

From: [Susann Kaltwasser](#)
To: [CityRecorder](#)
Cc: [citycouncil](#)
Subject: 2021 Unified Development Code Update testimony
Date: Monday, December 6, 2021 8:34:28 AM
Attachments: [UDC middle housing code changes 12621.pdf](#)

Please enter the attached testimony from East Lancaster Neighborhood Association (ELNA) into the public hearing record regarding the UDC update, item 4.a. on the December 6, 2021 City Council Agenda.

Susann Kaltwasser
Co-President, East Lancaster Neighborhood Association



EAST LANCASTER NEIGHBORHOOD ASSOCIATION (ELNA)

December 6, 2021

To: Salem City Council
From: Susann Kaltwasser, co-president ELNA
RE: 2021 Unified Development Code Update (item 4.a.)

East Lancaster Neighborhood Association has discussed the proposed changes of Unified Development Code on several occasions. In summary the members support most of the Staff Report understanding that due to State legislation very little discretion is allowed by local governments.

ELNA strongly supports the revisions to the Tree Conservation rules. It would be good for the City to complete a full tree inventory of significant and heritage trees as well as Oregon White Oaks. There such be a strategy for how to prevent mass denuding of a property prior to an application for development. We understand that some properties might have remnants of old orchards or Christmas tree farms that are sometimes considered natural areas. But can be shown to not be native and purposely planted in order to be harvested. This kind of tree is not our main concern.

As to middle housing UDC changes ELNA may not like some elements, but we do accept some of the revisions. However, we do not support the elimination of all off-street parking minimum for middle housing as proposed by the Planning Commission. We feel that all housing should have a similar parking requirement of at least one off street parking space per dwelling unit.

We acknowledge that more parking can be provided, but to allow developers to have full discretion as to local needs is inviting problems that ELNA feels the City Council can wisely avoid. If a project truly cannot be built with the minimum parking requirement, the applicant can always apply for a variance to address a specific situation. But to make a no-onsite requirement citywide without recourse for city planning, seems unwise.

This parking requirement would then be the minimum across all density levels whether single, duplex, triplex, 4-plex or multifamily.

To not require new development to provide no off-street parking is unfair to existing and future single family and multifamily residents. It shifts the demand for parking to the public right of way, which other residents, visitors, and delivery vehicles are already competing for. It is not reasonable to assume all residents in middle housing units will not have a vehicle. It could create animosity and resistance to greater housing density in existing single family zones.

The second point that ELNA wishes to address is the fact that once these code changes got into effect and with the future zone changes in Our Salem there will be many projects that will be out right permitted uses that no longer will require public notice or any form of public hearing/ review process. If the developer has a project that meets the UDC codes they can just go to the PAC center and be issued a permit. The neighbors will have no notice prior to the bulldozers coming to do their work.

ELNA thinks this is going to create problems that while can't be totally avoided, might be softened somewhat by having the requirement to make a courtesy notice to at minimum the Neighborhood Association, but preferable to the neighbors. Currently an applicant must make contact with the NA prior to completing their application. This would be an extension of that process. And adjacent property owners might be included in at least a written notice. Through this process perhaps slight modifications can be made that could alleviate points of conflict.

Thank you for the consideration of the ELNA board in this matter.