



2023

**CITY OF EUGENE
CLIMATE-FRIENDLY AREAS STUDY**

**PREPARED FOR OREGON DEPT. OF LAND CONSERVATION AND DEVELOPMENT
AS PART OF THE CLIMATE-FRIENDLY AND EQUITABLE COMMUNITIES PROGRAM**

About this Study

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities (CFEC) rulemaking. The work was in response to Governor Brown’s [Executive Order 20-04](#) directing state agencies to take urgent action to meet Oregon’s climate pollution reduction target of at least 80% below 1990 emissions levels by 2050, while ensuring equitable outcomes for underserved populations. Executive Order 20-04 directed the Department of Land Conservation and Development (DLCD), Oregon’s land use planning agency, to amend rules governing Oregon’s planning system for communities in the state’s eight most populated areas.

Among other components, the CFEC rules require communities with a population over 5,000 within the seven metropolitan areas outside of Portland Metro, including the City of Eugene, to adopt regulations allowing walkable mixed-use development in designated Climate-Friendly Areas (CFAs) within urban growth boundaries. This CFA Study meets the requirements of the rules to identify and study the most promising locations for Climate-Friendly Areas across Eugene.



Climate-Friendly Areas designation is one component of Eugene’s implementation of the CFEC rules, in coordination with the City’s existing community vision, and the City’s climate action, housing production, and transportation policies. Learn about Eugene’s CFEC implementation at www.eugene-or.gov/5022/Climate-Friendly-Rules.

Acknowledgements

Thank you to the Oregon Department of Land Conservation and Development, Lane Council of Governments, and Kearns and West for their support in completing Eugene’s CFA Study.



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Executive Summary

A Climate-Friendly Area (CFA) is intended to be an area where most people can meet their daily needs without relying on a car. They are urban mixed-use areas that contain, or are planned to contain, a mix of high-density housing, jobs, businesses, and services. These areas are served or are planned to be served by high-quality walking, biking, and transit infrastructure to provide frequent and convenient connections to key destinations within Eugene and the region.

The designation of Climate-Friendly Areas is one component of [Eugene’s implementation of the Climate-Friendly and Equitable Communities \(CFEC\) rules](#).

Climate-Friendly Areas Designation Process

The Climate-Friendly Areas designation process has three steps:

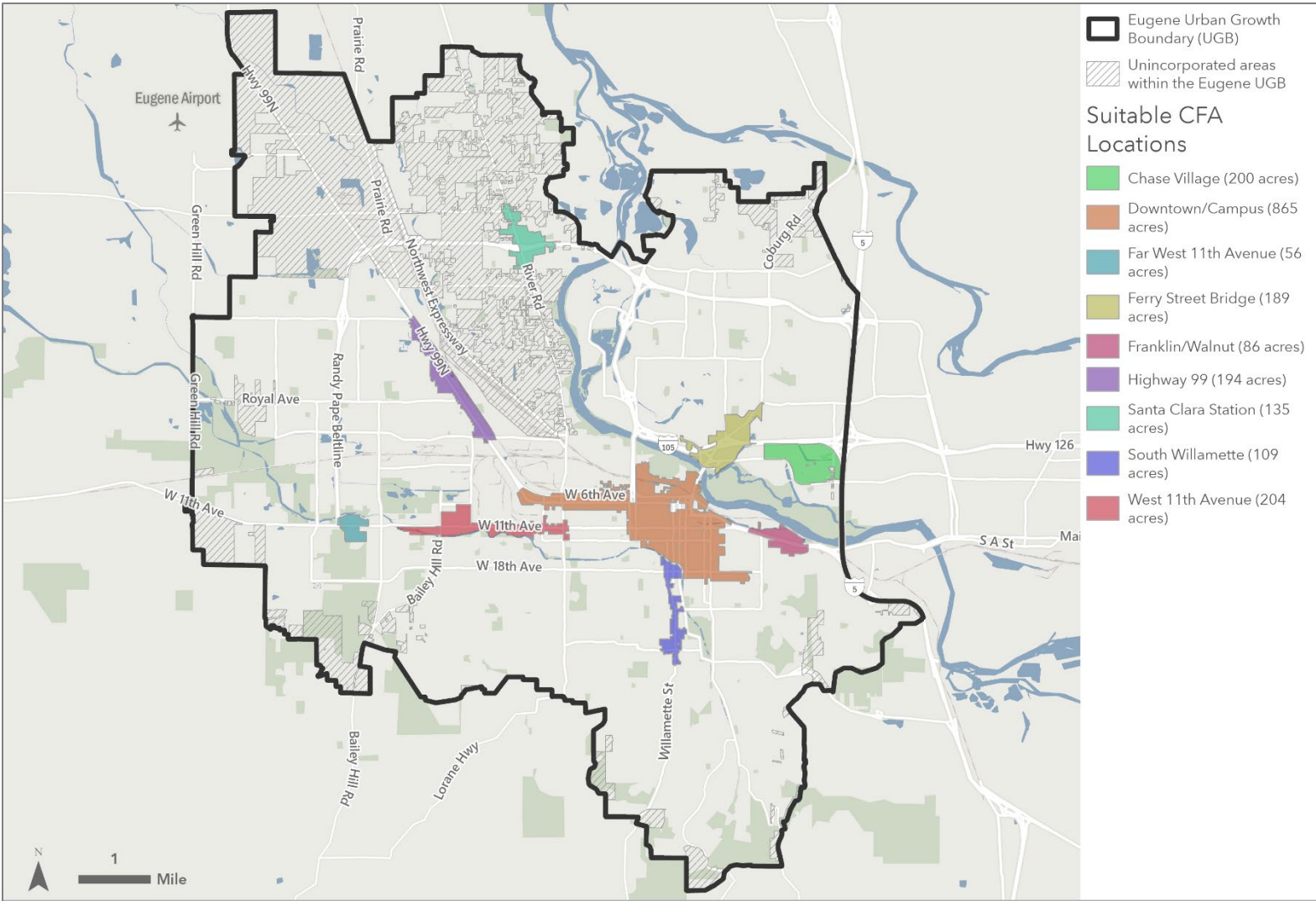
- **Step 1: Study** – As presented in this CFA Study, Eugene identified Potential CFAs across the city and studied the most promising locations. This study is primarily a technical analysis of what areas in Eugene can meet certain state requirements and criteria.
- **Step 2: Select and Adopt** – In 2024, the City will begin the process to select Eugene’s CFAs. The selection process will include community engagement, a recommendation from the Eugene Planning Commission, and direction from the Eugene City Council. The final CFAs may include a few or many of those identified in the CFA Study but may also include other areas identified by the public or decisionmakers. Staff will propose an adoption package including code and plan amendments, as well as displacement mitigation strategies, within Eugene’s upcoming urban growth planning work. The package is proposed for adoption by the City Council in 2026.
- **Step 3: Evaluate and Increase** – CFA designation is not intended to be static. The City will monitor and potentially increase areas with this designation during future urban growth planning, which is statutorily required for housing needs every eight years.

Approach

Eugene elected to use a “narrowing” approach to this process, first looking citywide for all potential locations, and then narrowing the candidates to identify the most promising areas based on the state’s CFA criteria. Lane Council of Governments (LCOG) produced seven technical memorandums to document the steps in this narrowing process. Eugene used the following CFA criteria to identify and narrow potential locations:

- Existing or planned urban centers
- Inside the Urban Growth Boundary
- Development not restricted by natural hazards
- Accessible via high-quality transit
- A minimum of 25 acres
- A minimum of 750 feet wide

The nine areas that met these requirements are called “Suitable CFAs” and are illustrated on Page 4.



Suitable CFA Locations
 Area Name and Acres

City of Eugene, Planning Division.

Note: This map is illustrative and should be used for reference only.
 August 2023



Evaluation of Climate-Friendly Areas

This CFA Study does not recommend a final configuration of Climate-Friendly Areas for designation. Instead, the Study evaluates each of the Suitable CFAs based on the additional criteria recommended or required in the CFEC rules, including:

- **Development Regulation Compliance:** Does the area comply, or can it be brought into compliance with the land use requirements (e.g., development regulations) for CFAs?
- **Dwelling Unit Capacity:** Can the area achieve the zoned residential building and dwelling unit capacity required for CFAs, regardless of current development?
- **High-Density Mixed-Use Areas:** Is the area within or near areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities?
- **Parks, Open Space, Plazas, or Similar Public Amenities:** Does the area contain, or is it near, sufficient parks and other public amenities? Would it be appropriate to site facilities providing public services within the area?
- **High-Quality Active Transportation:** Is the area served or planned to be served by high-quality walking and biking facilities?
- **Served by Adequate Infrastructure:** Can the area’s electricity, stormwater, water, and wastewater infrastructure support the land use requirements for CFAs?
- **Development and Redevelopment Conditions:** Can the area support the residential capacity requirements for CFAs?

The table below identifies the three most promising Suitable CFAs under each evaluation criterion. Three variations of the Downtown/Campus Suitable CFA were evaluated, with the best variation selected where appropriate. Staff determined that the adequacy of infrastructure is not an appropriate ranking criterion.

Suitable CFA Location	Development Regulations	Dwelling Unit Capacity	High-Density, Mixed-Use Areas	Parks and Amenities	Active Transportation	Development/ Redevelopment Conditions
Chase Village						
Downtown/Campus (or variation)	#2 (Variation B)	#1	#1 (Variation C)	#1	#1 (Variation A)	#1 (Variation C)
Far West 11th Avenue		#2				
Ferry Street Bridge	#1		#2			
Franklin/Walnut			#3	#3	#2	
Highway 99	#3	#3				
Santa Clara Station						#2
South Willamette				#2	#3	
West 11th Avenue						#3

Displacement Risk & Mitigation Measures

In addition to considering the suitability of Climate-Friendly Areas based on zoning, development regulations, access to transportation, and other criteria listed above, the City of Eugene must consider the risk of housing displacement of historically marginalized community groups stemming from CFA designation. The CFA Study provides several components to analyze the relationship between Climate-Friendly Areas and displacement risk, including:

- A citywide demographic profile illustrating the presence of historically marginalized community groups in Eugene, as well as demographic profiles of each Suitable CFA
- A spatial analysis that illustrates displacement risk citywide and within Suitable CFAs, resulting in the categorization of the areas into six displacement risk typologies
- An inventory of the City's current policies and practices to achieve fair and equitable housing outcomes
- A list of priority strategies to ensure fair and equitable housing outcomes within designated CFAs through increased housing production, preservation of existing affordable housing, and protection of residents at greatest risk to displacement

Next Steps

Through the development of this CFA Study, the City of Eugene identified several important next steps to guide the selection and designation of Climate-Friendly Areas. CFA selection and designation will serve as an important urban growth strategy for the city moving forward. Given the intertwining goals between upcoming citywide urban growth planning and CFEC requirements related to housing and land use, the City of Eugene will integrate these two projects for a more cohesive approach to housing and growth management planning. Several components of the urban growth planning work will specifically incorporate CFAs:

- **Housing Production Strategy (HPS):** A report that identifies and prioritizes tools, actions, and policies to address unmet housing needs in Eugene. The HPS Report will consider CFAs and build on and supplement the City's Housing Implementation Pipeline.
- **Redevelopment Analysis:** The City will analyze redevelopment potential in targeted study areas, including Suitable CFAs. The analysis will estimate market-feasible redevelopment potential, determine the potential for increased density within Suitable CFAs, and may help further evaluate or narrow the most promising options.
- **Public Involvement:** The Public Involvement Plan (PIP) for urban growth planning work will consider housing needs, production strategies, and displacement concerns holistically.

This CFA Study evaluates an initial, but not necessarily comprehensive, group of Suitable CFAs. The final Climate-Friendly Areas may be a few or many of those identified here but may also include other areas identified by the public or decisionmakers through additional engagement and analysis. City staff intend to secure a CFA recommendation from the Planning Commission and direction from the City Council by December 2024. A preferred configuration is necessary to inform other elements of the urban growth planning work, as well as the development of land use code and plan amendments, and to initiate adoption. Adoption of plan and code amendments designating Eugene's Climate-Friendly Areas must be complete by December 31, 2026. The City will monitor and potentially increase areas designated CFAs during future urban growth planning, which is statutorily required for housing needs every eight years.

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Section 1. What is a Climate-Friendly Area?

A Climate-Friendly Area (CFA) is intended to be an area where most people can meet their daily needs without relying on a car. They are urban mixed-use areas that contain, or are planned to contain, a mix of high-density housing, jobs, businesses, and services. These areas are served or are planned to be served by high-quality walking, biking, and transit infrastructure to provide frequent and convenient connections to key destinations within Eugene and the region.

By designating a CFA, Eugene will update its housing and transportation plans for these areas to have:

- Opportunities for increased development where people can live, work, shop, and play
- Identified and prioritized improvements that make it easier and safer for people to walk, bike, roll, and take transit to their destinations
- Strategies to avoid or minimize displacement of vulnerable residents, as well as preserve and increase affordable housing options

To help the state meet its climate goals, more development will need to occur in urban areas where people are less dependent on their cars. Over the last 100 years, planning practices have served to separate activities, creating greater inequities within cities and widespread dependence upon the automobile to meet daily needs. Climate-Friendly Areas are intended to help to reverse these trends.

1.1 Climate-Friendly Areas Designation Process

The Climate-Friendly Areas designation process has three steps: 1) Study, 2) Select and Adopt, and 3) Evaluate and Increase.

Step 1: Study

As presented in this CFA Study, Eugene identified Potential CFAs across the city and studied the most promising locations. This study is primarily a technical analysis of what areas in Eugene can meet certain state requirements and criteria. Lane Council of Governments (LCOG) provided technical assistance to the City of Eugene to complete the CFA Study.

An important part of selecting CFAs will be engaging historically marginalized community groups¹ to identify any areas where people might be at risk of being displaced from increased development and then propose strategies to prevent or mitigate displacement. **Appendix A. Climate-Friendly Areas Designation Community Engagement Approach** includes a community engagement approach to support the next steps in the CFA designation process. Kearns and West, a firm contracted by DLCDC, provided community engagement assistance with a focus on developing an engagement approach which

¹ The City of Eugene will use the term “historically marginalized community groups” in alignment with guidance from the City’s Office of Equity and Community Engagement in place of the Oregon Administrative Rules (OAR) Chapter 660, Division 12 (660-012-0125) term “underserved populations.” This OAR defines “underserved populations” as Black and African American people; Indigenous people including Tribes, American Indian/Alaska Native and Hawaii Native; People of Color including but not limited to Hispanic, Latina/o/x, Asian, Arabic or North African, Middle Eastern, Pacific Islander, and mixed-race or mixed-ethnicity populations; immigrants, including undocumented immigrants and refugees; people with limited English proficiency; people with disabilities; people experiencing homelessness; low-income and low-wealth community members; low- and moderate-income renters and homeowners; single parents; lesbian, gay, bisexual, transgender, queer, intersex, asexual, or two-spirit community members; and youth and seniors. Historically marginalized community groups include this list of underserved populations, as well as students and veterans.

integrates equity concerns from the community. The engagement approach meets the requirements of an engagement-focused equity analysis² as well as the City of Eugene’s Public Participation Guidelines and recently approved 2023-2026 Strategic Plan. The approach was developed in consultation with the City’s Office of Equity and Community Engagement.

Step 2: Select and Adopt

In 2024, the City will begin the process to select Eugene’s CFAs. The selection process will include community engagement, a recommendation from the Eugene Planning Commission, and direction from the Eugene City Council. The final CFAs may include a few or many of those identified in the CFA Study but may also include other areas identified by the public or decision makers. The CFA community engagement approach will be folded into a formal Public Involvement Plan for the City’s upcoming urban growth planning work, which will consider housing needs, production strategies, and displacement concerns holistically.³

Designation will require:

- Amendments to the [Eugene Land Use Code](#)
- New and revised policies within the [Envision Eugene Comprehensive Plan](#) – which staff expect will be integrated within new policy chapters for Housing, Compact Development, Public Involvement, and Community Health
- Revisions to the [Eugene 2035 Transportation System Plan](#)

Additionally, the City must identify and adopt strategies to mitigate or avoid potential displacement of residents resulting from CFA designation. Initial anti-displacement strategies are identified in this CFA Study.

Staff will propose an adoption package including code and plan amendments, as well as displacement mitigation strategies, within Eugene’s upcoming urban growth planning work. The package is proposed to go through the public hearing and adoption process in 2026. This process will include additional opportunities for public testimony, a public hearing and recommendation from Planning Commission, and a public hearing and action by City Council.

Step 3: Evaluate and Increase

CFA designation is not intended to be static. The City will monitor and potentially increase areas with this designation during future urban growth planning, which is statutorily required for housing needs every eight years. As a component of urban growth planning, CFAs will function as an important land use efficiency measure – a strategy to address unmet housing needs within the current urban area, through strategies like promoting compact housing development.

² Oregon Administrative Rules (OAR) Chapter 660, Division 12 (OAR 660-012-0135) outlines the requirements for an engagement-focused equity analysis, including working with historically marginalized community groups to develop key community outcomes, collect information on benefits and burdens from policy changes, adopt mitigation strategies, and report back to the people engaged, among other requirements.

³ Urban growth planning work is further described in Section 6.1.

Section 2. Requirements of a CFA Study

The CFEC rules establish specific requirements for a CFA Study.⁴ This section provides a summary of those requirements and a reference to where they are addressed within Eugene’s study.

TABLE 1. CFA STUDY REQUIREMENTS

CFA Study Requirement	Location of Requirement in Eugene CFA Study
(a) Maps showing the location and size of all potential climate-friendly areas. Cities and counties shall use the study process to identify the most promising area or areas to be chosen as climate-friendly areas but are not required to subsequently adopt and zone each studied area as a climate-friendly area.	Section 4.1 Potential CFA Locations
(b) Cities and counties subject to section (1) shall provide preliminary calculations of zoned residential building capacity and resultant residential dwelling unit capacity within each potential climate-friendly area consistent with section (2), or using an alternative methodology as provided in OAR 660-012-0320(10) and using land use requirements within each climate-friendly area as provided in OAR 660-012-0320. Potential climate-friendly areas must be cumulatively sized and zoned to accommodate at least 30 percent of the total identified number of housing units as provided in section (1).	Section 4.3 Evaluation of Suitable CFA Locations and Appendix B, Technical Memo #3c
(c) A community engagement plan for the designation of climate-friendly areas, including the process to adopt associated amendments to the comprehensive plan and zoning code, consistent with the requirements of OAR 660-012-0120 through 660-012-0130. The community engagement plan shall be consistent with the requirements for an engagement-focused equity analysis as provided in OAR 660-012-0135(3).	Appendix A. Climate-Friendly Areas Designation Community Engagement Approach
(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).	Section 4.3 Evaluation of Suitable CFA Locations and Appendix B, Technical Memo #3b
(e) A preliminary evaluation of existing development standards within the potential climate-friendly area(s) and a general description of any changes necessary to comply with the requirements of OAR 660-012-0320.	
(f) Plans for achieving fair and equitable housing outcomes within climate-friendly areas, as identified in OAR 660-008-0050(4)(a)-(f). Analysis of OAR 660-008-0050(4)(f) shall include analysis of spatial and other data to determine if the rezoning of potential climate-friendly areas would be likely to displace residents who are members of state and federal protected classes. The local government shall also identify actions that may be employed to mitigate or avoid potential displacement.	Section 5. Displacement Risk & Mitigation Measures and Appendix B, Technical Memo #2

⁴ Oregon Administrative Rules (OAR), Chapter 660, Division 12 (OAR 660-012-0315(4))

Section 3. Approach

This section provides a summary of the technical analysis completed by LCOG to identify the most promising locations for CFA designation. Eugene elected to use a “narrowing” approach to this process, first looking citywide for all possible locations, and then narrowing the candidates to identify the most promising areas based on the comprehensive criteria required in the CFEC rules and otherwise recommended by DLCD. LCOG produced seven technical memorandums, which are attached as **Appendix B. LCOG Technical Analysis Package**, to document the steps in this narrowing process.

3.1 Narrowing Process

At a high-level, this narrowing process can be summarized in three steps, consistent with the CFA criteria outlined in the CFEC rules:

- 1) Identify all Potential CFA locations across the city
- 2) Narrow to the most Suitable CFA locations
- 3) Evaluate the Suitable CFA locations based on the comprehensive criteria required in the CFEC rules and otherwise recommended by DLCD

Potential CFA Locations

At this step, the analysis includes locations citywide that met the basic CFA locational criteria. LCOG used a Geographic Information Systems (GIS) analysis to scan Eugene for the following:

- Existing or planned urban centers
- Inside the Urban Growth Boundary
- Development not restricted by natural hazards⁵
- Accessible via high-quality transit

Suitable CFA Locations

Next, the analysis refines the Potential CFA Locations to only those areas that met additional dimensional requirements. LCOG narrowed the locations to those that met the following CFA criteria:

- A minimum of 25 acres
- A minimum of 750 feet wide

Promising CFA Locations

This CFA Study does not recommend a final configuration of Climate-Friendly Areas for designation. The final step in the study process instead evaluates each of the Suitable CFAs based on the additional criteria recommended or required in the CFEC rules, including:

- **Development Regulation Compliance:** Does the area comply, or can it be brought into compliance with the land use requirements (e.g., development regulations) for CFAs?
- **Dwelling Unit Capacity:** Does the area’s zoning allow it to achieve the zoned residential building and dwelling unit capacity required for CFAs, regardless of current development?
- **High-Density Mixed-Use Areas:** Is the area within or near areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities?

