



CITY OF LYONS

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ORDINANCE NO. P10-65-2019

AN ORDINANCE AMENDING TITLE 18 “ZONING” OF THE LYONS MUNICIPAL CODE

WHEREAS, the Planning Commission recommends the City allow accessory dwelling units adjacent to an existing single-family residence within the single-family residential (SFR) and the multiple-family residential (MFR) zones; and

WHEREAS, the Planning Commission held a public hearing on March 25, 2019 to consider the amendments and recommends the City Council adopt the proposed amendments; and

WHEREAS, the City Council held a public hearing on April 23, 2019; and

WHEREAS, the City Council continued the public hearing to the next regularly scheduled City Council meeting on May 28, 2019 at 6:00 p.m. and directed the City’s Planning Consultant to develop goal findings in support of the proposal; and

WHEREAS, on May 28 2019 the City Council continued the public hearing, received additional public testimony, closed the public hearing and deliberated on the proposal;

WHEREAS, the Lyons City Council concurred with the Planning Commission recommendation to allow accessory dwelling units within the City’s residential zones in order to provide an additional housing option for local residents.

NOW, THEREFORE, the City Council of the City of Lyons hereby ordains as follows:

SECTION 1. Findings. Findings of Fact as attached in Exhibit A and incorporated herein are hereby adopted as a basis for the adoption of the amendments to the Lyons Zoning Ordinance.

SECTION 2. Section 18.05.030 of the Lyons Municipal Code is hereby amended to add the following definition:

Accessory Dwelling – an interior, attached, or detached residential structure that is used in connection with, or that is accessory to, a single-family dwelling.

SECTION 3. Section 18.20.10.B.8 of the Lyons Municipal Code is hereby amended to add an accessory dwelling as a permitted use in the Residential, single-family zone and to read as follows:

Section 18.20.10.B.8 Residential, single-family zone, SFR

B. Uses Permitted Outright

8. *Accessory Dwellings, subject to requirements in Section 18.30.045.*

SECTION 4. Section 18.20.20.B.8 of the Lyons Municipal Code is hereby amended to add an accessory dwelling as a permitted use in the Residential, multiple-family zone and to read as follows:

Section 18.20.20.B.8 Residential, multiple-family zone, MFR

B. Uses Permitted Outright

8. *Accessory Dwellings, subject to requirements in Section 18.30.045.*

SECTION 5. Section 18.30.045 of the Lyons Municipal Code to establish standards for an accessory dwelling is hereby added to read as follows:

Section 18.30.045 Accessory Dwelling Standards. An accessory dwelling shall conform to all of the following standards:

- A. **One Accessory Dwelling Unit Per Site.** A maximum of one accessory dwelling is allowed per legal single-family dwelling. The accessory dwelling unit may be either
 1. a detached building, or
 2. located in a portion of an attached accessory structure (e.g. above a garage or in a workshop), or
 3. a unit attached to or interior to the primary dwelling and located on the same floor as the main living area of the primary dwelling (e.g. an addition to or the conversion of a portion of the primary dwelling).
- B. **Floor Area of the Accessory Dwelling.**
 1. A detached accessory dwelling shall not exceed 900 square feet of floor area.
 2. An attached or interior accessory dwelling shall not exceed 900 square feet of floor area. An attached or interior accessory dwelling shall be located on the same floor level as the main living area of the primary dwelling.
- C. **Other Development Standards.**
 1. **Basic Zoning Requirements.** An accessory dwelling shall meet all other development standards (e.g. height, setbacks, lot coverage, architectural design standards, etc.) for building in the zoning district.

2. Other Development Requirements. The accessory dwelling shall comply with all of the following standards:
- a. One additional off-street parking space is required for the accessory dwelling.
 - b. The on-site sewage disposal system must have adequate capacity to serve both the primary dwelling and the accessory dwelling unit and the proposed accessory dwelling unit is located so it does not impact the septic drain field. The applicant shall provide a written certification from the Linn County Environmental Health Department that the proposal complies with on-site disposal system requirements.
 - c. Conversion of an existing legal non-conforming structure to an accessory dwelling is allowed, provided that the conversion does not increase the non-conformity;
 - d. A Recreational Vehicle (RV) may not be used as an accessory dwelling.
 - e. The temporary placement of a manufactured home as an accessory dwelling to allow for care of a resident due to a medical hardship or for elder care is permitted subject to the provisions of LMC 18.30.130.

