



Oregon

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March 15, 2024

Stephanie Powers, CHPC
Planning Director
Community Development
City of Central Point



RE: DLCD Comments on the City of Central Point Climate-Friendly Area Study

Dear Ms. Powers,

Thank you for submitting your climate-friendly area (CFA) study in compliance with Oregon Administrative Rule (OAR) 660-012-0315(4) and (5). The department published the study on our website for public comment on January 19, 2024. No public comments were received on the Central Point CFA Study. This comment letter from DLCD should be considered in the next step in the CFA process, which is to determine which climate-friendly area or areas the city will designate and to adopt zoning and development standards, as needed, to implement the CFA requirements.

OAR 660-012-0315(4) lists the required elements of a CFA study, which include the following:

- a) Maps showing the location and size of all potential climate-friendly areas.
- b) Preliminary calculations of zoned residential building capacity.
- c) A community engagement plan for the designation of climate-friendly areas.
- d) Analysis of how each potential climate-friendly area complies, or may be brought into compliance, with the requirements of OAR 660-012-0310(2).
- e) A preliminary evaluation of existing development standards within potential climate-friendly areas and changes to the standards necessary to comply with CFA requirements.
- f) Plans for achieving fair and equitable housing outcomes in climate-friendly areas, including analysis of whether zone changes for CFAs might displace residents who are members of state and federal protected classes.

Your submitted materials meet the requirements in OAR 660-012-0315(4). We appreciate the work you have done thus far and your timely submittal!

The following comments are intended to inform your community's next step, which is to designate sufficient climate-friendly areas with a zoned residential capacity to accommodate at least 30 percent of the community's total housing needs. As part of that process, we are happy to provide support for an urban design code audit, the development of CFA zoning district standards, and a market study.

Here is some of the preliminary data we have gleaned from your study and other sources:

2023 Population Estimate (PSU):	19,666	Total Housing Need:	9,751 dwelling units through 2039
Methodology:	Prescriptive (0320(8))	30% of Housing =	2,926 dwelling units
Primary CFA Requirements:	15 DU/acre 50 foot allowed bldg. height		

We note your preferred CFA is within the largely undeveloped East Transit Oriented District (ETOD), located to the north of East Pine Street and east of Interstate 5. We agree that the proximity of the Bear Creek Greenway and planned cross-town circulator transit service will provide good transportation options for people who work or live in the CFA. The fact that the site is largely undeveloped may allow for more rapid development in the near term. We are hopeful that the market study and code development for the area can work together to facilitate great housing and employment opportunities in this area. One challenge with this area will be ensuring that bicycle, transit, and pedestrian facilities are upgraded to provide good connectivity within the area and will provide good connections to other priority destinations, such as downtown. Typically, we would anticipate these improvements to be made in conjunction with development or redevelopment.

As you may be aware, there are two options for development standards in the CFA rules. If you wish to follow the “prescriptive rules” in OAR 660-012-0320(8), the entire CFA area would need to allow building heights of at least 50 feet. Alternatively, if you wish to reduce allowed building heights, the “outcome oriented” standards in OAR 660-012-0320(9) may be used. Using this approach, a city with the population of Central Point may designate a CFA with either a minimum residential density of 15 units per acre or a minimum floor area ratio of 1.0, so long as the development code allows for a zoned building capacity of at least 60,000 square feet per net acre. Depending upon setbacks and other requirements in your existing development code, it may be possible to meet these standards with building heights of 35 feet or less. We would be happy to discuss the alternative standards with you if you are interested in pursuing that approach.

Regardless, we note the capacity calculations in your study have used a hybrid approach that doesn’t fully comply with either methodology. As you determine which zoning standards you’d like to use in the CFA, we are happy to work with you to make sure the capacity calculations are clear and in compliance with the rules. That said, it appears that the proposed ETOD area would be able to accommodate at least 30% of all needed housing.

An additional consideration is whether all portions of the ETOD area have been annexed into the current city limits. If so, no further analysis is needed. However, if portions of the area have yet to be annexed, OAR 660-012-0310(2)(e) establishes some additional findings to justify inclusion of areas within a UGB, but outside the current city limits boundary. Required findings include the following:

- (A) *The area is contiguous with the city limits boundary;*

(B) The provision of urban services is contingent upon annexation into the city limits and the area is readily serviceable with urban water, sewer, stormwater, and transportation. "Readily serviceable" means that urban infrastructure services are nearby and could be provided to allow construction on the site within one year of an application for a building permit;

(C) The zoning that will be applied upon annexation, based on the city's comprehensive plan designation for the area, is consistent with climate-friendly area requirements;

(D) The county in which the subject area is located has adopted a consistent comprehensive plan designation for the area; and

(E) The city can demonstrate that at least 70 percent of complete annexation applications within the last five years have been approved within one year of the date of complete annexation application.

Please follow up with me if you have any questions about these requirements. My contact information is below.

Thanks again for your submitted study. We appreciate the good work you have done and look forward to supporting the CFA designation process yet to come. Please feel free to contact me, at (503) 602-0238, or at kevin.young@dlcd.oregon.gov if you have any questions or need further assistance.

Sincerely,

Kevin Young

Kevin Young, DLCD Senior Urban Planner

Cc: Brenda Ortigoza Bateman, DLCD Director

Kirstin Greene, DLCD Deputy Director

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