all applicable standards of this Code and to mitigate identified negative impacts to surrounding properties.
- (7) Time line extensions. A request for an extension will not require a new application; however, a written request shall be submitted to the Director 30 days prior to the expiration of the initial 12 month approval time line. The request shall include written verification from a licensed physician stating that the person requiring care as specified in Subsection (4)(b)1. of this Section continues to need care. Staff shall review the request to ensure that the applicant remains compliant with the approval criteria specified in Subsection (5) and any conditions of approval required under Subsection (6) of this Section. Upon expiration of the initial 12 month approval time line, the temporary living unit may be extended as follows:



- (a) Staff approved time line extensions. The applicant may obtain no more than two 6 month time line extensions from staff.

**EXCEPTION:** Temporary living quarters approved prior to the date of this amended Section may continue beyond the original approval time line on a yearly basis until the need no longer exists.

- (b) Criteria of approval for time line extensions. Staff approval of any time line extension request shall be based upon:
1. The physician's verification of condition that the patient still requires care; and
  2. Staff's verification that the temporary living quarters is still in compliance with the initial conditions of approval.

- (8) Compliance. The temporary living quarters shall maintain compliance with all conditions of approval. Violation of the provisions of this Section, or determination that the need can no longer be verified, shall be the basis for termination of approval."

**Section 2: Severability Clause.** If any subsection, sentence, clause, phrase or portion of this Ordinance is for any reason held invalid or unconstitutional by a court of competent jurisdiction, such portion shall be deemed a separate, distinct and individual provision and such holding shall not affect the validity of the remaining portions hereof.

**ADOPTED** by the Common Council of the City of Springfield by a vote of 5 for and 0 against, this 4th day of December, 2006.

**APPROVED** by the Mayor of the City of Springfield, this 4th day of December, 2006.

ATTEST:

Amy Sowa  
City Recorder

[Signature]  
Mayor

Joseph J. Leahy  
11/14/06  
CITY ATTORNEY

## ATTACHMENT 2

### STAFF REPORT

#### APPLICANT

City of Springfield - Jo. No. LRP 2006-0026

#### REQUEST

Amendment of the Springfield Development Code (SDC) – Section 36.135 Temporary Use – Emergency Medical Hardship.

#### BACKGROUND

On September 19, the Planning Commission held a work session regarding the “temporary” status of the Emergency Medical Hardship process. The Planning Commission directed staff to maintain the current 12 month initial approval time line and place a limit on time line extensions - allowing up to two 6 month extension opportunities at the staff level. The intent was to define “temporary” at 24 months. The Planning Commission also directed staff to include additional comments they had that evening and the reorganization of the process proposed by staff.

#### SPRINGFIELD DEVELOPMENT CODE CRITERIA FOR SDC AMENDMENTS

SDC 8.030 of the Springfield Development Code establishes criteria that must be met in order to approve this request. *“In reaching a decision on these actions, the Planning Commission and the City Council shall adopt findings which demonstrate conformance to the following: (1) The Metro Plan; (2) Applicable State statutes; and (3) Applicable State-wide Planning Goals and Administrative Rules.”*

##### *(1) The Metro Plan;”*

*“The Eugene-Springfield Metropolitan Area General Plan [Metro Plan] is the official long-range general plan (public policy document) of metropolitan Lane County and the cities of Eugene and Springfield. Its policies and land use designations apply only within the area under the jurisdiction of the Plan. The Plan sets forth general planning policies and land use allocations and serves as the basis for the coordinated development of programs concerning the use and conservation of physical resources, furtherance of assets, and development or redevelopment of the metropolitan area.” P. I-1*

#### Staff Response and Finding:

This is an amendment of an existing specific regulation. This amendment defines the “temporary” needs of citizens burdened with emergency medical hardships who require additional on-site housing for either the person requiring medical care or the care provider while ensuring that the neighborhood character is not disrupted. The initial duration of the temporary housing remains 12 months or less. The current unlimited time line extensions are now limited to two 6 month periods at the staff level, for a total time line of 24 months. In cases where additional time line extensions may be requested, the City Council would make that determination. The RV housing permitted is not considered to be permanent housing and thus, the short term nature of the use pre-empts the applicability of density objectives expressed in

the residential element of the Metro Plan. This amendment has no effect on, nor is it affected by Metro Plan policies.

*“(2) Applicable State statutes,”*

#### NEEDED HOUSING

ORS 197.307

*“(1) The availability of affordable, decent, safe and sanitary housing opportunities for persons of lower, middle and fixed income, including housing for farm workers, is a matter of statewide concern.*

*(2) Many persons of lower, middle and fixed income depend on government assisted housing as a source of affordable decent, safe and sanitary housing.*

*(3)(b) A local government shall attach only clear and objective approval standards or special conditions regulating, in whole or in part, appearance or aesthetics to an application for development of needed housing or to a permit, as defined in ORS 215.402 or 227.160, for residential development.*

*The standards or conditions may not be attached in a manner that will deny the application or reduce the proposed housing density provided the proposed density is otherwise allowed in the zone.”*

#### Staff Response and Finding:

This is an amendment of an existing specific regulation. Even though the primary users of both the current and proposed amended emergency medical hardship regulations tend to be lower and fixed income persons and the reformatting of the approval process is intended to provide clear and objective approval standards and conditions of approval, the “temporary” nature of the emergency hardship process does not affect the housing needs policies of ORS 197.307 cited above.

