

# CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS DEPARTMENT



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**TO:** House Committee on Housing, Oregon State Legislature  
**FROM:** Sandy Belson, Comprehensive Planning Manager, City of Springfield  
**DATE:** February 25, 2021  
**RE:** HB 2558

The City of Springfield appreciates the legislature's work to address the urgent and real housing needs that exist across Oregon and we support the principles of good planning, including increased density along transit corridors. Springfield is in the process of multiple comprehensive planning efforts to incorporate these concepts into our local land use plans. However, HB 2558 is an example of legislation that does not take into account the extensive time and effort by the City of Springfield and other local communities to develop and implement plans that are appropriate for our local context and fit within our larger planning framework.

One of the City of Springfield's most complex efforts regarding our local planning framework is our comprehensive housing strategy effort that began in 2016 with an evaluation of our local housing needs and the development of strategies that both increases the supply of housing and the accessibility of affordable housing throughout the housing continuum. This multi-pronged plan is being implemented on many fronts and includes a development code update project to lift the barriers to providing housing. Unfortunately, the increasing number of bills and administrative rules that mandate specific action are prohibitive to our efforts to address land use planning in a strategic and intentional way.

Specific concerns presented by HB 2558 include:

- Section 2(1): "Fixed guideway corridor" is not a term defined in the USC code referenced, nor is the term "fixed guideway public transportation system." "Fixed guideway" is defined, but it is unclear how the bill would apply in Springfield given that our bus rapid transit system (EmX) only "uses and occup[ies] a separate right-of-way or rail for exclusive public transportation" in limited locations along the EmX routes.
- Section 2(b)(A) includes two measures: a building height and a density. It is not clear which of these must be met. If the developer is not able to achieve 45 units per acre, does that mean the City must approve additional height? In addition, portions of Springfield's bus rapid transit system (EmX) have land on either side that is outside the city limits. It would be inappropriate to zone land to allow 45 units per acre when there are no city services – such as sanitary sewer, and public safety – to support that level of development.
- A segment of the EmX line passes through the Washburne Historic District. Historic homes in Springfield and the Washburne Historic District are generally one, one-and-a-half, or two stories in height. Historic Design Guidelines for the District state that size and scale in historic neighborhoods should be respected. This bill would require that we allow transformation of a portion of the District with multi-story apartment buildings be constructed next to one and two-story bungalows, completely overshadowing them.
- In 2020, the City of Springfield adopted parking reductions that also included further reduction in parking requirements for development in proximity to frequent transit. These reductions demonstrate support for public transit and reduced reliance on the automobile within our community. No parking minimums for residential uses, particularly those in

mixed-use areas, present several challenges. Not only will currently unsafe situations with unauthorized on-street parking be exacerbated in residential areas, but it could also increase costs for businesses that may need to enforce parking requirements as a result of residential area parking spilling into their parking lots.

- Not all, but much of the area along our EmX line that is planned and zoned residential or mixed-use is zoned to allow medium or high density residential, but even our high density residential doesn't allow for densities of 45 units per net acre (medium density is 14-28 units per net acre and high density is 28-42 units per net acre). HB 2558 would require Springfield to both rezone areas to high density and increase the densities allowed in those high-density areas, as well as amend the Comprehensive Plan Map to reflect these increased densities.
- Section 3 includes four different planning activities that would trigger the adoption of land use regulations or amendments to the comprehensive plan by a city to implement the activities in Section 2. The timing of these triggers needs to be clarified. For instance, it does not make sense to update zoning codes or amend comprehensive plans as part of a buildable lands inventory (Section 3 (1)) or a transportation system plan (Section 3 (2)). These activities would make sense as part of periodic review (Section 3 (3)) or following a housing capacity analysis (Section 3 (4)). Complying with the requirements of this legislative would be most efficient when the City would already be undertaking comprehensive plan and zoning map amendments to address the findings of fact that come out of either periodic review or a housing capacity analysis. Without additional clarity, it appears that the bill could ask us to undertake this work before we have properly analyzed our needs and take resources away from other needed planning projects.

The City of Springfield is committed to development that is supportive of our communities' transit investments and comprehensive planning efforts. We would appreciate the opportunity to participate in a conversation that includes our city planners for both housing and transportation in order to develop a comprehensive policy that will create the type of development the bill seeks to create in our jurisdiction. We did not have that opportunity with HB 2558. The bill does not recognize the ongoing work already underway by the City of Springfield for additional affordable housing, implementation of HB 2001 and 2003 as well as the requirements in support of higher density zoning and transit oriented development that are expected to come out of the rulemaking effort for Climate-Friendly and Equitable Communities.

As one of the few cities this legislation would apply to, we have serious concerns with how it would be implemented and what it would accomplish in our community. We oppose being included in HB 2558.