⁵ Development not restricted by natural hazards is based on Oregon Statewide Planning Goal 7: Areas Subject to Natural Hazards and Disasters

- **Parks, Open Space, Plazas, or Similar Public Amenities:** Does the area contain, or is it near, sufficient parks and other public amenities? Would it be appropriate to site facilities providing public services within the area?
- **High-Quality Active Transportation Facilities:** Is the area served or planned to be served by high-quality walking and biking infrastructure?
- **Served by Adequate Infrastructure:** Can the area’s electricity, stormwater, water, and wastewater infrastructure support the land use requirements for CFAs?
- **Development and Redevelopment Conditions:** Can the area support the residential building and dwelling unit capacity requirements for CFAs?

3.2 Summary of LCOG Technical Analysis

Table 2 lists the seven memorandums developed by LCOG, in order of completion, which are further summarized below.

TABLE 2. LCOG TECHNICAL ANALYSIS AND DELIVERABLES

CFA Study Step	Deliverable
Step 1. Identify Potential CFAs	Technical Memo #1
Step 2. Analysis of Potential CFAs (equity and displacement)	Technical Memo #2
Step 3. Analysis of Potential CFAs (Suitability, Policy, Capacity)	
Suitability Analysis	Technical Memo #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memo #3b
Capacity Analysis of Suitable CFAs	Technical Memo #3c
Step 2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memo #2.1
Step 4. Evaluate most promising CFAs	Technical Memo #4

Technical Memo #1 - Potential CFA Locations

Technical Memo #1 was the first step in analyzing and identifying Potential Climate-Friendly Areas. This analysis addressed basic locational requirements for CFAs, specifically urban centers within the UGB, high-quality transit infrastructure, and areas that allow development based on Goal 7: Areas Subject to Natural Disasters and Hazards restrictions.

Technical Memo #2 - Anti-Displacement Analysis

Technical Memo #2 provided a citywide demographic profile and spatial analysis of historically marginalized community groups, an inventory of fair and equitable housing policies, and an anti-displacement spatial analysis. The purpose of the memo was to present equity information to decisionmakers to inform future CFA designation and provide an inventory of existing City strategies to achieve fair and equitable housing outcomes that will help feed into the City’s future Housing Production Strategy. **Section 5** of this CFA Study expands on this initial work.

Technical Memo #3a - Suitability

Technical Memo #3a addressed additional locational requirements for the Potential CFAs identified in Technical Memo #1, including minimum dimension and width.

Technical Memo #3b - Development Regulation Compliance

Technical Memo #3b provided an initial evaluation of the policy and regulatory context for Suitable CFAs established through the preceding analyses (Technical Memos #1 and #3a). The purpose of this memo was to continue the narrowing process to identify the most promising CFAs. This memo specifically addressed how the existing land use code (development regulations) within Suitable CFAs complies with the CFA criteria established in the CFEC rules. This evaluation will inform policy and code adjustments Eugene would need to adopt with a CFA designation.

Technical Memo #3c - Capacity

Technical Memo #3c provided an analysis of the theoretical residential capacity of the Suitable CFAs. It takes in spatial and zoning data from Technical Memo #3a, development regulation (zoning) evaluation information from Technical Memo #3b, and specific capacity assumptions in the CFA rules.

Technical Memo #2.1 - Equity Analysis

Technical Memo #2.1 provided a summary of the results of the anti-displacement analysis (see Technical Memo #2) and initial review of housing production strategies that include the potential to mitigate displacement pressures for each context. **Section 5** of this CFA Study expands on this initial work.

Technical Memo #4 - Most Promising CFAs

Technical Memo #4 provided a cumulative evaluation of the factors contributing to the narrowing of “Potential” and then “Suitable” Climate-Friendly Areas to the “Most Promising” Climate-Friendly Areas. The purpose of this memo was to organize these factors by Suitable CFAs and provide a relative assessment of each area. **Section 4.3** of this CFA Study provides additional assessment, including mapping and analysis of redevelopment potential.

Section 4. Evaluation of Climate-Friendly Areas

This section provides a high-level summary of the results of the three-step narrowing and evaluation process conducted for the CFA Study. More detail and mapping are available in **Appendix B. LCOG Technical Analysis Package**.

4.1 Potential CFA Locations

To begin the narrowing process to identify all Potential CFAs citywide, the City and LCOG first considered basic locational requirements as outlined in the CFA criteria, including:

- **Urban Centers** – Existing or planned urban centers, such as downtowns, neighborhood centers, transit-served corridors, other similar districts, based on zoning designation. The City of Eugene chose to define existing and planned urban centers in terms of zoning. Staff selected 13 base zones and special area zones whose purpose is to encourage medium- and high-density residential, mixed use, and commercial development, and therefore closer in alignment to the CFA criteria.
- **Inside the Urban Growth Boundary** – CFAs are allowed inside the UGB (but outside city limits) per the rules, subject to additional conditions. Staff chose to primarily consider CFA locations within city limits, however, some adjacent Urbanizable Land (or land inside the UGB but outside city limits) is included where appropriate.
- **Development not Restricted by Goal 7** – CFAs may not be located in areas where development is prohibited under Statewide Planning Goal 7 – Areas Subject to Natural Disasters and Hazards, unless the local government has adopted requirements for development that will mitigate potential hazards to life and property. Because Eugene allows development in most areas with proper mitigation strategies, such as steep slopes and in the floodplain, only the FEMA Floodway is considered not developable in this analysis.
- **Accessible via High-Quality Transit** – Staff defined high-quality transit as four stops per hour during peak hours, as is defined elsewhere in the CFEC rules. The frequent transit corridors were provided by Lane Transit District (LTD), the regional transit provider. LCOG staff performed an analysis to find the half-mile walkable distance from the frequent transit corridors and that buffer area was used as the area served by high-quality transit. It is important to note that this approach limits the definition to current service, rather than planned service improvements.

LCOG assessed these locational requirements using a GIS analysis, with the output being a GIS layer representing areas that meet all four criteria. Figure 1 (page 17) illustrates the combined four locational criteria considered relevant in this step of the analysis. Figure 2 (page 18) shows Potential CFA Locations in Eugene from this first stage of analysis, based on the intersection of the four GIS layers.

FIGURE 1. COMBINED CFA LOCALATIONAL CRITERIA

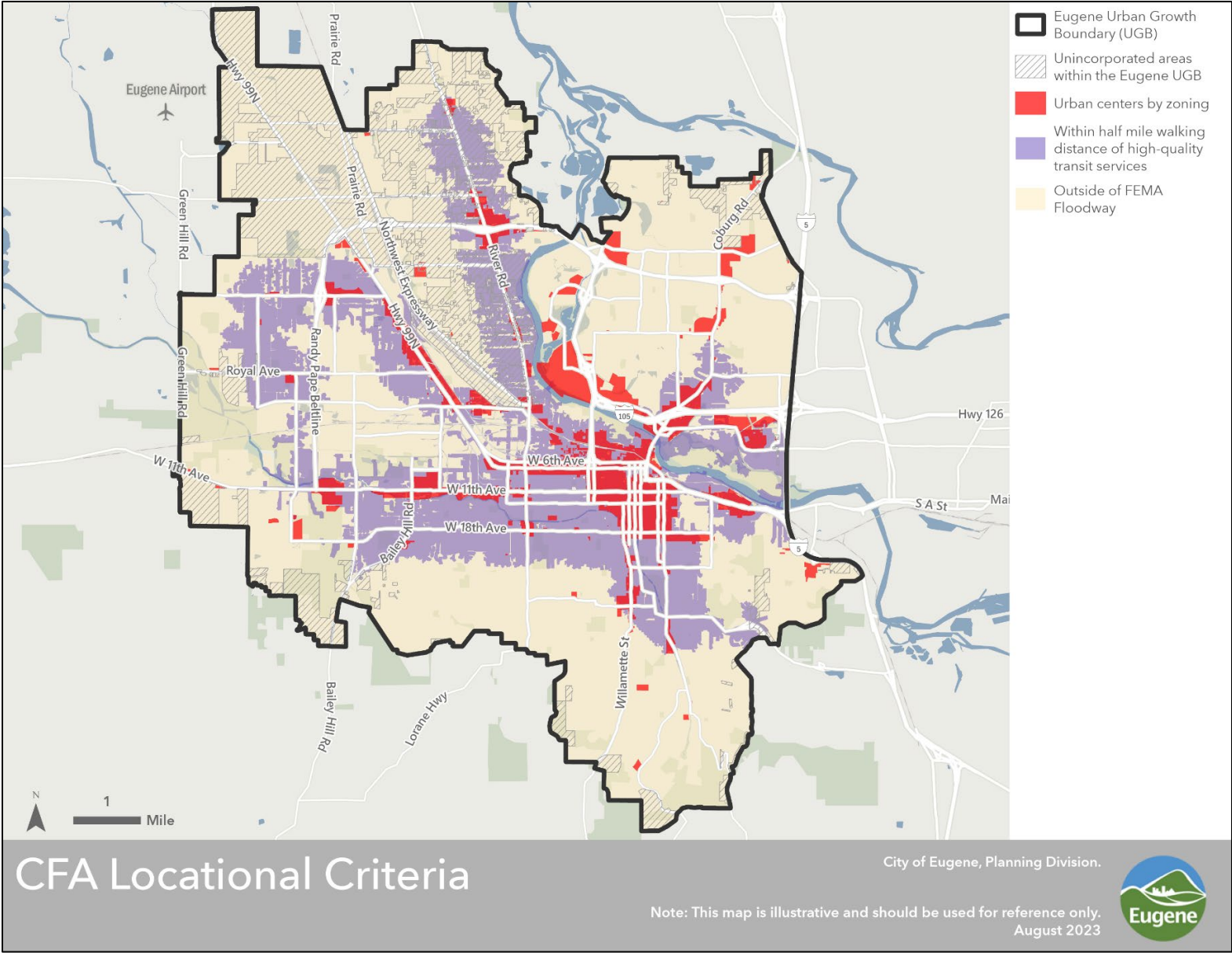
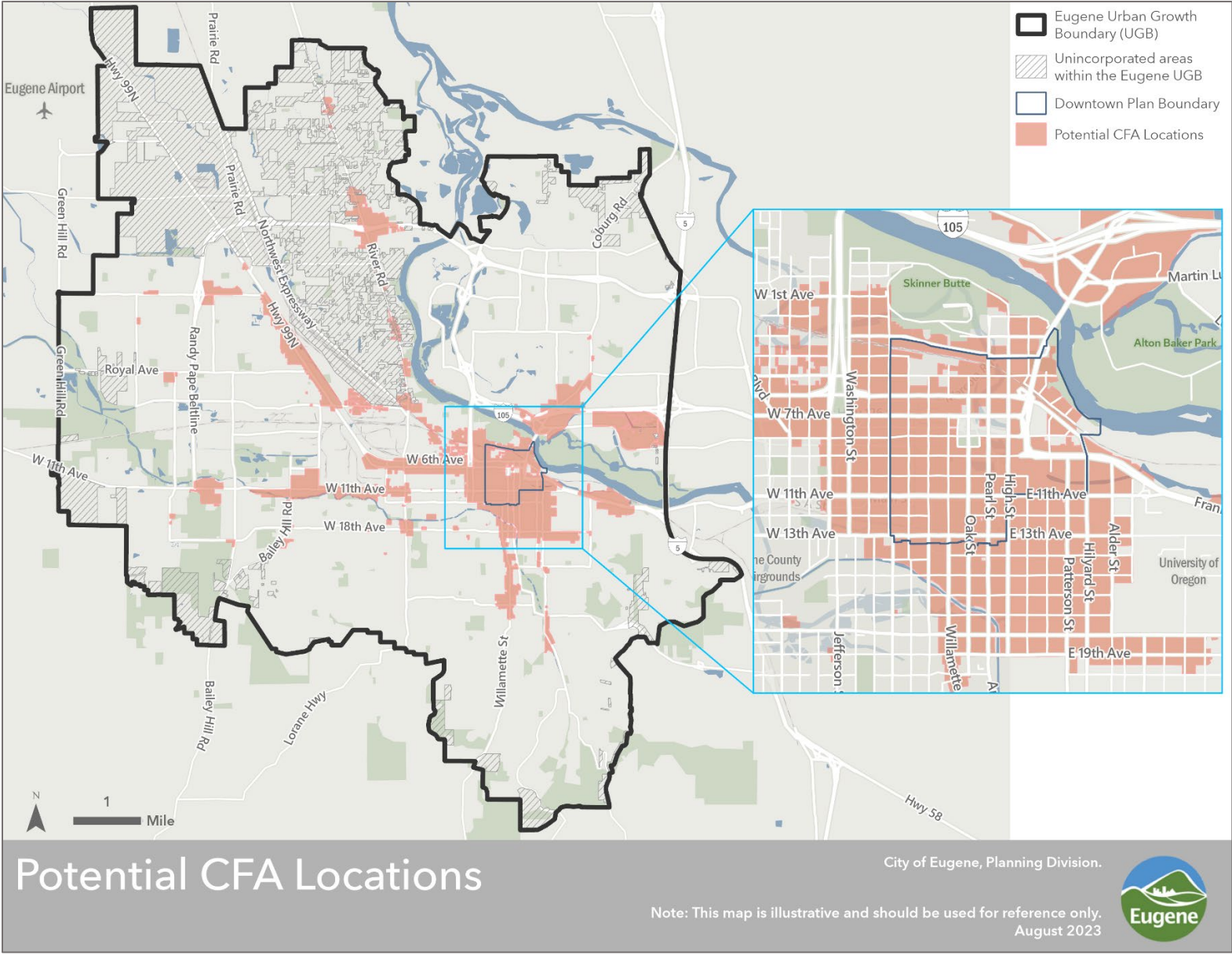


FIGURE 2. POTENTIAL CFA LOCATIONS



4.2 Suitable CFA Locations

At this subsequent step, the analysis identified locations that met additional dimensional requirements. The LCOG analysis narrowed the Potential CFA Locations to those that met the following criteria:

- **A Minimum of 25 Acres** – Because Eugene’s population is over 25,000, the City must designate at least one CFA with a minimum of 25 acres which includes the most intensive development standards required per local government size. Additional “Secondary” CFAs of any size can be designated with less intensive development standards.
- **A Minimum of 750 Feet Wide** – Contiguous CFAs with distinct land use requirements that meet the minimum width requirements. Some exceptions to the minimum width may be allowed.⁶

Per discussions with DLCDC, professional peers, and City staff, LCOG used an operational definition of suitable width that abides by the rule in a manner that is clear, objective, and technically sound:

- **Minimum Width of 750 Feet (Suitable)** – The Potential CFA includes at least one portion that will entirely contain a circle of 750 feet in diameter.

DLCDC guidance suggests a second, more optimal definition of suitable width exists:

- **Minimum Width of 750 Feet (Optimal)** – The Potential CFA includes a majority of portions (greater than 50% by area) that will entirely contain a circle of 750 feet.

Figure 3 (page 20) shows the results of both methods citywide. Areas in light orange are Potential CFA Locations that do not meet either width criterion (Non-Suitable); medium orange areas are Potential CFA Locations that meet the minimum width criterion (Suitable); and dark orange areas are Potential CFA Locations that meet the optimal width criterion (Optimal). Eugene chose to retain both the “Optimal” and “Suitable” CFA Locations for further analysis – subsequently referred to as Suitable CFAs.

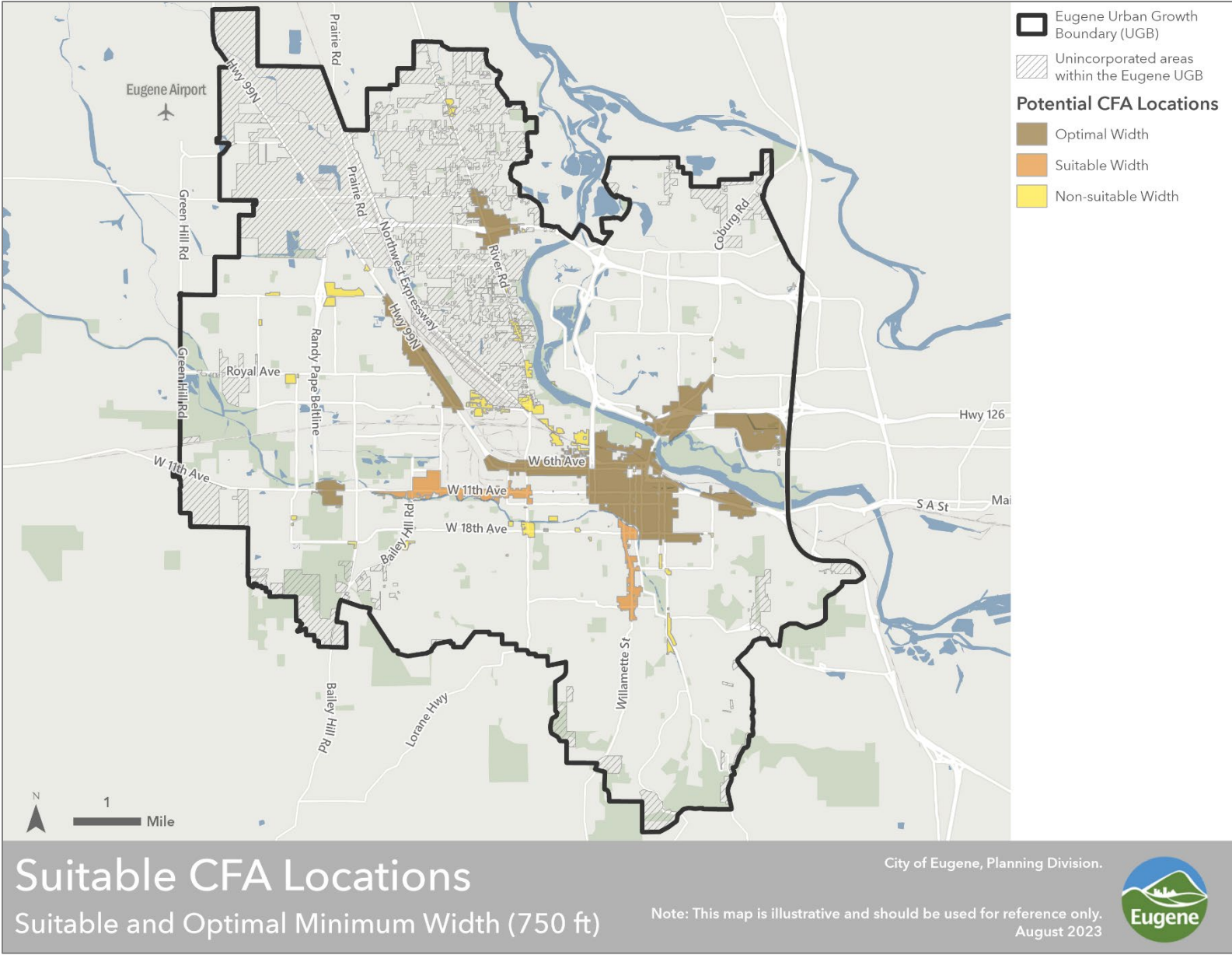
All the Potential CFA Locations that met the minimum width requirements also met the minimum 25-acre size. Table 3 shows the Potential CFA Locations that are of suitable width (those that are of optimal width are in bold), classified by size. Figure 4 (page 21) illustrates all Suitable CFAs.

TABLE 3. SUITABLE CFA LOCATIONS AND DIMENSIONS

Location Name	Optimal Width	Area
Downtown/Campus	Yes	865 acres
West 11th Avenue	No	203 acres
Chase Village	Yes	200 acres
Highway 99	Yes	194 acres
Ferry Street Bridge	Yes	189 acres
Santa Clara Station	Yes	135 acres
South Willamette	No	109 acres
Franklin/Walnut	Yes	86 acres
Far West 11th Avenue	Yes	56 acres

⁶ Natural barriers, such as rivers; long-term barriers in the built environment, such as freeways; constraint by adjacent areas planned and zoned to meet industrial land needs.

