

**LAW OFFICE OF BILL KLOOS, PC**

OREGON LAND USE LAW

375 W. 4<sup>TH</sup> STREET, SUITE 204  
EUGENE, OR 97401  
TEL (541) 343-8596  
FAX (541) 343-8702  
E-MAIL BILLKLOOS@LANDUSEOREGON.COM

February 17, 2010

Springfield Planning Commission  
c/o Springfield Dev't Services Dept.  
225 Fifth Street  
Springfield, OR 97477

Lane County Planning Commission  
c/o Lane County Land Management Division  
125 E. 8th Ave.  
Eugene, OR 97401

Re: Springfield Refinement Plan and Related Documents; File LRP 2009-00014  
Testimony of Home Builders Association of Lane County (HBA)

Dear Commissioners:

Please accept this testimony on behalf of the Home Builders Association of Lane County (HBA). The HBA and its members have participated in and supported this process in various ways since its inception. The final product will provide the basic roadmap for housing development for the next two decades. It will reflect the most significant policy choices for housing in Springfield in at past two decades. This process is also being carefully reviewed by state officials. With this letter I intend to flag several issues that are of the most importance to the HBA.

**1. Summary.**

The general proposal is to make the changes to the plan and code that are needed to accommodate 20 years of residential growth inside the existing UGB, largely by boosting densities. In making these changes the city has the obligation to apply all the relevant statewide planning goals. However, densities can only be boosted if facilities and services will be available to accommodate the increase. If the city is unable to accommodate all new growth inside the UGB in compliance with the goals, it will need to examine other alternatives, such as expanding the UGB. We make several points in this letter:

The city and the DLCDC have ignored the requirement to ensure that the 20-year land supply can be developed under clear and objective standards, as required by Goal 10. The city needs to ensure this right for all of the residential inventory land inside the UGB. Land that can't be developed under clear and objective standards needs to be debited from the inventory and other land needs to be added, even if it means pushing the UGB.

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Moving to a 100% parcel-specific plan for the city is a good policy, as it reduces the pressure to push the UGB. Land that does not have a definitive residential plan designation can't be counted toward meeting the 20-year supply.

The kinds of plan and code changes being considered by the city trigger Goal 12 and the TPR. The city must apply the TPR now, not later. The proposed densification likely will have a significant affect on state and local transportation facilities. The city may find that it can't meet both the ODOT standards for transportation (meeting mobility standards with existing and planned facilities) and the DLCDC standards for land use (going up in the UGB rather than out with the UGB). The city may be caught between two state gorillas with conflicting positions in the same comprehensive and coordinated land use scheme. These days ODOT may be the stronger gorilla. The city may not be able to comply with the TPR if it holds the UGB for residential growth.

Under the current code, any appreciable development proposal requires the city to determine there will be adequate capacity in public facilities. Boosting future residential densities to hold the current UGB creates phantom capacity if the facilities won't be there to support development. The city needs to do the analysis now to ensure that existing and planned facilities will provide the capacity to accommodate the new increment of growth being planned.

**2. The plan and code need language that ensures that, for all land in the 20-year residential BLI, owners have the right to develop needed housing under clear and objective standards, as required by statutes, Goal 10, and the Goal 10 rule.**

This is a requirement of state law. It has not been reflected in the Springfield plan and code in recent decades. Language is needed in the plan and code to ensure this right in the future. In the alternative, lands that are not developable under clear and objective standards need to be identified, debited from the BLI, and the deficit made up by adding more land to the UGB that can be developed consistent with state law.

The residential lands that the city inventories as buildable for needed housing must be developable under clear and objective standards. ORS 197.307(6); OAR 660-08-015.<sup>1</sup> This requirement has been in place in the statute and the rule since 1981 and 1982, respectively.

Eugene and Springfield stumbled over this requirement in their first effort to have the Metro Plan acknowledged in 1981. The initial DLCDC review of the 1980 Metro Plan and Eugene and

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<sup>1</sup> The language is identical in the statute and the rule. OAR 660-008-0015 states:

"Local approval standards, special conditions and procedures regulating the development of needed housing must be clear and objective, and must not have the effect, either of themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay."