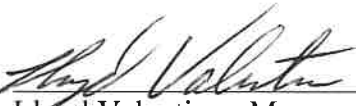
SECTION 6. SEVERABILITY

This ordinance is hereby declared to be severable. Should any section, clause, sentence or phrase of this ordinance be declared invalid by a court of competent jurisdiction, the remaining provisions shall continue in full force and effect and shall be read to carry out the purpose(s) of the ordinance before the declaration of partial invalidity.

This Ordinance read by title only on 28th day of May 2019.

This Ordinance passed by the Lyons City Council this 28rd day of May 2019.

APPROVED: _____


Lloyd Valentine - Mayor
City of Lyons, Oregon

Date: 5-28-2019

ATTEST:

By: Micki Valentine
Micki Valentine - Recorder
City of Lyons, Oregon

Date: 5/28/2019

Enclosure: Exhibit "A" – Findings of Fact

Exhibit A Ordinance P10-65-2019

Findings in support of the LYONS ZONING CODE AMENDMENT – ACCESORY DWELLING UNITS

In December 2018, the Lyons City Council requested the City staff prepare amendments to the Lyons Municipal Code to allow the construction of an accessory dwelling unit on any lot within the SFR and MFR residential zones where there is an existing single-family dwelling.

In 2017, the Oregon Legislature adopted Senate Bill 1051 requiring cities with a population over 2,500 persons to allow accessory dwellings within residential zones that are zoned to allow single-family dwellings. The requirements of SB 1051 do not apply to the City of Lyons but the City may adopt amendments to its zoning code to allow accessory dwellings. In March 2018 the Oregon Department of Land Conservation and Development issued an informational paper "Guidance on Implementing the Accessory Dwelling Units (ADU) Requirement under Oregon Senate Bill 1051". This City used this guidance paper to develop the city's proposed amendments to the Lyons Zoning Code.

The City concludes the proposal is in conformance with the Statewide Planning Goals and the Lyons Comprehensive Plan Goals and Policies.

STATEWIDE PLANNING GOALS

GOAL 1: CITIZEN INVOLVEMENT: TO DEVELOP A CITIZEN INVOLVEMENT PROGRAM THAT INSURES THE OPPORTUNITY FOR CITIZENS TO BE INVOLVED IN ALL PHASES OF THE PLANNING PROCESS.

The Lyons Planning Commission serves as the City's appointed Citizen Involvement Committee to review and update the existing comprehensive plan and development ordinances.

City Staff Involvement

City Planner David Kinney worked with City Recorder Micki Valentine to develop a code amendment proposal to allow accessory dwelling units in the city's single-family and multi-family residential zones.

Agency Coordination

The City provided notice of the proposed post-acknowledgement plan amendment to the Oregon Department of Land Conservation and Development (DLCD) February 1, 2019. The notice was provided 52 days prior to the initial public hearing on March 25, 2019.

Local Agencies. The City provided a notice of the public hearing and copies of the proposal to the following agencies:

- Lyons-Mehama Water District
- Lyons Rural Fire Protection District
- Linn County Planning Department, Attn: Alyssa Boles, and
- Linn County Environmental Health Department.

The notice requested the local agencies review the proposal and provide written comments to the City. Agencies were asked to return comments to the City prior to the March 25, 2019 public hearing before the Planning Commission. No

comments were submitted to the City. As of May 28, 2019, the City had not received any local agency comments.

Linn County GIS Department.

Linn County GIS staff provided housing data including a map of the existing housing stock, existing housing tables, and a map of vacant land in the R-1 and R-2 residential zones.

Local Citizen Involvement and Interested Party Testimony:

Copies of the proposal were made available to the public for review prior to the public hearings on the city's website, <http://cityoflyons.org>, and at City Hall. As part of the post acknowledgment amendment process, the City provided the community with the following notices and public comment opportunities:

Public Hearing Notices:

1. The City posted a Notice of Public Hearing at City Hall, the Lyons Post Office and other public locations in the City. The City advertised the hearings on the City's electronic message sign in front of City Hall.
2. The City published a public hearing notice in the Canyon Weekly, a local newspaper. The notice advertised both the Planning Commission and City Council hearings. The notice was published on Friday, March 8, 2019, more than 10 days prior to the Planning Commission public hearing on March 25, 2019.

