



City of Irrigon
 500 NE Main Ave.
 Irrigon, Oregon 97844
 541-432-3832
 clerk@ci.irrigon.or.us

PC FINDINGS REPORT

AMD#266-66

LandWise, LLC for Olin Homes, LLC
 Reduce Residential Dimensional
 Standards

APPLICANT: LandWise, LLC
 PO Box 146
 Pendleton, OR 97801

PETITIONER: Olin Homes (OR), LLC
 9301 NE 117th Ave.
 Vancouver, WA 98662

REQUEST: Reduce dimensional standards within the **Residential zone:**

Development Standard	Existing	Proposed
Lot Size	6,000 sq ft	4,000 sq ft
Lot frontage	60 ft	40 ft
Side Setbacks	10 ft	5 ft
Dwelling size	1,200 sq ft	800 sq ft

CONTENTS:

This staff report/request file is organized the following way:

- Background and Public Process
- Staff Comment
- Review Criteria
- Staff Recommendation
- Conclusions
- Exhibit A. Applicant’s Amendment Application and Testimony
- Exhibit B. Zoning Map
- Exhibit C. Example Lot Diagrams
- Exhibit D. Public Survey Summary as of February 20, 2026
- Exhibit E. Summary of Public Comments and Public Comment Letters
- Exhibit F. Agency Comment Letters

BACKGROUND AND PUBLIC PROCESS

The application was submitted on August 15, 2025, with an application supplement submitted on December 8, 2025; both are included as Exhibit A. The applicant requests changes to Residential Zone development standards. These changes include reductions to the minimum required lot size, lot frontage, side setbacks, and dwelling size as detailed in the “Request” table above. The application referenced allowing Accessory Dwelling Units (ADUs), but did not formally include allowing ADUs in their proposal.

This proposed amendment, if passed, would amend the City of Irrigon Development Code Ordinance (city law), making it a ‘legislative’ amendment. Legislative amendments are first reviewed by the

Planning Commission (PC) where the PC **makes a recommendation on its passage** to the City Council. The PC may recommend the amendment be approved, approved with modifications and/or conditions, or denied. **As the City Council (CC) is the legislative body of elected representatives, they take the PC's recommendation under advisement and make the final determination on the passage of the amendment.**

The purpose of the Findings Report is to document the Planning Commission's decision and the reasoning behind the decision. It provides the list of criteria applicable to the decision. The application must be found to be in compliance with all criteria to recommend its passage. Background information for this application is included in Exhibits A through C; the application, the city zoning map, and example lot diagrams, respectively.

Section § 10-4A-5: TYPE IV PROCEDURE (LEGISLATIVE) of Irrigon's Development Code describes the process for considering a legislative amendment. As prescribed, notice of this application was mailed on January 5, 2026, to all property owners within 250 ft of the Residential zone. This hearing was also noticed in the publication of record on January 14, 2026. The Planning Commission held two public hearings on February 5, 2026 and March 5, 2026. To allow for greater public involvement, the city released a public survey on January 5, 2026, and the initial results are presented in Exhibit D. The survey remains open and final results will be presented to the City Council.

REVIEW CRITERIA:

CITY OF IRRIGON COMPREHENSIVE PLAN

PLAN GOALS, FINDINGS, AND POLICIES

GOAL 1 CITIZEN INVOLVEMENT

GOAL 8 RECREATION NEEDS

GOAL 10 HOUSING

GOAL 11 PUBLIC FACILITIES AND SERVICES

GOAL 12 TRANSPORTATION

TITLE 10 DEVELOPMENT CODE

CHAPTER 3 COMMUNITY DESIGN STANDARDS

TABLE 10-3-3A MINIMUM REQUIRED PARKING BY USE

CHAPTER 4 ADMINISTRATION OF LAND USE AND DEVELOPMENT

§ 10-4F-2: LEGISLATIVE AMENDMENTS

§ 10-4A-5: TYPE IV PROCEDURE (LEGISLATIVE)

§ 10-4A-9: TRAFFIC IMPACT STUDIES/TRIP GENERATION LETTERS

All other applicable zoning ordinances or goals of the City of Irrigon Development Code and/or laws of the State of Oregon.

CITY OF IRRIGON COMPREHENSIVE PLAN

- GOAL 1** [...] *It Shall Be City Policy:*
- CITIZEN INVOLVEMENT**
- *To conduct periodic community surveys to ascertain public opinion and collect information; survey results should be distributed.*
 - *To encourage people to attend and participate in planning commission and city council meetings and hearings.*
- [...]
- *To make technical guidance and other reports available for public inspection.*
- [...]

FINDINGS The Planning Commission finds that the City followed City policy using the City's website and Facebook account to distribute information; conducting an online survey specific to the proposal, and holding an additional hearing to ensure a high level of public involvement in this process.

- GOAL 8** [...] *It Shall Be City Policy:*
- RECREATIONAL NEEDS**
- [...]
- *To develop neighborhood parks and outdoor recreational facilities to meet the needs of residents and visitors as the community grows.*
 - *To require the dedication of parkland or to require other investment as a part of the review and approval of large subdivisions and planned unit developments.*
- [...]

FINDINGS The Planning Commission finds that the proposal does not seek to change recreational stipulations in the code; however, it is worth noting that these exist and the need for recreational areas may be affected by increasing housing density. In Chapter 3, Community Design Standards; Section 10-3-3, Community Design: General Standards; 16, Public Use Areas require recreation areas based on the number of dwellings. The requirement aims to create three acres of recreation area for every one hundred dwelling units. Changing the density of dwellings (and people) may necessitate a reconsideration of this requirement to allow for the needed recreation space. Individuals will have less personal space within which to recreate, so more shared space may be desired or necessary for community health.

- GOAL 10** [...] *It Shall Be City Policy:*
- HOUSING**
- *To encourage a moderate rate of growth and a mixed population of varying age groups, incomes, and lifestyles.*
-

- To encourage and cooperate with public agencies, non-profit organizations, and private developers involved in supporting the creation of housing for people with development of low and moderate incomes housing.
- To encourage residential development which provides prospective buyers with a variety of residential lot sizes, a diversity of housing types, and a range in prices.
- To encourage a mix of residential uses with other compatible uses in appropriate locations.
- To encourage "missing middle" housing types that would include townhomes, duplexes, triplexes, and garden or courtyard apartments that fall between high density apartment buildings and lower density detached housing.
- To allow for the development of Accessory Dwelling Units in all residential zones, per state law.
- To provide flexibility in implementing residential zoning standards to support the development of a wide range of housing types while mitigating the impacts of development.
- To encourage efficient use of residential land within the Urban Growth Boundary, provide a sufficient amount of residential land to accommodate residential growth, and regularly monitor and periodically update an inventory of buildable residential land.

[...]

- To plan and regulate residential development to meet housing needs while preserving and protecting natural resources and reducing risks associated with natural hazards.

[...]

FINDINGS The Planning Commission finds that the housing policies promulgated in the Comprehensive Plan are explicit in their direction to City government to encourage the development of a broad mix of housing types to accommodate the full socio-economic range of its citizens. The Planning Commission finds that the City is meeting this goal with its existing ordinances. Further, the citizens are opposed to strongly opposed the proposal, with each element proposed receiving between 81% and 91% opposition on the public survey.

GOAL 11

[...]

PUBLIC FACILITIES AND SERVICES

It Shall Be City Policy:

- To develop, maintain, update, and expand police and fire services, streets, and sidewalks, water and sewer systems, as necessary to provide adequate facilities and services to the community.
- To require underground installation of utilities in all new

developments and as major improvements are made to areas with above ground utilities.

[...]

- To work with Morrow County to insure adequate provision for and control of solid waste disposal sites.*
- To plan public facilities, services, and utilities maintained by the City of Irrigon to meet expected demand.*
- To develop all underground utilities, including water, wastewater, power, and any others, before any surface roadwork or trails are brought up to full capabilities.*
- New development will have fully conventional services as part of the development, restricting development on onsite systems.*
- No private domestic wells will be drilled within the jurisdiction of the city. All water services will be provided by the current municipal system. Existing wells prior to 2017 are grandfathered for landscaping and irrigation purposes.*

[...]

- To require sufficient open and recreational space in accordance with Development Code Standards.*

[...]

FINDINGS The Planning Commission finds that the City is already challenged to provide water to its existing and projected customer base. This proposal would increase the projected customer base without a plan for how to provide services. The Commission finds that a new infrastructure analysis could help ensure that any new demands could be accommodated or provide a list of the necessary system upgrades that would be necessary, including accounting for the costs.

GOAL 12

[...]

TRANSPORTATION

It Shall Be City Policy:

[...]

- To create, maintain and improve a transportation system which is current, flexible, and coordinated with the comprehensive plan.*

[...]

- To ensure right-of-way acquisition and construction of streets, both by the City and by development, shall be based on adopted design standards for each level of street - arterial, collector, and local.*
 - To preserve right-of-way for planned transportation facilities through exactions, voluntary dedication, or setbacks.*
 - To require new developments to dedicate and fully improve local streets to standards of the Development Code.*
 - To determine the contribution of traffic from adjacent development*
-

to determine the appropriate level of responsibility for improving collector and local streets.

- To require full-street improvements as part of a project's conditions of approval for subdivisions and commercial developments.

[...]

- To provide sidewalks along all arterial streets not served by multi-use paths.

[...]

FINDINGS The Planning Commission finds that the proposal has the potential to significantly increase traffic. As the Oregon Department of Transportation stated in its February 4, 2026 comment letter, the proposal should have included, "a determination as to whether the increase [in traffic] is potentially significant" as pursuant to Transportation Planning Rules Section 660—12-0060. This determination is made by a licensed traffic engineer.

CITY OF IRRIGON ORDINANCES

CHAPTER 3

TABLE 10-3-3A

**COMMUNITY
DESIGN
STANDARDS**

MINIMUM REQUIRED PARKING BY USE.

[...]

Single-family dwelling - 2 spaces on the subject lot or parcel

[...]

FINDINGS The Planning Commission finds that the application does not propose a change to parking space requirements.

CHAPTER 4

§ 10-4F-2: LEGISLATIVE AMENDMENTS:

**ADMINISTRATION
OF LAND USE AND
DEVELOPMENT**

Legislative amendments are policy decisions made by City Council. They are reviewed using the Type IV procedure in Section 10-4A-5 of this Chapter and shall conform to the transportation planning rule provisions in Section 10-4G-6 of this Article, as applicable.

FINDINGS The Planning Commission finds that the City is properly processing the proposal as a Type IV procedure.

CHAPTER 4

10-4A-5: TYPE IV PROCEDURE (LEGISLATIVE):

**ADMINISTRATION
OF LAND USE AND
DEVELOPMENT**

A. Pre-application Conference: A pre-application conference is required for all Type IV applications initiated by a party other than the City. The requirements and procedures for a pre-application conference are described in subsection Section 10-4A-6C of this Article.

B. Application Requirements:

1. *Application Forms: Type IV applications shall be made on forms*

-
- provided by the City Planning Official or designee.*
2. *Submittal Information: The application shall contain:*
 - a. *The information requested on the application form;*
 - b. *A map and/or plan addressing the appropriate criteria and standards in sufficient detail for review and decision (as applicable);*
 - c. *The required fee; and*
 - d. *Additional information to demonstrate that the application satisfies approval criteria and standards, as listed in Section 10-4A.*
- C. *Approval Process and Authority:*
1. *The Planning Commission shall:*
 - a. *After notice and a public hearing, vote on and prepare a recommendation to the City Council to approve, approve with modifications, approve with conditions, deny the proposed change, or adopt an alternative; and*
 - b. *Within fourteen (14) business days of determining a recommendation, the presiding officer shall sign the written recommendation, and it shall be filed with the City Planning Official or designee.*
 2. *Any member of the Planning Commission who votes in opposition to the Planning Commission's majority recommendation may file a written statement of opposition with the City Planning Official or designee before the Council public hearing on the proposal. The City Planning Official or designee shall send a copy to each Council Member and place a copy in the record.*
 3. *If the Planning Commission fails to adopt a recommendation to approve, approve with modifications, approve with conditions, deny the proposed change, or adopt an alternative proposal within sixty (60) days of its first public hearing on the proposed change, the City Planning Official or designee shall:*
 - a. *Report the failure together with the proposed change to the City Council; and*
 - b. *Provide notice and put the matter on the City Council's agenda for the City Council to hold a public hearing and to make a decision. No further action shall be taken by the Commission.*
 4. *The City Council shall:*
 - a. *Approve, approve with modifications, approve with conditions, deny, or adopt an alternative to an application for legislative change, or remand the application to the Planning Commission for rehearing and reconsideration on all or part of the application;*
 - b. *Consider the recommendation of the Planning Commission, however, the City Council is not bound by the Commission's recommendation; and*
 - c. *Act on approval by ordinance, which shall be signed by the Mayor after the Council's adoption of the ordinance.*
-

D. Vote Required for Legislative Change:

- 1. A vote by a majority of the qualified voting members of the Planning Commission present is required for a recommendation for approval, approval with modifications, approval with conditions, denial or adoption of a proposed legislative action or alternative.*
- 2. A vote by a majority of the qualified members of the City Council present is required to decide any motion made on the proposal.*

E. Notice of Decision: Notice of a Type IV decision shall be mailed to the applicant, all participants of record, and the Department of Land Conservation and Development, within five (5) business days after the City Council decision is filed with the City Planning Official or designee. The City shall also provide notice to all persons as required by other applicable laws, as provided in 10-4A-6-D6.

J. Final Decision and Effective Date: A Type IV decision, if approved, shall take effect and shall become final as specified in the enacting ordinance, or if not approved, upon mailing of the Notice of Decision to the applicant.

FINDINGS

The Planning Commission finds that the City is properly processing the application as a Type IV application. All necessary dates and documentation can be found in the application file.

CHAPTER 4

**ADMINISTRATION OF
LAND USE AND
DEVELOPMENT**

§ 10-4A-9: TRAFFIC IMPACT STUDIES/TRIP GENERATION LETTERS:

The purpose of this Section is to assist in determining which road authorities participate in land use decisions, and to implement the State Transportation Planning Rule that requires the City to adopt a process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities. This Section establishes the standards for Traffic Impact Studies and Trip Generation Letters and when each would be required. It also determines who is qualified to prepare the study. (Ord. 262-24)

A. When Traffic Impact Study Required: The City or other road authority with jurisdiction may require a traffic impact study (TIS) as part of an application for development, a change in use, or a change in access. A TIS shall be required when a land use application involves one or more of the following actions:

- 1. A change in zoning or a plan amendment designation;*
- 2. Any proposed development or land use action that a road authority states may have operational or safety concerns along its facility(ies);*
- 3. An increase in site traffic volume generation by three hundred (300) average daily trips (ADT) or more; or*

[...]

B. A Trip Generation Letter is required for:

- 1. Any development listed below that would generate more than 100 new daily trips but less than the TIS standards in A above will require*

a Trip Generation Letter. Such developments include:

- Residential development consisting of more than 10 dwelling units,

[...]

2. Any case where, in the judgement of City staff, a Trip Generation Letter is necessary to protect the public interest.

C. Traffic Study Preparation: A traffic impact study or trip generation letter shall be prepared and stamped by a professional engineer with demonstrated traffic experience. If the road authority is the Oregon Department of Transportation (ODOT), consult ODOT's regional development review planner.

FINDINGS The Planning Commission finds that these criteria are not met. The applicant did not provide a study or a letter from a licensed traffic engineer on the expected increase in daily vehicle trips that would result from the proposal.

PUBLIC COMMENTS: See Exhibits D, E, and F.

