

1 IN THE CIRCUIT COURT FOR THE STATE OF OREGON

2 FOR THE COUNTY OF MARION

3  
4 **G GROUP, LLC**, an Oregon Limited  
5 Liability Company, **200**  
6 **INTERNATIONAL WAY, LLC**, an  
7 Oregon Limited Liability Company,  
8 **MCKENZIE-GATEWAY BUSINESS**  
9 **PARK, LLC**, an Oregon Limited  
10 Liability Company, **NORTHBANK**  
11 **PROPERTY, LLC**, an Oregon  
12 Limited Liability Company, and  
13 **RICHARDSON SPORTS, INC.**, an  
14 Oregon Corporation,

15 Plaintiffs,

16 v.

17 **STATE OF OREGON, CITY OF**  
18 **SPRINGFIELD**, a Municipal  
19 Corporation of the State of Oregon,  
20 **LANE COUNTY**, a Municipal  
21 Corporation of the State of Oregon,  
22 **PEACEHEALTH**, a Foreign  
23 Nonprofit Corporation, **CAS**  
24 **INVESTMENTS RICE FARMS**  
25 **LLC**, an Oregon Limited Liability  
26 Company, and **STATE**  
**INVESTMENTS L.L.C.**, an Oregon  
Limited Liability Company,

Defendants.

Case No.25CV55220

**COMPLAINT (Declaratory and  
Injunctive Relief under ORS  
28.020 and 28.080)**

**NOT SUBJECT TO  
MANDATORY ARBITRATION**

**Fees under ORS 21.135(2)(f)**

20 Plaintiffs G Group, LLC; 200 International Way, LLC; McKenzie-  
21 Gateway Business Park, LLC; Northbank Property, LLC; and Richardson  
22 Sports, Inc. ("Plaintiffs") allege the following:  
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## THE PARTIES

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2 1.

3  
4 Plaintiff G Group, LLC is an Oregon limited liability company  
5 properly authorized to engage in business in the State of Oregon.  
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7 2.

8 Plaintiff 200 International Way, LLC is an Oregon limited liability  
9 company properly authorized to engage in business in the State of Oregon.  
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11 3.

12 Plaintiff McKenzie-Gateway Business Park, LLC is an Oregon limited  
13 liability company properly authorized to engage in business in the State of  
14 Oregon.  
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16 4.

17 Plaintiff Northbank Property, LLC is an Oregon limited liability  
18 company properly authorized to engage in business in the State of Oregon.  
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21 5.

22 Plaintiff Richardson Sports, Inc. is an Oregon corporation properly  
23 authorized to engage in business in the State of Oregon.  
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1 6.

2 Defendant State of Oregon is created and organized under the State of  
3 Oregon's Constitution and the laws enacted by the Oregon legislature.  
4

5 7.

6 Defendant Lane County ("Lane County") is an Oregon municipal  
7 corporation.  
8

9 8.

10 Defendant City of Springfield ("City") is an Oregon municipal  
11 corporation.  
12

13 9.

14 Defendant PeaceHealth ("PeaceHealth") is a foreign nonprofit  
15 corporation based in the State of Washington.  
16

17 10.

18 Defendant CAS Investments Rice Farms LLC ("CAS Investments") is  
19 an Oregon limited liability company properly authorized to engage in  
20 business in the State of Oregon.  
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11.

Defendant State Investments L.L.C. (“State Investments”) is an Oregon limited liability company properly authorized to engage in business in the State of Oregon.

### JURISDICTION AND VENUE

12.

This Court has jurisdiction under ORS 28.010 and ORS 28.020, which grant circuit courts the power to declare rights regarding questions arising under a State statute and a local government’s comprehensive plan and land development code. Venue is proper in this Court pursuant to ORS 14.060 because Marion County is where the Oregon Legislative Assembly meets and where the cause of this suit arose.

### PLAINTIFFS’ STANDING

13.