Planning Commission Hearing and Public Testimony:

3. The Lyons Planning Commission held a public hearing on March 25, 2019 at City Hall. The City received the following public testimony:
 - Mark Orr, Lyons Oregon. Mr. Orr testified that the adoption of the ADU amendments would have permitted him the opportunity for him to construct an accessory dwelling on his property to care for a family member. Mr. Orr has a permit from the City to use a manufactured home as a medical hardship residence to care for a family member. Adoption of the ADU code would have allowed him to construct an ADU and eliminate the need for the medical hardship permit.

There was no other testimony, questions or comments provided to the Planning Commission. The public hearing record was closed at the conclusion of the hearing. The Planning Commission unanimously recommended the City Council adopt the ADU code amendments.

City Council Hearing and Public Testimony:

4. *Email from Mari Valencia, Enviroissues on behalf of the Fair Housing Council of Oregon (FHCO) and Housing Land Advocates (HLA).* On March 26, 2018, Mari Valencia, Enviroissues, on behalf of FHCO and HLA, corresponded by email with the City of Lyons Planning Consultant David Kinney. Her email stated they supported the City's proposal to provide more housing options for local citizens and requested a copy of the city staff report to the City Council.
5. *Email from Max Farber, Enviroissues on behalf of the Fair Housing Council of Oregon (FHCO) and Housing Land Advocates (HLA).* On April 16, 2018, Max Farber, Project Coordinator, Enviroissues, on behalf of FHCO and HLA, corresponded by email with the City of Lyons

Planning Consultant David Kinney. His email indicated they review post-acknowledgement plan amendments for Goal 10 or Fair Housing issues. He requested a copy of the proposal. Planning Consultant David Kinney responded and provided a copy of the Planning Commission recommendation and staff report.

6. Email from Louise Dix, AFFH Specialist, Fair Housing Council of Oregon (FHCO), including a letter dated April 23, 2019. The FHCO provided written testimony recommending the City of Lyons postpone adoption of the ADU Amendments to the Lyons Zoning Code until Goal 10 findings are included in the record. FHCO comments recommend the City address the demonstrated need for the proposal, impact on existing housing and the available buildable lands inventory. FHCO also asked the City to reconsider the inclusion of a one parking space on-site parking requirement for an accessory dwelling unit and urge adoption of the ordinance without the on-site parking requirement. FHCO requested written notice of the City's decision.
7. The Lyons City Council held a public hearing on April 23, 2019 at City Hall. The City received the following public testimony and questions:
 - The FHCO letter dated April 23, 2019 was entered into the record. Planning Consultant David Kinney responded to several questions from the City Council regarding Goal 10 findings, buildable lands inventory and on-site parking requirements for the ADU units. The City Council concurred that an on-site parking requirement should remain in the proposed ordinance.
 - There was no other testimony, questions or comments provided to the City Council.
8. Mr. Kinney recommended the public hearing be continued to May 28, 2019 to allow time to prepare Goal 10 findings and allow for additional public testimony. Mayor Valentine continued the public hearing to the regular Lyons City Council meeting on May 28, 2019, beginning at 6:30 p.m.
9. The Lyons City Council continued the public hearing on May 28, 2019. Planning Consultant David Kinney presented an update Ordinance P10-65-2019, with Exhibit "A" – Goal Findings. No additional public testimony was provided. The Mayor closed the public hearing and the City Council deliberated on the proposal.

GOAL 2: LAND USE PLANNING: TO ESTABLISH A LAND USE PLANNING PROCESS AND POLICY FRAMEWORK AS A BASIS FOR ALL DECISIONS AND ACTIONS RELATED TO THE USE OF LAND AND TO ASSURE AN ADEQUATE FACTUAL BASE FOR SUCH DECISIONS AND ACTIONS.

Under Goal 2, the proposal is a minor amendment an implementation measure, the Lyons Municipal Code, Chapter 18 – Zoning.

Consistency of the ADU Proposal with the Lyons Comprehensive Plan.

The following Goals and Policies in the acknowledged Lyons Comprehensive Plan apply to this proposal:

COMMUNITY RESOURCES: Housing

Goal: To provide sufficient buildable lands to meet the needs of current and future residents of Lyons.

- Policies: 1. The City of Lyons will sustain a variety in housing type, location, density and cost, to meet the housing needs of current and future City residents.

Findings:

The buildable lands inventory in the Lyons Comprehensive Plan Background Report, p. VII - 15, shows a need for 167 acres of buildable residential land and a supply of 172 acres of buildable residential land in the Lyons UGB to serve a projected population of 2,016 persons. This population forecast exceeds PSU's 2017 coordinated population forecast for the Lyons UGB, therefore the estimated amount of needed buildable lands in the Lyons Comprehensive Plan document is too high.