CONCLUSIONS:

In addition to the strong opposition from the citizens of Irrigon, the Planning Commission finds the application is not consistent with the Comprehensive Plan and recommends the City Council deny the application.

DECISION:

Based upon the information submitted, the comments of interested parties and the findings, the Planning Commission does not recommend the application to the City Council for approval.

The March 5, 2026 verbal vote to not recommend approval of the application to City Council is 4 in favor and 0 opposed with 0 abstaining.

The April 2, 2026 verbal vote to approve the Findings Report is 3 in favor and 0 opposed with 0 abstaining.

April 2, 2026

DATE OF ACTION



STEPHANIE CASE, CHAIR
CITY OF IRRIGON PLANNING COMMISSION

As this is a legislative action, the City Council takes the Planning Commission's recommendation under advisement and makes the final determination on the application.

Exhibit A. Applicant's Amendment Application and Testimony



A neighborly community providing safe services, developing innovative partnerships, focusing on quality and life-giving opportunities.

LAND USE, PLANNING AND PERMIT APPLICATION

Date: 8/15/25

Applicant/Contractor: Bo Smith-LandWise LLC CCB# NA

Address: PO Box 146 Pendleton, OR 97801

Owner: Olin Homes (OR) LLC

Address: 9301 NE 117th Ave. Vancouver, WA 98662

Phone: (541) 303-4157

Email: Bo@LandWise.pro

OFFICE USE ONLY

PERMIT NUMBER: _____

SITE REVIEW PERMIT: \$ _____

SITE REVIEW BY: _____ Date: _____

PERMIT/FEES PAID: \$ 2000 *IN* _____

SDC PAID: \$ _____ Date: _____

FINANCIAL REVIEW: _____ Date: _____

APPROVED FOR FURTHER PROCESSING:
YES _____ NO _____

FINAL APPROVAL DATE/INITIAL: _____

Type of Application	X	Fee	Type of Application	X	Fee
Annexation		\$2,500.00	Review Pre-Application		\$200.00
Appeal to Planning Commission		\$225.00	Road Closure Boring Only , per day		\$200.00
Appeal to City Council		\$350.00	Road Dedication (non-subdivision)		\$450.00
Back Flow Testing (by contractor)		Contractor	SDC Charges (Wtr, Swr, Prk, Trans)		\$ 5,072.00
Conditional Use Permit		\$600.00	Sign Permit		\$100.00
Comp Plan Amendment		\$1,400.00	Site Review – Type I		\$175.00
Connection (TAP) Fees: (water, sewer)		\$	– Type II (\$250 + 50.00 per unit)		\$
Demolition Permit		\$75.00	– Type III (\$500 + 50.00 per unit)		\$
Driveway Permit w/ conditions		\$150.00	Special Project(s) Code Ammds	X	\$ 2,000.00
Fence Permit w/conditions		\$50.00	Street Light Request T&M plus		\$6,5PW00.0
Fill/Removal Permit, w/ Conditions-LUCS		\$100.00	Sub-division/Multi-Family (\$5,000.00 max)		\$700.00+ \$35 per lot
Home Business		\$50.00	Temporary Use/Hardship		\$500.00
Lot Line Adjustment		\$450.00	Vacation of Street /Alley		\$900.00
Manufactured Home Review Fee		\$65.00	Variance		\$500.00
Miscellaneous (e.g. Lights, deck, patio)		\$30.00	Work in ROW w/conditions Min \$250		\$
Partition (Large 4+ / Small -3)		\$	Zone Change		\$2,000.00
Plan/Admin Review		\$500.00	Zone w/comp Amendment		\$2,500.00
Public Work Items (Fee Varies)		\$	Zone Permit per unit		\$50.00
Replat:		\$600.00	Zoning & Development Interpretation		\$325.00

INFORMATION REQUIRED TO PROCESS APPLICATION

Address of Property: Bare property - Not Addressed

Map No. 05N26E24DB Tax Lot No. 302 Parcel No. 3 Current Zone of Property Residential

Proposed Zoning: NA Site Plan (Conceptual Design/Plan/Specs required-Attached): Yes _____ No X

Description of further action that will be needed prior to processing application (attach additional documentation):

Application for text amendment, narrative, and supporting evidence

Signature of Owner: _____ Date: 8/15/25

Notice: This permit becomes null and void if the work or construction authorized is not commenced within 180 days, or if construction or work authorized is suspended or abandoned at any time after work is commenced.

Effective 1/1/2025



OLIN HOMES



Your Local Home Builder Since 1962

9301 NE 117th Ave., Vancouver WA 98662 | (360) 892-9555

7/8/2025

City of Irrigon
Planning Department
500 NE Main Avenue
Irrigon, OR 97844

Re: Authorization to Represent – Development Code Text Amendment Application

To Whom It May Concern,

This letter is to confirm that Olin Homes (OR) LLC, as the legal property owner in the City of Irrigon, hereby authorizes Bo Smith of LandWise LLC to act as our authorized representative for the purpose of preparing, submitting, and coordinating all aspects of a development code text amendment application to the City of Irrigon.

This authorization includes, but is not limited to, communicating with City staff, submitting application materials, attending public meetings or hearings, and representing Olin Homes (OR) LLC in all matters related to this application.

Please accept this letter as formal consent for Bo Smith and LandWise LLC to represent Olin Homes (OR) LLC in this matter.

Sincerely,

Dean Olin
Owner / Project Manager
Olin Homes (OR) LLC

Bo Smith
PO Box 146
Pendleton, OR 97801
541.303.4157
Bo@landwise.pro

August 15, 2025

City of Irrigon
500 NE Main Ave.
Irrigon, OR 97844

Re: Application for Development Code Text Amendments: Lot Size, Lot Frontage, Side Setbacks, and Minimum Residential Dwelling Size

Dear Planning Staff and Review Committee:

Please find enclosed an application packet proposing amendments to the City of Irrigon's development code related to minimum lot size, lot frontage, residential dwelling size, and setback requirements for residential development.

The requested changes aim to reduce the minimum lot size to 4,000 square feet, establish a minimum lot frontage of 40 feet for residential lots not located on cul-de-sacs, and revise the side setback requirement to 5 feet while keeping a 15-foot setback for street-side corner lots to ensure safe sight distances.

These amendments are intended to promote efficient land use, support housing affordability, and encourage a broader mix of residential development throughout the city. The proposal aligns with the City's Comprehensive Plan, including Goal 10, and reflects the community's goals for thoughtful growth, infrastructure efficiency, and overall livability.

The attached narrative also addresses related considerations such as accessory dwelling unit (ADU) potential and possible code language for those ADU's.

LandWise LLC is submitting this application on behalf of Olin Homes. Olin Homes currently has multiple subdivisions in progress focused on delivering affordable workforce housing in nearby communities including Hermiston and Stanfield.

We appreciate your time and review of this proposal. Please feel free to contact me if any additional information is needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Bo Smith", with a long, sweeping flourish extending to the right.

Bo Smith

Owner

LandWise LLC

Purpose of Proposed Development Code Amendments

This application seeks to amend the City of Irrigon’s development code by adjusting minimum lot size, frontage, minimum dwelling size, and side setback standards in residential zones. The goal is to support workforce housing, encourage efficient use of land, and expand the variety of housing options available in the community. These changes align with both state housing priorities and the City’s long-term vision for sustainable, well-managed growth.

Proposed Amendments

Table 10-2A-2
STANDARDS

Residential Use	Standard
Minimum lot area:	
Single-family	6,000 square feet 4,000 square feet
Duplex	7,000 square feet
Triplex	8,000 square feet
Quadplex	9,000 square feet
Multi-family (5+ units)	Determined by other standards and number of units proposed.
Cottage Cluster	Determined by other standards and number of cottages proposed.
Manufactured Home Parks	3,000 square feet per unit
Residential uses (Single, Duplexes, Triplexes, and Quadplexes)	60 feet - frontage minimum 40 feet - frontage minimum
Multi- Family	80 feet - frontage minimum
Corner Lot	1 side more than 70 feet
All lots not on a cul-de-sac	60 feet - frontage 40 feet - frontage minimum
Lots on a cul-de-sac	35 feet - frontage
Maximum building/structure height	35 feet
Maximum buildable lot (single family dwelling)	12,000 feet

Title 10 – Development Code

Maximum height - fences, retaining/garden walls:	See Chapter 3
Maximum building coverage (footprint plane as percent of site area):	
Single-family dwelling, plus accessory uses	60 percent
Duplex, Triplex, and Quadplex	60 percent
Multi-family	60 percent
Cottage Cluster	The courtyard must have 150 square feet per cottage plus required setbacks between cottages.
Public Use	60 percent
Minimum landscape area:	10 percent
Minimum setbacks (from the foundation unless otherwise defined):	
Front/street setback from Property Line (front of structure to property line)	20 feet
Side setback, except on corner lots on street side	10 feet 5 feet
Side setback on corner lots, street side	15 feet
Rear setback	10 feet
Cottage Cluster interior setbacks	10 feet minimum between all cottages and other structures

Note: These adjustments focus on flexibility in housing layout while preserving neighborhood safety and compatibility.

This amendment also requests reducing the minimum enclosed floor area for single-family dwellings in the R zone from 1,200 square feet to 800 square feet, with the proposed revised code written below to replace paragraph A.1. under subsection 1 under section 10-3-2 (Revisions shown in red):

“1. Floor Plan: In the R zone any single-family home or duplex shall have an enclosed floor area of not less than **800 hundred (800) square feet** (per unit).”

Housing Supply and Workforce Housing

Like many communities across Oregon, the City of Irrigon is facing a growing need to expand workforce housing options that are attainable for everyday working households.

The 2019 Morrow County Housing Strategies Report identifies a countywide shortage of workforce and market-rate housing, with an emphasis on the need for housing types that are cost-effective to build and maintain. It recommends reducing minimum lot sizes and enabling small-lot development to help increase supply.

The Oregon Housing Needs Analysis (OHNA) Legislative Recommendations Report reinforces this statewide, encouraging cities to adopt zoning and subdivision reforms that reduce regulatory barriers and enable infill, middle housing, and more diverse residential options.

Reducing minimum lot sizes to 4,000 square feet, minimum lot frontage to 40 feet, side setbacks to 5 feet for non-corner lots, and the minimum dwelling size to 800 square feet can directly support these goals by making it easier to deliver smaller, more attainable homes by design, without compromising neighborhood quality.

As the OHNA notes, cities should “allow more types of housing by right, simplify permitting, and update codes to allow for smaller lots and more flexible development standards.”

These recommendations directly support Irrigon’s effort to modernize its code and expand housing choice.

Efficient Use of Land and Infrastructure

Smaller lot sizes allow the City to make the most of land that is already zoned for residential use within its existing boundaries. This supports infill development, reduces pressure to expand the urban footprint, and makes better use of public investments in roads, water, sewer, and emergency services.

Even with the proposed 800 square foot minimum dwelling size, homes can be designed to include the required 15’ x 20’ garage and at least four off-street parking spaces, ensuring functionality and compliance with existing standards.

While higher-density development may lead to more daily vehicle trips, increased water demand, and additional wastewater generation, it also brings broader benefits to the community. A greater number of households increases the City’s tax base, helps fund infrastructure maintenance and upgrades, and drives more consistent traffic to local businesses and services.

By allowing residential lots to be smaller but still functional, the City can promote development that is compact, efficient, and fiscally responsible while still supporting long-term livability and infrastructure planning.

Support from the City of Irrigon Comprehensive Plan

The proposed changes are consistent with the City's Comprehensive Plan, particularly Goal 10: Housing, which outlines the City's commitment to:

- Maintain an adequate supply of land for future housing needs
- Support a variety of housing types across income levels
- Encourage the development of workforce housing

Goal 10 also promotes efficient use of buildable land, flexible zoning tools to adapt to market conditions, and the removal of barriers that limit housing diversity. By enabling smaller lots and more flexible design standards, the proposed amendments advance these local objectives while also aligning with statewide strategies outlined in the Oregon Housing Needs Analysis.

Parking, Family Size, and Community Needs

While this proposal reduces the minimum lot size, a 4,000 square foot lot still provides ample space for a typical home, a two-car garage, and a driveway. The 2019 Morrow County Housing Strategies Report notes that households in the region tend to be larger than average and often include multiple working adults, which contributes to higher vehicle ownership per household.

Typical lot configurations under the proposed standards allow for at least four off-street parking spaces (two in a garage and two in the driveway). This significantly reduces reliance on on-street parking and ensures that multi-generational or multi-vehicle households can be accommodated without adverse neighborhood impacts.

Future-Proofing: Compatibility with Housing Types and ADUs

These amendments are designed to support flexibility for future housing types, including Accessory Dwelling Units (ADUs), duplexes, triplexes, quadplexes, and multifamily development. While this proposal primarily addresses single-family housing, the revised 4,000 square foot minimum lot size with 40-foot frontage and 5-foot side setbacks for non-corner lots and 800 square foot minimum dwelling size provides sufficient space to accommodate ADUs while preserving functional backyard areas and design flexibility. Under current Oregon law, cities with a population greater than 2,500 are required to allow at least one ADU on lots zoned for detached single-family dwellings. This requirement is outlined in state statute and reinforced in DLCD's ADU guidance. While Irrigon has not yet

crossed that threshold, its population is approaching it. The current development code defines ADUs and exempts them from off-street parking requirements, but does not yet provide broader development standards (See proposed ADU language at the end of this narrative). These amendments are a proactive step toward ensuring the City's code is ready to support ADUs and other housing types before state law requires it. In future updates, the City may also consider applying graduated minimum frontage requirements based on housing type, such as:

- 40 feet for single-family homes
- 50 feet for duplexes
- 55 feet for triplexes
- 60 feet for quadplexes
- 65 feet for multifamily buildings

This approach would support a variety of housing forms while ensuring lot dimensions scale appropriately with building intensity.

Conclusion

The proposed development code amendments are intended to expand housing options that are attainable for everyday households, promote efficient land use, and support a wider range of housing types within the City of Irrigon. These changes are modest in scope but meaningful in impact, offering flexibility that aligns with local planning goals, state housing policy, and the realities of small-town development.

They are consistent with the City's Comprehensive Plan, Oregon's Goal 10 Housing objectives, and the recommendations outlined in the Morrow County Housing Strategies Report, the Oregon Housing Needs Analysis, and DLCDC housing guidance.

By modernizing lot size, frontage, and setback standards, the City can unlock new opportunities for workforce housing while ensuring that neighborhoods remain functional, livable, and fiscally sustainable.

We respectfully request the Planning Commission and City Council consider these amendments as part of a proactive strategy to foster diverse, attainable, and sustainable housing for the Irrigon community.

Proposed Code Language (Optional Addition)

Proposed Section 10-2A-6 – Accessory Dwelling Units (ADUs)

Purpose

To provide clear and consistent development standards for Accessory Dwelling Units (ADUs) in residential zones, in accordance with state law and the City’s housing goals.

A. Applicability

1. ADUs are permitted in all residential zones on lots developed or proposed to be developed with a detached single-family dwelling.
2. Each qualifying lot is allowed one ADU, either attached to or detached from the primary dwelling.