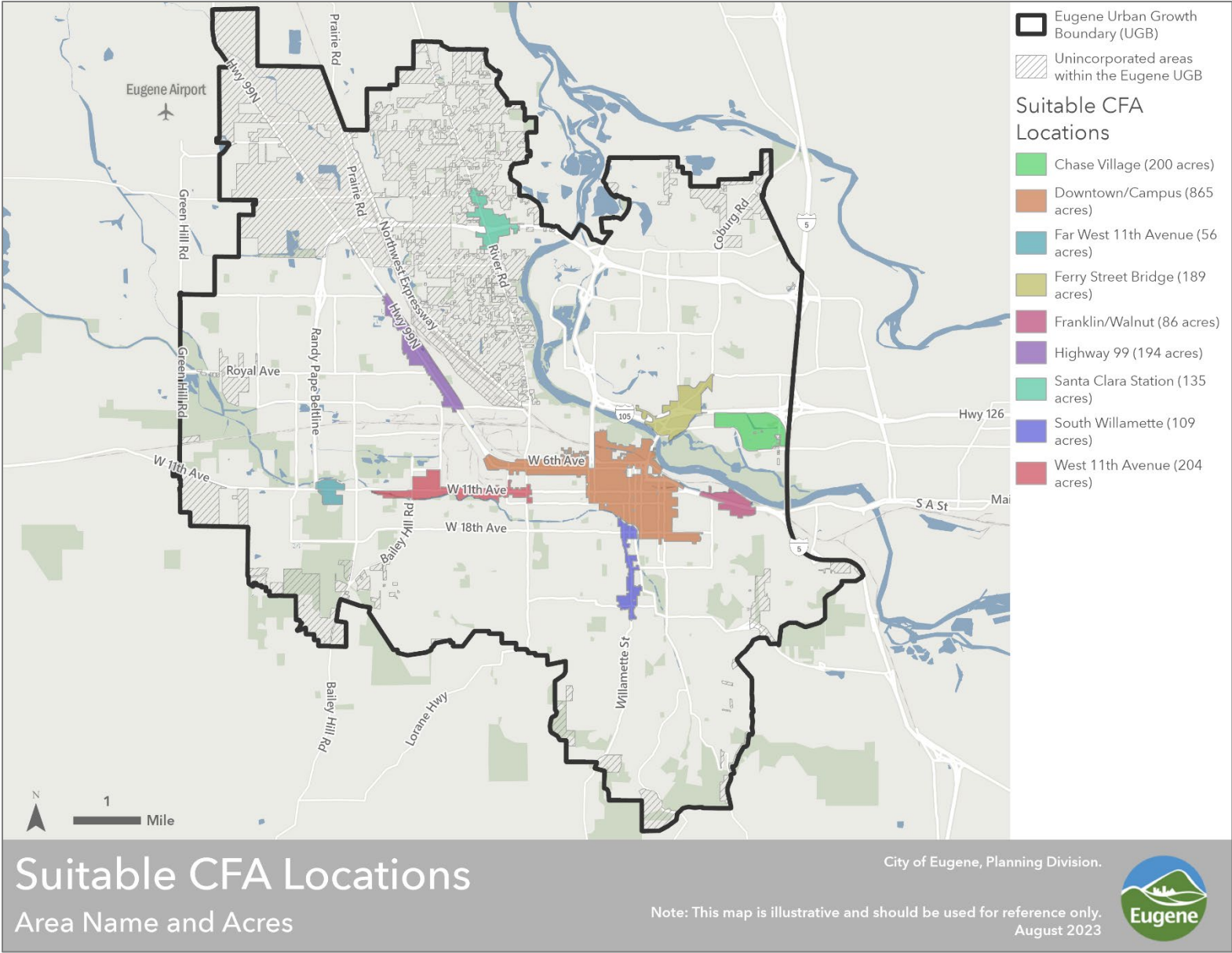
FIGURE 3. POTENTIAL CFA LOCATIONS OF SUITABLE AND OPTIMAL MINIMUM WIDTH



Suitable CFA Locations
 Suitable and Optimal Minimum Width (750 ft)

Note: This map is illustrative and should be used for reference only.
 August 2023

FIGURE 4. SUITABLE CFA LOCATIONS



4.3 Evaluation of Suitable CFA Locations

After narrowing to nine Suitable CFAs citywide, LCOG and City staff analyzed eight additional criteria recommended or required in the rules. The nine Suitable CFAs evaluated, as illustrated in Figure 4, include (in alphabetical order):

1. Chase Village
2. Downtown/Campus
3. Far West 11th Avenue
4. Ferry Street Bridge
5. Franklin/Walnut
6. Highway 99
7. Santa Clara Station
8. South Willamette
9. West 11th Avenue

In addition, staff included three variations of the Downtown/Campus Suitable CFA:

- Downtown/Campus, Variation A – Exclude the 6th/7th Avenue corridor west of Jefferson Street
- Downtown/Campus, Variation B – Exclude zones with lower levels of compliance with CFA criteria
- Downtown/Campus, Variation C – Exclude both of the above

Demographic Profile and Displacement Risk

Using the data collected for the displacement risk analysis described in **Section 5.2**, this evaluation includes key demographic trends in each Suitable CFA, including 1) income, 2) the presence of people vulnerable to displacement, 3) housing stock, and 4) changes in the housing market, and 5) the shift of certain demographics over time. Based on these five data sets, each area is then placed into one of the following six typologies according to their risk of displacement: Vulnerable, Early Gentrification, Active Gentrification, Late Gentrification, Becoming Exclusive, Advanced Exclusive, and Unassigned. The typologies, underlying data sets, and citywide results are available in **Section 5.2**. The analysis uses 5-Year American Community Survey (ACS) estimates for 2008-2012 and 2015-2019 by census block group (where available). A full demographic profile by block group for each Suitable CFA Location, using data from the displacement risk analysis, is available in **Appendix C. Demographic Profiles by Suitable CFA**.

Development Regulation Compliance

Suitable CFAs stretch across 13 base zones and special area zones with distinct land use requirements (e.g., development regulations) for each. The compliance evaluation considers the existing zoning and development regulations within each Suitable CF and the changes needed to bring it into compliance with CFA standards. Zones within each Suitable CF were evaluated as low, medium, or high compliance with the CFA standards. More information on compliance ratings for each criterion is available in **Appendix B, Technical Memo #3b**.

- **Outright Permitted Uses:** CFAs must allow both single-use and mixed-use developments, as well as certain outright permitted uses.⁷

⁷ For the purposes of this evaluation, any development that requires approval through a land use application process, such as Site Review, Planned Unit Development, or Conditional Use Permit, should not be considered “outright permitted,” regardless of whether it is a clear and objective application, planner director decision, hearings official decision, or otherwise. “Outright permitted” procedures provide an applicant for development certainty that if the application complies with all applicable requirements, the development will be approved.

- **Density Minimums and Building Height:** This CFA Study relies on the “prescriptive standards” presented in the CFEC rules, which require and encourage the following CFA designations:
 - *Primary CFA:* Designate at least one CFA with a minimum residential density of 25 dwelling units per net acre and a maximum building height of no less than 85 feet throughout.
 - *Secondary CFA (Optional):* Designate additional areas with a minimum residential density of 15 dwelling units per net acre and a maximum building height of no less than 50 feet throughout.
- Additional standards are further evaluated in **Appendix B, Technical Memo #3b.**

Dwelling Unit Capacity

CFAs must be zoned to allow for 30% of all current and future housing needs in Eugene, as determined by the most recently adopted and acknowledged analysis of housing capacity and needed housing. For Eugene, 30% of current and future housing need constitutes a total of 25,637 units.⁸ Each Suitable CFA includes a calculation of the percentage of total needed units it is currently sized to accommodate based on both Primary CFA and Secondary CFA prescriptive standards in the rules and existing land use code development regulations. This is not an evaluation of how much capacity there is on actual buildable land in the Suitable CFA.

In or Near High-Density Mixed-Use Areas

CFAs must be located within, or in proximity to, areas planned for or provided with high-density residential uses and a high concentration of employment opportunities. This evaluation provides an overview of current development patterns within each Suitable CFA, what type of development the Suitable CFA is zoned for, and an overview of adjacent zoning.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

Upon selection and adoption of CFAs, Eugene must prioritize locating government facilities that provide direct service to the public within CFAs, as well as prioritize parks, open space, plazas, and similar public amenities in or near CFAs that do not contain sufficient amenities already. This evaluation provides a general overview of existing public amenities and parks within and near each Suitable CFA.

Accessible via High-Quality Active Transportation Facilities

This evaluation provides a general overview of existing and planned high-quality pedestrian and bicycle services within and near each Suitable CFA, using the Eugene 2035 Transportation System Plan and feedback from the City’s Transportation Planning staff. Once designated, Eugene will conduct a multi-modal gap analysis that further describes any needed improvements to bicycle and pedestrian services within the designated CFAs.⁹

⁸ Eugene’s adopted Housing Needs Analysis (HNA) includes a calculation of existing dwelling units in Eugene (2011) and a projected future need within the UGB (2012-2032). The HNA is part of the Envision Eugene Residential Land Supply Study (2012-2032) which was adopted in 2017.

⁹ Oregon Administrative Rules (OAR), Chapter 660, Division 12 (OAR 660-012-0325) requires a multimodal transportation gap summary be coordinated between the local jurisdiction, transportation facility providers, and transportation services providers to consider multimodal transportation needs in each climate-friendly area.

Served by Adequate Infrastructure

City staff managing stormwater¹⁰ and wastewater planning, as well as the Eugene Water and Electric Board (EWEB), provided feedback on the adequacy of existing infrastructure to support development consistent with the land use requirements established in the CFEC rules. This feedback did not include detailed modeling, which may be necessary once CFAs are designated to inform future planning.

Development and Redevelopment Conditions

As outlined in the Climate-Friendly Areas Methods Guide (but not required by the rules), DLCDC recommends that cities “consider analysis of the near-term (1-5 years) development and redevelopment potential of candidate CFAs.” Eugene expects to complete a 20-year redevelopment analysis of Suitable CFAs during urban growth planning work in 2024-2025, further described in **Section 6. Next Steps**. This preliminary evaluation includes a brief analysis of two data sets:

- **Buildable Lands Inventory:** A snapshot of the current status of the adopted 2012-2032 Buildable Lands Inventory (BLI) land supply, the BLI monitoring data shows the development potential of land as of January 1, 2021. There are five different types of development potential for each tax lot: Developed, Partially Vacant, Undeveloped, Committed, and Protected.¹¹
- **Building Permit Data:** A map summarizing new building permit locations between 2012-2022 using Growth Monitoring data.¹²

¹⁰ Future projected land uses for stormwater basin planning are based on Metro Plan designations. The Eugene-Springfield Metropolitan Area General Plan (Metro Plan) Diagram currently serves as Eugene’s Comprehensive Plan Map and shows existing and projected land uses for Eugene, at a metropolitan scale.

¹¹ More information on the Eugene 2021 Buildable Lands Inventory snapshot, including definitions of the five types of development potential categories, is available here: <https://eugene-pwe.maps.arcgis.com/home/item.html?id=7c83daa672664889a917a5d1db7448ee>

¹² Eugene’s Growth Monitoring Program is developing a system to efficiently collect growth-related information, including the amount of housing being built and the status of Eugene’s adopted undeveloped land supply since it was inventoried in 2012. More information on the program is available at <https://www.eugene-or.gov/2081/Growth-Monitoring>.

Location 1: Chase Village

The Chase Village Suitable CFA comprises 200 acres. It is the third largest of the nine suitable locations. The Suitable CFA is bounded to the north by Oregon Highway 126 and to the east by Interstate 5. It is bounded to the south and west primarily by Martin Luther King Jr. Boulevard.

Demographic Profile and Displacement Risk

Based on the displacement risk area typology outlined in **Section 5.2**, of the two census block groups crossing into the Chase Village Suitable CFA, one is considered “Vulnerable” and one is considered “Active Gentrification” as illustrated in Figure 44 (page 108). Both block groups also cross into the Ferry Street Bridge Suitable CFA. Table 4 below summarizes the total acres by area type within the Chase Village Suitable CFA.

TABLE 4. CHASE VILLAGE SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Active Gentrification	131.2
Vulnerable	69.3
Total	200.5

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- As an area characterized by student-oriented housing development, the Suitable CFA has a much higher percentage of specific groups vulnerable to displacement than Eugene as a whole, including people with lower incomes, people of color, and people with limited English proficiency.
- Almost all the housing stock in the Suitable CFA is multi-unit housing (99% and 80%) and occupied by renters (100% and 81%).
- Between the 2008-2012 and 2015-2019 time periods, demographic shifts indicate the rising presence of students, who are often more racially diverse, have lower incomes, have higher educational attainment, and are more likely to be renters than the city as a whole. Demographic trends typical of student-oriented housing are not evident in the displacement risk area typology.

A full demographic profile of the Chase Village Suitable CFA is available in **Appendix C**.

FIGURE 5. CHASE VILLAGE SUITABLE CFA

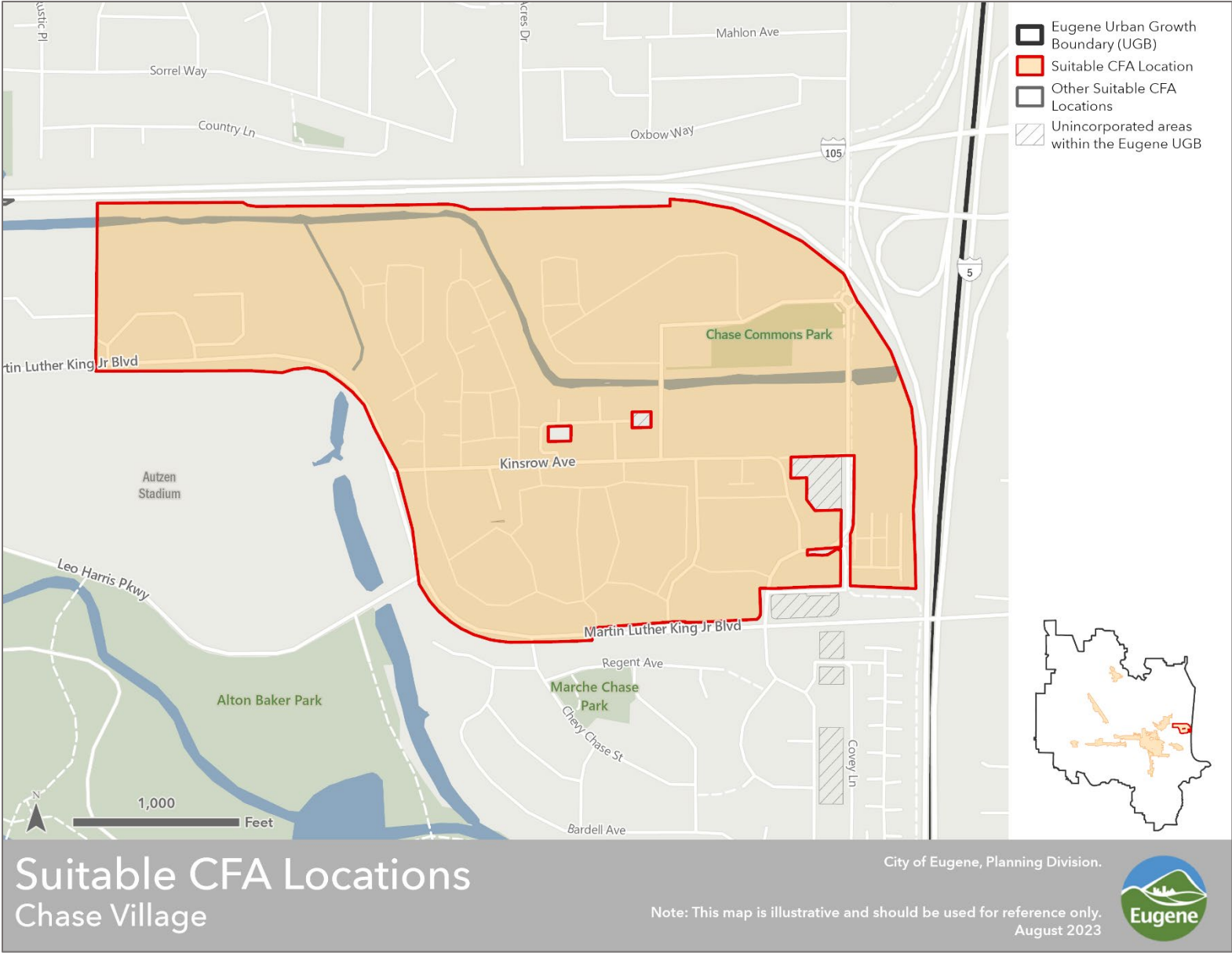
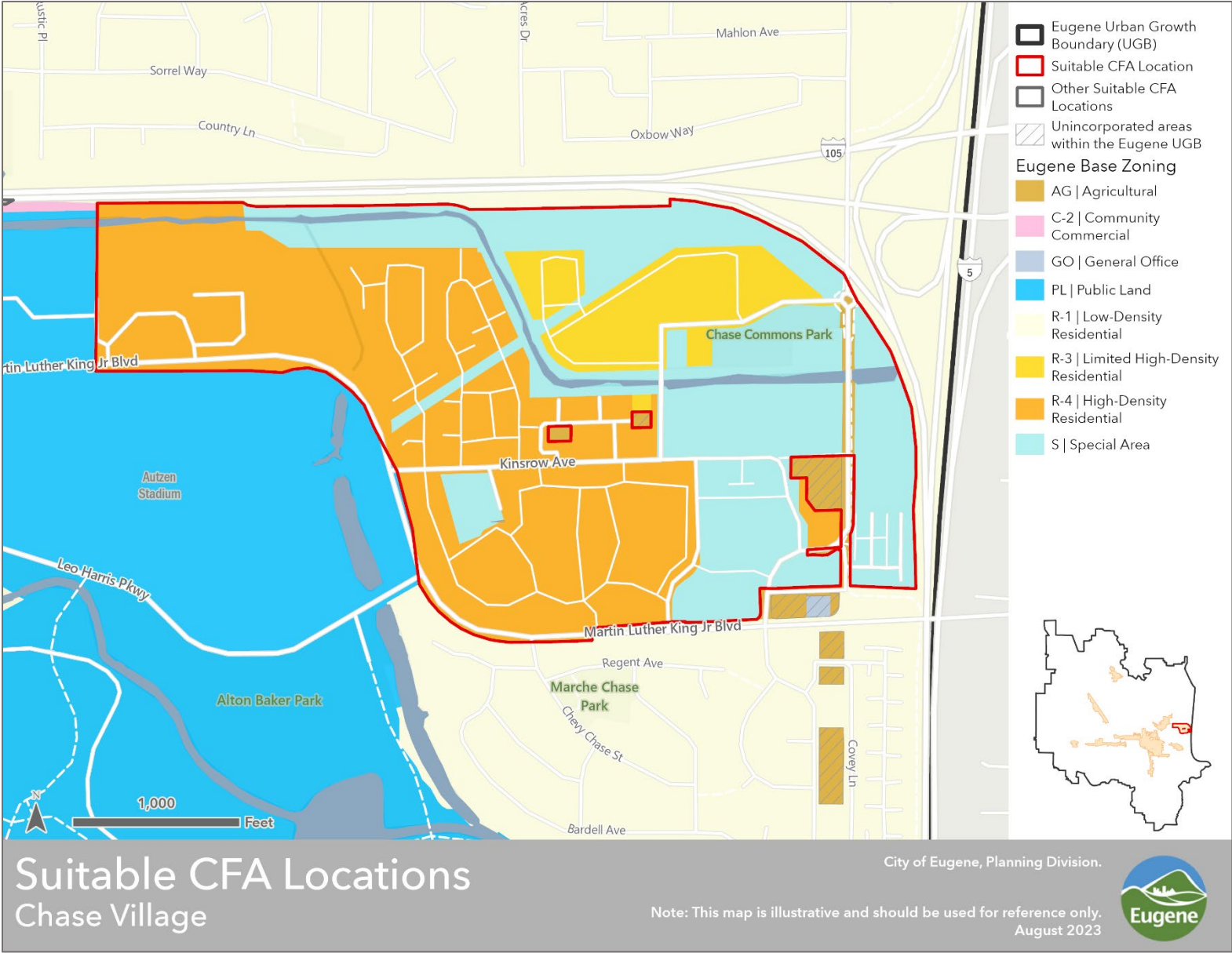


FIGURE 6. CHASE VILLAGE SUITABLE CFA - BASE ZONING



Development Regulation Compliance

As illustrated in Figure 6 (page 27), the Chase Village Suitable CFA is predominantly zoned as R-4 High-Density Residential (about 100 acres), R-3 Limited High-Density Residential (20 acres), and S-CN Chase Node Special Area Zone (77 acres). The Suitable CFA contains all five of the S-CN subareas, including Commercial (/C), High Density Residential (/HDR), High Density Residential/Mixed Use (/HDR/MU), Public Land (/PL), and Parks, Recreation and Open Space (/PRO). As no development capacity is assumed in the S-CN/PL or S-CN/PRO subareas, they are not reviewed for development regulation compliance in this section.

- **Permitted Uses:** All S-CN zoned areas (/C, /HDR, and /HDR/MU) are at medium compliance for CFA required outright permitted uses. Both R-3 and R-4 have low compliance ratings for permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by any of the current zoning and development standards. R-3, R-4, and S-CN achieve compliance with Secondary CFA criteria with an existing minimum density of 20 units/acre.
- **Building Height:** Maximum allowable building heights in areas zoned R-4 and S-CN are in compliance for both Primary and Secondary CFA criteria, however areas zoned R-3 only comply with Secondary CFA criteria.

Dwelling Unit Capacity

Using all zoned areas (excluding those considered not suitable for development), the Chase Village Suitable CFA meets **9%** of the needed housing capacity as a Primary CFA and **5%** of the needed housing capacity as a Secondary CFA. The S-CN subareas /PRO and/PL were assumed not suitable for residential development and are not included in the capacity calculations.

In or Near High-Density Mixed-Use Areas

The Chase Village Suitable CFA is planned as a high-density, mixed-use urban center as represented in the R-3, R-4, and S-CN zones. Much of the area is currently developed as high-density residential and is known for several large student-oriented housing developments. The areas bordering the Suitable CFA to the south are R-1 Low Density Residential, although Martin Luther King Jr. Blvd. establishes a substantial separation between the areas. The Ferry Street Bridge Suitable CFA, which includes Oakway Center and the surrounding commercial district, is nearby to the west.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

Within the Suitable CFA are the S-CN subareas of Public Lands (/PL) and Parks, Recreation, and Open Space (/PRO). These areas are owned by the City of Eugene for future parks development (/PRO) and to support stormwater infrastructure (/PL). The area west of the Chase Village Suitable CFA is zoned PL Public Land and includes portions of Alton Baker Park, Autzen Stadium, and Lane County services. Alton Baker Park is a large regional park with a full suite of recreation, parks facilities, and natural areas.

Active Transportation Facilities

The Chase Village Suitable CFA is accessible from key regional destinations via high-quality walking and biking facilities. The residential area is near the Ruth Bascom Riverbank Path System, an interconnected multi-use paved path with access to the University of Oregon campus, downtown Eugene and downtown Springfield, Alton Baker Park, and other destinations. The various housing developments within the Suitable CFA do not typically feature a mixture of uses and tend to be more auto oriented in

design. Martin Luther King Jr. Blvd. forms the southern boundary of the Suitable CFA and is classified as a minor arterial street with a wider sidewalk that functions as a shared use facility. Oregon Highway 126 forms the northern boundary; it is not an active transportation facility and is only accessible via Martin Luther King Jr. Blvd. The City will construct a project on Martin Luther King Jr. Blvd. in 2023-2024 designating the outer vehicle lanes as Bus and Turn (BAT) lanes and adding one new enhanced pedestrian crossing at Chevy Chase Street. Moving Ahead, a study by LTD and City of Eugene, identified a high-level vision for where enhanced corridor investments could go on Martin Luther King Jr. Blvd., including enhanced bicycle and pedestrian infrastructure and design elements such as queue jumps that will help buses get through traffic.