The July 1, 2017 population in the Lyons UGB was 1,243 persons. The coordinated population forecast for the Lyons UGB in the year 2040 is 1456 persons, an increase of 213 residents.¹ The City's planning consultant prepared an updated buildable land needs estimate for the 20-year planning period from 2019 to 2040. Table 1 shows the City will need 39 acres of buildable residential land to serve the 213 new residents by the year 2040.²

Table 1
Residential Land Needs in the City of Lyons
2019 to 2040

A	B	C	D	E	F	G
Zone	Population to be Added 2019-2040	Housing Type %	Persons per Household	# of Needed Housing Units	Density per acre	Acres Needed 2019-2040
Data Source	PSU Estimate	Safe Harbor	PSU Estimate	B ÷ D	Lyons Comp Plan	E ÷ F
Single Family Residential	160	75%	2.4	67	2.0	33.30
Multi-Family Residential	53	25%	2.4	22	4.0	5.50
Totals	213	100%	2.4	89		38.80

In May 2019, the Linn County GIS Department prepared two maps showing the existing housing stock and vacant land in the SFR and MFR residential zones in the City of Lyons. The Linn County GIS inventory shows the City has 69 acres of vacant land zoned for residential development.

¹ *Coordinated Population Forecast for Marion County, Oregon, its Urban Growth Boundaries and Unincorporated Areas, and Coordinated Population Forecast for Linn County, Oregon, its Urban Growth Boundaries and Unincorporated Areas.* Both reports prepared by the Population Research Center, College of Urban Affairs, Portland State University, June 2017. See Appendix C – Detailed Population Forecast Results. Results for the Lyons UGB are found in both reports.

² The City of Lyons does not have a sewer system. Minimum lot size is 0.5-acres per SFR dwelling. Under the Lyons Zoning Code and Linn County Environmental Health regulations SFR dwellings may be developed at a density of 2.0 units/acre. MDR dwellings may be developed at a density of 4.0 units/acre. Assuming a safe harbor ratio of 75% (SFR) / 25% (MFR) for new housing units, the City will need 33.5 acres for new SFR dwellings and 5.0 acres of buildable land for new MFR dwellings.

The City concludes it has an adequate supply of vacant residentially zoned land to meet the housing needs of the City by the year 2040.

The proposed ADU amendment will not change the amount of vacant, buildable land in the City of Lyons. It will provide an opportunity for ADU housing to be built on developed land in the City. In May 2019, Linn GIS data shows the City of Lyons has 472 single-family dwellings. If 3% of property owners add an ADU unit to their property, the City could add up to 15 dwelling units on existing lots already developed for SFR uses, thereby reducing the city's buildable land needs by 7-8 acres.

The City concurs with the Oregon Legislature's findings that the allowance of ADUs in a residential zone provide greater housing opportunities to enable property owners to:

- Care for family members who need medical assistance;
- Provide independent living facilities for multi-generational families;
- Allow for small rental units for singles, seniors or other independent persons;

The proposal is consistent with Goal 2 requirements to provide an adequate quantity of buildable residential land to provide for population growth within the 20-year planning period from 2019 to 2040.

The City followed the land use planning process established by the existing Lyons Comprehensive Plan policies and OAR 660-018 regarding post-acknowledgement plan amendments.

OAR 660-018 Post Acknowledgment Plan Amendments

660-018-0020 Notice of a proposed change to a Comprehensive Plan

The City submitted the Lyons Development Code to DLCD in compliance with OAR 660-018-0020 on February 1, 2019. The City's submittal included (1) the proposed text and (2) brief staff report explaining the proposal. A revised submittal was provided to DLCD on February 4, 2019. A DRAFT Ordinance and findings were uploaded to the DLCD website on May 21, 2019.

660-018-0035 DLCD Participation

The City of Lyons provided a PAPA plan amendment notice to DLCD. Patrick Wingard, DLCD Regional Representative for the Southern Willamette Valley, was provided a copy of the draft ordinance and findings prior to the City Council hearing on May 28, 2019.

660-018-0050 Notice of adoption of proposed change to a Comprehensive Plan

The City Recorder will provide notice of the adopted changes to DLCD and persons who participated in the local government proceedings and requested a copy of the notice of adoption.

The proposal does not change the Lyons Comprehensive Plan land use goals or policies. The update is an administrative amendment to the Lyons Municipal Code that is consistent with the adopted comprehensive plan and legislative policy to provide additional housing opportunities for accessory dwelling units, as adopted by the Oregon Legislature in 2017, Senate Bill 1051.