B. Development Standards

1. **Lot Size:** The minimum lot size for a primary dwelling with an ADU shall be 4,000 square feet, with a minimum frontage of 40 feet and minimum side setbacks of 5 feet for non-corner lots.
2. **Maximum Size:** The ADU shall not exceed 900 square feet or 50% of the floor area of the primary dwelling, whichever is less.
3. **Height:**
 - o Detached ADUs may not exceed the height of the primary dwelling.
 - o Attached ADUs shall comply with the height limits of the applicable zone.
4. **Setbacks:** ADUs shall comply with the setback standards for accessory structures in the applicable zone, with side setbacks not less than 5 feet for non-corner lots.
5. **Parking:** No off-street parking is required for an ADU.
6. **Design Compatibility:**
 - o Exterior materials, roof pitch, and window styles must be visually compatible with the primary dwelling.
 - o Detached ADUs on corner lots must maintain a minimum 15-foot street side setback.

C. Ownership and Occupancy

No owner-occupancy requirement shall be imposed on either the primary or accessory dwelling unit.

D. Utility Connections

ADUs may connect to existing water and sewer service for the primary residence or may establish separate connections as determined by the City.

Irrigon Comprehensive Plan – Goal 10

Goal 10: Housing - To increase the supply of housing to allow for population growth and to provide for the housing needs of the citizens of Irrigon.

In 2018-2019, Morrow County worked with the City of Irrigon and a team of consultants to conduct a County-wide housing study, including an analysis of future housing needs, an inventory of buildable residential land, and a set of strategies to address current and future housing needs. That effort helped form the basis for the most recent update of the Housing Element of the Comprehensive Plan. The City Council adopted the 2019 Housing Strategies Report through Resolution 19-19 on November 19, 2019.

Irrigon has an estimated 2018 population of 2,338 (Portland State University (PSU) population estimate). In total, the City has grown by roughly 338 people, or 17%, since 2000. Additionally, Irrigon had an estimated 792 housing units in 2018.

In comparison to the state, Irrigon tends to have a lower share of both owner and renter households spending more than 30% of their income on housing costs. Nevertheless, 22% of owner households and 38% of renter households fall within this category. Renters have disproportionately lower incomes relative to homeowners. The burden of housing costs is felt more broadly for these households, and there is a need for more affordable rental units in Irrigon, as in most communities in Oregon.

There is support for more ownership housing at price ranges above \$200,000. This is because most housing in the City is clustered at the lower price points, while analysis of household incomes and ability to pay indicates that some residents could afford housing at higher price points. Additionally, there is a need for rental units at the lowest price level to serve those households currently paying a high share of their income towards rent. The City's housing needs analysis indicates a modest surplus of apartments in the \$300 to \$900 per month rent range. This represents the common range of rent prices in the county, where rents for most units fall. Rentals at more expensive levels generally represent single family homes or larger properties for rent.

Irrigon is projected to add roughly 140 households between 2019 and 2039, with accompanying population growth of 430 people. (The number of households differs from the number of housing units, because the total number of housing units includes a certain percentage of vacant units.)

Irrigon has some capacity for residential development with approximately 196 acres of buildable land and zoned capacity for approximately 388 housing units which exceeds the projected 20-year need of 153 housing units. However, a large share of the buildable land is concentrated in several large parcels that are under farm use and may not be available for development in the short term. Additionally, a few large parcels are constrained or difficult to serve, limiting the housing unit capacity on these parcels without significant investments in public infrastructure and willingness of property owners to sell or develop land.

The City finds that:

- The Housing Needs Analysis results (2019) show need for nearly 153 net new housing units by 2039.
- Of the new units needed, roughly 85% are projected to be ownership units, while 15% are projected to be rental units.
- 54% of the new units are projected to be single family detached homes, while 3% is projected to be some form of attached housing, and 42% are projected to be mobile homes.
- Of ownership units, 55% are projected to be single-family homes, and 45% mobile homes.
- An estimated 50% of new rental units are projected to be single-family detached, and 22% will be some form of new attached buildings, and 28% mobile homes.
- Irrigon's current housing capacity (supply) of approximately 388 housing units exceeds the projected 20-year need (demand) of approximately 153 units.

The City finds the following Strategies could assist the City to Meet Future Housing Needs:

As part of the 2018-19 Morrow County Housing Study, the project team identified a set of strategies that the County and its cities can implement to meet a range of local housing needs to accommodate households of varying sizes, incomes, and other circumstances. Strategies vary in their applicability among different jurisdictions in Morrow County. A list of strategies that may be applicable to Irrigon follow. Additional information about these strategies can be found in the Morrow County Housing Strategies Report (2019).

Land Supply Strategies

- Evaluate and Address Infrastructure Issues
- Ensure Land Zoned for Higher Density Uses is not Developed at Lower Densities

- Research UGB Expansion or Adjustment Opportunities if Growth Exceeds Projected Rates

Policy and Code Strategies

- Adopt Supportive and Inclusive Comprehensive Plan Policies
- Enhance Local Amenities and Services
- Adopt Minimum Density Standards
- Incentivize Affordable and Workforce Housing
- Facilitate “Missing Middle” Housing Types in All Residential Zones
- Support High Density Housing in Commercial Zones Promote Accessory Dwelling Units
- Encourage Cottage Cluster Housing
- Support Accessory Dwelling Units

Incentives for Development

- System Development Charges (SDC) and/or Fee Waivers
- Tax Exemptions and Abatements

Funding Sources and Uses

- Construction Excise Tax
- Tax Increment Financing (Urban Renewal)
- Local Housing Development Funds
- Other Property Owner Assistance Programs
- Public/Private Partnerships
- Land Acquisition/ Use Public Lands
- Community Land Trust
- Regional Collaboration & Capacity Building

It Shall Be City Policy:

- To encourage a moderate rate of growth and a mixed population of varying age groups, incomes, and lifestyles.
- To encourage and cooperate with public agencies, non-profit organizations, and private developers involved in supporting the creation of housing for people with development of low and moderate incomes housing.
- To encourage residential development which provides prospective buyers with a variety of residential lot sizes, a diversity of housing types, and a range in prices.

- To encourage a mix of residential uses with other compatible uses in appropriate locations.
- To encourage “missing middle” housing types that would include townhomes, duplexes, triplexes, and garden or courtyard apartments that fall between high density apartment buildings and lower density detached housing.
- To allow for the development of Accessory Dwelling Units in all residential zones, per state law.
- To provide flexibility in implementing residential zoning standards to support the development of a wide range of housing types while mitigating the impacts of development.
- To encourage efficient use of residential land within the Urban Growth Boundary, provide a sufficient amount of residential land to accommodate residential growth, and regularly monitor and periodically update an inventory of buildable residential land.
- To encourage the maintenance and development of manufactured homes as an affordable housing choice in appropriate locations.
- To encourage maintenance and rehabilitation of the existing housing stock.
- To plan and regulate residential development to meet housing needs while preserving and protecting natural resources and reducing risks associated with natural hazards.

Executive Summary

Oregon's housing undersupply threatens the very core of our common purpose as Oregonians. We cannot grow sustainably, move toward a more equitable economy, or address the full complexity of the homelessness crisis unless we substantially increase our supply of homes.

Making meaningful progress will require comprehensive system reforms. While Oregon has already made great strides, including through recent legislative initiatives such as House Bill 2001 and House Bill 2003 (2019), we are still falling behind. To continue, the state and its communities must now tackle the harder reforms needed to prioritize housing production.

Our current system plans for and invests in too little housing. The outcome is undersupply, rising home prices, segregation and displacement in some communities, and deepening inequities across all communities. Together, we must plan for and build the housing we need, where we need it.

The recommendations in this document describe the comprehensive, system-wide reforms needed to reverse decades of underinvestment in housing production and development readiness, organize our land use planning systems toward the common goal of building housing, and begin to redress disparities in housing outcomes. These recommendations can only make a difference if the Oregon Legislature commits to serious reform of the land use planning system, helps local governments pay for public infrastructure and affordable housing, and creates a cohesive state approach to housing production. Those comprehensive reforms will require significant investments, as well as changes to state statute, rule, and guidance to implement. In summary, they are:

Housing Under-Production is a National Problem

Oregon is not alone. While nearly every state is experiencing underproduction, Oregon's outcomes are among the worst.

Measured as a share of housing stock, Oregon ranks 4th in under-producing housing in the country behind California, Colorado, Utah, and ahead of Washington State.

Recommendation 1) Plan for what's needed.

Oregon's land use system needs to balance housing production with growth management, economic, and environmental goals. For this to work, the system requires a reorientation that starts with an updated and consistent statewide methodology to more clearly determine housing need and equitably distribute it among jurisdictions. Planning for what's needed requires that:

- 1.1 Adopt OHNA Methodology.** Formalize the OHNA methodology as the standardized, statewide source for setting common goals for housing planning. OHCS and DLCD have extensively reviewed and refined the [2019 pilot methodology](#) (see [Appendix D](#) for refinements) Maintaining and deploying it will require administrative and technical capacity, a regular cycle of review and update to incorporate new data, and annual database management to track statewide progress toward housing production targets.

What is the Oregon Housing Needs Analysis?

The OHNA is the cornerstone of a reformed housing planning system. It provides a comprehensive, city-by-city estimate of housing need by income, along with data and information about how local housing outcomes vary by race and ethnicity, age, disability status, and other identity markers. When implemented, it will be a regularly updated data suite that can be used to set state and local housing production targets. It provides a more accurate representation of full housing need and a more equitable distribution of affordable housing throughout regions.

In the methodology alone, the ONHA takes a big step toward equitable outcomes compared to the current Housing Capacity Analysis methods, by incorporating historic housing underproduction and housing needed for people experiencing homelessness into future production targets, and by using regional incomes to project housing need by income level. In addition, the OHNA would be the source of annual housing production dashboards that provide clear metrics that can be used to track and monitor real production outcomes and metrics related to housing equity.

- 1.2 **Establish Production Targets and Equity Indicators.** Establish housing production targets and equity indicators, produced by the state, for cities with a population above 10,000 people to help solve our crisis. The state would measure progress toward targets in an outcome-driven system that adjusts policies over time.
- 1.3 **Emphasize Housing Production Strategies.** With their OHNA-derived housing production targets and strengthened policy requirements, cities would craft community-led and implementable Housing Production Strategies (HPSs) that promote equitable housing production and overcome locally specific development barriers.
- 1.4 **Streamline UGB Amendments.** Improve and streamline land capacity and urbanization processes to expedite well-planned expansions that support needed housing where capacity is limiting production.

Recommendation 2) Build what's needed, where it's needed.

It's one thing to plan to accommodate housing and another for that housing to be built. Where housing is built and for whom dramatically impacts who prospers and how our neighborhoods function. Building what's needed where it's needed will require us to:

- 2.1. **Commit Sustained, Coordinated Investment.** Commit resources for housing production, affordable housing production, and development readiness, including infrastructure funding. This is not a one-time, small-scale investment. The state must sustain this effort over time and focus investments in the construction of housing that the market is least likely to produce without aid: housing for low- and middle-income households and housing in rural and coastal markets. Creative financing and funding sources that leverage private investment should be considered. Additionally, the state has the opportunity to better coordinate existing resources and focus funding toward the goal of housing production (see Recommendation 3.1).

2.2. Reinforce Housing Choice for All. Use the implementation of Housing Production Strategies to advance fair and equitable housing outcomes, including addressing segregation and displacement.¹ We must build more housing in the places where it is needed, with intentional strategies that aim for fair housing and enable housing choice for all.

Recommendation 3) Commit to working together with urgency.

Housing underproduction is a systemic problem that no one actor can resolve. Public, private, local, and statewide entities all have a role to play and can become obstacles when not coordinated. **There is no one entity or person responsible for the public sector role in housing production at the state level.** For our state to have an effective system to accelerate housing production, we must have coordinated administrative systems that can deliver. Working together with urgency requires us to:

3.1. Establish a Coordinated Governance Structure. Develop a mechanism for state agency administration, collaboration, and accountability, to make rapid progress toward housing production goals. The solution should encompass a housing production team composed of experts in development, affordable housing development, fair housing, planning and development code, permitting processes, etc. to diagnose and overcome development barriers to quickly identify and implement policy or funding interventions where needed.

3.2. Continue State and Regional Policy Action. Develop strategies in which the State and Metro Regional Government (Metro) clearly articulate the tools, actions, and policies the state and regional governments will employ to meet housing production targets. These strategies should describe what they will contribute to partnerships with local jurisdictions, consistent with their statutory and charter limitations. Metro will continue to manage its region's land use planning processes and will use housing projection methodologies consistent with the OHNA. The state will allocate housing production goals to local jurisdictions within the Portland Metropolitan Area.

Implementation Considerations

Few policy imperatives are more important to Oregon's future than increasing the pace of building new homes. Housing production is on the critical path to building Oregon's economic competitiveness, helping families prosper, and improving community resilience. Simply producing the units needed to meet current demand could generate up to \$40 billion in additional economic growth, a boost that would benefit us all.²

¹ Those who most often face housing discrimination, segregation, and displacement include, but are not limited to, low-income households, households of color, people with disabilities, large families, other federally protected classes, and households with other specific housing needs.

² This estimate is based on Oregon's share of the national economic benefits that come from producing 3.8 million housing units across the country over a 20-year time period (as described in [Up for Growth's Housing Underproduction in the U.S. 2022 Report](#)), scaled to match the OHNA estimates of current underproduction and units needed for people experiencing homelessness. Economic growth is measured as increase in gross domestic product.

Implementing these recommendations will likely need to be sequenced over more than one legislative cycle. To make near-term progress on their implementation, we recommend that the Legislature consider bills in the 2023 session that advance the goal of building more homes. DLCD and OHCS look forward to continuing conversations about solutions and refining these recommendations in advance of and during the 2023 legislative session.

A. Redefine Oregon’s Planning Process for Housing

The Legislature should establish the OHNA as the foundation for Goal 10 planning processes in state statute, including directing cities to replace local projections of need in Housing Capacity Analyses (HCAs) with OHNA-generated 20-year need. It should strengthen HPSs by requiring actions that address housing barriers and advance fair housing outcomes, and by incorporating production targets based on the data provided in the OHNA. Additionally, the Legislature should make statutory changes necessary to make needed urban growth boundary (UGB) expansions³ more efficient and certain and support housing production within the UGB.

B. Coordinate State Response

The Legislature should establish a Housing Production Team and administrative leadership position. This team should be deployed as quickly as possible to achieve early housing production wins by helping cities build on challenging development sites, removing barriers, and focusing state resources. Additionally, this team should be charged with developing the first ever statewide Housing Production Strategy, which can shift the state’s energy and efforts to this urgent challenge. The Legislature should direct staff at a broad cross-section of agencies, including DLCD, Oregon Housing and Community Services, Business Oregon, the Oregon Health Authority, the Bureau of Labor and Industries, and the Oregon Department of Transportation, to coordinate their activities and (as appropriate) available funding toward the goal of housing production in coordination with the new Housing Production Team.

C. Create Innovative Funding and Finance Solutions

In addition to funding affordable housing production through OHCS, the Legislature should establish new housing production funding mechanisms aimed at housing the market cannot produce on its own, including middle-income housing. Along with better coordination of existing funding sources, new sources for infrastructure funding, systems development charges, and pre-development activities are needed. Several formal and informal groups of stakeholders are considering innovative funding and financing mechanisms that are resonant with the recommended fund types in this report.

³ Each Oregon city is surrounded by an urban growth boundary (UGB); a line that designates where a city expects to grow over a 20-year period. Generally speaking, it’s where the city ends, and the farms and forests begin.