Plaintiffs have standing because they either own or manage properties located adjacent to or near the proposed Crisis Center described below and are adversely affected by House Bill 2005 (“HB 2005”), which allegedly overrides the City’s current Comprehensive Plan and Land Development

1 Code that prohibits the proposed Crisis Center. Due to their proximity to  
2 the Crisis Center, Plaintiffs are entitled to procedural due process rights  
3 related to the siting of the Crisis Center under Oregon land use law. See ORS  
4 227.175; *Fasano v. Bd of County Comm'rs of Washington Cnty*, 264 Or 574 (1973).  
5

## 6 **FACTS**

### 7 14.

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9 Lane County entered into a Purchase and Sale Agreement with CAS  
10 Investments and State Investments (hereinafter collectively "Sellers") on  
11 November 5, 2024, to purchase Sellers' property along International Way in  
12 Springfield. The property is 17.95 acres and currently consists of a hazelnut  
13 orchard on Tax Lots 400 and 5400 in the west half of Section 15 in Township  
14 17 South, Range 3 West of the Willamette Meridian (the "CAS Property").  
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### 18 15.

19 Lane County and PeaceHealth intend to develop a 24-hour, seven-day-  
20 a-week mental health crisis center on the CAS Property, consisting of the so-  
21 called Lane County "Stabilization Center," the PeaceHealth "Timber Springs  
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1 Behavioral Health Hospital” (together the “Crisis Center”), and parking  
2 facilities that include recreational vehicle camping sites.

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4 16.

5 Plaintiff G Group, LLC (“G Group”) manages properties owned by  
6 Plaintiff 200 International Way, LLC located at 200 International Way,  
7 Plaintiff McKenzie-Gateway Business Park, LLC at 909 International Way,  
8 and Plaintiff Northbank Property, LLC at 950 International Way, all in  
9 Springfield, Oregon. The properties consist of 20.62 acres of land and 99,440  
10 square feet of leasable building space providing office and industrial  
11 services, and products to customers in a multi-building business park  
12 setting. Plaintiff Northbank Property, LLC’s property is located  
13 approximately 40 feet from the CAS Property, and the other G Group-  
14 managed properties are located in the nearby vicinity of the CAS Property.  
15 The relationship between the CAS Property and Plaintiffs’ properties is  
16 shown on the aerial attached herein as Exhibit 1.  
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23 17.

24 Plaintiff Richardson Sports, Inc. (“Richardson”) owns property located  
25 at 500 International Way in Springfield, Oregon. Richardson’s property

1 consists of 14.10 acres of land and approximately 170,000 square feet of  
2 building space, including the company headquarters and manufacturing  
3 and warehouse spaces (“Richardson Property”). Richardson manufactures  
4 athletic products and employs approximately 400 people at this location.  
5 The Richardson Property operates 19 hours per day and five to six days per  
6 week, and many of its employees work shifts that begin or end during  
7 nighttime hours. The Richardson Property is adjacent to the CAS Property  
8 and shares a common boundary line.  
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12 18.

13  
14 The G Group properties, the Richardson Property, and the CAS  
15 Property are all located in the City of Springfield’s Campus Industrial zone.  
16 The Springfield Development Code (“SDC” or “Land Development Code”)  
17 provides that this zone is “intended to provide opportunities for  
18 diversification of the local economy by offering prime sites in a campus  
19 environment for large-scale light manufacturing firms and research and  
20 development complexes emphasizing modern technology and employing  
21 skilled workers in family wage jobs.” SDC 3.2.405.  
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19.

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2 The Springfield City Council and the Lane County Board of  
3 Commissioners recently adopted new rules for siting medical facilities in the  
4 Campus Industrial zone along International Way. Those rules prohibit the  
5 Crisis Center in the Campus Industrial zone. Richardson, G Group, and  
6 PeaceHealth all participated in the rule adoption proceedings.  
7  
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11 While the County Board was overseeing the rulemaking for the  
12 Campus Industrial zone, the County, without notice to the City or Plaintiffs,  
13 lobbied state legislators to enact a “Supersiting” law purporting to override  
14 the City’s Comprehensive Plan and Land Development Code by mandating  
15 approval of the Crisis Center on the CAS Property. The County Board did  
16 not disclose its Supersiting plans during the public proceedings on the  
17 Campus Industrial zoning rules.  
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21.

