



Oregon

Tina Kotek, Governor

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Kristen Maze
Community Development Director
City of Talent



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

Dear Ms. Maze,

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. We received no public comments on it. This comment letter from DLCD should be considered during your 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 select a promising site of 25 acres or larger and adopt appropriate CFA zoning standards for the area, to the extent that such standards are not addressed under the current zoning of the site. The requirements and findings for this step of the process may be found in OAR 660-012-0315(6). Related to that process, we are happy to provide support for an urban design code audit for Talent.

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

2023 Population Estimate (PSU):	5,228	Requirement for Cities with a population between 5,001 and 10,000: Designate at least one climate-friendly area of at least 25 acres.
Methodology:	Prescriptive (0320(8))	
Primary CFA Requirements:	15 DU/acre 50 foot allowed bldg. height	

We would be remiss not to express our sympathy for the suffering your community has endured since the 2020 Alameda Fire. While there has been a substantial amount of rebuilding which has already occurred, we understand Talent is still very much in the process of rebounding from the damage. We are hopeful that CFA designation will help to support new opportunities for housing and businesses in Talent, reinforcing the strength and resilience of your community.

In this context, your preferred CFA area, a 33-acre area within portions of the city's Central Business District and Highway Commercial Business District, is an excellent choice as a base for the community's employment, service, and transportation needs. The potential CFA contains some large, mostly undeveloped areas that will provide near-term development opportunities, as well as some established businesses that may wish to expand within the area. The area is also well-served with bicycle and ADA-compliant pedestrian facilities, as well as convenient regional transit services.

The urgency of climate change prompts us to do what we can to reduce climate pollution. Facilitating mixed-use development has been shown to significantly reduce the length and number of vehicle trips needed for residents, workers, and visitors to meet their daily needs. Additionally, well-planned mixed-use neighborhoods allow for healthier lifestyles, less expensive infrastructure costs over time, and promote local businesses, services, and community vibrancy. We are excited to help to expand these opportunities in your community.

In our review of the study, we noted that portions of the CFA are located within the Old Town Historic District. Recent amendments to Rule 0320 do allow cities to designate CFAs at a scale that may be more compatible with existing development within the historic district. Specifically, OAR 660-012-0320(9) now allows an alternative approach for cities with a population of 5,001 to 10,000 to designate a CFA with either a minimum residential density of 15 units per acre or a minimum floor area ratio of 1.0, if 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. Demonstrating that an existing zone provides adequate zoned capacity for development per the amended rule can be as simple as providing examples of recent development under the current zoning standards that have met or surpassed the 60,000 square feet per net acre threshold. We would be happy to discuss the alternative standards with you if you are interested in pursuing that approach.

Lastly, we have reviewed your anti-displacement analysis and note that use of the mapping tool found Talent to not currently be at risk for the displacement of underserved populations.

However, your knowledge of residents and property owners within the proposed CFA area should also be considered. The statewide mapping tool is dependent upon U.S. Census data at the census tract level, which may not be sufficiently fine-grained for a more local approach. Your study identifies a number of measures that may be implemented to mitigate against displacement and we encourage you to employ one or more strategy if your knowledge of the area suggests that displacement could occur.

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

Matt Crall, DLCD Planning Services Division Manager

Josh LeBombard, DLCD Southern Oregon Regional Representative