



# Oregon

Theodore R. Kulongoski, Governor

## Department of Land Conservation and Development Community Services Division South Willamette Valley Field Office

644 A Street  
Springfield, OR 97477  
971.239.9453 – Mobile  
ed.w.moore@state.or.us

Web Address: <http://www.oregon.gov/LCD>

January 29, 2010

Linda Pauly  
Principal Planner  
City of Springfield  
225 5th Street  
Springfield, Oregon 97477



**Transmitted electronically via e-mail to [lpauly@ci.springfield.or.us](mailto:lpauly@ci.springfield.or.us)**

RE: Comments on the Springfield 2030 Refinement Plan (2030 Plan); Springfield File # LRP2009-00015 – DLCD File # Springfield PAPA 011-09

Dear Ms. Pauly:

The Department of Land Conservation and Development (DLCD) thanks the City of Springfield for submitting the proposed Springfield Development Code (SDC) amendments as the first phase of Land Use Efficiency Measures arising from the City's Residential Lands Study project. Please enter the following comments into the record of all hearings on the proposal.

### **Springfield Development Code Amendments –**

A) **Section 3.2-205 B:** This section proposes a new residential district for small lot residential development, or an SLR District. The SLR District proposes a minimum density of 8 dwelling units per net acre and a maximum density of 14 dwelling units per net acre. The existing Low Density Residential District has a density range of 6 – 14 dwelling units per net acre. As a land use efficiency measure the establishment of a new district would have minimal if any benefit. If the establishment of an SLR zoning district is to be used as an efficiency measure for purposes of establishing a UGB for Springfield, the City needs to demonstrate how many more residential units, and for which housing types and at what densities, can be accommodated within the proposed UGB through application of the SLR District verses the existing LDR District.

### **B) Section 3.2-210 – Schedule of Use Categories for residential zones:**

- Since the purpose of SLR is for housing types not permitted in LDR, the location restriction on duplexes should be removed and duplexes should be an outright permitted use anywhere in SLR as an additional efficiency measure, and also to encourage a more affordable housing type.

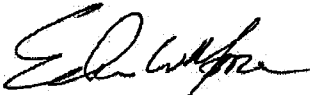
The only difference between the LDR and the SLR from the table appears to be the size of the lot. This would seem to be inconsistent with the definition of the SLR District which is to “encourage a mix of attached and detached single family dwellings and reduced lot/parcel sizes that are permitted outright.”

- To achieve more efficient use of land within the medium and high density residential districts, MDR and HDR respectively, detached single-family housing, including zero lot-line single-family housing and manufactured houses on individual lots, should not be allowed in the MDR and HDR Districts (allowing land to be used for other more appropriate housing types); and duplexes should be an outright permitted use and not subject to special development standards.
- The SLR District does not allow mobile home parks as shown in this section. ORS 197.480(1)(b) requires permitting manufactured home parks in all zones with density ranges of 6-12 units/acre. Since the SLR zone falls within this density range, the schedule of uses table needs to be amended to allow mobile home parks in the SLR.

I have also taken the liberty to attach a PDF copy of the proposed SDC amendments with additional comments/ suggestions in the margin for your consideration.

Should the city have any questions regarding this process please do not hesitate to contact me by phone at (971) 234-9453 or by e-mail at [ed.w.moore@state.or.us](mailto:ed.w.moore@state.or.us).

Respectfully,



Ed Moore, AICP  
South Willamette Valley Regional Representative

- c. Bill Grile, Director, Springfield DSD  
Kent Howe, Planning Director, Lane County  
File: Springfield PAPA 011-09