22  
23 The 2025 Oregon Legislature convened on January 21, 2025, subject to  
24 a constitutional deadline to conclude its work by June 29, 2025. On June 12,  
25 2025, a one-page HB 2005 was introduced in the Oregon House of  
26

1 Representatives. The bill, which stated it was “[r]elating to behavioral  
2 health,” consisted of two sections. Section 1 stated that:

3 “The Oregon Health Authority shall study  
4 behavioral health. The authority shall submit a  
5 report in the manner provided by ORS 192.245, and  
6 may include recommendations for legislation, to the  
7 interim committees of the Legislative Assembly  
8 related to health no later than September 15, 2026.”

9 Section 2 directed that Section 1 would be repealed on January 2, 2027.

10 22.

11 On June 16, 2025, 78 pages of amendments to HB 2005 were  
12 introduced, replacing the original version of the bill. Though the  
13 amendments retained the description of “[r]elating to behavioral health,” the  
14 amended bill addressed other distinct topics, including civil commitment,  
15 studies of tribal members, the Oregon Administrative Procedures Act,  
16 criminal justice proceedings, and land use.

17 23.

18 On June 16, 2025 – less than two hours after posting the amendments -  
19 the legislature held the only public hearing on HB 2005, ensuring there  
20 would be minimal public notice or debate on its contents.  
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The bill was then ushered through both houses of the legislature within 11 days to meet the end of session deadline.

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The bill passed in the Senate on June 26, 2025, and the House on June 27, 2025, and was enacted into law as Oregon Laws 2025 chapter 559. The legislature adjourned on June 27, 2025. The limited floor debate on the bill indicated that legislators did not understand the substance of the bill, particularly its land use provisions. For example, when Senator Mike McClane, R-Powell Butte, raised a question about the Supersiting provisions, another senator erroneously asserted that Senator McClane was talking about the wrong bill.

26.

HB 2005 prohibits a local government from requiring “a plan amendment, zone change, or conditional use permit” for a “crisis stabilization center” and a “mental or psychiatric hospital” if the two facilities are located adjacent to one another and within an urban growth boundary. HB 2005 also requires the local government to approve this

1 facility within 30 days of application of a request for a development permit,  
2 subject to the local government's determination regarding the adequacy of  
3 local infrastructure to support the facility. HB 2005 also provides that the  
4 local government's permitting decision is not a "land use decision" under  
5 ORS chapter 197.  
6

7  
8 27.

9 The Oregon Supreme Court has recognized due process rights  
10 inherent in Oregon's land use system and ORS chapter 227 contains specific  
11 provisions assuring due process and fundamental fairness in land  
12 development permit decisions within Oregon cities. Those provisions  
13 largely mirror the due process requirements of the Fourteenth Amendment  
14 to the United States Constitution. Specifically, ORS 227.173(1) requires  
15 public notice and opportunity for a public hearing before a city issues a land  
16 development permit. Because the CAS Property is within an urban growth  
17 boundary, the public notice required by ORS 227.173(1) for a land  
18 development permit decision regarding the CAS Property must extend at  
19 least to landowners within 100 feet of the CAS Property. The SDC  
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1 implements chapter 227 and sets the required development permit notice to  
2 300 feet. See SDC 5.1.425.

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4 28.

5 The requirement of HB 2005 that the local government approve a  
6 facility within 30 days of application of a request for a development permit,  
7 would make it impossible for the City to provide the due process required  
8 by ORS chapter 227 and the City's Land Development Code. HB 2005 does  
9 not purport to amend or override the public due process rights provided by  
10 ORS chapter 227 and the City's Land Development Code.  
11  
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14 29.

15 On July 29, 2025, two days after HB 2005 passed through both  
16 chambers of the legislature, Lane County voted to authorize its County  
17 Administrator to complete the purchase of the CAS Property in the amount  
18 of \$7,819,020 for the purpose of developing the Crisis Center.  
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21 30.