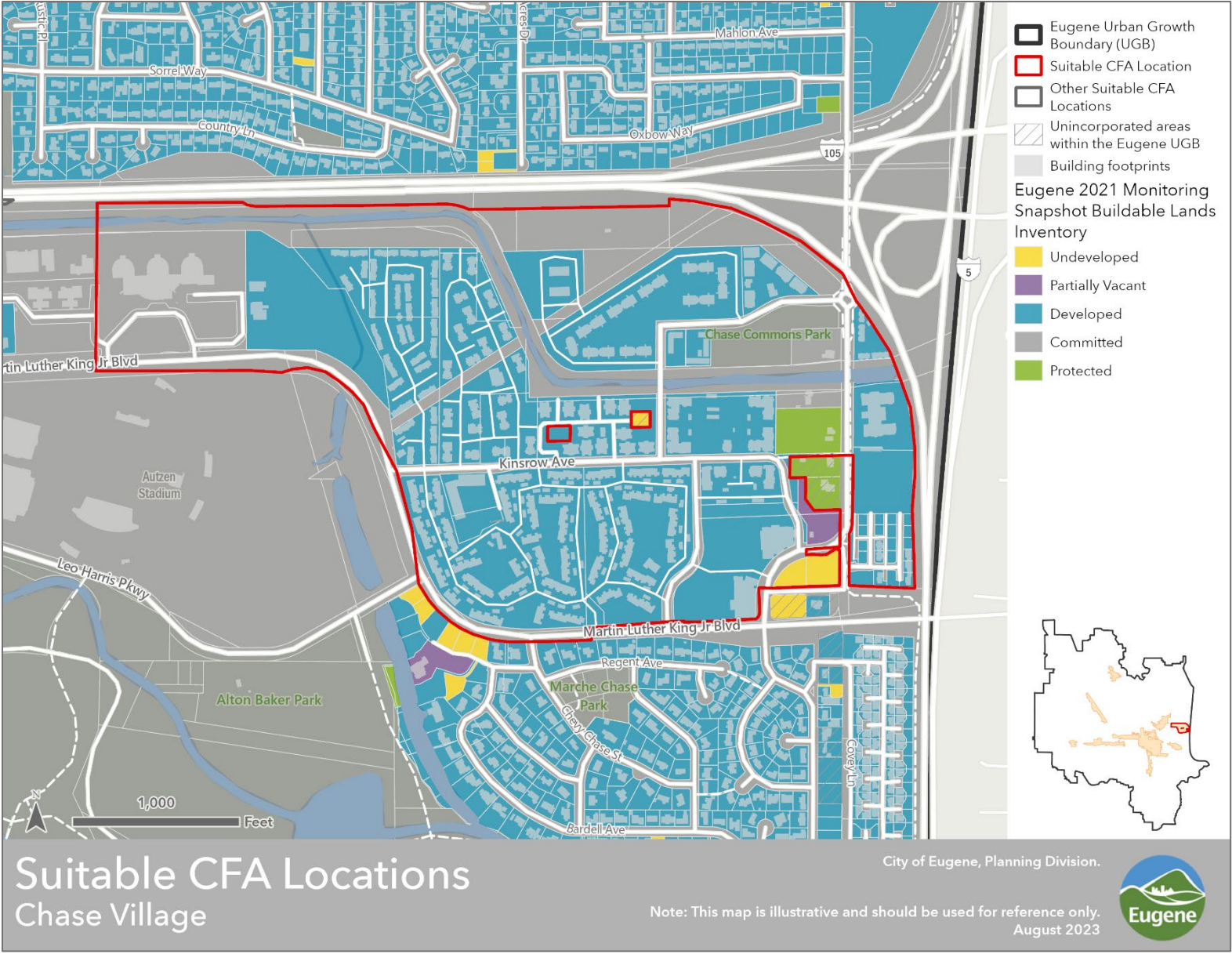
Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns about possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use, based on the assumed Metro Plan designations, for the Chase Village Suitable CFA is primarily High Density Residential (HDR) and HDR Mixed Use. If CFA designation results in more commercial development than currently projected, the volume of runoff generated for the area would likely be higher. The City's stormwater management planning team would need to evaluate the storm system under the higher impervious surface area conditions to see if any flooding or conveyance issues are predicted.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA location. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

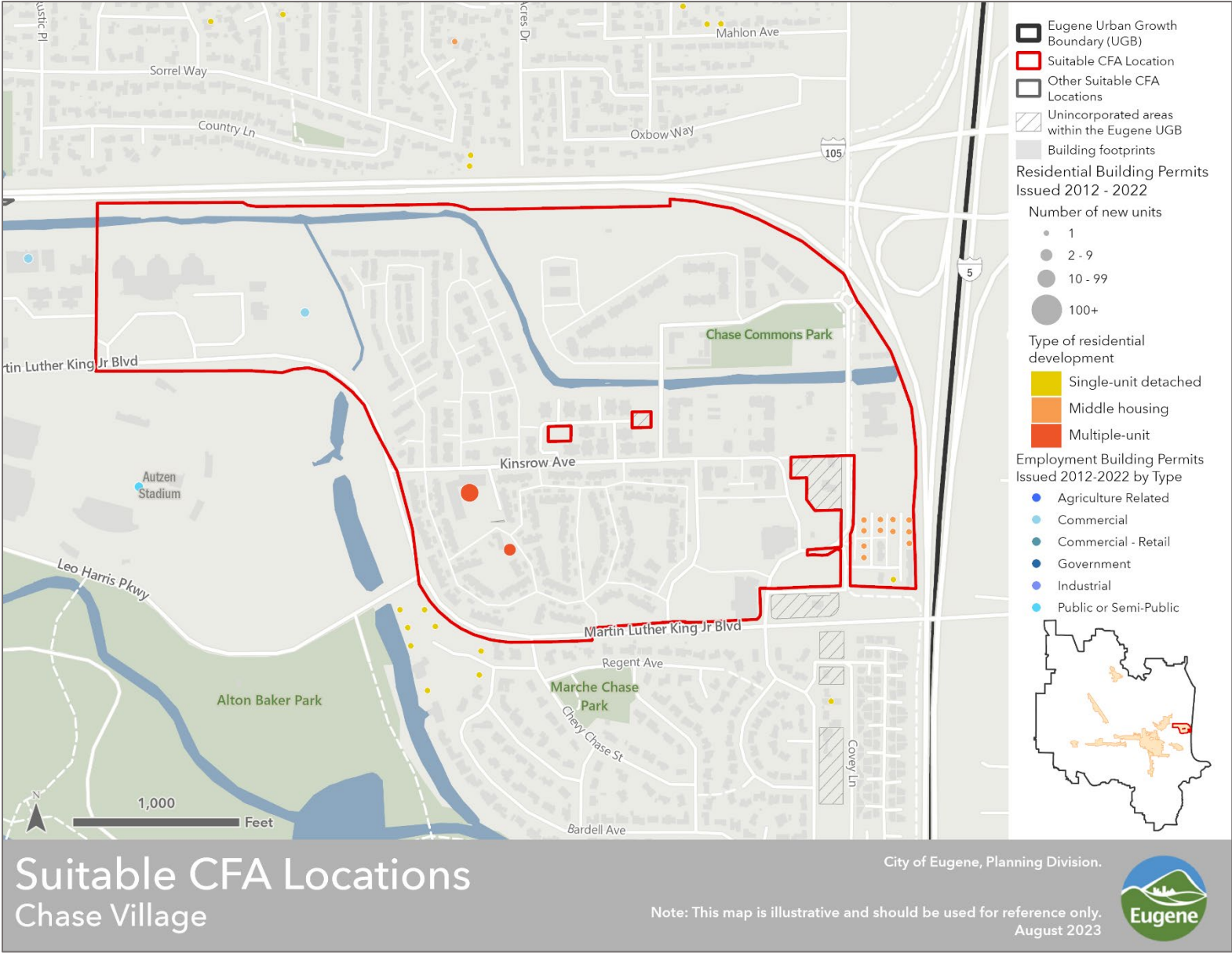
According to the 2021 BLI snapshot, the Chase Village Suitable CFA is primarily Developed, as illustrated on Figure 7 (page 30). There are a few Undeveloped and Partially Vacant parcels at the southeast corner along Garden Way, and one small parcel excluded from the Suitable CFA due to its AG Agricultural zoning at the very center. Building permit activity between 2012-2022, illustrated in Figure 8 (page 31), included a few housing projects, both multi-unit and middle housing, and one employment project.

FIGURE 7. CHASE VILLAGE SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)



Suitable CFA Locations
 Chase Village

FIGURE 8. CHASE VILLAGE SUITABLE CFA - BUILDING PERMIT ACTIVITY (2012-2022)



Location 2: Downtown/Campus

The Downtown/Campus Suitable CFA is 865 acres with meandering boundaries. It is the largest of the nine suitable locations. The Suitable CFA stretches beyond the Downtown Plan Area¹³ and encompasses both the Downtown Urban Renewal District¹⁴ and much of the Riverfront Urban Renewal District.¹⁵ The Suitable CFA notably includes a narrow segment about 20 blocks long extending west along 6th and 7th Avenues, as well as a primarily residential area to the southeast, adjacent to the University of Oregon campus, among other irregularly shaped inclusions. Additionally, three smaller variations were analyzed for this Suitable CFA, including:

- Downtown/Campus, Variation A – Exclude the 6th/7th Avenue corridor west of Jefferson Street
- Downtown/Campus, Variation B – Exclude zones with lower levels of compliance
- Downtown/Campus, Variation C – Exclude both of the above

Demographic Profile and Displacement Risk

There are 22 census block groups that cross into the Downtown/Campus Suitable CFA. Based on the displacement risk area typology outlined in **Section 5.2**, 7 block groups are considered “Vulnerable,” three are considered “Early Gentrification,” and one is considered “Active Gentrification” as illustrated in Figure 44 (page 108). Several block groups cross into the Franklin/Walnut, West 11th Avenue, and South Willamette Suitable CFAs as well. Table 5 below summarizes the total acres by area type within the Downtown/Campus Suitable CFA.

TABLE 5. DOWNTOWN/CAMPUS SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	313.0
Early Gentrification	238.8
Active Gentrification	19.4
Unassigned	293.7
Total	864.9

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- Residents of this Suitable CFA tend to have lower incomes compared to the city as a whole.

¹³ The most recent Eugene Downtown Plan was adopted in 2004. The Plan establishes policies and implementation strategies to advance the Vision for Greater Downtown Eugene (2001).

¹⁴ On June 12, 2023, the Eugene City Council voted to amend the Eugene Downtown Urban Renewal Plan to increase the spending limit in the Plan and include new projects in the Plan, both of which will enable high priority downtown improvements within the District. The Plan amendment includes three types of projects that are now eligible for urban renewal funding: housing, physical improvements to address safety and comfort, and emerging projects such as community facilities, open spaces, and commercial development support. More information on Downtown Urban Renewal is available at www.eugene-or.gov/3240/Urban-Renewal.

¹⁵ The redevelopment of the Downtown Riverfront has been a part of the community’s vision for decades. The City's Urban Renewal Agency leads the redevelopment of the 16 acres of riverfront property that will become Eugene’s Riverfront Neighborhood. More information on Downtown Riverfront development projects is available at www.eugene-or.gov/3506/Downtown-Riverfront.

- Nearly all housing stock in this Suitable CFA is multi-unit housing and renter-occupied units.
- This Suitable CFA has a mix of residents that are vulnerable to displacement, including some block groups with a higher percentage of people of color, and others with more people with disabilities and/or single-parent households.
- Rents are more affordable in this area but have increased more between the 2008-2012 and 2015-2019 periods than the city as a whole.
- Some areas within the Suitable CFA experienced demographic changes indicating displacement between 2008-2012 and 2015-2019, but these trends were uneven across block groups.

A full demographic profile of the Downtown/Campus Suitable CFA is available in **Appendix C**.