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Springfield implementing measures found the submittal to be deficient under Goal 10 for failure to have clear and objective standards for approval of development on Goal 10 land.<sup>2</sup> Changes had to be made to the plan and the code to ensure only clear and objective standards would be applied to the Goal 10 inventory land.<sup>3</sup>

The requirement for clear and objective standards remains in place today, although the legislature in 1997 allowed for an alternate approval track for standards that are not clear and objective, provided that land owners retain the option of developing under clear and objective standards.<sup>4</sup> Eugene took advantage of the 1997 statute by providing two tracks for each of the five approaches to developing residential land when it gave its zoning code a complete makeover in 2001. For each approach to developing housing it adopted alternative standards – a “General” track and a “Needed Housing” track. The former has discretionary standards; the latter has clear and objective standards.<sup>5</sup> Eugene’s recasting of its code to come into compliance was reviewed comprehensively by LUBA, with many pieces of the code being remanded by LUBA for failure to be clear and objective. See *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370 (2002).

In contrast to Eugene, Springfield comes to this planning effort with code standards that, over the decades, have migrated away from clear and objective standards. The current planning effort has not focused on giving the code a fresh shake down to meet the standard. It is time to do that, in order to comply with state statutes and Goal 10.

Lands that can be developed under clear and objective standards meet the state requirement; lands that cannot do not meet the state requirement. The city planning effort needs to identify which residential lands can be developed under clear and objective standards. Those lands can be included in the inventory; others may not.

There is a subtle but important gloss on the state requirement for clear and objective standards

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2 See DLCD Acknowledgment of Compliance Staff Report (June 12, 1981) at 86.

3 See DLCD Acknowledgment of Compliance Staff Report (July 29, 1982) at 25-31.

4 The alternative track language adopted in 1997 appears in ORS 197.307(3)(d) and states:

“In addition to an approval process based on clear and objective standards as provided in paragraph (b) of this subsection, a local government may adopt an alternative approval process for residential applications and permits based on approval criteria that are not clear and objective provided the applicant retains the option of proceeding under the clear and objective standards or the alternative process and the approval criteria for the alternative process comply with all applicable land use planning goals and rules.”

5 There are five tracks for getting housing approvals in the Eugene code under clear and objective standards. These are: partitions (EC 9.8220); subdivisions (EC 9.8520); Conditional Use Permits (EC 9.8100); Site Review (EC 9.8445); and Planned Unit Developments (EC 9.8325). There are also standards for development of multi-family housing, which are supposed to be clear and objective. EC 9.5500.

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for housing. Lands must be actually developable; if the clear and objective standards are so stringent as to prevent development, then those lands are not countable toward the inventory. Eugene has amended its code over the years to discourage people from applying under the clear and objective standards, to push them into the discretionary track. Eugene's 2001 code amendments illustrate how this works. In reviewing the new 2001 code, LUBA struck down standards for stormwater regulation that, although clear and objective, were so stringent that they prevented development.<sup>6</sup> In response to the LUBA opinion, the city removed the offending stormwater standards in 2002.

The current Springfield code does not guarantee landowners the right to develop lands in the 20-year buildable land supply under clear and objective standards. Draft changes to the code do not guarantee this right either. The draft Springfield Refinement Plan (SRP) is silent about this right as well. This omission needs to be corrected if the city hopes to have its SRP and implementing measures acknowledged.

There are several ways to approach this task. (1) The city could amend its plan and implementing regulations to excise all standards that are not clear and objective from any collection of standards that are potentially applicable to the development of housing on the 20-year inventory of land. (2) The city could follow the Eugene model, discussed above, and offer two tracks for any city approvals of needed housing – one with discretionary standards and one with clear and objective standards. (3) Finally, the city could add language to its plan and code

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6. *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370 (2002). LUBA said:

**"2. Stormwater Runoff**

"In section II.A.2.u, we held that LUCU 9.8325(10) imposes a clear and objective requirement that stormwater runoff from a PUD will not "create negative impacts on natural drainage courses" such as erosion, turbidity or sediment transport, "due to increased peak flows or velocity." We agreed with the city that, while LUCU 9.8325(10) may be difficult to meet, its prohibition on negative impacts of the specified type is clear and objective. Petitioners argue that, even if LUCU 9.8325(10) is clear and objective, it nonetheless offends the needed housing statute, because it is so difficult to meet that it effectively forces needed housing applicants to opt for the alternative, discretionary track. Petitioners submit that rain falls on all development, and all water moving across ground carries some sediment, creates some turbidity, and has some erosional component, no matter how minute, and therefore no PUD could possibly comply with LUCU 9.8325(10).

