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**EXHIBIT G-22**  
**LU 15-0017**

To: Lake Oswego City Council  
From: Carol Radich, Vice- Chair Evergreen Neighborhood Assoc.  
Re: LU 15-0017  
Date: Nov. 25, 2015

Dear Mayor and Council Members,

First ENA would like to acknowledge and thank the Planning Commission for its work regarding substandard lots; we agree with the goal of LU 15-0017, that is, to regulate development on substandard lots so as to mitigate the impacts of these developments on existing neighborhoods.

Unfortunately, however, though some of the code changes proposed in this ordinance may be workable for many neighborhoods, they would be unfairly punitive to many of the homeowners in the R7.5 Evergreen Neighborhood. A very large number of lots in Evergreen, perhaps as many as 50%, are substandard; most of these, however, are only marginally below the required 7500 square feet. A look at the 20 tax lots on Ellis Avenue, for example, shows that 9 lots measure 60 X 120, or 7200 square feet. The nearby lots on Sixth Street between Evergreen and Ellis are all substandard, all measuring the same 7200 square feet.

In a unanimous decision of the ENA board, it was agreed that limitations proposed in LU 15-0017 could have a negative impact on our neighborhood. Instead of restricting building height to 22 feet or the average of adjacent buildings, the board endorsed a sliding scale that would establish maximum roof height and roof height exceptions relative to lot size. An example of the scale as it would pertain to R7.5 zones is shown on p.2 of Exhibit G-21. This would limit roof heights to 22', with no allowance for exceptions, on lots 5000 square feet and smaller; the allowed height and height exception would increase as the lot size increased, reaching the maximum height of 28' with a 3' exception for standard lots. With that sliding scale, the many lots in Evergreen that are near the legal size would have only a slightly smaller roof height limit, a limitation that would be far more equitable than imposing a strict limit on every substandard lot, regardless of its degree of non-compliance.

We recognize, too, that roof height is also limited by the lot coverage of a structure. A reasonable regulation, then, would be to apply to substandard lots the most stringent height limit, that determined by FAR or by lot size.

Finally, the sliding scale that we propose does include a maximum limit of 3' for a roof height exception. Current code allows a 6' exception, an increase that ENA believes is too much for even standard lots; therefore we propose an overall 3' height limit exception.

Thank you on behalf of the Evergreen Neighborhood Association  
Carol Radich, Vice-Chair

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