FIGURE 9. DOWNTOWN/CAMPUS SUITABLE CFA

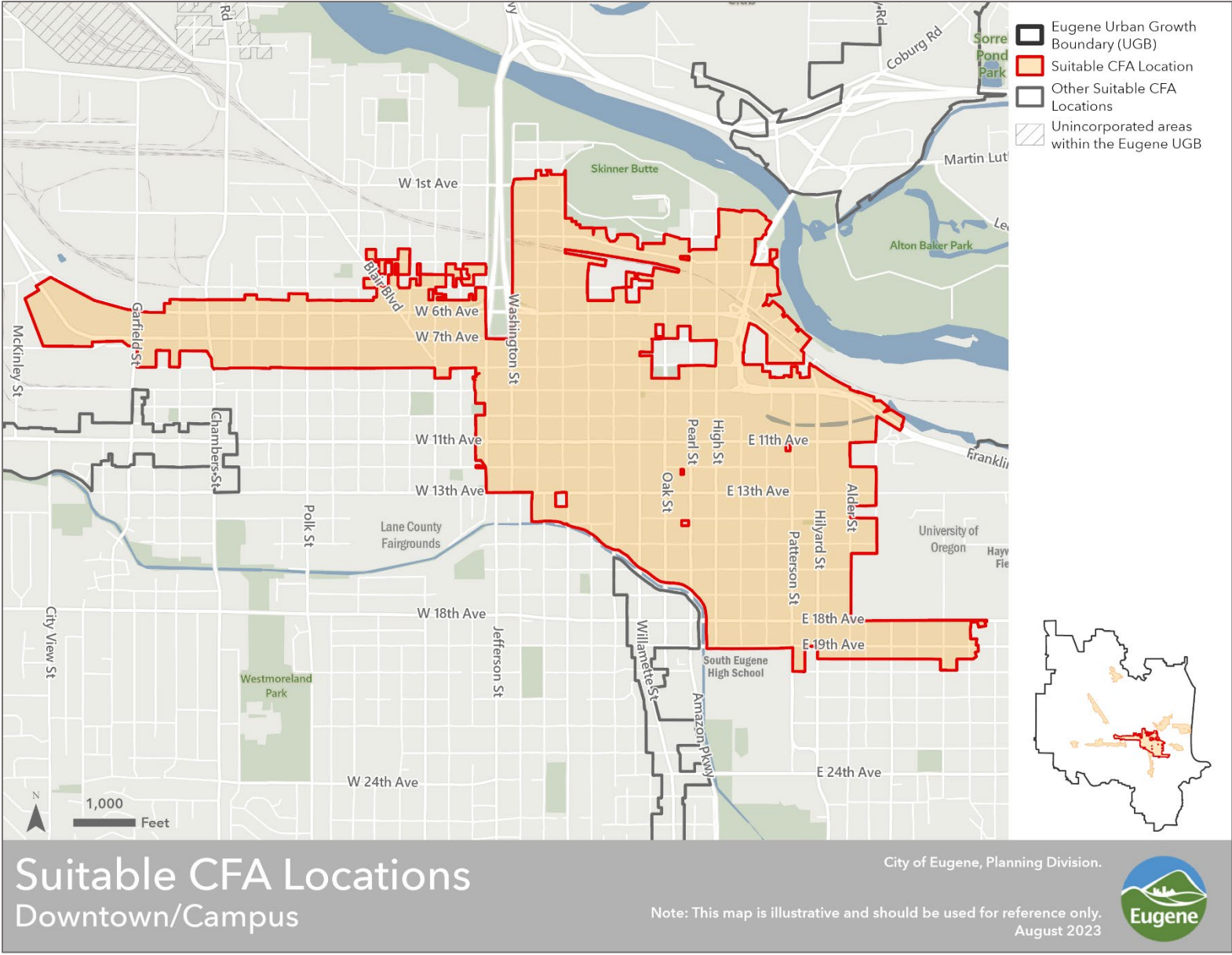


FIGURE 10. DOWNTOWN/CAMPUS SUITABLE CFA – BASE ZONING

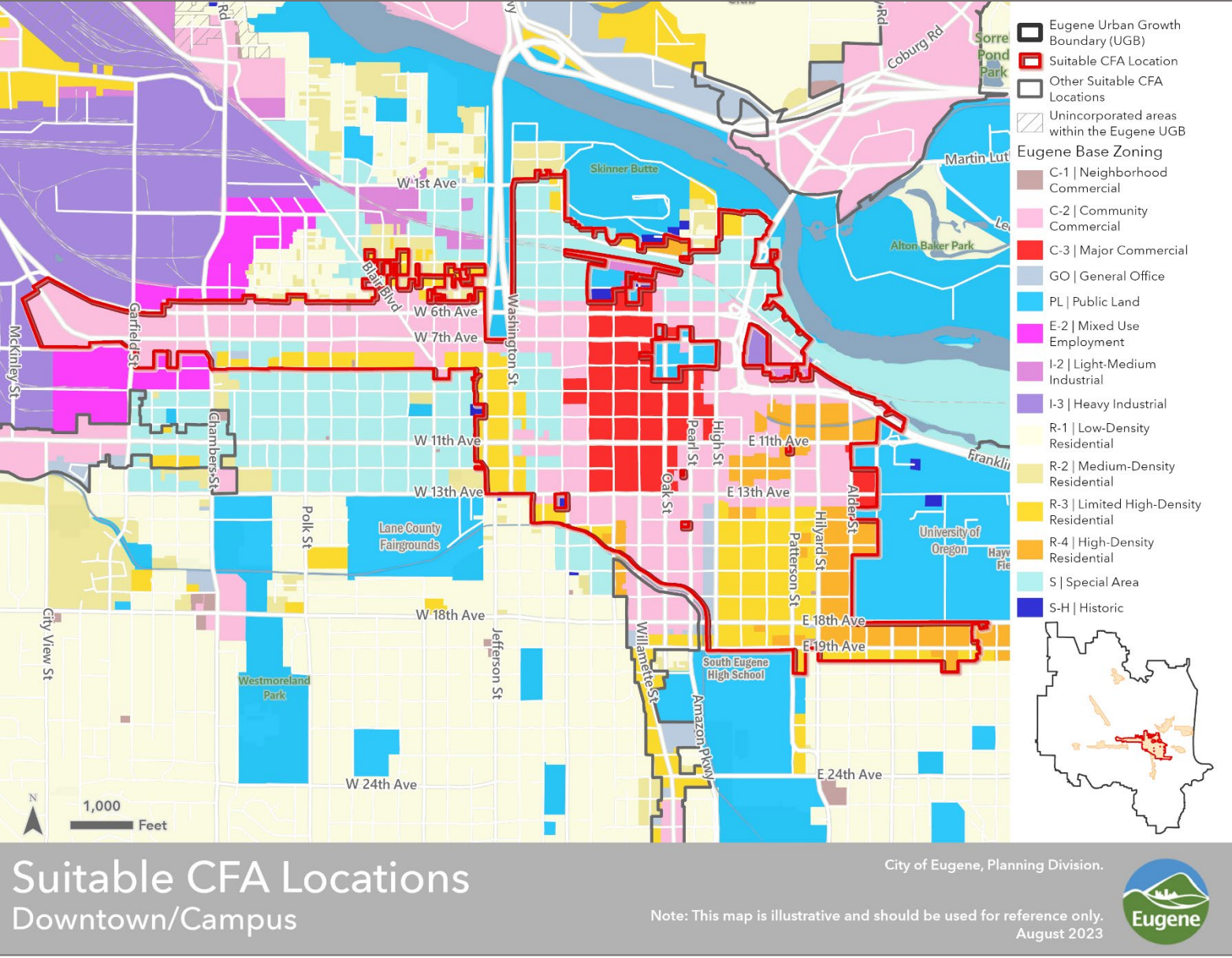


FIGURE 11. DOWNTOWN/CAMPUS SUITABLE CFA - VARIATION A

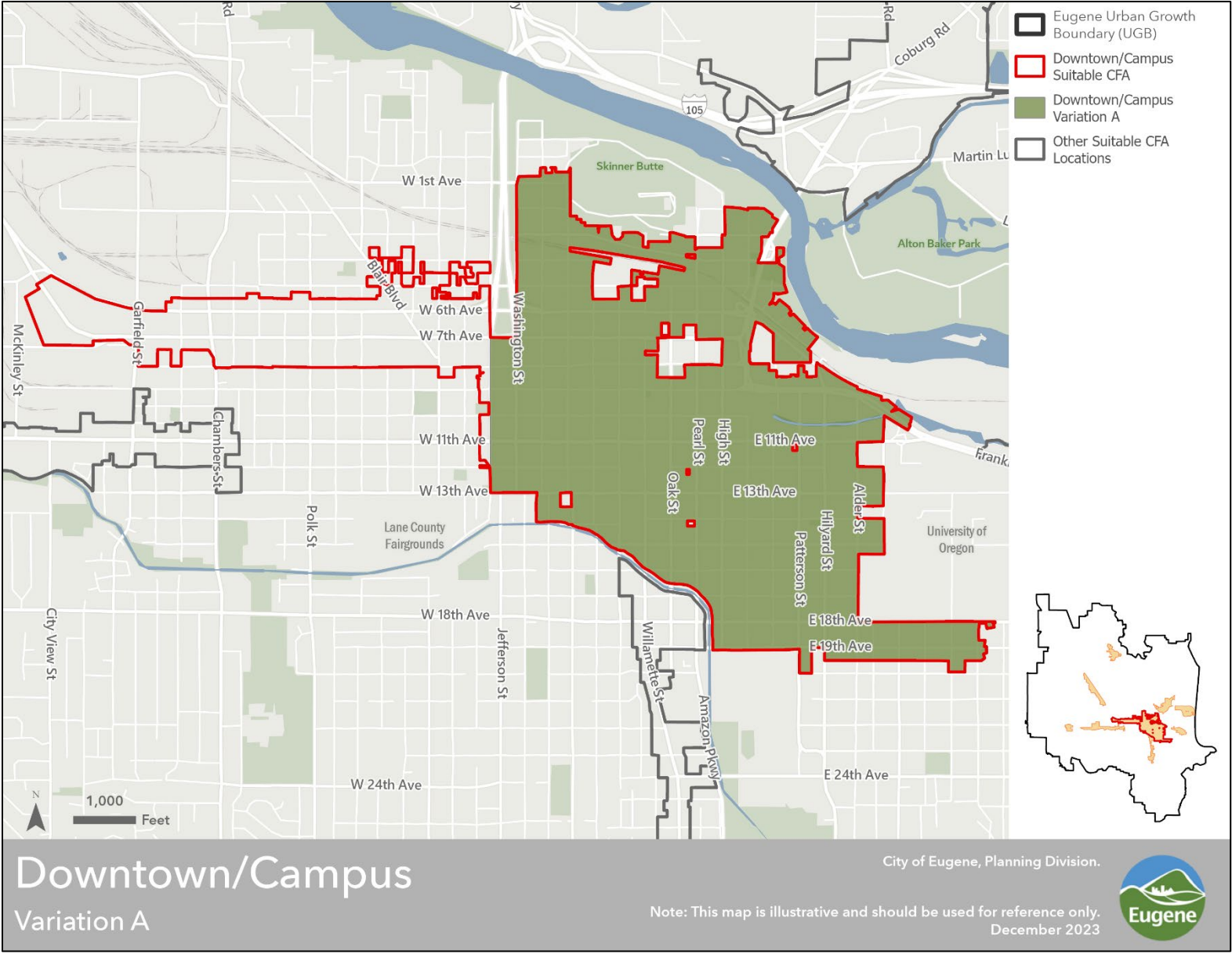


FIGURE 12. DOWNTOWN/CAMPUS SUITABLE CFA - VARIATION B

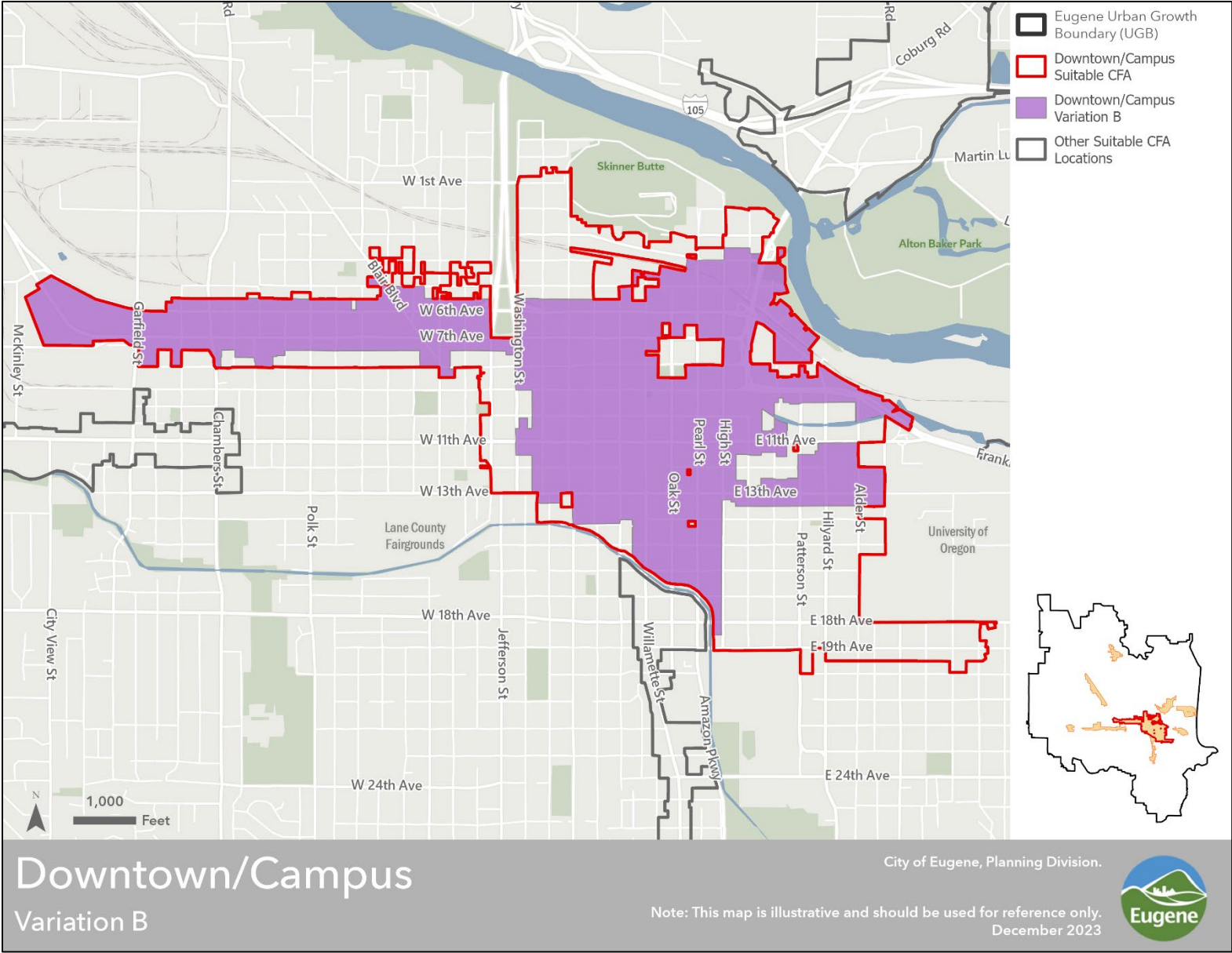
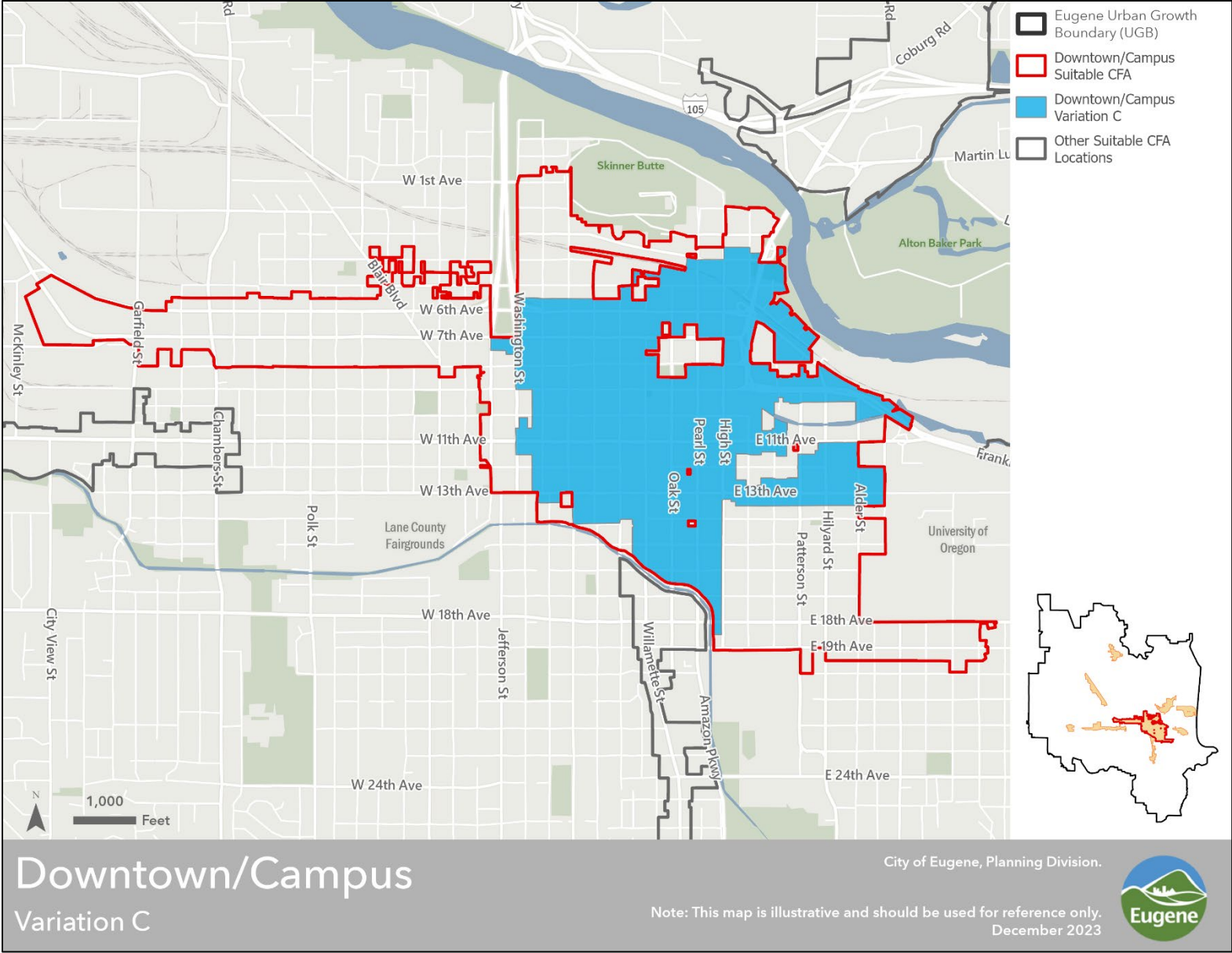


FIGURE 13. DOWNTOWN/CAMPUS SUITABLE CFA - VARIATION C



Development Regulation Compliance

As illustrated in Figure 10 (page 35), the Downtown/Campus Suitable CFA contains numerous base zones and overlay zones. The most predominant zones are C-2 Community Commercial (about 359 acres), C-3 Major Commercial (111 acres), R-3 Limited High-Density Residential (164 acres), and R-4 High-Density Residential (97 acres). There are five special area zones within the Suitable CFA, including S-C Chambers (9 acres), S-DR Downtown Riverfront (21 acres), S-DW Downtown Westside (24 acres), S-F Fifth Street (8 acres), and S-W Whiteaker (61 acres). There is also a small strip of GO General Office (10 acres) and a very small amount of C-1 Neighborhood Commercial (less than 2 acres).

- **Permitted Uses:** C-2 and S-C/C-2 are highly CFA compliant zones, except where C-2 overlaps with the /SR Site Review overlay zone. This overlay zone requires a land use application process and makes otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant.¹⁶ C-3 and S-F also rate high in compliance and exist exclusively within this Suitable CFA. The two downtown special area zones (S-DW and S-DR, including applicable subareas), S-W, and GO areas are medium compliant for outright permitted uses. However, /SR limitations in the S-W zone, where it is applicable, reduce compliance. Both R-3 and R-4 have low compliance ratings for CFA required outright permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards. Areas zoned R-3, R-4, and S-DW (unless mixed-use) meet density minimums for Secondary CFA criteria.
- **Building Height:** Maximum allowable building heights in areas zoned C-2, C-3, R-4, S-C, S-F, and S-DW are in compliance for both Primary and Secondary CFA criteria, however areas zoned R-3 and GO only comply with Secondary CFA criteria. The S-W and S-DR (subareas D & E) zones rate notably low in compliance due to height constraints. Relatedly, most of the central downtown area is covered by the /TD Transit Oriented Development overlay which requires a minimum floor to area ratio (FAR) of either 2.0 FAR or .65 FAR.

Variation A

Four of the special area zones are retained in Variation A, including S-DR Downtown Riverfront, S-DW Downtown Westside, S-F Fifth Street, and S-W Whiteaker. The areas removed from this variation are mostly zoned C-2, with some small areas of R-3, GO, and S-C Chambers.

- **Permitted Uses:** Variation A removes mostly areas that are highly compliant with CFA required permitted uses, including C-2 and S-C/C-2 zoned areas. The small areas of R-3 and GO that are removed in this variation help to improve overall compliance. Overall, Variation A does not meaningfully impact compliance with outright permitted uses.
- **Density Minimums:** Variation A does not meaningfully impact compliance with density minimums.
- **Building Height:** The small areas of R-3 and GO that are removed in this variation help to improve overall compliance. As noted above in permitted uses, some highly compliant zones are removed under this variation.

¹⁶ Appendix C. LCOG Technical Package, Technical Memo #3b includes further mapping and analysis of overlay zones that impact compliance with CFA criteria.

Variation B

Four special area zones are retained in Variation B, including S-C Chambers, S-DR Downtown Riverfront, S-DW Downtown Westside, and S-F Fifth Street. The areas removed from this variation are all segments zoned C-1, R-3, R-4, and S-W Whiteaker which have lower levels of compliance overall.

- **Permitted Uses:** Variation B is more compliant with CFA required outright permitted uses than the original Downtown/Campus Suitable CFA. The zones that are retained in this variation are either highly compliant (C-2, C-3, S-C, and S-F) or medium compliant (S-DW, S-DR, and GO) for outright permitted uses. Some /SR limitations in C-2 and GO remain, which reduce “outright” compliance where applicable.
- **Density Minimums:** This variation removes R-3 and R-4 zoned areas, which are some of the only zones with existing minimum densities, although they only achieve compliance with Secondary CFA criteria.
- **Building Height:** Variation B removes two zones that did not achieve high compliance for Primary CFA criteria – R-3 and S-W. Some areas of lower compliance remain (S-DR and GO).

Variation C

The most predominant zones in Variation C are C-2 and C-3. Three special area zones are retained, including S-DR Downtown Riverfront, S-DW Downtown Westside, and S-F Fifth Street. The areas removed from this variation are mostly zoned as C-1, C-2, R-3, R-4, as well as two special area zones – S-W Whiteaker and S-C Chambers.

- **Permitted Uses:** Variation C is more compliant with CFA required outright permitted uses than the original Downtown/Campus Suitable CFA. The zones that are retained in this variation are either highly compliant (C-2, C-3, and S-F) or medium compliant (S-DW, S-DR, and GO) for outright permitted uses. A very small amount of /SR limitations in C-2 remain, which reduces “outright” compliance where applicable.
- **Density Minimums:** As with Variation B, this variation removes R-3 and R-4 zoned areas, which are some of the only zones with existing minimum densities, although they only achieve compliance with Secondary CFA criteria.
- **Building Height:** As with Variation B, this variation removes two zones with maximum allowable building heights that do not comply with Primary CFA criteria – R-3 and S-W. Some areas of lower compliance for building height remain (S-DR and GO).

Dwelling Unit Capacity

Using all zoned areas, the entire Downtown/Campus Suitable CFA meets **59%** of the needed housing capacity as a Primary CFA and **33%** of the needed housing capacity as a Secondary CFA. It is the only location of the nine considered with enough estimated capacity to meet the minimum 30% needed housing requirement by itself.

Variation A

Using all zoned areas, Variation A meets **46%** of the needed housing capacity as a Primary CFA and **26%** of the needed housing capacity as a Secondary CFA. This variation has enough estimated capacity to meet the minimum 30% needed housing requirement by itself as a Primary CFA but would need additional areas to meet the needed housing requirement as a Secondary CFA.

Variation B

Using all zoned areas, Variation B meets **48%** of the needed housing capacity as a Primary CFA and **27%** of the needed housing capacity as a Secondary CFA. This variation has enough estimated capacity to meet the minimum 30% needed housing requirement by itself as a Primary CFA but would need some supplementation as a Secondary CFA.

Variation C

Using all zoned areas, Variation C meets **37%** of the needed housing capacity as a Primary CFA and **21%** of the needed housing capacity as a Secondary CFA. This variation has enough estimated capacity to meet the minimum 30% needed housing requirement by itself as a Primary CFA but would need some supplementation as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Downtown/Campus Suitable CFA is large with meandering boundaries and subsequently has many adjacent uses, including several areas of high-density mixed-use. Within the Suitable CFA, the downtown core (mostly C-2 and C-3) is mixed-use with high-density housing scattered throughout. The riverfront redevelopment area (S-DR) is developing at a high-density and planned for mixed-use. The R-3 and R-4 zoned areas, west of the University of Oregon campus, are zoned or developed at higher densities with non-residential uses scattered throughout. The Whiteaker area (S-W) is zoned for a mixture of uses but not necessarily developed with high-density throughout. The 6th and 7th Avenue portion (mostly C-2) is not developed with or near high-density mixed-use.

Adjacent to the Suitable CFA, there are a few small pockets of R-1 (on West 6th Avenue, Amazon Creek near 13th Avenue, and south of the University of Oregon campus). The farthest western reaches of the Suitable CFA along 6th and 7th Avenues are adjacent to industrial land uses. Additionally, there is a small section of industrial zoned land excluded from the current Suitable CFA boundaries, on the northeast edge of the CFA near the Coburg/Broadway interchange. This zoning is a remnant of the historical uses for the area. Current uses are public (Eugene Federal Building and Federal Courthouse) and commercial development.

The three variations each reduce the amount of adjacent non-compatible uses to differing degrees, but none of the variations eliminate such uses.

Variation A

Variation A, when compared to the original Suitable CFA, has fewer non-compatible adjacent uses. There is less R-1 adjacency, although some remains near Amazon Creek and the University of Oregon campus. This variation also eliminates some of the adjacent industrial zoned land on the west edge of the original CFA.

Variation B

Variation B retains the adjacency to industrially zoned lands, noted in the original CFA. There is less R-1 adjacency around the University of Oregon campus, but some remains along 6th/7th Avenue.

Variation C

Variation C retains the fewest incompatible adjacent uses of the Downtown/Campus variations. Some R-1 adjacency remains along Amazon Creek on the southwest side of Variation C. Additionally, there is a

small amount of industrially zoned land retained on the northeast edge of the original CFA, which is currently developed for commercial and public uses.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

Within the Suitable CFA, there are several small parks, plazas, and similar public spaces, including the Park Blocks around 7th/8th Avenue and Oak Street and the Lane County Farmer's Market Pavilion. Eugene Parks and Open Space staff noted that downtown is currently underserved, as parts of the Suitable CFA are not within a half-mile walking distance of a playground. This gap is expected to be addressed through planned improvements to the Downtown Park Blocks and expansion of the Downtown Riverfront Park. To the north and northwest, the Downtown/Campus Suitable CFA is bounded mostly by parks and open space land uses along the Willamette River, including Skinner's Butte and the new Downtown Riverfront Park. Alton Baker Park is also nearby, across the Willamette River, and connected by high-quality bicycle and pedestrian infrastructure.

To the south/southwest, the Suitable CFA is adjacent to South Eugene High School and Amazon Park and is bounded by the University of Oregon campus to the east. This Suitable CFA is unique in that it is home to many public facilities, including the new Eugene City Hall on the riverfront, the Eugene Public Library downtown branch, the LTD Eugene Station, City and County office buildings, courthouses/municipal court, and more.

Variation A

Variation A retains all adjacent parks, open space, and public amenities included within and adjacent to the original CFA.

Variation B and Variation C

Both variations retain most of the adjacent or nearby parks, open space, and public amenities included in the original CFA. Less of the University of Oregon campus and South Eugene High School/Amazon Park/Roosevelt Middle School areas are adjacent to the variations, but the general proximity is retained.

Active Transportation Facilities

Downtown Eugene and areas adjacent to the University of Oregon campus generally feature high-quality active transportation facilities. Some of these facilities include two-way cycle tracks and protected bike lanes (Alder Street near campus, 13th Avenue connecting downtown and campus, soon to be constructed High Street protected bike lanes connecting Amazon Park and the Downtown Riverfront, and soon to be constructed protected bike lanes on 8th Avenue downtown). There are several major arterials that pass through the Downtown/Campus Suitable CFA, including the 6th/7th Avenue corridor, Coburg Road (connecting downtown to the Ferry Street Bridge Suitable CFA), and Broadway/Franklin Boulevard/OR Highway 126 (connecting downtown to the Franklin/Walnut Suitable CFA, downtown Springfield, and Interstate 5). Franklin Boulevard is scheduled for major improvements to support more safe and comfortable walking, biking, and transit. Franklin Boulevard, LTD's Eugene Station, and the 6th/7th Avenue corridor are served by EmX bus rapid transit.

Variation A

Variation A retains all the high-quality active transportation facilities of the original CFA. It eliminates a large section of a major arterial passing through the original CFA, the 6th/7th Avenue corridor.

Variation B

Variation B retains most of the high-quality active transportation facilities of the original CFA. Less of the Alder Street two-way cycle track is included in the variation, although it still passes through the Suitable CFA near the 13th Avenue entrance to the University of Oregon campus.

Variation C

Like Variation B, Variation C retains most of the high-quality active transportation facilities of the original CFA. Less of the Alder Street two-way cycle track is included in the CFA. Additionally, it eliminates a large section of a major arterial passing through the original CFA – the 6th/7th Avenue corridor, as does Variation A.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns about possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the Downtown/Campus Suitable CFA is Commercial and Commercial Mixed Use. Some parts of the Suitable CFA are projected as High Density Residential (areas zoned R-3 and R-4), Industrial (S-DW), or Mixed Use (S-W). If CFA designation results in more commercial development than currently projected, the volume of runoff generated for the area would likely be higher. The City’s stormwater management planning team would need to evaluate the storm system under the higher impervious surface area conditions to see if any flooding/conveyance issues are predicted.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA location. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City’s wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Variation A

Variation A does not have any unique infrastructure concerns compared to the original CFA.

Variation B and Variation C

By removing the less compliant, primarily residential zones, Variation B and Variation C are more aligned with current stormwater basin planning. The areas retained in both variations are all projected as Commercial and Commercial Mixed Use, which aligns better with CFA designation.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, most of the Downtown/Campus Suitable CFA is Developed, as illustrated in Figure 14 (page 45). There are several Undeveloped parcels scattered across the Suitable CFA. Importantly, much of the downtown core is classified as Committed, which is land devoted to special uses like parks, schools, government offices, and rights-of-way and is not considered to have development or redevelopment potential. The Downtown Riverfront development area is classified as Committed in this snapshot as it was owned by the City of Eugene and EWEB prior to its ongoing development as a high-density, mixed-use area.