**GUIDANCE ON IMPLEMENTING
THE ACCESSORY DWELLING UNITS (ADU) REQUIREMENT
UNDER OREGON SENATE BILL 1051
UPDATED TO INCLUDE HB 2001 (2019)**



*M. Klepinger's backyard detached ADU, Richmond neighborhood, Portland, OR.
(Photo courtesy of Ellen Bassett and accessorydwellings.org.)*

OREGON DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT

MARCH 2018, updated SEPTEMBER 2019



Introduction

As housing prices in Oregon go up, outpacing employment and wage growth, the availability of affordable housing is decreasing in cities throughout the state. While Oregon's population continues to expand, the supply of housing, already impacted by less building during the recession, has not kept up. To address the lack of housing supply, House Speaker Tina Kotek introduced House Bill (HB) 2007 during the 2017 legislative session to, as she stated, "remove barriers to development." Through the legislative process, legislators placed much of the content of HB 2007 into Senate Bill (SB) 1051, which then passed, and was signed into law by Governor Brown on August 15, 2017 (codified in amendments to Oregon Revised Statute 197.312). In addition, a scrivener's error¹ was corrected through the passage of HB 4031 in 2018.

Among the provisions of SB 1051 and HB 4031 is the requirement that cities and counties of a certain population allow accessory dwelling units (ADUs) as described below:

- a) *A city with a population greater than 2,500 or a county with a population greater than 15,000 shall allow in areas within the urban growth boundary that are zoned for detached single-family dwellings the development of at least one accessory dwelling unit for each detached single-family dwelling, subject to reasonable local regulations relating to siting and design.*
- b) *As used in this subsection, "accessory dwelling unit" means an interior, attached or detached residential structure that is used in connection with or that is accessory to a single-family dwelling.*

This requirement became effective on July 1, 2018 and subject cities and counties must now accept applications for ADUs inside urban growth boundaries (UGBs).

On August 8, 2019, Governor Brown signed HB 2001, which established that off-street parking and owner-occupancy requirements are not "reasonable local regulations relating to siting and design." This means that, even if a local development code requires off-street parking and owner-occupancy, as of January 1, 2020, local jurisdictions may not mandate off-street parking spaces for ADUs nor require a property owner to live in either a primary or

¹ *The scrivener's error in SB 1051 removed the words "within the urban growth boundary." HB 4031 added the words into statute and thus limited the siting of ADUs to within UGBs. As a result, land within a city with a population greater than 2,500 but that is not within a UGB is not required by this law to be zoned to allow accessory dwelling units. For counties with a population greater than 15,000, only those unincorporated areas within a UGB are required by this law to be zoned to allow accessory dwelling units.*

accessory dwelling. The law provides an exception for ADUs that are used as vacation rentals, which may be mandated to provide off-street parking or have owner-occupancy requirements.

Some local governments in Oregon already have ADU regulations that meet the requirements of SB 1051 and HB 2001, however, many do not. Still others have regulations that, given the overall legislative direction to encourage the construction of ADUs to meet the housing needs of Oregon's cities, are not "reasonable." The Oregon Department of Land Conservation and Development (DLCD) is issuing this guidance and model code language to help local governments comply with the legislation. The model code language is included at the end of this document.

Guidance by Topic

The purpose of the following guidance is to help cities and counties implement the ADU requirement in a manner that meets the letter and spirit of the law: to create more housing in Oregon by removing barriers to development.

Number of Units

The law requires subject cities and counties to allow "at least one accessory dwelling unit for each detached single-family dwelling." While local governments must allow one ADU where required, DLCD encourages them to consider allowing two units. For example, a city or county could allow one detached ADU and allow another as an attached or interior unit (such as a basement conversion). Because ADUs blend in well with single-family neighborhoods, allowing two units can help increase housing supply while not having a significant visual impact. Vancouver, BC is a successful example of such an approach.

Siting Standards

In order to simplify standards and not create barriers to development of ADUs, DLCD recommends applying the same or less restrictive development standards to ADUs as those for other accessory buildings. Typically that would mean that an ADU could be developed on any legal lot or parcel as long as it met the required setbacks and lot coverage limits; local governments should not mandate a minimum lot size for ADUs. So that lot coverage requirements do not preclude ADUs from being built on smaller lots, local governments should review their lot coverage standards to make sure they don't create a barrier to development. Additionally, some jurisdictions allow greater lot coverage for two ADUs. To address storm water concerns, consider limits to impermeable surfaces rather than simply coverage by structures.

Any legal nonconforming structure (such as a house or outbuilding

that doesn't meet current setback requirements) should be allowed to contain, or be converted to, an ADU as long as the development does not increase the nonconformity and it meets building and fire code.

Design Standards

Any design standards required of ADUs must be clear and objective (ORS 197.307[4]). Clear and objective standards do not contain words like "compatible" or "character." With the exception of ADUs that are in historic districts and must follow the historic district regulations, DLCDC does not recommend any special design standards for ADUs. Requirements that ADUs match the materials, roof pitch, windows, etc. of the primary dwelling can create additional barriers to development and sometimes backfire if the design and materials of the proposed ADU would have been of superior quality to those of the primary dwelling, had they been allowed. Other standards, such as those that regulate where entrances can be located or require porches and covered entrances, can impose logistical and financial barriers to ADU construction.

Public Utilities

Development codes that require ADUs to have separate sewer and water connections create barriers to building ADUs. In some cases, a property owner may want to provide separate connections, but in other cases doing so may be prohibitively expensive.

System Development Charges (SDCs)

Local governments should consider revising their SDC ordinances to match the true impact of ADUs in order to remove barriers to their development. In fact, HB 2001, passed by the Oregon Legislature in 2019, requires local governments to consider ways to increase the affordability of middle housing types through ordinances and policies, including waiving or deferring system development charges. ADUs are not a middle housing type, but if a local government is reviewing its SDCs for middle housing, that would be a good time to review ADU SDCs as well. ADUs are generally able to house fewer people than average single-family dwellings, so their fiscal impact would be expected to be less than a single-family dwelling. Accordingly, it makes sense that they should be charged lower SDCs than primary detached single-family dwellings. Waiving SDCs for ADUs has been used by some jurisdictions to stimulate the production of more housing units.

Accessory Dwellings (model code)

Note: ORS 197.312 requires that at least one accessory dwelling be allowed per detached single-family dwelling in every zone within an urban growth boundary that allows detached single-family dwellings. The statute does not allow local jurisdictions to include off-street parking nor owner-occupancy requirements. Accessory dwellings are an economical way to provide additional housing choices, particularly in communities with high land prices or a lack of investment in affordable housing. They provide an opportunity to increase housing supply in developed neighborhoods and can blend in well with single-family detached dwellings. Requirements that accessory dwellings have separate connections to and pay system development charges for water and sewer services can pose barriers to development. Concerns about neighborhood compatibility and other factors should be considered and balanced against the need to address Oregon's housing shortage by removing barriers to development.

The model development code language below provides recommended language for accessory dwellings. The italicized sections in brackets indicate options to be selected or suggested numerical standards that communities can adjust to meet their needs. Local housing providers should be consulted when drafting standards for accessory dwellings, and the following standards should be tailored to fit the needs of your community.

Accessory dwellings, where allowed, are subject to review and approval through a Type I procedure[, pursuant to Section _____,] and shall conform to all of the following standards:

*[A. **One Unit.** A maximum of one Accessory Dwelling is allowed per legal single-family dwelling. The unit may be a detached building, in a portion of a detached accessory building (e.g., above a garage or workshop), or a unit attached or interior to the primary dwelling (e.g., an addition or the conversion of an existing floor).*

/

*A. **Two Units.** A maximum of two Accessory Dwellings are allowed per legal single-family dwelling. One unit must be a detached Accessory Dwelling, or in a portion of a detached accessory building (e.g., above a garage or workshop), and one unit must be attached or interior to the primary dwelling (e.g., an addition or the conversion of an existing floor).]*

B. Floor Area.

1. A detached Accessory Dwelling shall not exceed [800-900] square feet of floor area, or [75-85] percent of the primary dwelling's floor area, whichever is smaller.
2. An attached or interior Accessory Dwelling shall not exceed [800-900] square feet of floor area, or [75-85] percent of the primary dwelling's floor area, whichever is smaller. However, Accessory Dwellings that result from the conversion of a level or floor (e.g., basement, attic, or second story) of the primary dwelling may occupy the entire level or floor, even if the floor area of the Accessory Dwelling would be more than [800-900] square feet.

C. Other Development Standards. Accessory Dwellings shall meet all other development standards (e.g., height, setbacks, lot coverage, etc.) for buildings in the zoning district, except that:

1. Conversion of an existing legal non-conforming structure to an Accessory Dwelling is allowed, provided that the conversion does not increase the non-conformity;

2. No off-street parking is required for an Accessory Dwelling;
3. Properties with two Accessory Dwellings are allowed [10-20%] greater lot coverage than that allowed by the zone in which they are located; and
4. Accessory dwellings are not included in density calculations.

Definition (This should be included in the “definitions” section of the zoning ordinance. It matches the definition for Accessory Dwelling found in ORS 197.312)

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



PO Box 146
Pendleton, OR 97801
541.303.4157
www.landwise.pro

December 8, 2025

City of Irrigon
Planning Department
120 NW 1st Avenue
Irrigon, OR 97844

DEC 8 2025
copy

Re: Addendum to the Application for Development Code Text Amendments: Lot Size, Lot Frontage, and Side Setbacks

Dear Planning Staff and Review Committee:

Please find attached addendum to the previously submitted (August 15, 2025) Application for Development Code Text Amendments: Lot Size, Lot Frontage, and Side Setbacks.

We are submitting this addendum to support the originally submitted application on behalf of LandWise LLC, where we serve as the owner’s representative for Olin Homes.

We appreciate your time and review of this proposal. Please feel free to contact me if any additional information is needed.

Sincerely,

Bo Smith
Owner
LandWise LLC

Enclosure

Addendum to Application Narrative

Addendum to Application Narrative

Comprehensive Plan Goal Responses

This addendum is provided to support the previously submitted development code amendment and to respond to the Comprehensive Plan goals identified by the City Manager. The following sections explain how the proposed amendment aligns with and supports Goals 6, 9, 11, 12, and 14 in the City of Irrigon Comprehensive Plan. These responses are intended to be attached to the original narrative for use in the Planning Commission and City Council review process.

Goal 6: Air, Water, and Land Resources Quality

The proposed development code amendment is consistent with Goal 6 because it does not change or reduce any standards that protect air, water, or land resources. All existing DEQ, groundwater, stormwater, and erosion control regulations remain fully in effect. The amendment adjusts dimensional standards for residential lots but does not authorize any new uses or create any exemptions from environmental requirements.

- Air quality impacts in Irrigon are tied primarily to everyday activities and vehicle use, as noted in the Comprehensive Plan. Smaller residential lots do not change this dynamic and do not introduce new sources of emissions.
- Water quality protections under the Lower Umatilla Basin Groundwater Management Area also remain in place, and all development will continue to follow the same requirements for groundwater protection, stormwater management, and floodplain compliance.
- Allowing smaller lots supports compact development patterns that reduce the amount of land disturbed for each new home. This approach limits grading and soil disturbance and helps protect the area's land and water resources. Existing development standards, such as maximum building coverage, will continue to regulate impervious surfaces and stormwater impacts. These provisions ensure that future development proceeds in a manner consistent with the City's environmental goals.

Overall, the amendment advances Goal 6 by enabling efficient use of already zoned residential land while preserving all environmental protections.

Goal 9: Economic Development

The proposed development code amendment supports Goal 9 by strengthening the conditions needed for economic stability and growth in Irrigon. The Comprehensive Plan identifies that Irrigon's economy depends on agriculture, food processing, manufacturing, energy employers, and nearby regional job

centers. These industries require a reliable workforce, and the availability of attainable workforce housing plays a direct role in supporting employer retention and reducing commute burdens. Allowing smaller and more flexible residential lots helps narrow the gap between local wages and the cost of housing, which supports a stronger economic foundation for residents and employers.

The Comprehensive Plan also stresses the need to expand local commercial activity and increase the community's economic resilience. Efficient residential development patterns help support local businesses by increasing the number of households able to live within the City. A growing and stable population base encourages new services, attracts small business investment, and strengthens demand for local amenities.

This amendment also aligns with the City's policy to encourage diversified and nonpolluting development. More efficient lot standards help reduce per unit development costs and make it easier for contractors and homebuilders to deliver new housing within the existing service areas of the City. This supports steady construction activity, reinforces local trade jobs, and contributes to the City's long term tax base.

In summary, the amendment advances Goal 9 by supporting local workforce needs, strengthening residential affordability, and promoting economic resilience throughout the community.

Goal 11: Public Facilities and Services

The proposed amendment is consistent with Goal 11 because it preserves the City's existing approach to water, sewer, transportation, emergency services, and all other public facilities. The amendment does not modify how services are delivered and does not increase demand beyond what residential zoning currently allows. All new development will continue to connect to City utilities and comply with the standards identified in the Comprehensive Plan and the City's adopted facility plans.

The Comprehensive Plan emphasizes that compact development patterns help reduce the long term costs of extending and maintaining public infrastructure. Smaller lots make more efficient use of existing streets, water lines, sewer lines, and emergency service coverage by concentrating development within areas already planned for urban services. This improves the cost effectiveness of public investment and supports the City's long term financial planning.

All approved subdivisions and site development will continue to undergo the same capacity and service evaluation that is already required. The amendment simply allows more flexibility in how residential land can be configured within service ready areas, without expanding the service boundary or creating additional burdens on City facilities.

Overall, the amendment supports Goal 11 by encouraging development that can be served efficiently and by maintaining full compliance with the City's existing public facility requirements.

Goal 12: Transportation

The proposed amendment is consistent with Goal 12 because it maintains all transportation standards and does not alter any street design, access spacing, driveway standards, or the City's adopted Transportation System Plan. Development on smaller lots must still comply with the same requirements for street frontage, access management, and circulation. This ensures that safety and functionality remain unchanged.

The Comprehensive Plan emphasizes the importance of a transportation system that supports local travel, regional access, and pedestrian and bicycle mobility. Smaller lots contribute to more compact neighborhoods within the existing street network, which can reduce travel distances and encourage walking and cycling to schools, parks, and other community destinations. This supports the City's long-term vision for connected and efficient travel corridors.

Traffic impacts related to new development will continue to be evaluated through the subdivision process or on a case specific basis. The amendment does not change the amount or type of housing allowed in residential zones, but it helps concentrate development in areas already planned for urban services. This reduces the need for new road extensions and supports responsible use of transportation infrastructure.

Overall, the amendment supports Goal 12 by ensuring compliance with the Transportation System Plan and by promoting a development pattern that uses the existing transportation network efficiently.

Goal 14: Urbanization

The proposed amendment directly advances Goal 14 by promoting compact and efficient development within the existing urban growth boundary. The Comprehensive Plan clearly states that growth should occur in a compact urban form and that the City should avoid unnecessary outward expansion. Smaller and more flexible residential lots help the City accommodate population growth within its current boundary, reducing the need for future expansion and protecting agricultural and resource lands outside the City limits.

The Comprehensive Plan acknowledges that much of the City's buildable land is located in larger parcels that may require significant investment to develop. By allowing smaller lots and more efficient layouts, the amendment helps make these properties more feasible for development in areas already planned for water, sewer, and roadway systems. This promotes orderly growth and aligns with the City's service delivery plans.

Goal 14 also emphasizes that land inside the urban growth boundary should be used wisely. The amendment supports this direction by allowing a more flexible pattern of development that uses serviced land responsibly and increases the efficiency of public investment. Compact residential growth also helps maintain a clear distinction between urban and rural land, which is a central purpose of the urban growth boundary.

Overall, the amendment advances Goal 14 by supporting efficient, coordinated development within the urban growth boundary and making the best use of the City's planned service areas.