"We agree with petitioners, at least in the abstract, that imposing a clear and objective standard that is impossible or virtually impossible to meet is a prohibition in the guise of a standard ORS 197.307(3)(d) allows the city to offer a discretionary approval track, "provided the applicant retains the option of proceeding under the clear and objective standards[.]" That option is illusory if the clear and objective standards are impossible to satisfy. It may not be the case that LUCU 9.8325(10) is impossible to satisfy. However, the city provides no assistance on this point, or indeed any response to this subassignment of error at all. Accordingly, we sustain this subassignment of error." [Footnote omitted.]

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that clearly guarantees landowners the right to development approvals under only clear and objective standards. This would have the effect of negating the applicability of current or proposed plan and code standards that are not clear and objective.

The third option, of course, would be the most efficient mechanism in the context of the current planning effort, where the city has a lot of other planning work to do, and in a short time frame. We offer the following language as a suggested starting point for consideration by the city:

Add to the Residential Land Use and Housing Element of the SRP the following policy language:

“Consistent with the Needed Housing Statute, Goal 10, and the Goal 10 rule, persons developing needed housing on land in the 20-year buildable land inventory are entitled to city decisions that apply only standards, conditions, and procedures that are clear and objective and that do not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay. ORS 197.307(6); OAR 660-08-015. The city may have an alternative approval process based on standards that are not clear and objective, provided applicants retain the option of proceeding under either process. ORS 197.307(3)(d). The city’s implementing regulations shall be drafted, interpreted and applied in a fashion that implements this right.”

In the zoning code and other implementing regulations, the city needs to add language that implements these rights. The language should be broad enough that it is effective immediately. We suggest the following language:

“Notwithstanding any other provisions of this zoning code or other implementing regulations, development applications for needed housing on land in the 20-year buildable land inventory shall be reviewed under standards, conditions, and procedures that are clear and objective, and that do not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay. Standards that are not clear and objective shall not be applied unless and applicant affirmatively elects processing under such standards.”

The current code is rife with standards related to needed housing that are not clear and objective. It would be accurate to say that no residential land in the city, which requires a land use decision or limited land use decision prior to applying for a building permit, presently can be developed under clear and objective standards, as required by state law. A few examples follow:

*Partition and Subdivision Tentative Plans:*

Capacity requirements for public and private improvements to be determined by Public Works Director, without clear standards being stated. SDC 5.12-125.C.

Protection standards for significant clusters of trees. SDC 5.12-125.C.; SDC 5.19-125.

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Parking area and ingress-egress standards with language like "facilitate," "avoid congestion." SDC 5.12-125.F.

Discretionary conditioning on a range of issues, including redesigning or reducing the size of the development, to "mitigate identified negative impacts to surrounding properties." SDC 5.12-130.

Sight obscuring fencing requirement at the discretion of any citizen or the Director. SDC 5.12-130.B.

*Site Plan Review for single family and duplex dwellings on Medium and high Density land, and all Multi-family residential development:*

Capacity requirements for public and private improvements to be determined by Public Works Director. SDC 5.17-125.B.

Protection standards for significant clusters of trees. SDC 5.17-125.E; SDC 5.19-125.

Parking area and ingress-egress standards with language like "facilitate," "avoid congestion." SDC 5.17.D.

Discretionary conditioning on a range of issues, including redesigning or reducing the size of the development, to "mitigate identified negative impacts to surrounding properties." SDC 5.17-130.

Sight obscuring fencing requirement at the discretion of a citizen or the Director. SDC 5.17-130.B.

**3. The proposed draft of the Springfield Refinement Plan (SRP) would adopt a 100% parcel-specific refinement plan for the city. This is a good policy change, which maximizes the acreage that can be counted in the residential BLI. The city should stick with this policy through the balance of the plan amendment process.**

The city is proposing to use the SRP to confirm the plan designation for every tax lot in the city. This will maximize the amount of land that can be counted toward each BLI. This policy should be preserved through the balance of the planning process. If this policy is abandoned for any reason, such as objections from persons commenting or planning requirements of the DLCDD, the city will need to debit from each BLI the tax lots and acreage for which the Metro Plan diagram does not provide a definitive plan designation. Then the needed acreage will need to be made up somewhere else, such as by expanding the UGB.