Building permit activity between 2012-2022, illustrated in Figure 15 (page 46), included hundreds of units across several new multi-unit housing developments, as well as a smaller amount of middle

housing and single-unit projects closer to the University of Oregon campus. Multi-unit projects were generally concentrated along Broadway/Franklin Boulevard, which tended to be student-oriented housing projects, and along both 11th Avenue and 13th Avenue, which tended to be income-qualified housing projects. The 5th Street Market area also gained two new multi-unit housing projects, one market rate and one income-qualified project. This snapshot does not include a significant number of units under construction and anticipated within the Downtown Riverfront area and on 13th Avenue at the entrance to the University of Oregon campus. Ongoing projects in these areas are expected to bring hundreds of new residential units through several large, multi-unit developments in the next 2-3 years.

Variation A

The 6th/7th Avenue corridor (excluded in this variation) experienced much less building permit activity between 2012-2022, with a handful of commercial permits and one small multi-unit project.

Variation B

The R-3 and R-4 zoned areas on the west side of the University of Oregon campus (excluded in this variation) were very active with redevelopment and infill projects between 2012-2022, although the areas tended to see smaller scale middle housing and multi-unit developments.

Variation C

Variation C most closely aligns with the City's existing priorities for increased housing development, as expressed through the Downtown Plan, Downtown Urban Renewal District, and Downtown Riverfront Urban Renewal District. Variation C retains many of the areas that have seen the most development and redevelopment, mostly large multi-unit housing projects, between 2012 and 2022. It also retains areas, including the Downtown Riverfront and 13th Avenue, where large housing projects are under construction or anticipated soon. However, Variation C also retains most of the Committed lands within the Downtown/Campus Suitable CFA. As noted above, Committed lands are not considered to have near-term development or redevelopment potential.

FIGURE 14. DOWNTOWN/CAMPUS SUITABLE CFA – MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

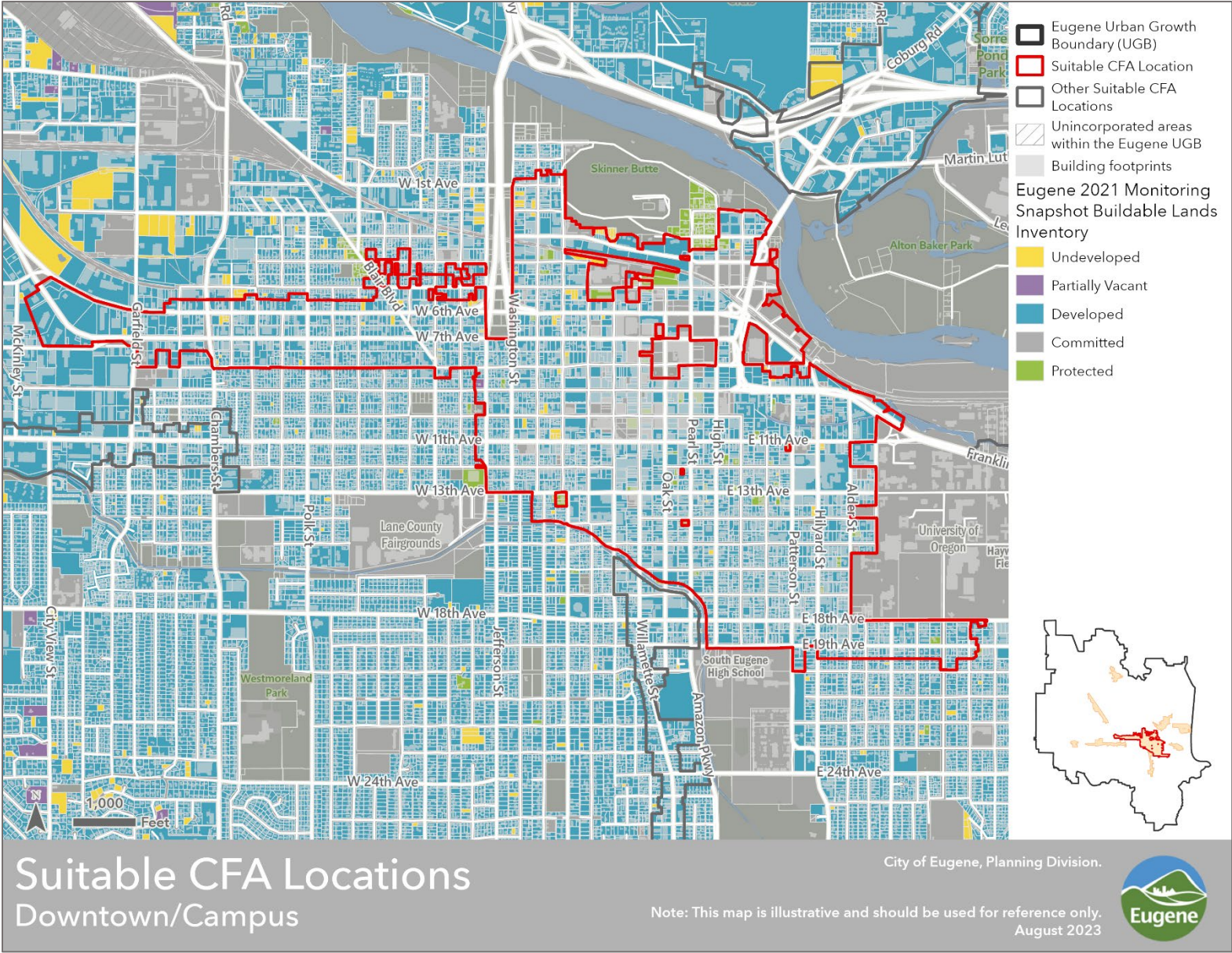
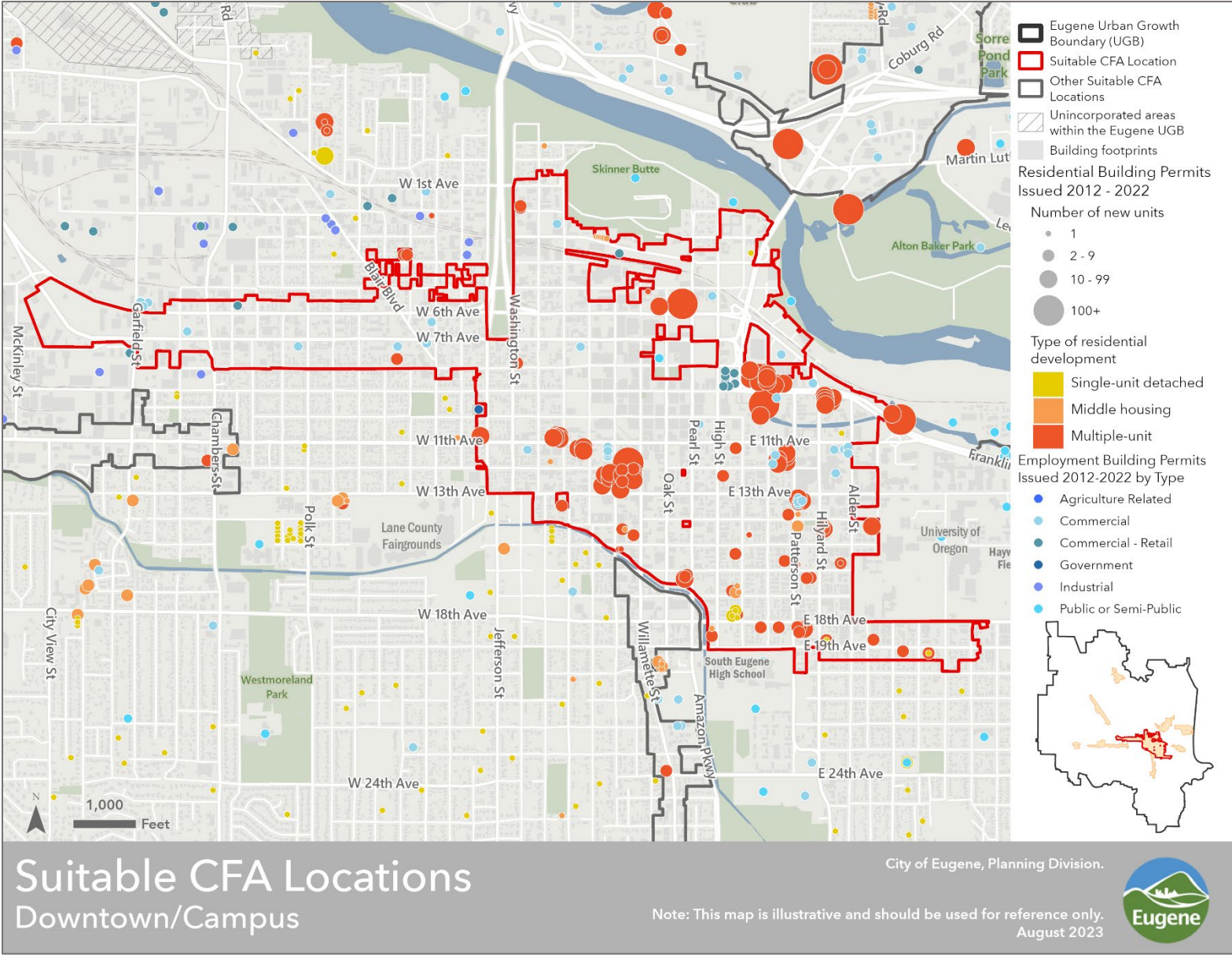


FIGURE 15. DOWNTOWN/CAMPUS SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 3: Far West 11th Avenue

The Far West 11th Avenue Suitable CFA is relatively small at 56 acres. It is the smallest of the nine suitable locations.

Demographic Profile and Displacement Risk

Based on the displacement risk area typology outlined in **Section 5.2**, of the three census block groups that cross into the Far West 11th Avenue Suitable CFA, one is considered “Vulnerable” and one is considered “Early Gentrification” which also crosses into the West 11th Avenue and Highway 99 Suitable CFAs. One is unassigned which means it does not fit one of the six area typologies, as illustrated in Figure 44 (page 108). Table 6 below summarizes the total acres by area type within the Far West 11th Avenue Suitable CFA.

TABLE 6. FAR WEST 11TH AVENUE SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	29.7
Early Gentrification	26.3
Unassigned	0.5
Total	56.4

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- The displacement analysis and risk typology cannot adequately consider housing trends in areas that are primarily industrial development, as is the case in this Suitable CFA. The housing activity indicators for one block group (Unassigned) were suppressed given the lack of reliable data.
- Parts of this Suitable CFA have residents with lower incomes who are potentially vulnerable to displacement.
- Housing market trends and the available housing stock are variable across the Suitable CFA.
- The Suitable CFA did not experience any notable demographic shifts in the period analyzed to indicate ongoing displacement.

A full demographic profile of the Far West 11th Avenue Suitable CFA is available in **Appendix C**.

FIGURE 16. FAR WEST 11TH AVENUE SUITABLE CFA

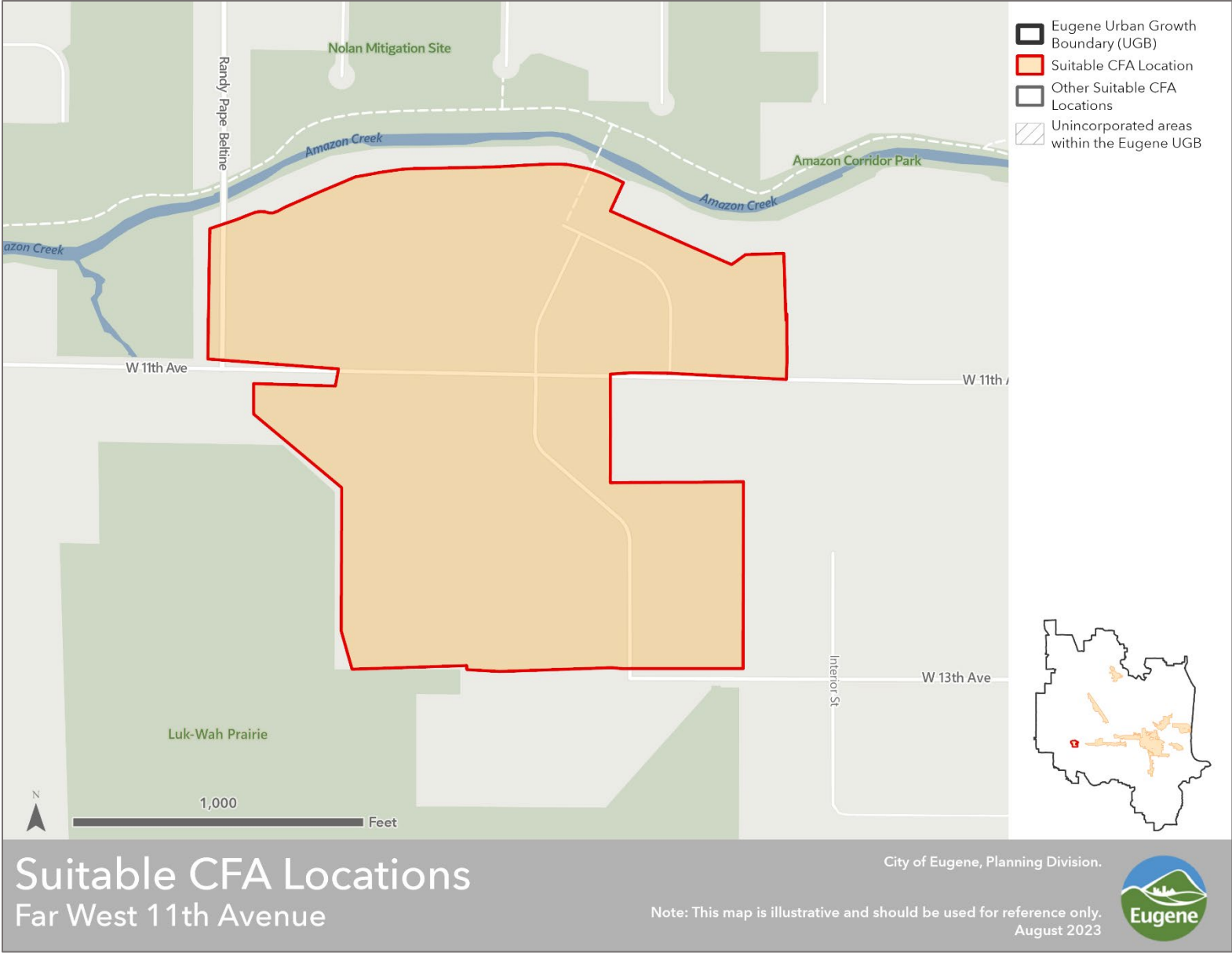
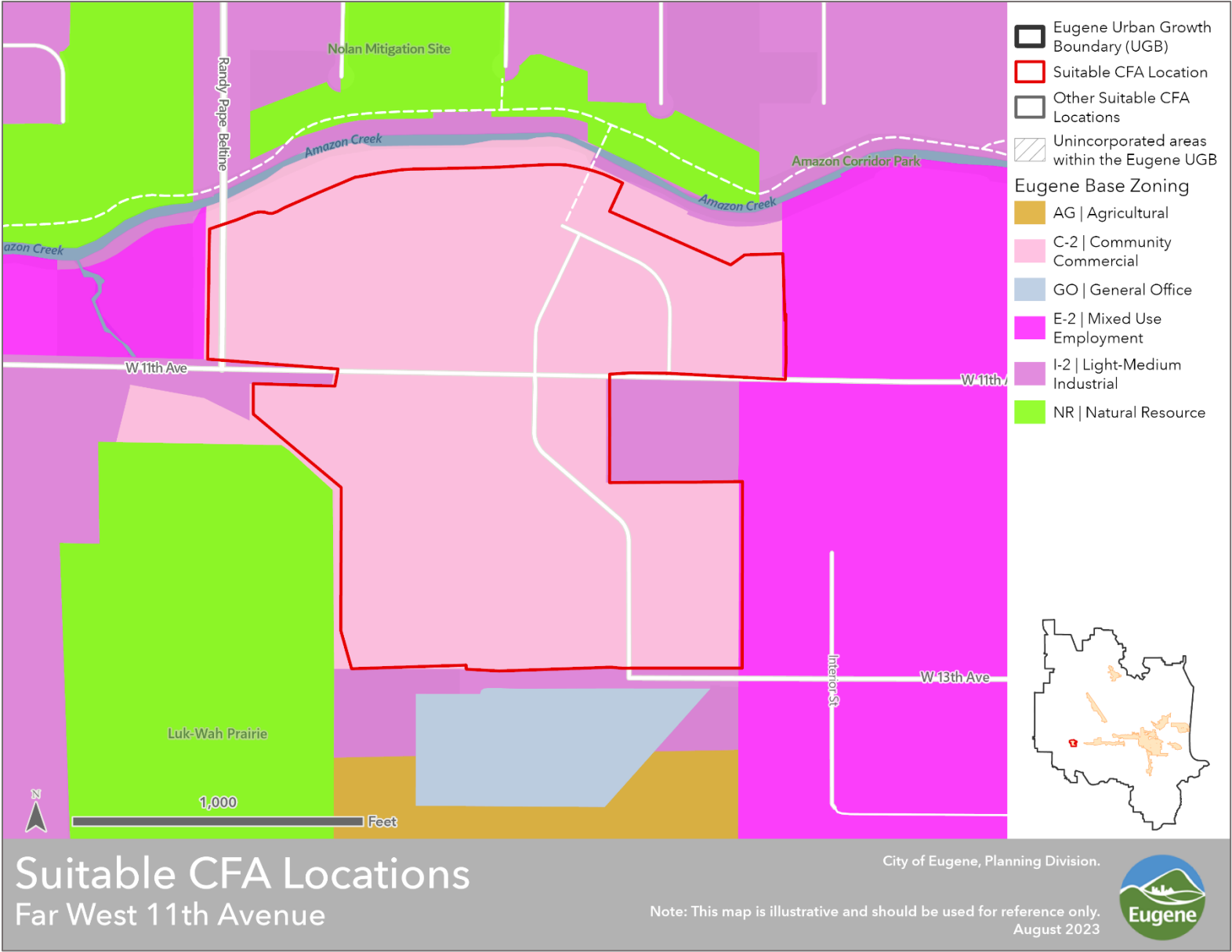


FIGURE 17. FAR WEST 11TH AVENUE SUITABLE CFA - BASE ZONING



Suitable CFA Locations
 Far West 11th Avenue

Development Regulation Compliance

As illustrated in Figure 17 (page 49), the Far West 11th Avenue Suitable CFA contains only one base zone (C-2 Community Commercial) and several overlay zones.

- **Permitted Uses:** C-2 is a highly CFA-compliant zone, except where it overlaps with the /PD Planned Unit Development or /SR Site Review overlay zones. These overlay zones require a land use application process and make otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. Both /SR and /PD overlays cover a large portion of the Suitable CFA.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards. Although higher densities are allowed in C-2, no minimum densities are currently established.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 comply with both Primary and Secondary CFA criteria.

Dwelling Unit Capacity

Using all zoned areas, the Far West 11th Avenue Suitable CFA meets **4%** of the needed housing capacity as a Primary CFA and **2%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Far West 11th Avenue Suitable CFA is not in or near high-density mixed-use areas. It is mostly surrounded by I-2 Light-Medium Industrial Land and E-2 Mixed Use Employment. There is also a significant piece of GO General Office zoned land to the south of the Suitable CFA.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

Amazon Creek constitutes the Suitable CFA’s northern boundary. NR Natural Resources zoning lies to the north for a natural area park owned by the City of Eugene, and to the south and southwest for two natural areas owned by the Bureau of Land Management (BLM). Eugene Parks and Open Space staff noted that this area is not currently served, as it is not within a half-mile walking distance of a playground.

Active Transportation Facilities

The Far West 11th Avenue Suitable CFA is not well-served by active transportation facilities. The exception is the Fern Ridge shared use path connecting west Eugene with the central city, which makes up the northern boundary of this Suitable CFA. The Fern Ridge Path connects to the Suitable CFA via a pedestrian and bike bridge over Amazon Creek. This Suitable CFA sits just east of the intersection of Beltline Highway and West 11th Avenue, two major arterials. The West 11th Avenue corridor is characterized by auto-oriented commercial and industrial uses and is served by EmX bus rapid transit.

Adequate Infrastructure

- **Electricity:** EWEB staff noted that increased development in this area could place a strain on existing electric capacity. This area is served by the Willow Creek Substation, but the feeder for the area is already at maximum capacity. More intensity of development would require additional modeling, planning, and potential infrastructure investments.
- **Stormwater:** The projected land use for this Suitable CFA is Commercial and Commercial Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.

- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific, water main extensions may be required for service.
- **Wastewater:** The City’s wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the Far West 11th Avenue Suitable CFA is primarily Developed, as illustrated on Figure 18 (page 52). There are a few Undeveloped parcels along the northern boundary of the Suitable CFA along Amazon Creek. Undeveloped parcels surround the Suitable CFA on the south side of West 11th Avenue are primarily I-2 Light-Medium Industrial and E-2 Mixed Use Employment lands. As is evident in Figure 15, the existing building footprints within this Suitable CFA are large. Building permit activity between 2012-2022, illustrated in Figure 19 (page 53), included two commercial projects – improvements to the existing Walmart building and construction of an LTD bus terminal.

