



# Oregon

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October 17, 2023

Mike Upston, AICP  
Community Development Director  
City of Eagle Point, Oregon



## RE: DLCD Comments on the City of Eagle Point's Climate-Friendly Area Study

Dear Director Upston,

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 August 31, 2023. One comment was received, which we are providing to you (see attachment). As you know, this comment letter and any associated comments from the public are intended to inform 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 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 (not required for cities with a population below 10,000, such as Eagle Point).
- 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.

The 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 at least one climate-friendly area of 25 acres or more. As we've discussed, we look forward to providing technical assistance to prepare the necessary development code amendments for your new CFA.

- Firstly, we appreciate the proactive approach you have taken with the study. Noting that Eagle Point is on the cusp of crossing the 10,000 population threshold (the 2022 certified population estimate for Eagle Point is 9,968), the study casts a wider net than is necessary to address the base requirement for a city with population below 10,000. This preliminary work will facilitate the community's process for further CFA designation

once the 10,000 threshold is crossed, and may also assist with planning for potential CFAs in the interim.

- Based on your analysis, we agree the downtown area is the best candidate CFA for Eagle Point. This is unsurprising, as downtown areas generally contain the greatest mix and proximity of homes, stores, jobs, and services in our cities. We hope the popularity of this area for housing, jobs, and services will continue, thereby reducing the distance and number of vehicle trips within the area. Other co-benefits include supporting healthier lifestyles and reducing per capita infrastructure construction and maintenance costs for the community.
- Your anti-displacement analysis uses the department's mapping tool and methodology, finding no potential for displacement in your candidate CFA. The mapping tool is limited by the scale of analysis at the census tract level, which is not very fine-grained. We encourage communities to supplement the displacement analysis with local knowledge if there may be a concentration of members of state or federal protected classes in CFA study areas. This would not preclude a potential CFA from consideration, but could inform mitigation measures to be used to offset displacement that might otherwise occur. Please don't hesitate to contact us if you have any questions about displacement and potential mitigation measures.
- We have reviewed the comments submitted. Whether or not the city amends the Town Center Plan as is suggested, designation of the downtown area as a CFA should prompt city decision-makers to consider actions to facilitate the development of housing, including affordable housing, within the area, along with actions to facilitate the location of jobs and services in the CFA. Enhanced planning for pedestrian, bicycle, and transit facilities in this area is also necessary, and we believe such planning efforts would position the city well in competitive applications for future state and federal funding.

Thanks again for your submitted study. We appreciate the good work you have done and look forward to the CFA designation process yet to come. Please feel free to contact me, at (503) 602-0238, or at [kevin.young@dlcd.oregon.gov](mailto: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 Bateman, DLCD Director

Kirstin Greene, DLCD Deputy Director

Matt Crall, DLCD Planning Services Division Manager

Josh LeBombard, DLCDC Southern Oregon Regional Representative

Attachment

Attachment A: Public Comment Received on the City of Eagle Point's CFA Study