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The balance of the discussion here explains why a 100% parcel specific plan designation is needed and why the city does not have one now.

Buildable residential land must have a residential designation on the plan. OAR 660-008-0020(1).<sup>7</sup> As a result of the "housekeeping amendments" in 2004, the Metro Plan became partially, but not completely, parcel-specific.

The following language was added to the Metro Plan in 2004:

"The Plan designation of parcels in the Metro Plan Diagram is parcel-specific in the following cases:

1. Parcels shown on the Metro Plan Diagram within a clearly identified Plan designation, i.e., parcels that do not border more than one Plan designation;
2. Lands outside the UGB within the Metro Plan boundary;
3. Parcels with parcel-specific designations adopted through the citizen-initiated Plan amendment process;
4. Parcels shown on a parcel-specific refinement plan map that has been adopted as an amendment to the Metro Plan Diagram.

There is a need for continued evaluation and evolution to a parcel-specific diagram. The Metro Plan designations below, Metro Plan policies, adopted buildable lands inventory analyses, refinement plans, and local codes provide guidance to local jurisdictions in determining the appropriate Plan designation of parcels that border more than one Plan designation within the metropolitan UGB." [Metro Plan at II-G-2].

The Home Builders argued to the three elected bodies during the 2004 housekeeping amendment process that the Metro Plan should be 100% parcel-specific. That is, in order to provide certainty to landowners, every parcel should have a clear plan designation on the Metro Plan; no parcels should be of indeterminate plan designation. The Springfield and Eugene city attorneys advised

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<sup>7</sup> 660-008-0020(1) says:

**Specific Plan Designations Required**

(1) Plan designations that allow or require residential uses shall be assigned to all buildable land. Such designations may allow nonresidential uses as well as residential uses. Such designations may be considered to be "residential plan designations" for the purposes of this division. The plan designations assigned to buildable land shall be specific so as to accommodate the varying housing types and densities identified in the local housing needs projection.

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that a 100% parcel-specific plan designation was not required by state law.<sup>8</sup> The elected bodies adopted the language above, making the diagram less-than 100% parcel specific.<sup>9</sup> The LCDC agreed on appeal that the plan is not required to be 100% parcel specific.<sup>10</sup>

So, as things stand now, going into the HB 3337 planning process, the Metro Plan does not assign a definitive plan designation to every parcel. However, under the Goal 10 rule quoted above, "buildable" lands must have a residential plan designation. Absent the current proposal to designate each tax lot with a plan designation, the city would have to determine which of the tax lots in the Metro Plan area inside the UGB do not have a definitive residential plan designation. From the plan language quoted above, we know that the following tax lots do carry a definitive parcel-specific residential plan designation: (1) parcels that are coded with a residential plan designation in the RLID database approved with the housekeeping amendments and which are not adjacent to a boundary line between two plan designations; (2) other parcels with a residential plan designation shown on parcel-specific refinement plans; and (3) other parcels that have been given residential plan designations in city council decisions. Other parcels do not have a definitive residential plan designation, even though they may be coded as residential in the RLID database.

Presently the tax lots on the Metro Plan that do not have a definitive residential plan designation occupy what might be called a "fuzzy line" on the Metro Plan diagram. Absent the proposed policy, the number and acreage of tax lots that are on the fuzzy line would need to be identified and quantified so that they can be deducted from the inventories.

Again, the HBA supports the proposed shift to a 100% parcel specific plan diagram, in the form of the SRP plan diagram, which would refine the Metro Plan diagram. This policy provides the most certainty to land owners and developers. It also minimizes the pressure to expand the UGB. It is probably the single most effective policy choice the city can make to reduce the pressure on the UGB. We urge the city to stick with this policy in the balance of the planning process.