FIGURE 18. FAR WEST 11TH AVENUE SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

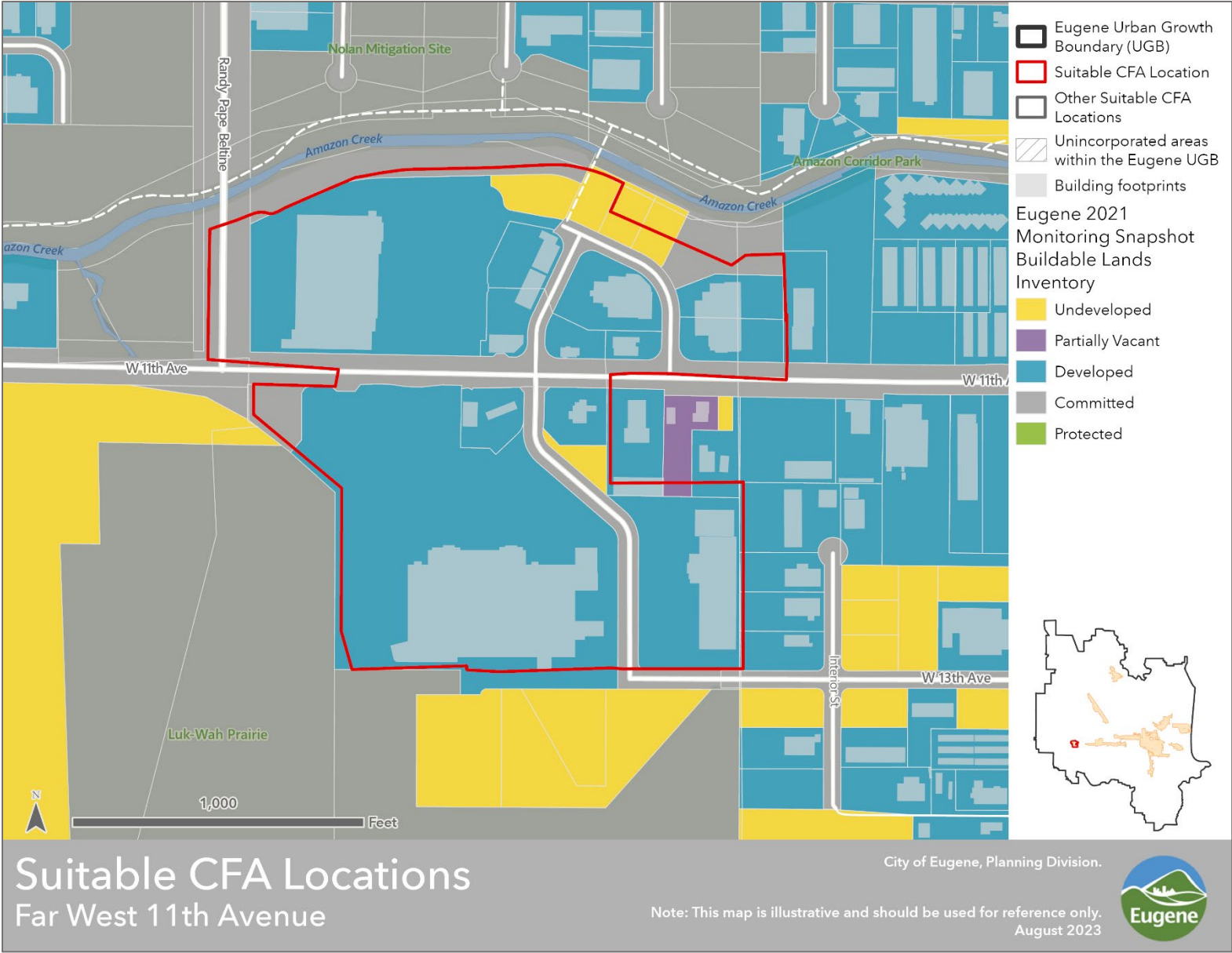
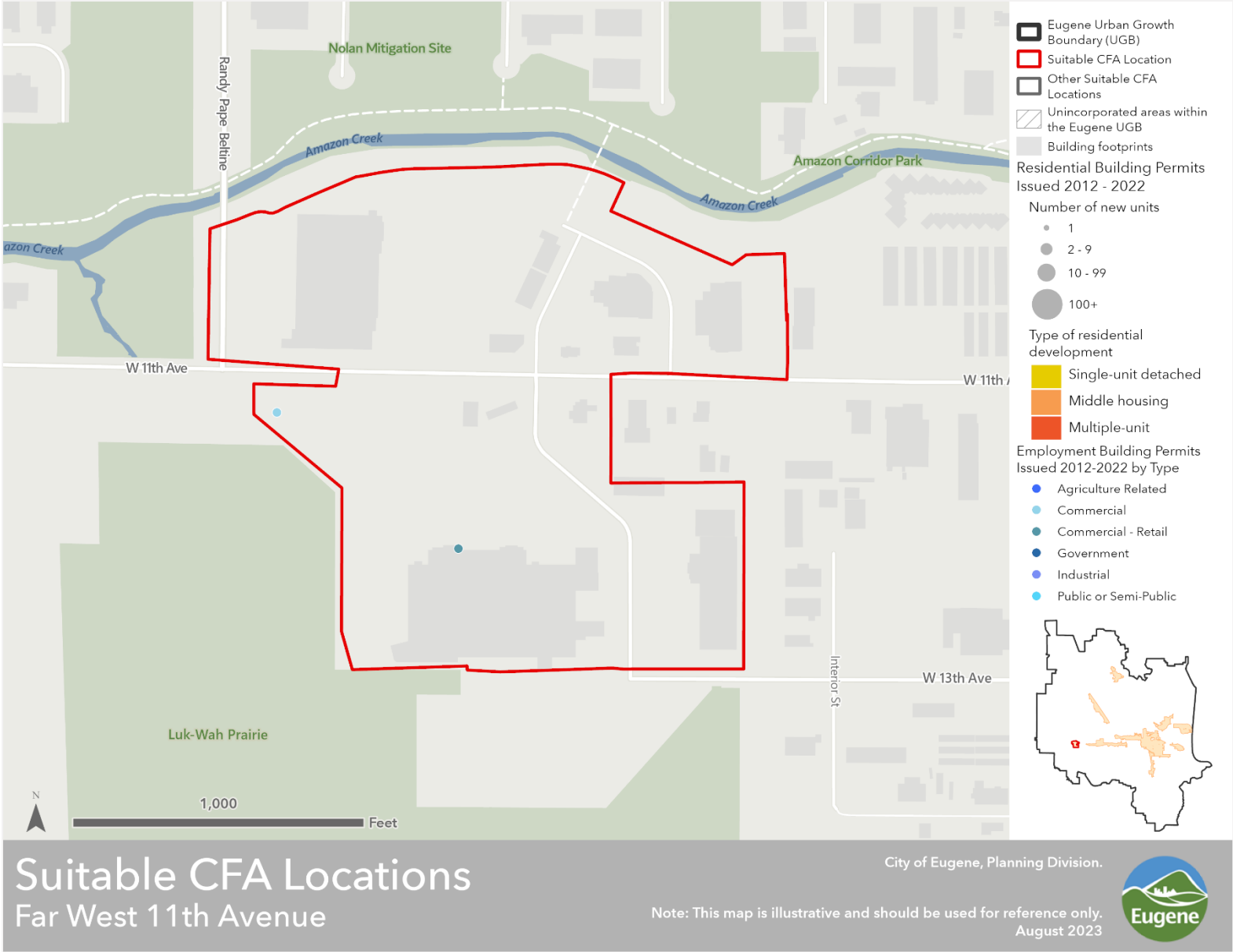


FIGURE 19. FAR WEST 11TH AVENUE SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 4: Ferry Street Bridge

The Ferry Street Bridge Suitable CFA is 189 acres in size. It is the fifth largest of the nine suitable locations. It extends from the Ferry Street Bridge along Coburg Road to the northeast. It encompasses Oakway Center and the surrounding commercial district as well as a few small fragments of adjacent uses.

Demographic Profile and Displacement Risk

Based on the displacement risk area typology outlined in **Section 5.2**, of the 7 census block groups that cross into the Ferry Street Bridge Suitable CFA, two are considered “Vulnerable,” one is considered “Early Gentrification,” and one is considered “Active Gentrification” as illustrated in Figure 44 (page 108). Three are unassigned, meaning they do not fit one of the six area typologies. Table 7 below summarizes the total acres by area type within the Ferry Street Bridge Suitable CFA.

TABLE 7. FERRY STREET BRIDGE SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	32.7
Early gentrification	15.7
Active gentrification	32.2
Unassigned	108.8
Total	189.4

The block groups that cross into the Ferry Street Bridge Suitable CFA demonstrate unique trends. The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- Two block groups overlap with the Chase Village Suitable CFA and exhibit characteristics of student-oriented housing development such as a much higher percentage of specific groups vulnerable to displacement than the city as a whole and more housing stock that is multi-unit housing and occupied by renters.
- Two block groups indicate early signs of displacement risk due to notable increases in rental housing costs and the presence of vulnerable community groups.
- The final three block groups are areas with predominantly higher incomes and more single-unit and owner-occupied housing.

A full demographic profile of the Ferry Street Bridge Suitable CFA is available in **Appendix C**.

FIGURE 20. FERRY STREET BRIDGE SUITABLE CFA

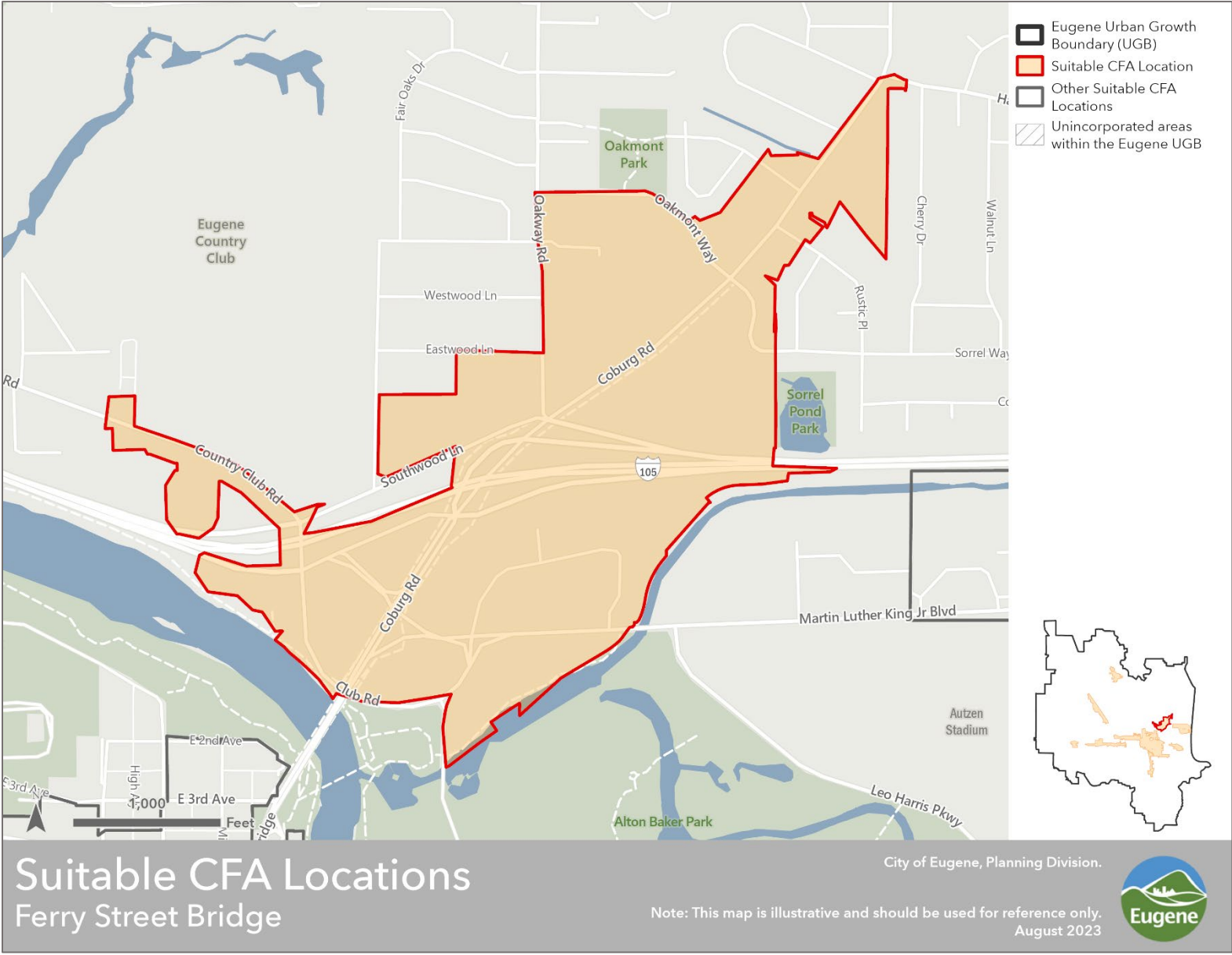
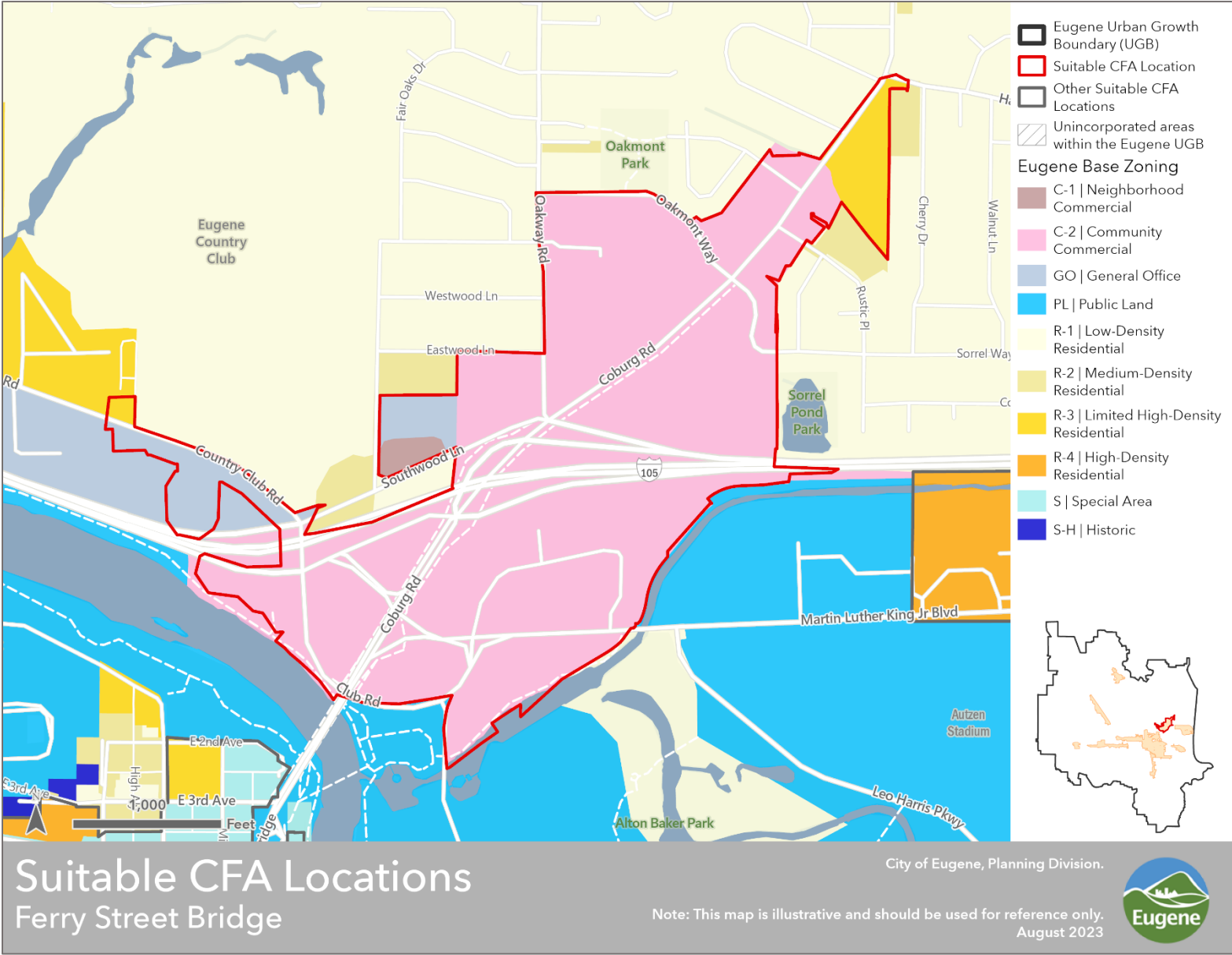


FIGURE 21. FERRY STREET BRIDGE SUITABLE CFA - BASE ZONING



Development Regulation Compliance

As illustrated in Figure 21 (page 56), the Ferry Street Bridge Suitable CFA is primarily zoned C-2 Community Commercial (about 168 acres), with small pockets of GO General Office (12 acres), R-3 Limited High Density Residential (8 acres), and C-1 Neighborhood Commercial (less than 2 acres).

- **Permitted Uses:** C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review and/or /PD Planned Unit Development overlay zones. These overlay zones require a land use application process and make otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. Though not extensive, there are sections of /SR and /PD overlays in the CFA. Both GO and C-1 are medium compliant and R-3 has low compliance ratings for CFA-required outright permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards. Areas zoned R-3 achieve Secondary CFA compliance.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 comply with both Primary and Secondary CFA criteria, however areas zoned R-3 and GO only comply with Secondary CFA criteria. C-1 does not achieve the required building heights for either Primary or Secondary CFAs.

Dwelling Unit Capacity

Using all zoned areas, the Ferry Street Bridge Suitable CFA meets **14%** of the needed housing capacity as a Primary CFA and **8%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Ferry Street Bridge Suitable CFA constitutes a high-density, mixed-use area, but is bounded on its north and east largely by R-1 zoned land and development. To the west, there are portions of GO and R-3 that were excluded from the Suitable CFA boundaries given their distance from transit (more than a half-mile walking distance from a frequent transit corridor). The Suitable CFA could be expanded to include more of these areas. Areas even further west of the Suitable CFA include more R-3 and C-2 areas, including the Valley River Center shopping mall. Similarly, these areas were excluded due to a lack of existing frequent transit service.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

The Ferry Street Bridge Suitable CFA is near parks and open space amenities. To the south, the area is bound by a mixture of government services, parks, and the Willamette River shoreline on PL Public Land. Alton Baker Park also abuts the location to the south. There are also two adjacent neighborhood parks, Oakmont Park and Sorrel Way Park.

Active Transportation Facilities

The Ferry Street Bridge Suitable CFA is served by active transportation facilities, but they are not adequate to make this area comfortable or safe for people walking and biking. This Suitable CFA sits at the intersection of several major and minor arterials, including an entrance ramp for Interstate 105. Coburg Road, at the center of this auto-centric commercial area, features high volumes of vehicle traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or biking. The City has worked with property and business owners in the area to consolidate driveways along this section of Coburg Road in recent years. A section of Coburg Road and all of Oakway Road are planned for protected bike lanes in Eugene’s 2035 Transportation System Plan. The Oakway

protected bike lanes are scheduled to be constructed within the next few years. There are currently shared use paths on both sides of the Ferry Street Bridge crossing the Willamette River into the Suitable CFA, continuing to I-105/Oakway Road where they transition to bike lanes and sidewalks on either side of Coburg Road. Moving Ahead, a study by LTD and City of Eugene, identified a high-level vision for where enhanced corridor investments could go on Coburg Road, including enhanced bicycle and pedestrian infrastructure and design elements such as queue jumps that will help buses get through traffic.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the Ferry Street Bridge Suitable CFA is primarily Commercial and Commercial Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the Ferry Street Bridge Suitable CFA is primarily Developed, as illustrated in 59Figure 22 (page 59). There are a few Undeveloped parcels on the west side of the Suitable CFA that are zoned GO and C-1. As illustrated in Figure 23 (page 60), some of that Undeveloped land has had recent building permit activity for multi-unit housing. Between 2012-2022, building permits were issued for four large multi-unit housing developments, as well as several commercial projects within the Suitable CFA.