22 G Group and Richardson submitted testimony opposing the purchase  
23 before the July 29, 2025 meeting, requesting that the County perform  
24 additional due diligence on the CAS Property to evaluate land use issues  
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1 before purchasing the CAS Property. Numerous PeaceHealth executives  
2 then testified in support of the purchase at the July 29, 2025 meeting.

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4 31.

5 The County's decision to purchase the CAS Property for the purpose  
6 of developing the Crisis Center violates the City's Comprehensive Plan and  
7 Land Development Code, which does not authorize hospitals or other  
8 medical facilities that provide emergency or urgent care in the local Campus  
9 Industrial zone.  
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12 32.

13  
14 The City has not and, on information and belief, does not intend to  
15 amend its Comprehensive Plan and Land Development Code to implement  
16 HB 2005 by changing allowed land uses in the Campus Industrial zone to  
17 accommodate the Crisis Center. Nor, on information and belief, does the  
18 City intend to amend its Land Development Code governing the applicable  
19 permitting process.  
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22 33.

23  
24 The CAS Property is not currently located within the corporate limits  
25 of the City and is required to be annexed to the City to permit the Crisis  
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1 Center under HB 2005. The City conducted a Development Initiation  
2 Meeting (“DIM”) with Lane County and PeaceHealth on August 21, 2025, to  
3 discuss the annexation of the CAS Property.  
4

5 34.

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7 Declarations by the Court on Plaintiffs’ requests and contentions will  
8 resolve the controversies between the parties described below and will  
9 eliminate uncertainty as to the rights of the parties under HB 2005 and the  
10 City’s Comprehensive Plan and Land Development Code.  
11

12 **FIRST CLAIM FOR RELIEF**

13 **(Declaratory Relief under ORS 28.020)**

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15 35.

16  
17 Plaintiffs reallege and incorporate by reference all those allegations set  
18 forth above as though fully set forth herein.  
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20 36.

21 Plaintiffs are legally entitled to utilize the procedural due process  
22 rights provided to them pursuant to ORS chapter 227 and the City’s Land  
23 Development Code relating to the City of Springfield’s issuance of a land  
24 development permit for the Crisis Center. HB 2005 prescribes a procedure  
25

1 for siting the Crisis Center that conflicts with ORS chapter 227 and the City's  
2 Land Development Code. Implementation of the siting procedure  
3 prescribed by HB 2005 by the City would deprive Plaintiffs of their due  
4 process rights under ORS chapter 227 and the City's Land Development  
5 Code.  
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8 37.

9  
10 There is a justiciable controversy in that the City intends to proceed to  
11 process and issue a land development permit for the Crisis Center pursuant  
12 to HB 2005 without providing the procedural requirements of ORS chapter  
13 227 and the City's own Land Development Code.  
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15 38.

16  
17 Plaintiffs are entitled to a declaration that they are entitled to utilize  
18 the procedural rights afforded to Plaintiffs by ORS chapter 227 and the City's  
19 Land Development Code relating to the City of Springfield's issuance of a  
20 land development permit for the Crisis Center.  
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**SECOND CLAIM FOR RELIEF**

**(Declaratory Relief under ORS 28.020)**

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Plaintiffs reallege and incorporate by reference all those allegations set forth above as though fully set forth herein.

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227.173(1) provides *inter alia*:

“(1) Approval or denial of a discretionary permit application shall be based on standards and criteria, which shall be set forth in the development ordinance and which shall relate approval or denial of a discretionary permit application to the development ordinance and to the comprehensive plan for the area in which the development would occur and to the development ordinance and comprehensive plan for the city as a whole.”

Siting of the proposed Crisis Center violates ORS 227.173(1) because the City’s Comprehensive Plan and Land Development Code prohibit siting the Crisis Center on the CAS Property.

1 41.

2 Plaintiffs are entitled to a declaration that the City is required to amend  
3 its Comprehensive Plan and Land Development Code before issuing a  
4 development permit for the Crisis Center in the Campus Industrial zone.  
5

6 42.