Opening and framing

Good evening Chair and Commissioners. For the record, my name is Bo Smith with LandWise, here on behalf of Olin Homes. We are located at 27 SW Dorion Ave. in Pendleton. Thank you for the time and effort that went into the staff report. I appreciate the level of detail and the concerns that were raised.

Before I respond to the individual comments, I want to set the table clearly for both the Commission and anyone here from the community. This application does not approve a subdivision, it does not approve a house, and it does not require any property to be developed differently than it is today. What it does is update the development code so that when housing is proposed in the future, the city has more flexibility to allow housing types that better match current needs.

Nothing in this proposal removes the city's authority or safeguards. All existing review processes remain in place.

Density and potential increase in households

Staff raised concerns that reducing minimum lot sizes could increase residential density and potentially add hundreds or even over a thousand households citywide. Those figures represent a theoretical maximum buildout if every eligible parcel were developed to its absolute limit. That is not how development happens in reality.

Zoning capacity does not equal development approval. Market demand, financing, ownership patterns, infrastructure timing, and subdivision review all determine what actually gets built and when. This amendment does not force land to be developed or require higher density. It simply allows flexibility where it makes sense over time.

For residents, this means gradual, incremental change rather than sudden neighborhood shifts. For the city, it means planning ahead instead of reacting later when housing pressure becomes more difficult to manage.

Water, sewer, and stormwater infrastructure

Staff expressed concern that increased density could strain water, sewer, and stormwater systems and suggested additional analysis may be needed. Infrastructure capacity is an important issue, but the appropriate time to analyze it is when an actual development proposal is submitted.

This amendment does not approve extensions of utilities or override infrastructure review. Every future subdivision or development would still be required to demonstrate adequate capacity

before moving forward. If infrastructure is insufficient, the city already has the authority to deny or condition development.

From a resident standpoint, this ensures systems are not overburdened. From the city's standpoint, it preserves full control over timing and capital planning decisions.

Traffic and transportation

Staff also raised traffic concerns and referenced thresholds that typically trigger traffic studies. Those standards are designed to evaluate specific development proposals, not legislative zoning changes.

At this stage, there is no project location, no site layout, and no roadway frontage to analyze. Requiring traffic studies now would be speculative and would not meaningfully inform decision making. Traffic impacts are best evaluated during subdivision and site plan review, when actual trip generation and mitigation can be identified.

For residents, this ensures traffic issues are addressed where they actually occur. For the city, it avoids spending time and resources on analysis that does not reflect real world conditions.

Parking

Concerns were also raised that smaller lots could increase on street parking. This amendment does not change parking requirements. Existing standards for garages and off street parking remain in place.

Lot size alone does not determine how many vehicles a household owns. Smaller homes often serve seniors, smaller households, or first time buyers who typically have fewer vehicles. Parking impacts are project specific and are most appropriately evaluated when a development is proposed.

For residents, this means neighborhood protections remain intact. For the city, it avoids overregulating based on assumptions rather than evidence.

Affordability and housing cost

Staff questioned whether smaller lots actually result in more affordable housing and noted that home prices are influenced by developer business models. That is true, and it is also why zoning should avoid unnecessary barriers.

No zoning code can guarantee affordability. However, large minimum lot sizes guarantee higher land costs per home. Reducing lot size lowers the land component of housing cost and allows more attainable options to be built.

This proposal is about workforce housing and housing choice, not price controls. It creates opportunity without mandates.

For residents, this expands options for young families, downsizing seniors, and local workers. For the city, it supports economic diversity and long term community stability.

Housing needs and timing

Staff referenced the Housing Needs Analysis and suggested that the city may already have sufficient capacity to meet projected demand. Capacity on paper does not always translate into housing on the ground.

Many parcels are constrained by ownership, infrastructure timing, or feasibility. The same planning documents that identify capacity also recommend zoning reform as a tool to address future needs.

Acting now allows the city to stay ahead of demand rather than waiting until shortages become more acute. For residents, this helps prevent displacement. For the city, it supports proactive planning rather than emergency responses.

Public facilities and services

Concerns were raised that increased households could place additional demand on city services. Growth of any kind increases demand, but compact and incremental growth is more efficient to serve than low density expansion.

Smaller lots within existing residential areas make better use of infrastructure that is already in place. Development also contributes system development charges and tax base that help fund services.

For residents, this supports more efficient public investment. For the city, it strengthens long term fiscal sustainability.

Accessory Dwelling Units

Staff noted a preference to delay ADU consideration. ADUs are not the focus of this amendment. They were included as optional, informational language, and I am comfortable separating that discussion entirely so the Commission can focus on the core issue of lot standards.

Conditions and additional requirements

Staff suggested that if the amendment is approved, conditions such as infrastructure analysis or traffic studies could be applied. Conditions are most effective when tied to specific development proposals.

Applying broad conditions at the zoning stage risks undermining the purpose of the amendment by reintroducing barriers the change is intended to address. The city already has full authority later in the process to ensure projects meet all standards.

Closing

At its core, this amendment is about flexibility, not force. It does not approve development, remove safeguards, or override city authority. It simply updates outdated standards so future housing can better match the needs of people who already live here.

For residents, it provides choice and helps people stay in the community. For the city, it aligns zoning with adopted policy and positions Irrigon for thoughtful, manageable growth.

Thank you. I'm happy to answer questions.

My name is Angie Sullivan with LandWise 27 SW Dorion Ave, Pendleton

Chair and Commissioners, my name is Angie Sullivan with LandWise, LLC. Thank you for the opportunity to speak tonight.

I want to focus on affordability, but I want to frame it in terms of **values**, not just numbers, because this decision is really about **who Irrigon is for**, now and in the future.

Affordability isn't about cutting corners or lowering standards. It's about **creating opportunity**. It's about recognizing that our community is made up of people in different stages of life, with different household sizes, incomes, and needs, and that our code should reflect that reality.

Right now, Irrigon's development standards assume that every household needs a large lot and a large home. But for many working families, seniors, and first-time buyers, those minimums quietly push homeownership out of reach before a project ever gets off the ground.

This amendment addresses affordability where it actually begins: **with land and design flexibility**.

By allowing smaller lots and homes down to 800 square feet, we are not mandating smaller housing. We are allowing choice. We are allowing someone to buy less house instead of being forced to buy more than they need or can afford.

The staff report notes that code changes alone don't guarantee affordability, and that's true. But what is also true is that **current standards guarantee higher costs**. Large minimum lots, wide frontage requirements, and minimum home sizes all translate directly into higher prices, regardless of who is building the home.

This proposal does not remove safety standards, design requirements, or neighborhood compatibility rules. It does not change height limits or eliminate parking requirements. What it does is modernize outdated assumptions about what a "successful" home must look like.

The City's Comprehensive Plan, particularly Goal 10, calls for a range of housing types and price points. This amendment is a practical way to put that value into action. It also aligns with statewide housing policy that encourages communities to remove barriers to smaller homes, missing-middle housing, and attainable ownership options.

If we want people who work in Irrigon to live in Irrigon, we need housing they can realistically afford. If we want seniors to downsize without leaving their community, we

need homes that fit that stage of life. And if we want growth that is thoughtful, fiscally responsible, and sustainable, we need flexibility built into our code.

This proposal does not force change on any neighborhood. It simply allows the City to say yes when an appropriate, well-designed project comes forward.

At its core, this is a stewardship decision. It's about ensuring Irrigon remains a community where people can build a future, not just pass through.

I respectfully ask the Planning Commission to recommend approval and allow this conversation to continue at the City Council level.

Thank you for your time and service.

LandWise

Land Development & Project Consulting

PO Box 146 | 27 SW Dorion Ave
Pendleton, OR 97801
541.429.4063
LandWise.pro

February 5, 2026

**Executive Summary – Letters of Support
Proposed Residential Development Code Amendments
City of Irrigon**

The enclosed letters of support reflect broad, informed backing for the proposed residential development code amendments from regional housing professionals, municipal leadership, builders, and engineering experts. Collectively, these letters emphasize that the proposed updates are a practical, well-considered response to current housing market conditions, rising construction costs, and documented workforce housing needs.

Industry representatives, including the Northeast Oregon Home Builders Association and local builders, note that existing dimensional standards such as minimum lot sizes, frontage requirements, and minimum home sizes have become increasingly misaligned with today's construction realities. The proposed amendments introduce modest, targeted adjustments that improve project feasibility and housing affordability while maintaining neighborhood character, zoning intent, and community standards. Importantly, supporters emphasize that the proposal does not expand the urban growth boundary, alter zoning districts, or introduce new housing types where they are not already permitted.

Municipal leadership from the City of Stanfield provides firsthand experience demonstrating that similar code changes have resulted in successful, well-maintained neighborhoods that are embraced by residents. These developments have improved housing availability for working families, reduced per-unit infrastructure costs, and strengthened long-term community stability, all while integrating seamlessly into existing neighborhoods.

From an engineering and infrastructure perspective, the proposed amendments are described as a responsible approach to growth. Smaller, more efficient lots allow cities to make better use of existing infrastructure, reduce long-term maintenance costs, and support sustainable residential development patterns that benefit both residents and municipalities.

Taken together, these letters affirm that the proposed development code amendments align with local comprehensive planning goals, regional and statewide housing strategies, and real-world development experience. The consistent message across all letters is clear: the proposed updates represent a balanced, thoughtful solution that supports housing supply, affordability, and community resilience within the City of Irrigon.

Respectfully,



Bo Smith



Letters of Support – Summary Overview

1. Northeast Oregon Home Builders Association (NEOHBA)

Letter From: Northeast Oregon Home Builders Association

Signed By: Shanna Escobedo, Executive Officer

Date: February 3, 2026

Summary:

NEOHBA expresses strong support for the proposed residential development code amendments, emphasizing that the changes are a locally tailored, practical response to rising construction costs and workforce housing needs. The letter highlights how reduced minimum lot sizes, narrower frontage requirements, and lower minimum home sizes improve feasibility without altering zoning districts, expanding the urban growth boundary, or changing allowed housing types. NEOHBA notes that the amendments align with Irrigon’s Comprehensive Plan and statewide housing strategies, supporting increased housing supply within existing city limits while maintaining neighborhood character.

2. City of Stanfield

Letter From: City of Stanfield

Signed By: Darla Linker, City Manager

Date: Noted on letter (2026)

Summary:

Drawing from Stanfield’s firsthand experience, the City supports Irrigon’s proposed code amendment allowing smaller residential lot sizes. The letter explains that while similar projects initially faced community skepticism, the completed neighborhoods proved successful, well-maintained, and highly desirable. Smaller lots helped reduce infrastructure costs, improved housing affordability, supported workforce retention, and strengthened neighborhoods. Based on these outcomes, the City of Stanfield encourages approval of the amendment as a positive tool for addressing workforce housing while preserving community character.

3. Residential Construction Specialists / Northeast Oregon Home Builders Association

Letter From: Residential Construction Specialists

Signed By: Reed Jassmann, President, Northeast Oregon Home Builders Association; Owner, Residential Construction Specialists

Date: Not specified (2026)

Summary:

This letter supports the proposed code amendment from a builder and industry perspective. It explains that restrictive lot standards, combined with rising land and construction costs, limit the ability to deliver homes that working families can afford. Increased flexibility in lot standards allows for efficient land use while maintaining quality, livability, and long-term value. The letter emphasizes strong buyer demand for homes on efficiently sized lots and notes that such changes help projects move forward, increase housing supply, and support local employment without compromising community standards.

4. ACH Engineering, P.S.

Letter From: ACH Engineering, P.S.

Signed By: Aaron Hoeft, Civil Engineer

Date: January 21, 2026

Summary:

From an engineering and infrastructure standpoint, ACH Engineering supports the proposed development code amendment. The letter explains that thoughtfully planned increases in residential density improve infrastructure efficiency, reduce per-lot costs, and support long-term maintenance. Smaller lots enable more effective use of existing streets, utilities, and stormwater systems while expanding housing opportunities for the workforce. Based on professional experience designing and reviewing similar projects, the amendment is described as a practical, reasonable update that balances growth with safety, livability, and responsible infrastructure planning.

Submitted at the Public Hearing on March 5, 2026

3/5/26 P11
/s/

Good evening Chair and Commissioners. For the record, my name is Bo Smith. I live at 2947 Blue Jay Street in Umatilla and I am here with LandWise, on behalf of Olin Homes. I appreciate the opportunity to return tonight and continue the discussion that began at the previous hearing.

At the last meeting, many residents took the time to come and share their thoughts about this proposal. I want to start by acknowledging that participation. It is clear that people care deeply about their community and about how development decisions might affect the character of Irrigon. Those concerns deserve to be heard and taken seriously.

My goal tonight is not to repeat everything that was presented previously, but to respond to the themes that came up during the last hearing and clarify what this amendment actually does and what it does not do.

First, I want to restate an important point that sometimes gets lost in the conversation. This amendment does not approve a subdivision, it does not approve a house, and it does not require any property to be developed differently than it is today. It is a legislative code amendment that simply updates the development standards that would apply if someone proposes housing in the future. All existing development review processes remain in place.

Several residents expressed concern that this change would dramatically increase density in Irrigon. While the amendment does allow somewhat smaller lots, zoning standards do not determine what actually gets built. Development happens gradually and is influenced by market demand, property ownership, financing, and city review processes. What this amendment does is provide flexibility so that when housing is proposed, it can better reflect the types of homes people are actually looking for today.

A number of residents also spoke about protecting the small town character of Irrigon. That is an important value and one that this proposal does not eliminate. Even with the proposed changes, homes would still be single family houses in residential neighborhoods. Height limits remain the same, parking requirements remain the same, and building standards remain the same. The amendment adjusts minimum dimensions, but it does not fundamentally change the type of neighborhoods that exist in Irrigon.

Infrastructure was another concern raised during the last hearing, particularly regarding water, sewer, and transportation systems. Those concerns are understandable. However, infrastructure capacity is evaluated when development proposals are submitted. Every subdivision must demonstrate that adequate water, sewer, and transportation infrastructure exists before it can be approved. If those systems cannot support a project, the city already has the authority to require improvements or deny the application. That safeguard remains unchanged under this amendment.

Traffic and parking concerns were also raised by several residents. Those impacts are evaluated at the time of development. The city's current code already requires off street parking for residential homes, and nothing in this amendment reduces those requirements. If future development proposals generate traffic impacts, those impacts are addressed through the city's review process and transportation standards.

Parking specifically came up during the previous meeting when the city presented data showing that the average number of vehicles per household in Irrigon is already higher than what the current code assumes. In other words, the parking challenges residents are experiencing today are happening under the existing standards, not because of this proposal.

That highlights an important point about development codes. They are meant to evolve as communities change. If current parking standards no longer reflect real world conditions, the city absolutely has the authority to update those requirements. In fact, staff even suggested that the city may want to explore increasing parking requirements citywide.

This amendment does not reduce parking requirements and it does not prevent the city from revising them. What it does is allow the city to begin modernizing parts of its development code and addressing issues like parking in a proactive way. Rather than waiting until problems become larger, this conversation provides an opportunity to evaluate existing standards and adjust them where necessary.

Another concern raised by residents was whether smaller lots actually result in more affordable housing. It is true that zoning alone cannot guarantee housing prices. However, minimum lot size directly affects the cost of land per home. When the minimum lot size is larger than necessary, it increases the cost of every house that is built. Allowing somewhat smaller lots lowers that land cost component and creates the opportunity for more attainable housing options.

This is especially important for younger families, first time buyers, and seniors who may want to downsize but remain in their community. The goal of this amendment is not to force density or dramatically change neighborhoods. The goal is to allow a broader range of housing options so that people who work in Irrigon and who grew up here have a better chance of finding housing they can afford.