The City concludes it took appropriate steps to coordinate the Lyons Municipal Code amendments with affected agencies and the proposal complies with Goal 2 coordination requirements in OAR 660-018.

Conclusion re: Goal 2 Compliance: The City concludes the Lyons Development Code complies with the Lyons Comprehensive Plan goals and policies and Goal 2 procedural requirements in OAR 660-018.

GOAL 3: AGRICULTURAL LANDS

GOAL 4: FOREST LANDS

Goals 3 and 4 do not apply within adopted, acknowledged urban growth boundaries. The City concludes the amendments to the Lyons Development Code do not address any issues related to Goals 3 or 4.

GOAL 5: OPEN SPACES, SCENIC AND HISTORIC AREAS, AND NATURAL RESOURCES: TO PROTECT NATURAL RESOURCES AND CONSERVE SCENIC AND HISTORIC AREAS AND OPEN SPACES.

Goal 5 does not apply. The proposal does not include new inventories or protection measures for Goal 5 resources.

GOAL 6: AIR, WATER AND LAND RESOURCES QUALITY: TO MAINTAIN AND IMPROVE THE QUALITY OF THE AIR, WATER, AND LAND RESOURCES OF THE STATE.

Goal 6 does not apply. The *Lyons Municipal Code* amendment for accessory dwelling units does not update the Lyons Comprehensive Plan's inventories related to air, water or land resources. The proposal does not impact air, water or land resources quality in the Lyons UGB.

GOAL 7 - AREAS SUBJECT TO NATURAL DISASTERS AND HAZARDS: TO PROTECT LIFE AND PROPERTY FROM NATURAL DISASTERS AND HAZARDS.

Goal 7 does not apply. The proposed amendments do not prepare any inventories or adopt changes to the Lyons Comprehensive Plan goals and policies for any areas subject to natural hazards. Any new development with designated hazard areas (flood plain, floodway, wetlands or protected areas) must comply with the existing natural hazard regulations of the City and Linn County.

The City concludes the Lyons Development Code complies with Goal 7 requirements.

GOAL 8 - RECREATIONAL NEEDS: TO SATISFY THE RECREATIONAL NEEDS OF THE CITIZENS OF THE STATE AND VISITORS AND, WHERE APPROPRIATE, TO PROVIDE FOR THE SITING OF NECESSARY RECREATIONAL FACILITIES INCLUDING DESTINATION RESORTS.

Goal 8 does not apply. The proposal does not impact any parks or recreational facilities.

GOAL 9 - ECONOMIC DEVELOPMENT: TO PROVIDE ADEQUATE OPPORTUNITIES THROUGHOUT THE STATE FOR A VARIETY OF ECONOMIC ACTIVITIES VITAL TO THE HEALTH, WELFARE AND PROSPERITY OF OREGON'S CITIZENS.

Goal 9 does not apply. The proposal does not impact employment lands or economic development activities of the City.

GOAL 10 - HOUSING: TO PROVIDE FOR THE HOUSING NEEDS OF CITIZENS OF THE STATE.

Statewide Planning Goal 10 and OAR 660-008 require Oregon's cities to inventory the existing housing supply, assess housing needs and provide a 20-year supply of buildable residentially zoned land for future

housing growth and plan for the provision of public facilities in a timely manner. This proposal does not change any residential plan designations or rezone any land for residential use. It does not modify the city's buildable lands inventory.

The City requested the Linn GIS Department to prepare updated maps and data tables on housing stock and vacant land in the SFR and MFR zones in the City of Lyons in May 2019.

Map 1 - "Housing Stock"

Map 2 - "Vacant Land in Residential Zones"

Table 2
Housing Stock in the City of Lyons UGB
May 2019

A	B	C	D
Housing Type	# of Buildings	# Housing Units	% of Total Housing Units
Single Family Residential		346	69%
Multi-Family Residential		126	25%
SFR and MH Total		472	93%
Duplex	9	18	4%
Apartments	3	13	3%
Other Dwelling Units	0	0	0%
Multi-Family Total		31	7%
Totals		503	100%

Source: Linn County GIS, May 2019

Table 2
City of Lyons - Developed and Vacant Land Summary
May 2019

A	B	C	D
Zone	Developed for Residential Use (Acres)	Vacant (Acres)	Total
Single Family Residential	252.18	62.94	315.12
Multi-Family Residential	17.39	6.15	23.53
Public	0.50		0.50
Commercial	11.16		11.16
Industrial	3.16		3.16
Totals	269.57	69.09	338.66

Source: Linn County GIS, May 2019

Table 2 & Table 3 and the Map 2 - "Vacant Lands" show the City has an adequate supply of vacant residentially zoned land to meet the housing needs of the community for the 20-year planning period from 2019 to 2040.