7  
8 There is a justiciable controversy in that the City intends to evaluate a  
9 land development permit for the Crisis Center pursuant to HB 2005, rather  
10 than standards and criteria set forth in the local Comprehensive Plan and  
11 Land Development Code, in contravention of ORS 227.173.  
12

13  
14 **THIRD CLAIM FOR RELIEF**

15 **(Declaratory Relief under ORS 28.020)**

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17 43.

18 Plaintiffs reallege and incorporate by reference all those allegations set  
19 forth above as though fully set forth herein.  
20

21 44.

22 Article IV, Section 20 of the Oregon Constitution provides:  
23

24 **“Section 20. Subject and title of Act.** Every Act shall  
25 embrace but one subject, and matters properly  
26 connected therewith, which subject shall be

1 expressed in the title. But if any subject shall be  
2 embraced in an Act which shall not be expressed in  
3 the title, such Act shall be void only as to so much  
4 thereof as shall not be expressed in the title.”

45.

5 HB 2005 embraces more than one subject. Sections 1 through 37 of HB  
6 2005 address civil commitment of persons with mental illness by amending  
7 statutes in ORS chapters 127 and 426. Sections 37-40 concern the intersection  
8 of state and tribal courts related to involuntary hospitalization and  
9 behavioral health treatment of tribal members. Sections 41-42 amend the  
10 Oregon Administrative Procedures Act (ORS chapter 183) related to the  
11 Oregon Health Authority. Sections 43-57 relate to crimes and criminal  
12 justice proceedings. Finally, Sections 58-61 amend Oregon land use laws at  
13 ORS chapters 197 and 197A to facilitate siting of certain facilities, including,  
14 but not limited to, the Crisis Center, without reference to whether those  
15 facilities relate to the civil and criminal proceedings described in other  
16 portions of the bill.  
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23 These various subjects are not expressed in the title of HB 2005 and the  
24 procedural maneuvers used by the sponsors of HB 2005 deprived the  
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1 legislative assembly and the public with notice of the subjects of the bill,  
2 including notice of the subjects related to land use.

3  
4 46.

5 Plaintiffs are entitled to a declaration pursuant to ORS 28.020 that HB  
6 2005 violates the single-subject requirement of the Oregon Constitution.  
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8 47.

9 There is a justiciable controversy in that the City intends to proceed to  
10 process and issue a land development permit for the Crisis Center pursuant  
11 to HB 2005 without providing the procedural requirements of ORS chapter  
12 227 and the City's own Land Development Code.  
13  
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15 **FOURTH CLAIM FOR RELIEF**

16 **(Declaratory Relief under ORS 28.020)**

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18 48.

19 Plaintiffs reallege and incorporate by reference all those allegations set  
20 forth above as though fully set forth herein.  
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1 49.

2 Plaintiffs have property rights recognized by state law due to the  
3 proximity of their above-described property to the proposed Crisis Center.  
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5 50.

6 Plaintiffs are entitled to a declaration that the above-described  
7 provisions in HB 2005 violate Plaintiffs' procedural due process rights  
8 afforded by the Due Process Clause of the Fourteenth Amendment to the  
9 United States Constitution.  
10  
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12 51.

13  
14 There is a justiciable controversy in that the City intends to proceed to  
15 process and issue a land development permit for the Crisis Center pursuant  
16 to HB 2005 without providing the procedural requirements of ORS chapter  
17 227 and the City's own Land Development Code.  
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1 **FIFTH CLAIM FOR RELIEF**

2 **(Injunctive relief under ORS 28.080)**

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4 52.

5 Plaintiffs reallege and incorporate by reference all those allegations set  
6 forth above as though fully set forth herein.  
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8 53.

9 ORS 28.080 authorizes this Court to grant supplemental relief based  
10 upon a declaration issued under ORS chapter 28.  
11

12 54.

13 If this Court issues the declaratory relief requested, then the City has  
14 no lawful right to issue a development permit for the proposed Crisis Center  
15 without complying with its Comprehensive Plan and Land Development  
16 Code.  
17  
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19 55.