Finally, I want to address the question of whether the city even needs this type of flexibility right now. Staff noted that the city may currently be on track to meet projected housing demand under the existing code. Planning ahead is still important. Housing markets and demographics change over time, and updating development standards today helps ensure the city has the tools it needs to respond to future needs without waiting until shortages become more severe.

At the end of the day, this amendment is about flexibility rather than mandates. It does not require development, it does not remove safeguards, and it does not override the city's authority to review and regulate projects. What it does is give Irrigon the ability to adapt its development standards so that future housing can better match the needs of its residents.

I appreciate the continued discussion and the thoughtful input from both the Commission and the community, and I am happy to answer any questions.

Thank you.

3/5/26 PH

Angie Sullivan with LandWise – 27 SW Dorion Ave., Pendleton, Oregon

Good evening Chair Case and members of the Planning Commission. Thank you for the opportunity to speak tonight.

My name is Angie Sullivan, and I am here to speak about the need for attainable housing for working families in Irrigon.

Across our region, we are facing a growing gap between what working families earn and what housing costs. Teachers, healthcare workers, tradespeople, agricultural workers, and small business employees are the backbone of communities like Irrigon. Yet many of these individuals are increasingly unable to find housing they can afford in the communities where they work.

Attainable housing is not about lowering standards or changing the character of a community – and certainly not your community. It is about providing well-designed, durable homes that working families can realistically afford. Reducing land costs is one method that can help improve affordability. When we create opportunities for these families to live locally, we strengthen schools, support local businesses, and build a more stable community.

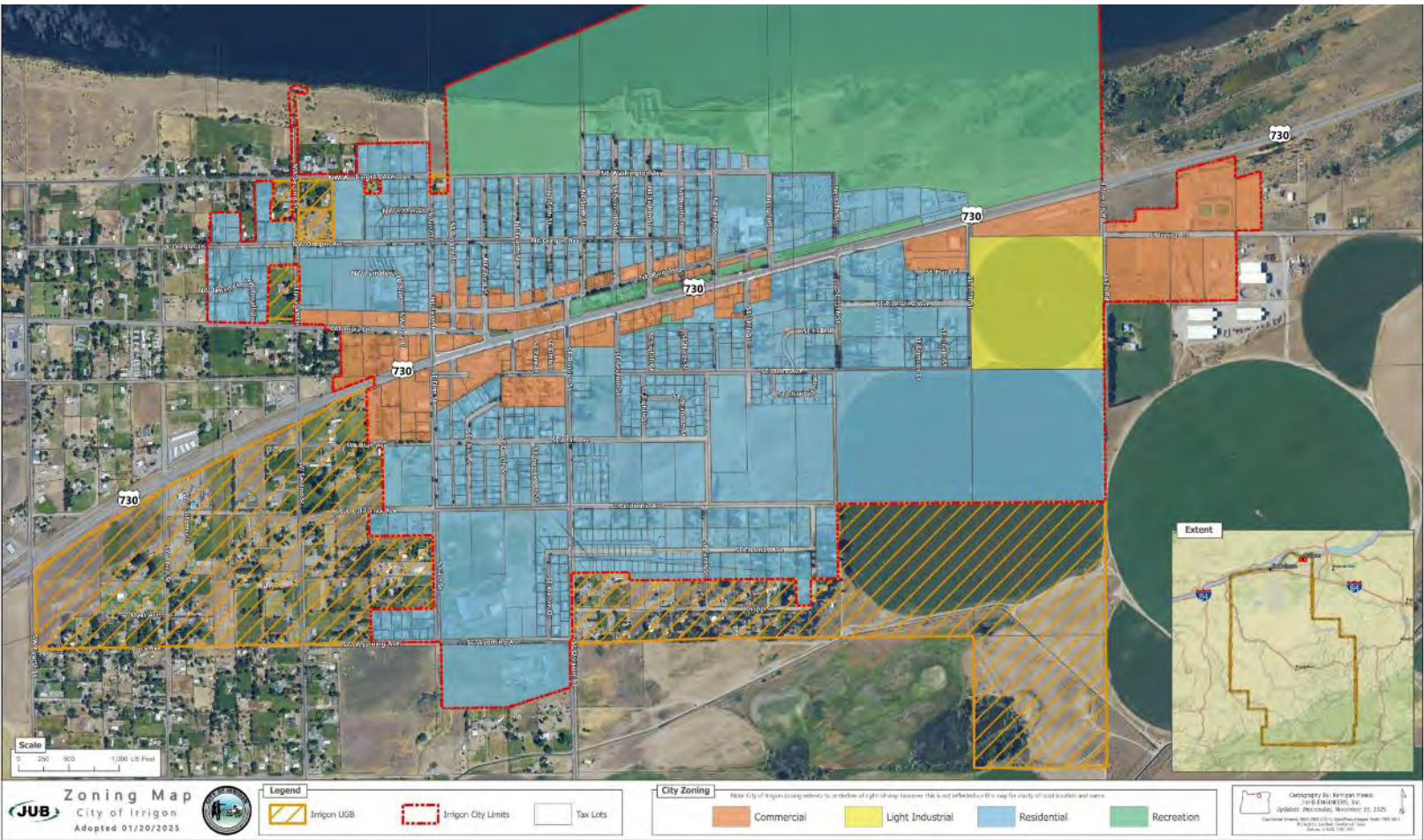
I also want to briefly address the recent survey distributed by the City. While public input is important, the way questions are framed can significantly influence responses. Several questions in the survey appeared to present housing development in a negative light rather than neutrally presenting options for community growth. For surveys to truly inform good policy, they should be structured in a balanced way that allows residents to evaluate both the challenges and the benefits of housing solutions.

LandWise respectfully requests that the survey results be made available in a timely fashion so we can adequately prepare our testimony for the upcoming City Council meeting.

I encourage the Commission to continue looking carefully at the real housing needs of working families and to support thoughtful, responsible housing development that helps keep Irrigon a place where the people who work here can also afford to live.

Thank you for your time and for your service to the charming community of Irrigon.

Exhibit B. Zoning Map



Example Lot Diagrams. The diagram on the left shows an example lot with the existing required minimums for lot size, setbacks (neighbor buffers), dwelling size, and garage space. The diagram on the right shows an example lot with the minimums proposed in the amendment from LandWise, LLC and Olin Homes, LLC. The tables to the right of each diagram use the setbacks to calculate the Neighbor Buffer and area available for structures under each set of standards.

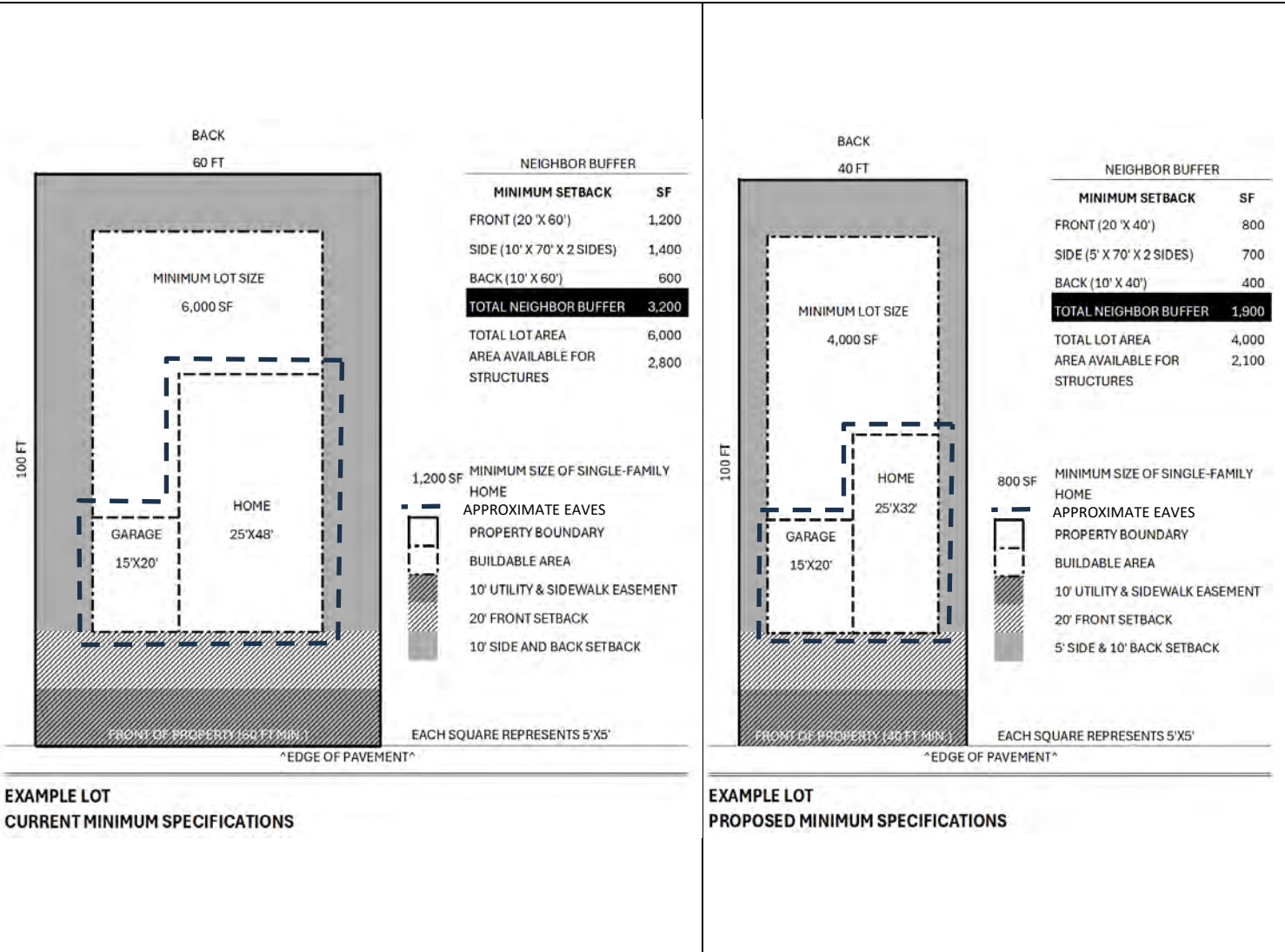


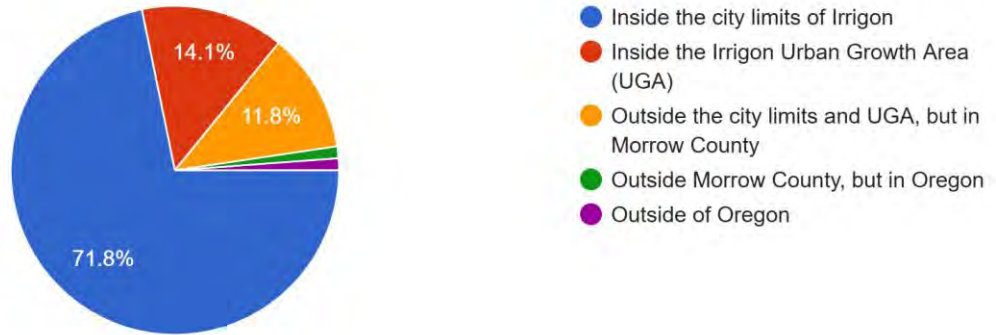
Exhibit C. Example Lot Diagrams

Exhibit D. Public Survey Summary as of February 20, 2026

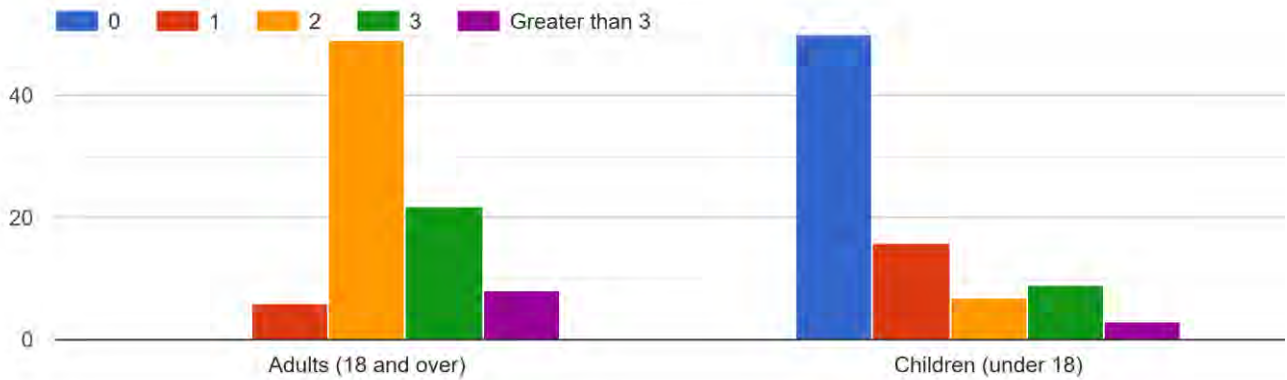
Survey Respondents:

Where is your primary residence?

85 responses



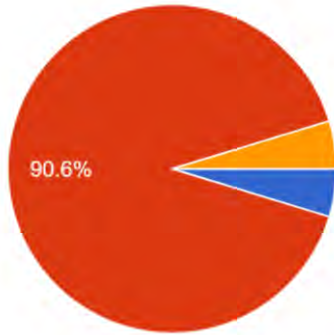
How many people are in your household?



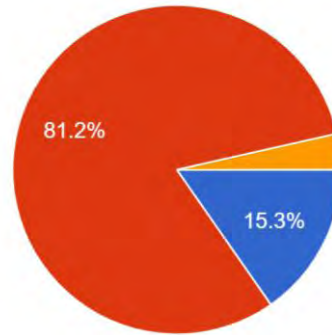
Results (85 Responses)

Response Options: Yes ● No ● Other ●

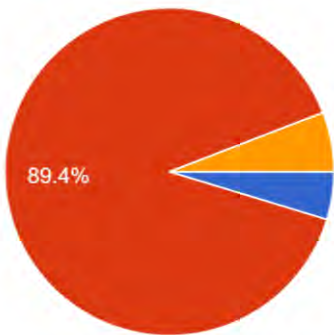
Should the minimum lot size be reduced from 6,000 square feet (0.14 acres) to 4,000 square feet (0.09 acres)?



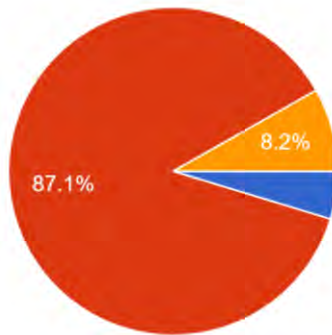
Should the minimum home size be reduced from 1,200 square feet to 800 square feet?



Should the minimum lot width be reduced from 60 ft to 40 ft?



Should the residential side neighbor buffer be reduced from 10 ft to 5 ft?