**4. For land inside the current UGB, the city must apply Goal 12 and demonstrate that its proposed amendments to its plan and implementing regulations will comply with the TPR.**

The draft SRP and related documents propose adding 20-year's residential growth to the lands in the existing UGB. This policy reflects the assumption that there is (or will be) sufficient land and infrastructure in the existing UGB to accommodate that growth. The city's analysis of growth thus far has focused on the supply of land, and making changes to regulations that will ensure that the increment of population can be housed on the existing land supply – without

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8 Ltr from E. Jerome, City Attorney, to K. Yeiter, Planner (March 1, 2004)

9 See Eugene Ordinance No. 20319 (April 17, 2004).

10 LCDC Order 05-WKTASK-001662, Approving Periodic Review Work Task 17 (May 3, 2005).

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needing to add any land to the UGB. The DLCD's comments have focused on land supply too; its theme has been to urge boosting assumptions about residential development and redevelopment densities, and making code changes to ensure the higher densities will be realized.

Like land supply, transportation capacity is a constraint on development capacity. It is just as important as the land supply. But it has been largely ignored in the public discussion of the HB 3337 strategy thus far. The DLCD has been largely silent about Goal 12 in its extensive and spirited comments filed thus far, perhaps assuming that the ODOT would make its own appearance. But the ODOT has been silent, too. Regardless, the transportation capacity issue is one the city must address now. *Willamette Oaks, LLC v. City of Eugene*, 232 Or App 29, 220 P3d 445 (2009).

Under the Transportation Planning Rule, land can't be replanned or rezoned for development, and regulations can't be amended to boost density without complying with the TPR. Under the city code, development proposals can't go forward without demonstrating the Level Of Service standards will be met.

The issue here for the HBA is one of creating phantom capacity – that is, a land supply that is inventoried as available for residential development or redevelopment, but which can't actually be developed at its planned density because the existing and planned transportation system won't support the increment of traffic. The HBA wants to ensure that the HB 3337 package adopted by the city has real capacity for growth, and no phantom capacity. Holding the SRP proposal up against Goal 12 now is one way to shake out phantom capacity.

If the 20-year buildable land supply inside the existing UGB can't be approved as consistent with Goal 12, then the city will need to look outside the existing UGB to make up the deficit. We realize, of course, that the answers here are only partially in the control of the city. The city may have some flexibility to amend TransPlan or its regulations to lower its own LOS standards on city facilities to allow more crowding on city streets in order to accommodate more growth. However, ODOT is in charge of state transportation facilities. If the city's HB 3337 program will cause state facilities to fail, at the end of the planning horizon, and the ODOT will not budge on its own plan or standards, then the city may need to shift its HB 3337 strategy, looking to spread future growth out rather than push it up. It may be that the ODOT, with its TPR, becomes the gorilla that prevents the city and the DLCD from achieving their preferred growth option of putting 20-years residential growth into the existing UGB. If ODOT has been at the table in the SRP planning thus far, it has been pretty quiet.

The legal requirement to address Goal 12 now, for most parts of this HB 3337 process, is plain from the statutes and regulations that apply. The notable exception is land being added to the UGB but held with zoning that does not allow uses that would generate more vehicle trips. See Goal 14 Rule; OAR 660-024-0020(1)(d). The city is proposing to take advantage of this provision with respect to the employment land it proposes to add to the UGB.

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The general rule is that all goals and rules apply when establishing or amending a UGB. OAR 660-024-0020(1). The city's scope of work under HB 3337 is to "establish" an Urban Growth Boundary, and to do this work in compliance with ORS 197.296. ORS 197.304(1)(a), (b). ORS 197.296(8) states directly that plan and code amendments made by the city to accommodate 20-years residential growth must comply with the statewide planning goals.

Goal 12 compliance is required at the time of the anticipated city action amending the plan or code that triggers Goal 12. Compliance may not be deferred to a later date. *Willamette Oaks, LLC v. City of Eugene*, 232 Or App 29, 220 P3d 445 (2009).

The city posture here, with respect to the need to comply with the TPR is similar to what it was in the context of the PeaceHealth Riverbend litigation. See *Jaqua v. City of Springfield*, 46 Or LUBA 134 (Jan. 5, 2004), *rev'd in part* 193 Or App 573, 91 P3d 817 (2004)(remanding city plan and zone changes for PeaceHealth Riverbend). There the city was amending a refinement plan to facilitate siting the hospital; here the city is amending the plan and the code to collate 20-years population growth into the existing UGB. Each decision requires comply with the TPR, but the present task has a much, much greater scale.