20 Plaintiffs seek injunctive relief as an equitable remedy because no  
21 other legal remedy is available or adequate to prevent the City from issuing  
22 a development permit for the proposed Crisis Center in a zone that does not  
23 permit such use, and without the due process protections afforded property  
24  
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1 owners as required by ORS chapter 227. Plaintiffs do not seek injunctive  
2 relief preventing Lane County and PeaceHealth from acquiring approval for  
3 its proposed Crisis Center under the City's current Comprehensive Plan and  
4 Land Development Code.  
5

6 **WHEREFORE,** Plaintiffs pray for a declaratory judgment and decree  
7 as follows:  
8

9 A. A declaration that HB 2005 is unconstitutional;  
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11 B. A declaration that HB 2005 does not exempt the City from  
12 complying with its due process requirements associated with the issuance of  
13 a development permit for the proposed Crisis Center if the Court declares  
14 that HB 2005 is constitutional;  
15

16 C. A declaration that the City is required to amend its  
17 Comprehensive Plan and Land Use Regulations before issuing a  
18 development permit for the proposed Crisis Center;  
19  
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21 D. A declaration that the above-described provisions in HB 2005  
22 violate Plaintiffs' procedural due process rights afforded by the Due Process  
23 Clause of the Fourteenth Amendment to the United States Constitution;  
24  
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1 E. An injunction order restraining the City from issuing a  
2 development permit for the proposed Crisis Center until the Court renders  
3 its determinations; and  
4

5 F. A judgment for Plaintiffs awarding costs, disbursements, and  
6 such other relief this Court may deem just and equitable.  
7

8 DATED this 9<sup>th</sup> day of October, 2025.

9 HATHAWAY LARSON LLP  
10

11 By: /s/ Gregory S. Hathaway  
12

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15 Portland, OR 97209

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18 *Of Attorneys for Plaintiffs G Group, LLC; 200  
19 International Way, LLC; McKenzie-Gateway  
20 Business Park, LLC; and Northbank Property,  
21 LLC*  
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*Of Attorneys for Plaintiff Richardson Sports, Inc.*

# EXHIBIT 1

**Map & tax lots 17-03-15-5400, 17-03-15-30-400**  
 ~18-acre site pending acquisition by Lane County/PeaceHealth for Crisis Center

**Map & tax lot 17-03-15-40-600**  
 ~14-acre Richardson Property

**Map & tax lot 17-03-15-40-3600**  
 ~2.4-acre 200 International Way, LLC property managed by G Group

**Map & tax lot 17-03-14-00-1001**  
 ~11-acre undeveloped PeaceHealth property

**Map & tax lots 17-03-15-30-202, -201**  
 ~10-acre Northbank Property, LLC property managed by G Group

**Map & tax lots 17-03-15-40-1101, -1103, -1200**  
 ~38-acre site of existing PeaceHealth Riverbend Annex

**Map & tax lot 17-03-15-30-700**  
 8-acre McKenzie-Gateway Business Park, LLC property managed by G Group

**Map & tax lot 17-03-15-40-1102**  
 ~4-acre site of future LifePoint/PeaceHealth rehabilitation facility, recently rezoned Medical Services

**Map & tax lots 17-03-14-1802, -1900, 17-03-23-1700, 17-03-23-22-100**  
 ~52-acre area zoned R-2, mostly undeveloped

**Map & tax lots 17-03-22-4102, -4200, -4000, -3500, -3900, -3600, -3401, -3402, -3800**  
 ~40-acre Mixed Use Commercial-zoned area here generally undeveloped except for parking lot

**Map & tax lots 17-03-22-4101, -4102**  
 ~43-acre area zoned Medical Services with existing PeaceHealth hospital (~20 acres undeveloped)

**Map & tax lot 17-03-22-3700**  
 ~8-acre undeveloped property zoned R-2

## Legend

-  Campus Industrial (CI) zoned property
-  PeaceHealth property
-  CAS Property/proposed Crisis Center
-  Richardson Property
-  Properties managed by G Group