Overview

- Majority of respondents were inside Irrigon City Limits and UGB
- Majority of respondents are not in favor of changing the minimum residential standards (81% to 90% said “No” to each change). Respondents most pressing concerns were:
 - Privacy
 - Home values and affordability
 - Parking/Traffic
 - Greatly impacts (strains) water and sewer systems without a plan for improving for funding infrastructure demands.
 - Having enough room for outbuildings
 - Fire safety
- The proposed change with the most support (15%) was on the minimum home size as some respondents thought it should be up to the owner, not the government

Exhibit E. Summary of Public Comments and Public Comment Letters

February 5, 2026 Public Hearing

All comments in favor of the application were delivered by the applicant or an employee of the applicant:

- Housing affordability
- Workforce housing
- Flexibility in zoning
- Economic growth

Multiple residents spoke in opposition, citing concerns including:

- Increased density and congestion
- Parking limitations
- Traffic impacts
- Water and sewer capacity
- Loss of small-town character
- Reduced yard space for families
- 5-foot setbacks being too narrow
- Affordability not guaranteed
- Impact on existing property owners

March 5, 2026 Public Hearing

All comments in favor of the application were delivered by the applicant or an employee of the applicant:

- Need for attainable housing for working families
- Request for balanced survey methods in future public engagement

In Opposition:

- Concerns about smaller lot sizes and referenced a Stanfield subdivision constructed by the applicant as an example of high-density development. Questions of whether such changes serve the community's best interest.
- Support for staff's recommendation not to approve the amendment and request the Commission heed public's opposition.

Barbara Phillips
80610 Wagon Wheel Loop
Irrigon, OR 97844

Irrigon Planning Commission
500 NE Main Ave.
Irrigon, OR 97844

February 3, 2026

Subject: Opposition to Proposed Zoning Change – Land Use Notice AMD 266-26

I am writing to express my opposition to the proposed zoning changes in Irrigon's Residential Zone, specifically regarding the reduction of minimum lot sizes, the reduction of side setbacks, and the reduction of minimum home square footage requirements. While we recognize the need for thoughtful housing growth, the proposed density increase poses significant risks to the long-term viability and character of Irrigon.

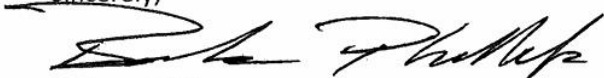
As a resident of Irrigon for 28 years, and owner of developable acreage within City limits, I believe these changes will negatively affect the character, safety, and property values of our community for the following reasons:

- **Incompatibility with Existing Neighborhood Character:** The existing homes in Irrigon were designed with larger lot sizes and a consistent, suburban feel. Transitioning to high-density lots would lead to a "crowded" feel that contradicts the very reasons residents choose to invest in this rural community.
 - **Reduced Setbacks Create Safety and Privacy Issues:** Reduced side setbacks, which allow homes to be closer together, will decrease privacy for existing residents and raise fire safety concerns regarding the space between structures.
 - **Infrastructure and Public Safety:** Our existing roads, water, and sewage systems were engineered for low-density residential use. Increasing the number of households without a proportional upgrade to infrastructure risks systemic strain, increased traffic congestion, and diminished emergency response efficiency.
 - **Impact on Property Values:** The introduction of high-density housing into a single-family residential area, along with smaller, non-conforming homes, could likely result in a decline in property values.
- Thank you for your time and consideration of these concerns.

I respectfully urge the Commission to deny this application. We advocate for a development strategy that prioritizes the quality of our living standards over the sheer quantity of units.

Thank you for your dedication to the future of Irrigon.

Sincerely,



Barbara Phillips

February 21, 2026

Re: Developer's Proposed Amendment to City Code

Aaron, City Council, and Planning Commission:

Once again the City of Irrigon is being pressured by developers to allow them to do something which benefits the developers at Irrigon's expense. The expense I am referring to is an increasing lack of conformity in our community. Conformity may not sound important when first considered, but it is important to appraisers and to lenders. It is important to homeowners, homebuyers and people who want to build a home in Irrigon. For what they are worth, here are my thoughts on this zoning change.

People who want to build or place a home generally prefer to build that home in a neighborhood of similar homes. Irrigon has very few building sites in areas with any conformity. Same problem with existing homes. We have a few streets with several site built homes in a row (very few) but almost no neighborhoods that do not include single or double wide mobile homes or manufactured homes. I am not trying to knock mobile and manufactured homes. I have owned them in the past and still own one today. I may live in one again when we downsize. But this is not conformity and may not be a choice location for many people to buy or build. We have nice homes along side of singlewide mobiles from 1970s,

Mobile homes were placed in Irrigon in significant numbers at least as far back as the Seventies. We had codes in Irrigon at that time but they were very loosely written. Irrigon was hungry for development in the Seventies so there was little regulation. Irrigon had a very nice couple who lived here and acted as developers, along with a manufactured home sales business on Hwy 730. In addition to a basic lack of conformity throughout Irrigon, this development boom left our small community with 4 large mobile home courts which are still here today. It also left us with much higher percentage of mobile homes compared to neighboring communities.

In the Nineties another developer, Dan Biamonte came to Irrigon and developed 3 small subdivisions and placed manufactured homes on them. Biamonte also pressured the City in various ways. Some of the homes were set on flag lots to allow for more lots and more homes on small pieces of land. Some got garages or carports but some did not. You can see these developments on Division St, Crimson and Clover off of E Idaho, and corner of S First St and Nevada.

Conformity does matter. As a new realtor in 1994 I was told repeatedly "You can't get that much out of that house because it's in Irrigon." That was the mantra of the realtors then. Upon asking appraiser Doug Barak, I was told that the price difference compared to other communities was 10% to 15% lower for the same property in Irrigon. How much of that difference was lack of conformity I do not know but I am convinced at least a part of it was due to lack of conformity. I do believe that Irrigon has overcome most of that but it has taken a long time.

City developed stricter development codes and has enforced them strictly. I commend the City for that. Hopefully, the City will not loosen their codes to allow what looks like high density housing developments in our community which is not a high density area. In addition to subdivisions of high density housing, the change they are requesting to allow 800 sf homes on 4,000 sf lots would include not only their little developments, it would include a lot of other land. Irrigon has homes on many lots that are large enough to allow partitioning into 1 or more additional lots which could each have a home placed on them. The result would not be pretty.

The City has done a good job of implementing new codes and enforcing them in recent years. I am hoping the Council and Planning Commission will adhere to our current codes and appreciate that adhering to them will make Irrigon better. This will benefit our existing homes as well as future development in our community.

Irrigon is no longer starving for development—we do not need to cave in to developers. We already have development occurring here.

Patti Burres
PO BOX 288
IRRIGON OR 97844-0288

☰ Content

Conformity in Real Estate: Principles & Valuation (Expert Guide)

Published on 04 February 2026 in [Information](#) 11 minutes on read



Image taken from the YouTube channel [birminghamappraiser](#), from the video titled [Appraisal Principle of Conformity](#).

The Principle of Conformity is one of the foundational tenets of real estate appraisal. Simply put, it asserts that maximum value is realized when a property is in reasonable agreement with the standards of the surrounding neighborhood.

This means homes that are drastically larger, smaller, or architecturally distinct from their immediate neighbors often suffer diminished market appeal and lower valuation ceiling. For buyers and investors, conformity ensures stability and predictability in property assessments, while non-conformity introduces valuation risk.

Now, let's dive deeper into the core definition of conformity and why it matters so much to lenders and appraisers.

The Foundation: What is the Principle of Conformity in Real Estate?

Content

***Key Takeaway:** The principle of conformity dictates that a property achieves maximum value when it is reasonably similar to its surrounding properties within a defined market area.*

Real Estate Valuation: Conformity and Neighborhood Standards

Defining the Core Concept

The **principle of conformity definition real estate** establishes that maximum value accrues to properties that are architecturally and functionally consistent with their environment. This is a crucial foundational element of modern valuation standards, including the Uniform Standards of Professional Appraisal Practice (USPAP).

It asserts that the value of a property is maximized when it exists within **homogeneous neighborhoods**, where structures generally share similar characteristics regarding size, age, condition, and utility. Deviations from the established norm, particularly excessive differences in style or scale, disrupt the market equilibrium and introduce immediate appraisal challenges.

The Role of Appraisers and Lenders

For financial institutions and secondary market investors, the principle of conformity functions as a critical risk mitigation tool. Appraisers utilize this **appraisal principle** heavily when conducting a **comparative market analysis (CMA)** to establish the subject property's defensible valuation.

The core methodology involves reliably comparing the subject property to recently sold, highly similar properties (comparables). Non-conforming properties complicate this necessary data set, forcing complex adjustments that increase valuation uncertainty.

Market resistance is inherently higher for outlier properties, meaning lenders often view non-conformity as a direct threat to collateral stability. This foundational principle quickly leads to complex decisions about property design and customization.

Conformity vs. Customization: Where High Design Goes Wrong

***Key Takeaway:** Highly customized renovations often fail to appeal to a broad market, leading to a diminished pool of comparable sales and unnecessary appraisal complexity. When personalization exceeds neighborhood standards, the resulting property value may be lower than the cost invested, generating a measurable loss upon sale.*

The Risk of Aesthetic Obsolescence

While homeowners often seek unique features to differentiate their property, excessive deviation from community norms introduces significant risk. This risk is defined by the potential for rapid **aesthetic obsolescence**, where highly specific design choices—such as hyper-modern fixtures or extremely polarizing color schemes—become immediately dated or unattractive to the general buying pool.

The core challenge for lenders and potential buyers lies in marketability. When **appraising highly unique homes**, appraisers struggle to find sufficient comparable sales (Comps) that

reflect the property's specific features, complicating the valuation process and often necessitating conservative adjustments.

[Real Estate Valuation: Conformity and Neighborhood Standards](#)
A property's value is fundamentally linked to its market breadth; narrow appeal directly correlates with reduced final sale price potential.

You also like

[When Tyranny Becomes Law Rebellion Becomes Duty \(Quote Analysis\)](#)

Understanding Over-Improvement

The concept of **over-improvement** occurs when the financial investment made in customization or renovation exceeds the maximum achievable market value for that specific location and property type.

In real estate economics, every property is judged based on its **highest and best use**, which assumes the usage must be legally permissible, physically possible, financially feasible, and maximally productive. Custom renovations that drastically elevate the cost structure beyond the typical neighborhood ceiling violate the financial feasibility requirement.

You also like

[Juliet and Lady Capulet: Analyzing Their Dysfunctional \(Transactional\) Relationship](#)

For example, installing a commercial-grade, multi-station kitchen in a modest suburban starter home constitutes a measurable over-improvement. Although the construction cost may be \$100,000, the market may only recoup a fraction of that expense because surrounding properties establish the pricing ceiling.

Lenders view properties exhibiting clear over-improvement as greater risks because the eventual resale value is anchored firmly by the neighborhood average, regardless of the individual owner's personal investment.

To avoid these pitfalls, we must examine the tangible ways neighborhood standards are enforced and maintained.

Practical Applications: How Conformity Affects Valuation and Sales

Key Takeaway: Valuation hinges significantly on a property's adherence to community standards, meaning highly customized or over-improved features can trigger the **Principle of Regression**. Lenders and appraisers view deviation from established norms as a direct risk factor that limits **market acceptance** and reduces the pool of willing buyers.

Category	Description	Impact
Size/Style Difference	Home 50% larger than neighbors	High valuation cap/Regression risk

Category	Description	Impact
Real Estate Valuation, Conformity and Neighborhood Standards		Buyer pool
Material Quality	Luxury finishes far exceeding local standards	Over-improvement/Wasted capital

The core function of **real estate appraisal principles explained** is to estimate a property's market value based on the actions of typical, rational market participants. When a property deviates significantly from the surrounding properties, it creates complexity in the valuation process. The critical issue is the lack of comparable sales data, which makes the appraiser reluctant to assign a higher value.

Highly personalized or unconventional renovations often fail the test of broad market appeal. These unique features increase the potential for **functional obsolescence** or **external obsolescence**, depending on how they clash with established neighborhood expectations. This directly translates into lower valuation caps imposed by lenders.

Homogeneity and Market Appeal

Conformity is intimately linked to the concept of **market acceptance**. A neighborhood defined by predictable size, architectural style, and quality provides a stable environment for buyers and lenders. This homogeneity assures buyers that the property's value is supported by similar, demonstrated sales.

When an owner undertakes a bespoke renovation—such as installing highly specialized fixtures or radically altering the facade—they risk limiting the potential buyer pool. While the owner may value the uniqueness, the majority of the market seeks reliable, transferable, and conventional housing stock. Appraisers must disregard capital expenditures that are unlikely to be recovered in a typical sale.

The economic consequence of non-conformity is most often seen through the **Principle of Regression**. This principle states that the value of a superior property will be negatively affected by the presence of surrounding, lesser-quality properties. A luxury, custom-built home situated among moderate, standard homes will rarely achieve a commensurate valuation due to this external drag.

Zoning, HOAs, and Standardization

Formal regulatory mechanisms significantly enforce standardization within communities, thereby guaranteeing a baseline level of conformity. **Zoning ordinances** dictate minimum lot size, setback requirements, and density, preventing wildly disparate development patterns. Adherence to these laws is the foundational requirement for legal conformity.

In planned developments, **HOAs (Homeowners Associations)** elevate conformity requirements to an aesthetic level. These associations use Covenants, Conditions, and Restrictions (CC&Rs) to govern everything from paint color to roof materials and landscaping. Violations of these rules can trigger fines or mandatory removal, severely impacting a property's marketability and appraisal.

From a valuation perspective, adherence to both **zoning ordinances** and **HOA** rules minimizes risk for the lender. Non-compliant structures are inherently risky because they may require

Real Estate Valuation: Conformity and Neighborhood Standards
value.

Given these rules, owners must develop clear strategies for ensuring their property enhancements contribute positively to value.

Strategies for Maximizing Value Through Consistency

***Key Takeaway:** Maximizing appraisal value requires strategic alignment of renovations with prevailing neighborhood expectations, as highly personalized features rarely offer high Renovation ROI. Practical value strategies focus on incorporating standard features that appeal to the widest market, ensuring successful comparable sales evaluations.*

The core challenge for property owners is distinguishing between personal preference and market appeal. While a bespoke, ultra-luxury renovation may increase the utility for the current owner, it often fails the marketability test. For lenders and appraisers, **does conformity increase property value?** The answer is unequivocally yes, because it reduces volatility and expands the pool of potential buyers.

The goal of value maximization is to capture the highest possible return on investment (**Renovation ROI**) during resale. This is achieved by focusing capital on features that are expected and easily valued by the appraisal process, rather than bespoke elements that introduce valuation complexity.

Renovating with the Neighborhood in Mind

Adherence to the principle of conformity means viewing the property not in isolation, but as an integrated component of its immediate surroundings. This requires a granular understanding of the dominant style, materials, and feature sets prevalent within the tract or subdivision.

 You also like

[Remote Memory Definition: Understanding Access in Distributed Systems](#)

- **Feature Standardization:** Focus renovation budgets on high-demand, standard features. These include universal elements like two-car garages, quartz countertops, and neutral color palettes. These features contribute directly to strong **comparable sales** (comps).
- **Material Selection:** Select materials that match or slightly exceed the quality standards of nearby properties, but avoid materials so rare or niche that they cannot be easily substituted or priced by appraisers.
- **Layout Consistency:** Major structural changes that fundamentally alter the flow (e.g., converting four standard bedrooms into two massive custom suites) often hurt valuation. Buyers seek predictable layouts that meet family needs.
- **Curb Appeal Alignment:** The exterior presentation must align with the neighborhood's visual standards. An overly contemporary façade in a historical, traditional neighborhood creates a stark violation of conformity that appraisers must penalize.

Appraisers rely on the market to dictate value. If every home in the immediate vicinity features traditional wood flooring, installing highly specialized, rare-earth stone flooring will likely not

Real Estate Valuation: Conformity and Neighborhood Standards

When to Deviate (and Why It's Risky)

Deviation from conformity is sometimes necessary to address deferred maintenance or to incorporate modern amenities (e.g., HVAC systems, energy efficiency improvements). However, aesthetic deviation introduces significant risk.