Under the TPR, it is the city's proposed amendments to the "acknowledged comprehensive plan, or a land use regulation" that triggers Goal 12. OAR 660-012-0060(1). Many of the actions being taken by the city to comply with HB 3337 fall within this definition. These include: adoption of the SRP refinement plan text; adoption of the new SRP plan diagram, which makes specific plan designations that were previously indeterminate; changes to the plan designation and zoning of other individual tax lots, including resolving plan/zone conflicts; and adoption of efficiency measure regulations.

The city will need to take actions to comply with Goal 12 if any of its proposed amendments "would significantly affect an existing or planned transportation facility." OAR 660-012-0060(1). Considering the kinds of actions the city is contemplating, the test for "significantly affect" will be the standard set out in OAR 660-012-0060(1)(c):

"As measured at the end of the planning period identified in the adopted transportation system plan [(TSP)]:

"(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."

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There are two transportation system plans that are relevant here -- the Oregon Highway Plan and the Eugene/Springfield TransPlan. Each has a different planning horizon, and each applies to its respective transportation facilities. The Oregon Highway Plan has a much longer planning timeframe; applies to the more substantial transportation facilities that are critical to accommodating local growth; and, as reflected in the comments sprinkled through the record for the February 17 hearing, its facilities are likely to be significantly affected by the amendments being proposed.

**5. The city has built into its development code standards that require a public facilities and services capacity analysis for any new development. The capacity analysis standards limit development potential of any land. If these standards are to remain in the code, the city needs to ensure that the increment of population being allowed by the proposed amendments can be accommodated by existing and planned public facilities.**

The SRP proposes a number of changes that would increase residential density in many areas inside the existing UGB, as a way of accommodating 20-years growth without pressing the UGB. This policy will increase the demand on city services and facilities, such as roads, sanitary sewer, and stormwater. If the facilities and services can't be provided to accommodate the higher density, then the higher density can't actually be developed, and the "up not out" strategy inherent in the SRP is a fiction.

The question of adequacy of facilities comes into play in Springfield at the time of any development proposal. For example, in connection with almost any kind of development proposal, the city has to determine whether the existing and planned facilities and services can accommodate the specific development. Several examples follow:

Site Plan Review is required for any Multi-family residential development. SDC 5.17-105.B.2. In connection with getting Site Plan approval, the Public Works Director must determine there is adequate capacity in the public facilities, including streets, sanitary, and stormwater. SDC 5.17-125.B.

Partition and subdivision tentative plan approval requires a capacity analysis. The Public Works Director must determine there is adequate capacity in the public facilities, including streets, sanitary, and stormwater. SDC 5.12-125.C.

It may be that, at the time of a specific development proposal, the needed services are not immediately available, but they are planned to be developed in the future. In that event, the Public Works Director might deny the development for lack of capacity, but everyone would know that the development could be done in the planning period, because the needed facilities are in the plan. If, however, the facilities are neither adequate now nor planned to be adequate in the future, then the development can't be done immediately or during the planning period. In this event, the boost in allowed density being authorized now, as part of the SRP, is really creating phantom inventory for residential development. That is, the city would be adopting policies to absorb more growth without the prospect of having the actual capacity to do that.

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If the capacity analysis standard is to stay in the code, then the city has an obligation to conduct the analysis now, in connection with preparing the SRP, that supports a finding that the capacity in public facilities and services that will be needed to serve the proposed boost in density is available now or will be available during the planning period, based on planned improvements. If that finding can't be made, then the city will need to follow a different strategy for accommodating the projected residential development – for example, by expanding the UGB. If the city can't grow up because it won't have the capacity to do that, then it will need to plan to grow out. We need the answer to that question now.

The HBA looks forward to participating in the balance of this process in a constructive and positive way. It also looks forward to the prospect that both the DLCD and the ODOT will address the issues raised here in a thorough fashion.

Sincerely,

Bill Kloos

Cc: Laura Potter, Home Builders Association of Lane County  
Ed Moore, DLCD south Willamette Valley Region Representative  
Bob Cortright, DLCD Transportation Planning Coordinator  
Darren Nichols, DLCD Community Services Manager

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