#### POST ACKNOWLEDGEMENT PROCEDURES

ORS 197.610

“197.610 Local government notice of proposed amendment or new regulation; exceptions; report to commission.

(1) A proposal to amend a local government acknowledged comprehensive plan or land use regulation or to adopt a new land use regulation shall be forwarded to the Director of the Department of Land Conservation and Development at least 45 days before the first evidentiary hearing on adoption. The proposal forwarded shall contain the text and any supplemental information that the local government believes is necessary to inform the director as to the effect of the proposal. The notice shall include the date set for the first evidentiary hearing. The director shall notify persons who have requested notice that the proposal is pending.

(2) When a local government determines that the goals do not apply to a particular proposed amendment or new regulation, notice under subsection (1) of this section is not required. In addition, a local government may submit an amendment or new

regulation with less than 45 days' notice if the local government determines that there are emergency circumstances requiring expedited review. In both cases:

(a) The amendment or new regulation shall be submitted after adoption as provided in ORS 197.615 (1) and (2); and

(b) Notwithstanding the requirements of ORS 197.830 (2), the director or any other person may appeal the decision to the board under ORS 197.830 to 197.845....”

**Staff Response and Finding:**

This is amendment of an existing specific regulation. The “temporary” nature of the emergency hardship process is not proposed to change. Except for the public notice requirements of Goal 1 (see Criterion (3), below), there are no State-wide land use goals that apply to this amendment. Therefore, the 45 day notice to Department of Land Conservation and Development (DLCD) prior to the first evidentiary hearing is not required. However, staff will notice DLCD after adoption of the Ordinance as required in (2)(a).

***“(3) Applicable State-wide Planning Goals and Administrative Rules.”***

GOAL 1: CITIZEN INVOLVEMENT - OAR 660-015-0000(1)

GOAL 2: LAND USE PLANNING OAR 660-015-0000(2)

GOAL 3: AGRICULTURAL LAND OAR 660-015-0000(3)

GOAL 4: FOREST LANDS OAR 660-015-0000(4)

GOAL 5: NATURAL RESOURCES, SCENIC AND HISTORIC AREAS, AND OPEN SPACES  
OAR 660-015-0000(5)

GOAL 6: AIR, WATER AND LAND RESOURCES QUALITY OAR 660-015-0000(6)

GOAL 7: AREAS SUBJECT TO NATURAL HAZARDS

GOAL 8: RECREATIONAL NEEDS OAR 660-015-0000(8)

GOAL 9: ECONOMIC DEVELOPMENT OAR 660-015-0000(9)

GOAL 10: HOUSING OAR 660-015-0000(10)

GOAL 11: PUBLIC FACILITIES AND SERVICES OAR 660-015-0000(11)

GOAL 12: TRANSPORTATION OAR 660-015-0000(12)

GOAL 13: ENERGY CONSERVATION OAR 660-015-0000(13)

GOAL 14: URBANIZATION OAR 660-015-0000(14)

GOAL 15: WILLAMETTE RIVER GREENWAY OAR 660-015-000(15)

GOAL 16: ESTUARINE RESOURCES OAR 660-015-000(16)

**GOAL 17: COASTAL SHORELANDS OAR 660-015-000(17)**

**GOAL 18: BEACHES AND DUNES OAR 660-015-000(18)**

**GOAL 19: OCEAN RESOURCES OAR 660-015-000(19)**

**Staff Response and Finding:**

Goals 1-15. This amendment does not allow a permanent use, nor is it intended to implement housing objectives directed towards specialized housing needs or affordable housing (Goal 10). The provisions of this amendment deal with a local need that was first addressed by the City Council to provide temporary relief for emergency medical hardships.

Goals 16-19. These goals do not apply because there are no coastal, ocean, estuarine, or beach and dune resources within the City's jurisdiction.

There are no State-wide Planning Goals or Administrative Rules which apply to this amendment or which this amendment seeks to implement other than compliance with Goal 1, Citizen Involvement, pertaining to public notice. Notice of Planning Commission and City Council work sessions and public hearings were printed in the Springfield News and placed on the City's web site on October 6, 2006. In addition, the owners of property containing the three current emergency medical hardship applications have been notified by mail.

**CONCLUSION/RECOMMENDATION/REQUESTED ACTION**

Staff has demonstrated criteria of approval listed in SDC 8.030: (1) Metro Plan policies; (2) State statutes; and (3) State-wide Planning Goals and Administrative Rules either do not apply to, or this proposed SDC amendment minimally impacts, the criteria.

Staff recommends the Planning Commission: approve the attached Order and forward the proposed amendment of SDC 36.135 to the City Council with a recommendation for adoption.