Highly customized features, such as indoor saltwater pools in a cold climate or commercial-grade kitchens in a standard residential home, often result in negative adjustments during the appraisal process. The appraiser must justify that the market will pay a premium for that specific feature, and typically, it will not.

The risk stems from a concept known as **functional obsolescence** or **super-adequacy**. When a feature is far beyond the reasonable needs or desires of the typical buyer, the excessive cost is considered incurable. The appraisal may assign zero value—or even negative value—to the overly expensive feature because it dramatically limits the potential buyer pool.

Lenders perceive highly specialized homes as high-risk collateral. If they must foreclose, they require assurance that the property can be quickly and easily liquidated. Unique properties inherently require more time on the market and often command lower overall prices relative to their replacement cost.

Understanding these guidelines brings us to our final thoughts on the enduring importance of market standardization.

To visualize how neighborhood standardization translates into concrete value assessments, watch this short video explaining the key appraisal principles at work.

Watch: The Principle of Conformity in Real Estate Valuation



We understand that navigating appraisal principles can be complex. Still have questions about conformity or over-improvement? Here are the top queries real estate professionals encounter.

Real Estate Valuation: Conformity and Neighborhood Standards

Real Estate Valuation: Conformity and Neighborhood Standards

Q1: Does conformity increase property value?

While strict conformity does not actively "increase" property value in the way a major renovation might, it is crucial for **preserving stability and mitigating risk**. Properties that conform closely to the neighborhood standard are perceived as less risky investments, which supports consistent market pricing and ensures properties sell within the typical neighborhood price range. Lack of conformity introduces uncertainty, which can depress value.

Q2: What is an example of non-conformity?

A classic example of non-conformity is the presence of a dramatically different architectural style or functional use. For instance, building a sleek, glass-and-steel contemporary structure in a neighborhood strictly comprised of **Victorian homes**, or converting a residential property into a commercial operation without corresponding zoning changes (if permissible). The resulting **aesthetic and functional clash** creates market resistance.

Q3: How does conformity affect the "Highest and Best Use" analysis?

Conformity heavily influences the "Highest and Best Use" analysis by defining what the market considers **financially feasible and legally permissible**. Even if a property could theoretically be converted into a denser, higher-earning use (the "highest" earning), if that use violates neighborhood standards or zoning (the "permissible"), it is not truly the best use. Conformity effectively limits the maximum acceptable use to maintain neighborhood homogeneity and value.

Q4: Is the Principle of Conformity the same as the Principle of Regression?

No, they are distinct but related concepts. The **Principle of Conformity** states that maximum value is realized when a property is reasonably similar to its neighbors. The **Principle of Regression** is the negative consequence that occurs when a property is superior to the surrounding properties, causing its value to be pulled down toward the lower average. A significant violation of conformity often triggers the Principle of Regression because the superior property is not accepted or valued by the market due to its surrounding context.

The Principle of Conformity is a powerful, often overlooked, driver of property value. While individuality is appealing, standardized design promotes stability and maximizes the appraisal ceiling for lenders. By renovating or purchasing within the context of the neighborhood's norms, you safeguard your investment against valuation penalties associated with over-improvement or non-compliant design.

Ultimately, smart real estate decisions prioritize market acceptance over unique aesthetic choices when financial return is the primary goal.



February 3, 2026

Letter of Support for Proposed Residential Development Code Amendments

To Whom It May Concern,

On behalf of the **Northeast Oregon Home Builders Association**, we are pleased to offer our strong support for the proposed amendments to the City of Irrigon's residential development standards.

This application reflects exactly the type of **locally tailored, practical solution** communities need to address today's housing challenges especially workforce housing. Local governments are best positioned to understand their housing market conditions and infrastructure capacity. These proposed updates appropriately use local flexibility to remove barriers that currently make housing production difficult, while maintaining the intent and structure of existing zoning.

The current dimensional standards in Irrigon – including large minimum lot sizes, wide lot frontage requirements, substantial setbacks, and high minimum house size thresholds – directly affect housing feasibility. As construction, labor, and material costs have risen, these standards have increasingly made it difficult to produce homes at price points attainable for working families. Modest reductions in lot size, lot width, side yard setbacks, and minimum floor area are reasonable adjustments that can significantly improve project feasibility without fundamentally altering neighborhood character.

Importantly, this amendment focuses on **increasing housing supply within existing city limits/urban growth boundaries** on land that is already zoned for residential use and served by infrastructure. By reducing the minimum lot size from 6,000 to 4,000 square feet, narrowing frontage requirements, allowing more workable setbacks, and lowering the minimum enclosed floor area from 1,200 to 800 square feet, the proposal enables more efficient use of land while still supporting quality residential development.

Equally important is what this amendment does *not* do. It does not change zoning districts or the zoning map, does not alter allowed housing types, does not expand the urban growth boundary, and does not introduce multifamily development where it is not already permitted. Instead, it makes targeted code refinements that allow the community to better meet its housing needs under existing plans and infrastructure.



P.O. Box 436, Hornington, OR 97123



541-561-6978



admin@neohba.com



www.neohba.com



The proposal is consistent with Irigon's Comprehensive Plan Goal 10, which calls for a variety of lot sizes and housing options, and it aligns with regional and statewide housing strategies encouraging communities to remove regulatory barriers through clear and objective standards.

These updates represent a balanced approach that supports housing choice, improves affordability feasibility, and helps ensure that workforce families can find homes in the communities where they live and work. We respectfully urge approval of this application.

Sincerely,

Northeast Oregon Home Builders Association

By: 
Shanna Escobedo, Executive Officer

B Phillips Submitted 3/5/26

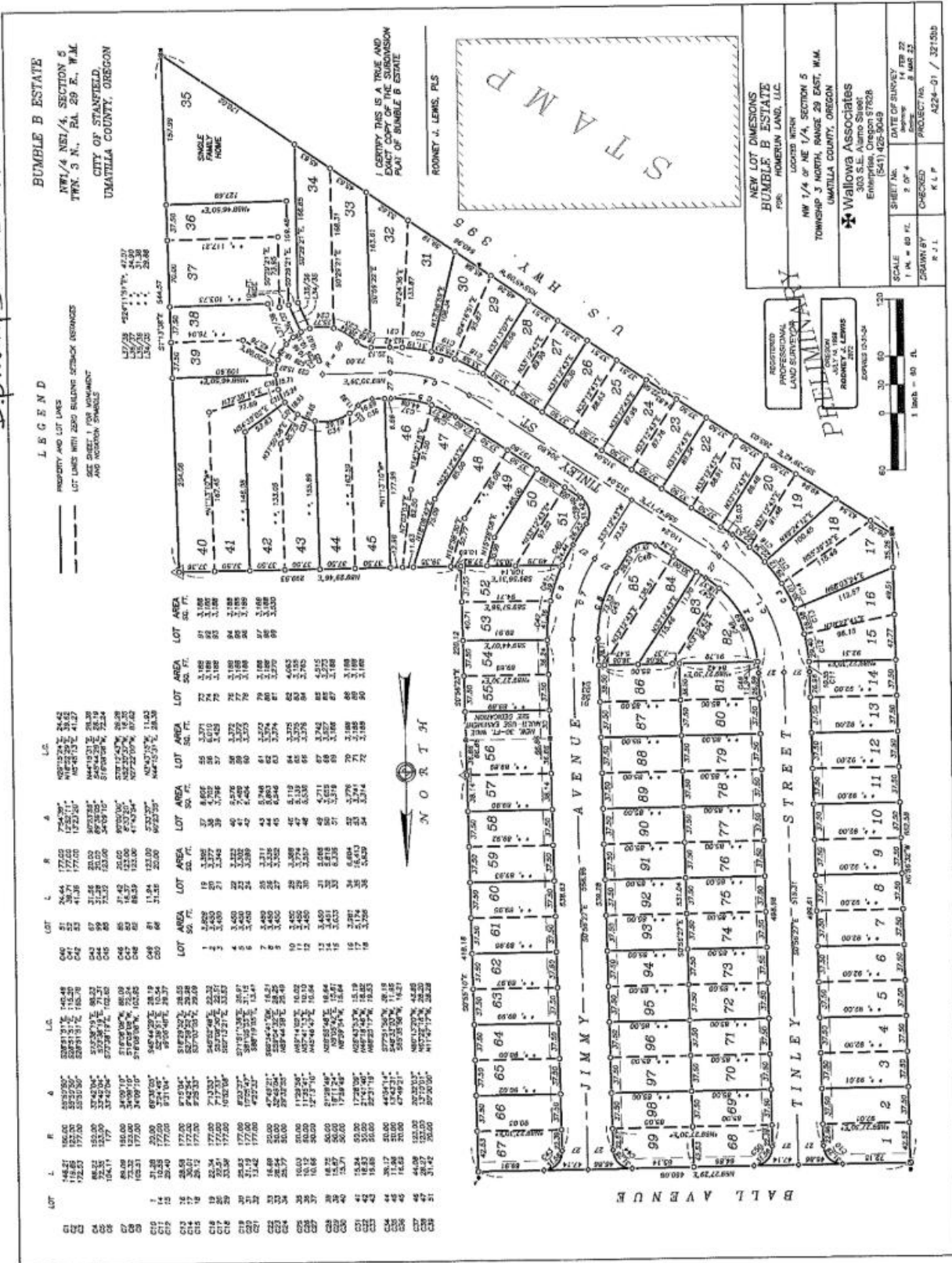


Exhibit F. Agency Comment Letters

From: HERT Dawn * DLCD <Dawn.Hert@dlcd.oregon.gov>

Sent: Monday, February 2, 2026 5:00 PM

To: Aaron Palmquist <aaron.palmquist@ci.irrigon.or.us>

Subject: FW: City of Irrigon amendments (AMD 266-26)

Hello Aaron,

Please see the email comments below from our Housing Accountability and Production Office with regards to the upcoming code amendment application #AMD266-26 public hearing on Thursday.

I am planning to attend the meeting virtually. Please let me know if you would like to catch up prior to the meeting.

Thanks. Take care and talk soon,
Dawn

Dawn Marie Hert [Hear my name](#) .
Eastern Oregon Regional Representative | Community Services
Division
Pronouns: She/Her/Hers
Oregon Department of Land Conservation and Development
Eastern Oregon University, One University Blvd, Badgely Hall, Room
233A | LaGrande, OR 97850-2807
Cell: 503-956-8163 | Main: 503-373-0050
dawn.hert@dlcd.oregon.gov | www.oregon.gov/LCD

Regional Representative for the ten most eastern Counties and 59 Cities.

From: MARQUARDT Ryan * DLCD <Ryan.MARQUARDT@dlcd.oregon.gov>

Sent: Monday, February 2, 2026 1:19 PM

To: HERT Dawn * DLCD <Dawn.Hert@dlcd.oregon.gov>

Subject: City of Irrigon amendments (AMD 266-26)

Hi Dawn,

I'm providing HAPO comments on the above-referenced casefile for amendments to Irrigon's zoning code. The proposed amendments make the city's residential development regulations less stringent and support the statewide goals of increasing housing production, affordability, and choice. HAPO hasn't identified any issues with the proposed amendments and state housing laws applicable to the city.

The city is also encouraged to pursue allowing ADUs, which was mentioned in the applicant's materials as an option. Irrigon's current certified population estimate is 2,133. ORS 197A.425 requires cities with a population greater than 2,500 to allow an ADU, and may be applicable to the

city in the future depending on population growth. When the ADU statute is codified, the siting and development standards must be clear and objective, as required by ORS 197A.400. A standard requiring general visual compatibility would not satisfy that statute. HAPO staff is available to discuss options for design standards that would be clear and objective, including use of model codes.

Let me know if I can answer any questions.

Thanks,

Ryan

Ryan Marquardt, AICP

Housing Planner | Housing Accountability and Production Office

Pronouns: he/him

Oregon Department of Land Conservation and Development

635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540

Cell: 971-375-5659 | Main: 503-373-0050

ryan.marquardt@dlcd.oregon.gov | www.oregon.gov/LCD

The Housing Accountability and Production Office is a joint office between the Department of Land Conservation and Development (DLCD) and the Department of Consumer and Business Services' Building Codes Division (BCD).



Morrow County

P.O. Box 788 • 110 N. Court St.
Heppner, OR 97836 • (541) 676-5613
www.morrowcountyor.gov

February 4, 2026

Aaron Palmquist, City Manager
City of Irrigon
500 NE Main Avenue
Irrigon, OR 97844

RE: Code Amendment AMD#266-26

Dear Aaron:

On behalf of the Morrow County Board of Commissioners, please consider this letter in support of the proposed code amendment. The Board of Commissioners, in their meeting today, requested that staff submit this letter on their behalf.

The proposed code amendment would decrease the minimum lot size in residential zones and allow landowners the opportunity to increase residential density and in turn build more houses in the city.

As you know, there is significant commercial and industrial growth taking place in the northern region of the county. That growth in turn has generated commensurate demand for housing. The proposed smaller lot sizes and increase in density creates additional opportunities to increase housing in the city. Increasing housing opportunities inside city limits has the secondary benefit of decreasing demand for housing outside city limits that rely on domestic water from the Lower Umatilla Basin Groundwater Management Area (LUBGWMA).

Please accept the county support for the proposed zone change.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Jensen".

Matthew Jensen
County Administrator

A handwritten signature in blue ink, appearing to read "Tamra Mabbott".

Tamra Mabbott
Planning Director



Oregon

Tina Kotek, Governor

Department of Transportation

Region 5

3012 Island Avenue

LaGrande, OR 97850

February 4, 2026

City of Irrigon VIA EMAIL: clerk@ci.irrigon.or.us
500 NE Main Ave.
Irrigon, OR 97844

Subject: *City of Irrigon Amendment to City Land Use Ordinances AMD#266-26*

The Oregon Department of Transportation (ODOT) has received notice of the proposed amendment to the city land use ordinance submitted by LandWise, LLC on behalf of Olin Homes, LLC, AMD#266-26. ODOT has jurisdiction of Highway 002/US730, including responsibilities for managing access within the corridor. US730 is the major transportation facility through the City of Irrigon.

The proposal would amend the ordinance in relation to dwelling lot size on all residentially zoned land. This reduction in lot size would result in an increase in residential lots within the City of Irrigon and therefore an increase in trips to and from the transportation facilities, including the highway. The potential increase in trips is not quantified in this proposal; a determination as to whether the increase is potentially significant should be made pursuant to Transportation Planning Rules Section 660-012-0060. It is unlikely these trips would otherwise be evaluated at the development stage in a traffic impact analysis.

Additionally, ODOT has access control along a large portion of the highway abutting residentially zoned land. ODOT anticipates reduction in minimum lot size could increase the number of properties with highway frontage resulting in an increase in highway connections, and approach relocation/new approach requests. Properties abutting the highway should be aware of their highway access rights for planning purposes. "A reservation of access affords the right to apply for an approach but does not guarantee approval of an application for state highway approach or the location of an approach." (OAR 734-051). The City should also encourage utilization of shared connections or alternative access from lower order streets where feasible upon development/redevelopment to preserve the capacity and functionality of the highway.



Oregon

Tina Kotek, Governor

Department of Transportation

Region 5

3012 Island Avenue

LaGrande, OR 97850

ODOT appreciates the opportunity to provide review and comment on this proposal. Please enter this letter into the record of the proceedings. Also, please provide me with a copy of the decision.

Respectfully,

Kelli Nicole Martin, P.E.

Region 5 Access Management Engineer

Cc: Rich Lani, District 12 Manager
Paul Howland, District 12
Tom Lapp, District 12 Permit Specialist
Cheryl Jarvis-Smith, Region 5 Planner