This proposal creates opportunities for additional housing units on land that is considered "developed" and not identified as "net buildable land". If 3% of the 472 SFR home sites add an accessory dwelling unit, this would reduce the buildable lands need by 7-8 acres.

Over the past 10 years, the City has issued several “hardship permits” for the placement of manufactured homes next to an existing home to allow for the property owner/resident to care for a family member who is either elderly or has medical issues which warrant the person living close to another family member. Under the City’s code, these manufactured homes must be removed from the site within 90 days of the time the MH is no longer used by the family member.

The accessory dwelling unit proposal will add another housing option for property owners. It will:

1. Provide a mother-in-law dwelling unit for a family member who may require minimal care, but can still live independently.
2. Provide a secondary dwelling for an existing resident on the property.
3. Provide a low-cost rental unit; which may provide needed income for the property owner.
4. Provide an opportunity to convert an unused portion of a dwelling to a productive use.
5. Eliminate the need for a property owner to obtain a conditional use permit for a family member (Medical Hardship) and to move a manufactured home on a property and extend water, sewer and private utility services to a structure that will need to be removed in the future, and
6. Enable a property owner to make permanent improvements which will add to the City’s assessed value.

As discussed under the Goal 2 findings, the proposal complies with the Lyons Comprehensive Plan goals or policies. There are no other housing policies in the plan that apply to this proposal.

The City concludes the proposed zoning code amendment to allow an “accessory dwelling” on the same lot as a single-family dwelling will provide another housing option for a property owner and complies with Goal 10.

GOAL 11 - PUBLIC FACILITIES AND SERVICES: TO PLAN AND DEVELOP A TIMELY, ORDERLY AND EFFICIENT ARRANGEMENT OF PUBLIC FACILITIES AND SERVICES TO SERVE AS A FRAMEWORK FOR URBAN AND RURAL DEVELOPMENT.

Statewide Planning Goal 11 “Public Facilities and Services” requires cities “*to plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.*” The purpose of Goal 11 is to ensure cities plan for and provide needed services and public facilities within the City’s urban growth area. Key urban services include law enforcement, fire and police protection, emergency management, health services, education, solid waste disposal, telecommunications (telephone, cable TV, broadband), energy services (electric, natural gas), parks and recreation services, public works (water, sewer, storm drainage and transportation), land use planning and general local government services.

Lots that are currently developed have already invested in public infrastructure and private utility improvements. The proposed “accessory dwelling” amendments will utilize existing investments already made by the City of Lyons, Lyons-Mehama Water District and other private utility providers.

The City of Lyons does not have a wastewater treatment facility or collection system. On-site sewage disposal (septic) systems are installed on individual parcels. The on-site disposal systems must comply with requirements of the Oregon DEQ and the Linn County Environmental Health Department. The proposed code amendment includes a requirement that the property owner certify that an accessory dwelling can be placed on the site without negatively impacting the existing on-site sewage disposal system and that the Linn County Environmental Health Department certify that the on-site sewage disposal system has the capacity to serve the existing and the new dwelling unit. Linn County Planning

and Linn County Environmental Health Department did not have any comments on the proposed ADU amendment.

The City concludes it has coordinated planning for public facility and service improvements with affected agencies who provide services inside the City. The City also concludes the information provided is consistent with the public facilities goals and policies in the Lyons Comprehensive Plan.

The City concludes the proposal complies with Goal 11 “Public Facilities” and OAR 660-011.

GOAL 12 – TRANSPORTATION: TO PROVIDE AND ENCOURAGE A SAFE, CONVENIENT AND ECONOMIC TRANSPORTATION SYSTEM.

Goal 12 does not apply. The proposal does not impact any roads or transportation systems in the City.

GOAL 13 - ENERGY CONSERVATION: TO CONSERVE ENERGY.

The proposal does not address Goal 13 issues.

GOAL 14: URBANIZATION: TO PROVIDE FOR AN ORDERLY AND EFFICIENT TRANSITION FROM RURAL TO URBAN USE.

The proposal does not address Goal 14 issues.