FIGURE 22. FERRY STREET BRIDGE SUITABLE CFA – MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

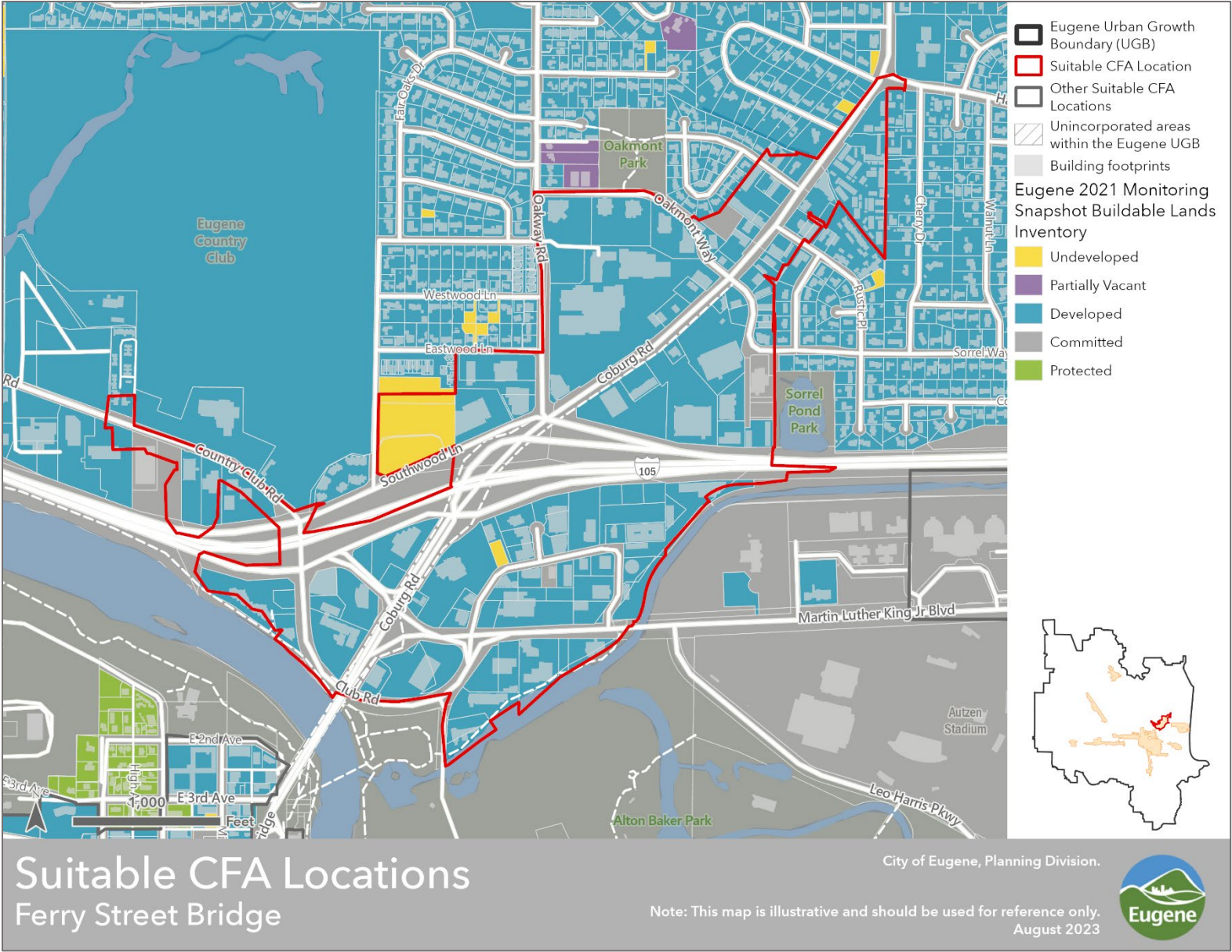
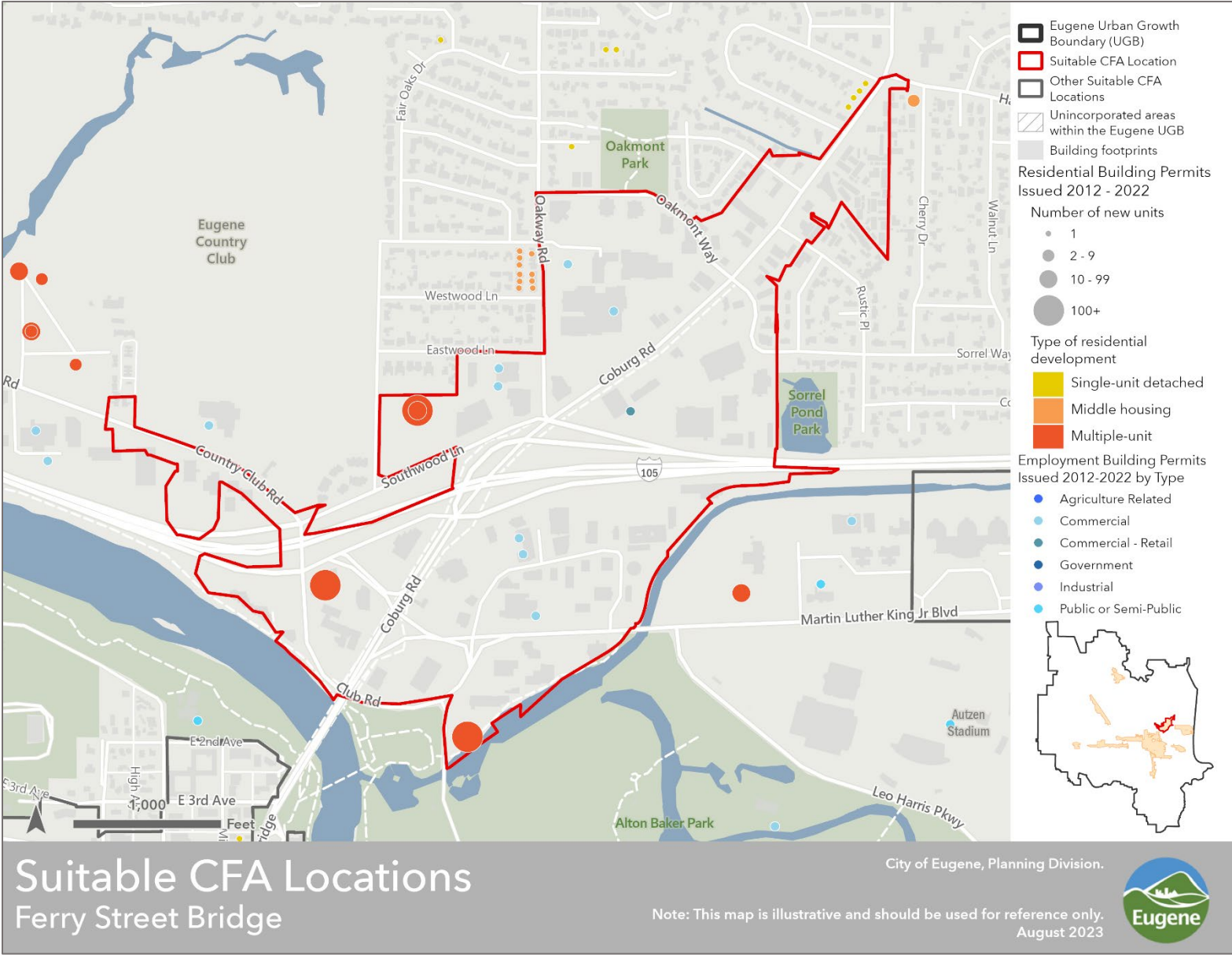


FIGURE 23. FERRY STREET BRIDGE SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 5: Franklin/Walnut

The Franklin/Walnut Suitable CFA is 86 acres. It is the second smallest of the nine suitable locations. It mostly comprises the uses on either side of a short stretch of Franklin Boulevard near its intersection with Walnut Street and adjacent to the University of Oregon campus. Its northern bounds are the railroad tracks with the Willamette River just on the other side.

Demographic Profile and Displacement Risk

Based on the displacement risk area typology outlined in **Section 5.2**, the only census block group that crosses into the Franklin/Walnut Suitable CFA is considered “Vulnerable” to displacement, as illustrated in Figure 44 (page 108). This block group also crosses into the Downtown/Campus Suitable CFA. Table 8 below summarizes the total acres by area type within the Franklin/Walnut Suitable CFA.

TABLE 8. FRANKLIN/WALNUT SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	85.1
Unassigned	1.2
Total	86.3

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- The block group had a much higher percentage of certain groups vulnerable to displacement than the city as whole, including households with lower incomes, communities of color, and households with limited English proficiency.
- Almost all the housing stock was multi-unit housing and occupied by renters.
- Between the 2008-2012 and 2015-2019 periods, median gross rent, median household income, the percent of renter-occupied units, and the percent of people of color rose more significantly in the block group than the city as a whole. This points to a rising presence of college-age students, who are often more racially diverse, have lower incomes, and are more likely to be renters than the general public.

A full demographic profile of the Franklin/Walnut Suitable CFA is available in **Appendix C**.

FIGURE 24. FRANKLIN/WALNUT SUITABLE CFA

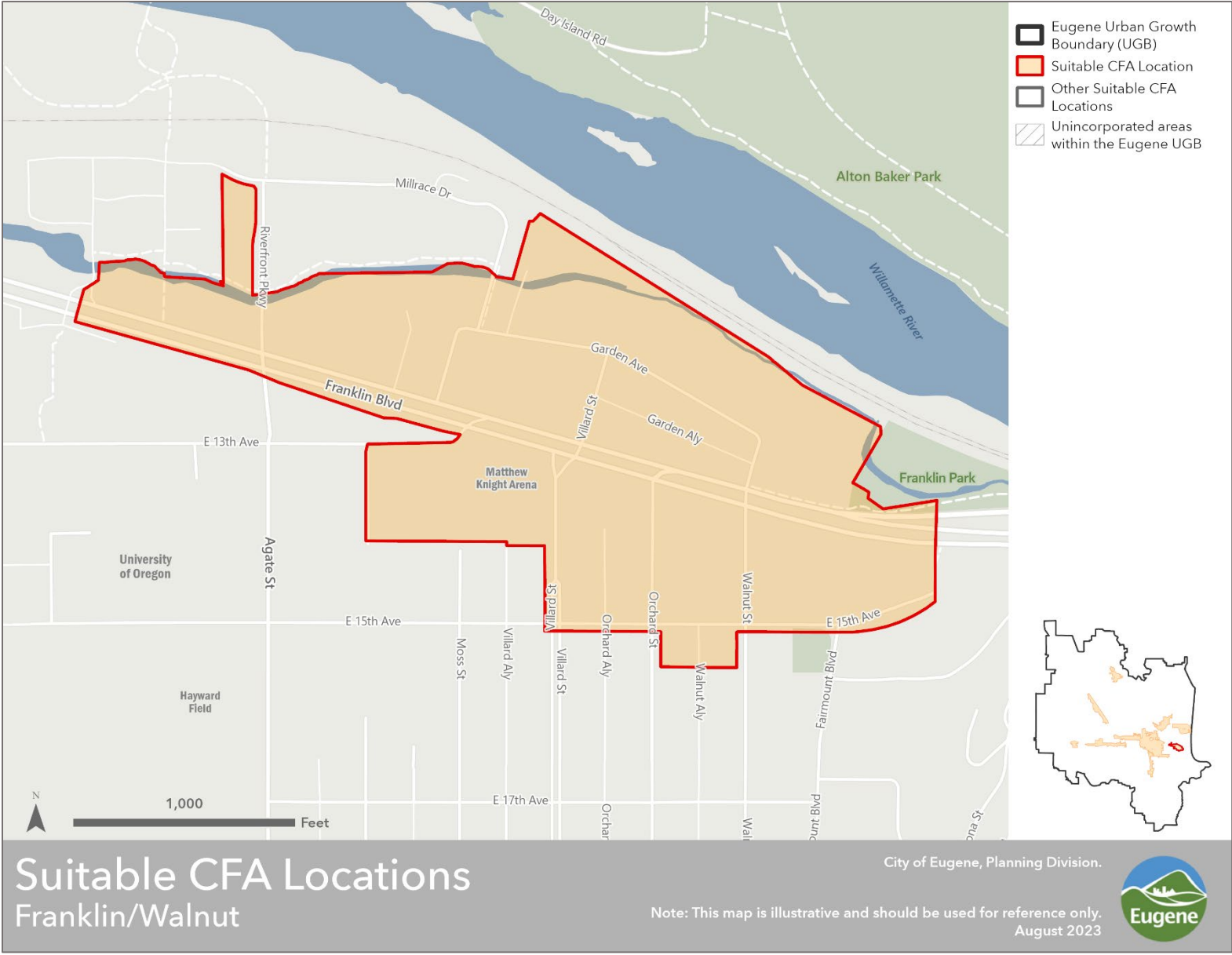
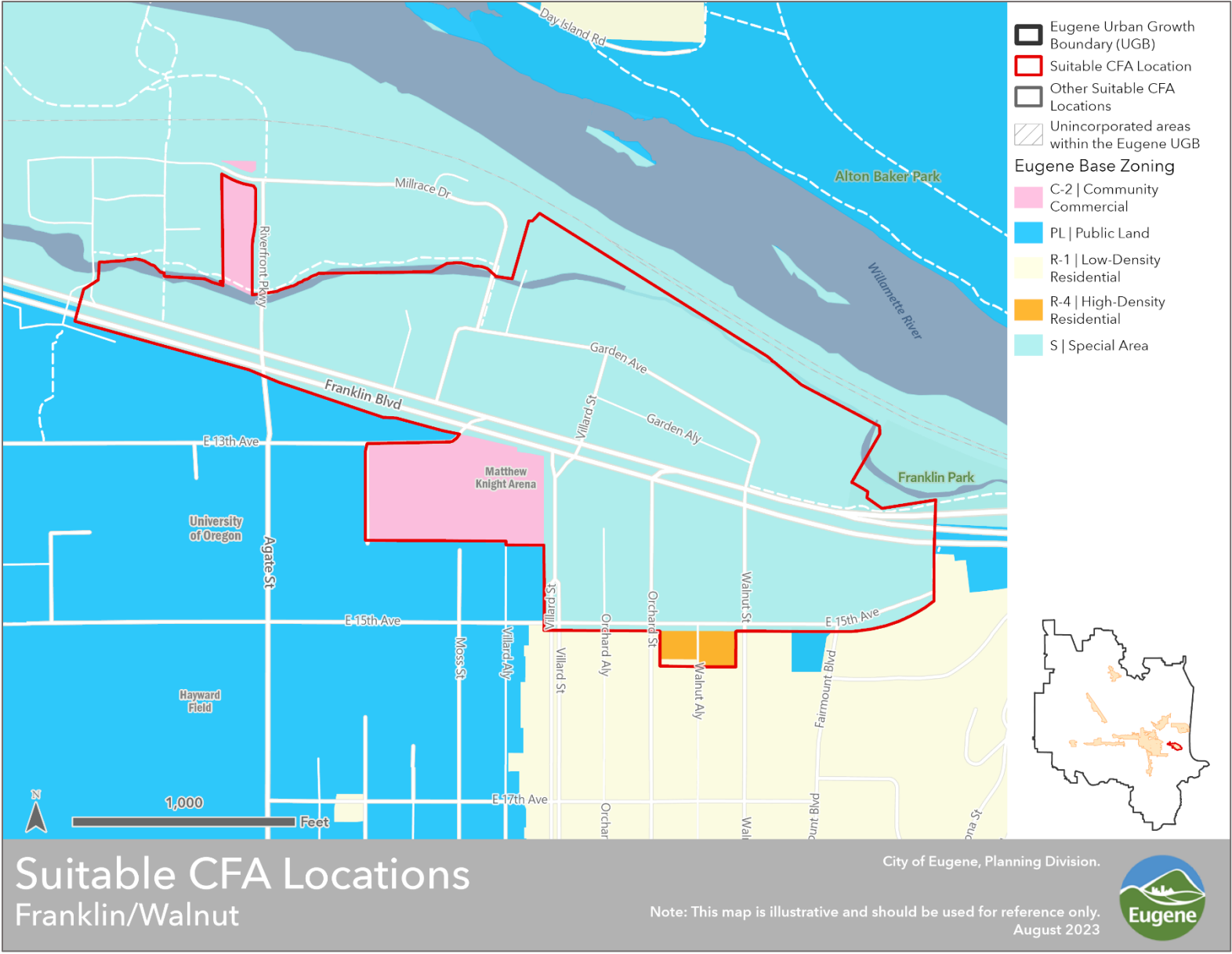


FIGURE 25. FRANKLIN/WALNUT SUITABLE CFA - BASE ZONING



Suitable CFA Locations
 Franklin/Walnut

Note: This map is illustrative and should be used for reference only.
 August 2023



Development Regulation Compliance

As illustrated in Figure 25 (page 63), the Franklin/Walnut Suitable CFA contains only a few base zones. The Suitable CFA is dominated by the S-WS Walnut Station Special Area Zone (about 75 acres) which includes four subareas - Franklin Corridor (/FC), Garden Avenue (/GA), Transition Edge 15th (/TE-15), and Parks, Recreation, and Open Space (/PRO). As no development capacity is assumed in the S-WS/PRO subarea, it is not reviewed for development regulation compliance in this section. This zone, including all its subareas (except /PRO), is generally compliant with CFA criteria. As such, compliance in this zone is summarized for the entire zone rather than by subarea. The Suitable CFA also contains some portions that are zoned C-2 Community Commercial (10 acres) and R-4 High-Density Residential (less than 2 acres).

- **Permitted Uses:** C-2 and S-WS are highly compliant zones, while R-4 has low compliance ratings for CFA required outright permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards, but areas zoned R-4 achieve Secondary CFA compliance. Areas zoned C-2 and S-WS do not currently have minimum densities in place.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 and R-4 comply with both Primary and Secondary CFA criteria, however areas zoned S-WS only comply with Secondary CFA criteria.

Dwelling Unit Capacity

Using all zoned areas, the Franklin/Walnut Suitable CFA meets **6%** of the needed housing capacity as a Primary CFA and **4%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Franklin/Walnut Suitable CFA is planned for mixed-use development and includes several high-density developments. Areas south of the Suitable CFA are zoned R-1 Low Density Residential, with implications for development capacity related to building step-back and height transition regulations.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

The Franklin/Walnut Suitable CFA is bounded on the north by the railroad tracks and the Willamette River and Alton Baker Park on its opposite shore, accessible via two nearby footbridges. To the north is a large area of land owned by University of Oregon that contains open space and a portion of the Ruth Bascom Riverbank Path System that connects to downtown. To the southwest is the University of Oregon campus. On the south side of Franklin Boulevard, this Suitable CFA abuts both the Franklin Park Natural Area and Fairmount Neighborhood Park.

Active Transportation Facilities

The Franklin/Walnut Suitable CFA is adjacent to the Ruth Bascom Riverbank Path System, connecting the location to various key destinations in Eugene and Springfield. Within the Suitable CFA, Franklin Boulevard/OR Highway 126 provides a connection to the Downtown/Campus Suitable CFA, downtown Springfield, and Interstate 5. Franklin Boulevard is scheduled for major improvements to support more safe and comfortable walking, biking, and transit. Parallel streets and paths to Franklin Boulevard, such as Garden Avenue and the Millrace Path, also provide comfortable walking and biking facilities. Franklin Boulevard is served by EmX bus rapid transit.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the Franklin/Walnut Suitable CFA is Commercial and Commercial Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the Franklin/Walnut Suitable CFA is primarily Developed and Committed land, as illustrated on Figure 26 (page 66). There are two small Undeveloped parcels on the north side of Franklin Boulevard. Several hundred units of housing were permitted within the Suitable CFA between 2012-2022, as illustrated in Figure 27 (page 67). There were also building permits issued for public or semi-public projects on the parcels on the west side of the Suitable CFA, classified as Committed lands, as well as a few commercial projects along Franklin Boulevard.

FIGURE 26. FRANKLIN/WALNUT SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

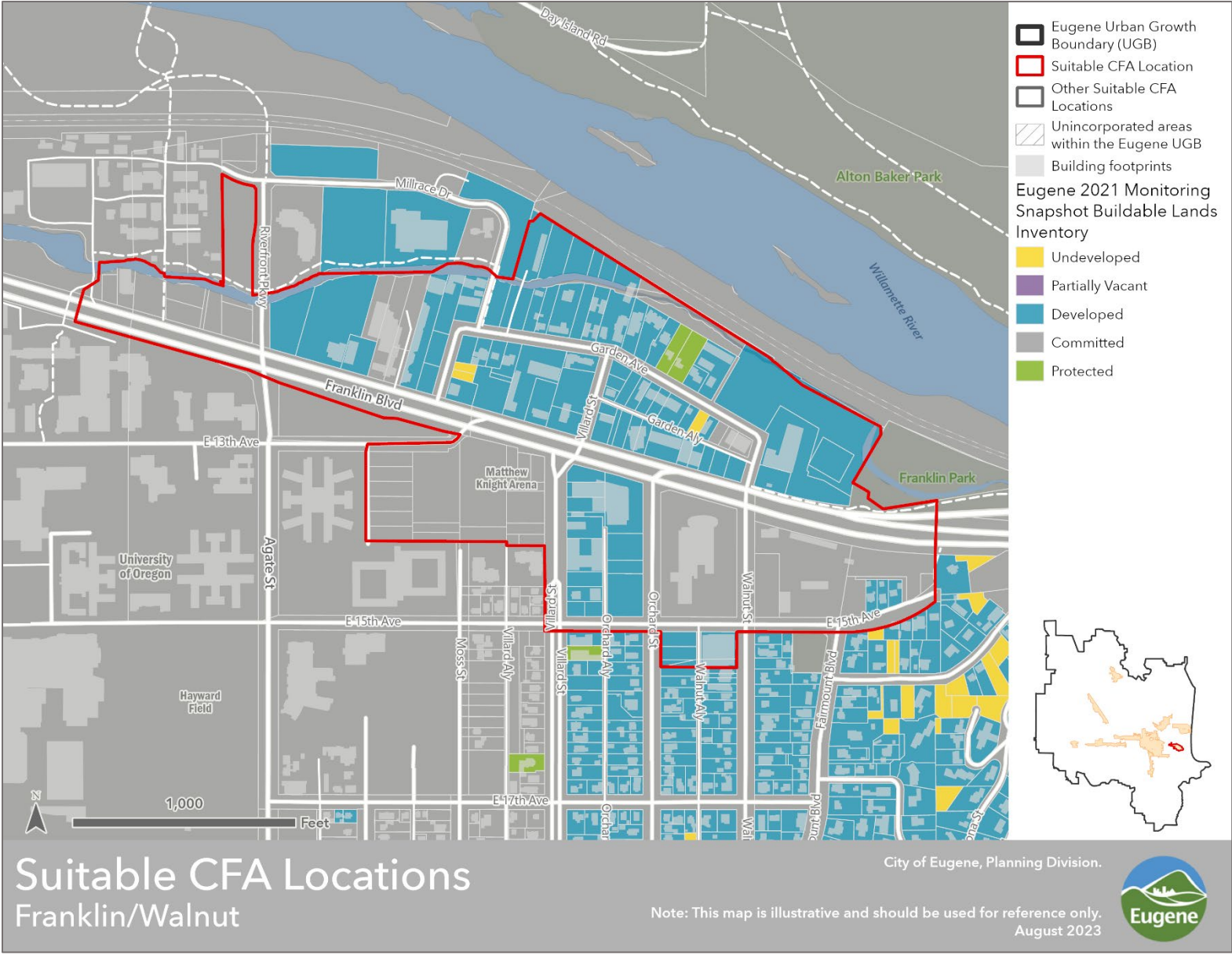
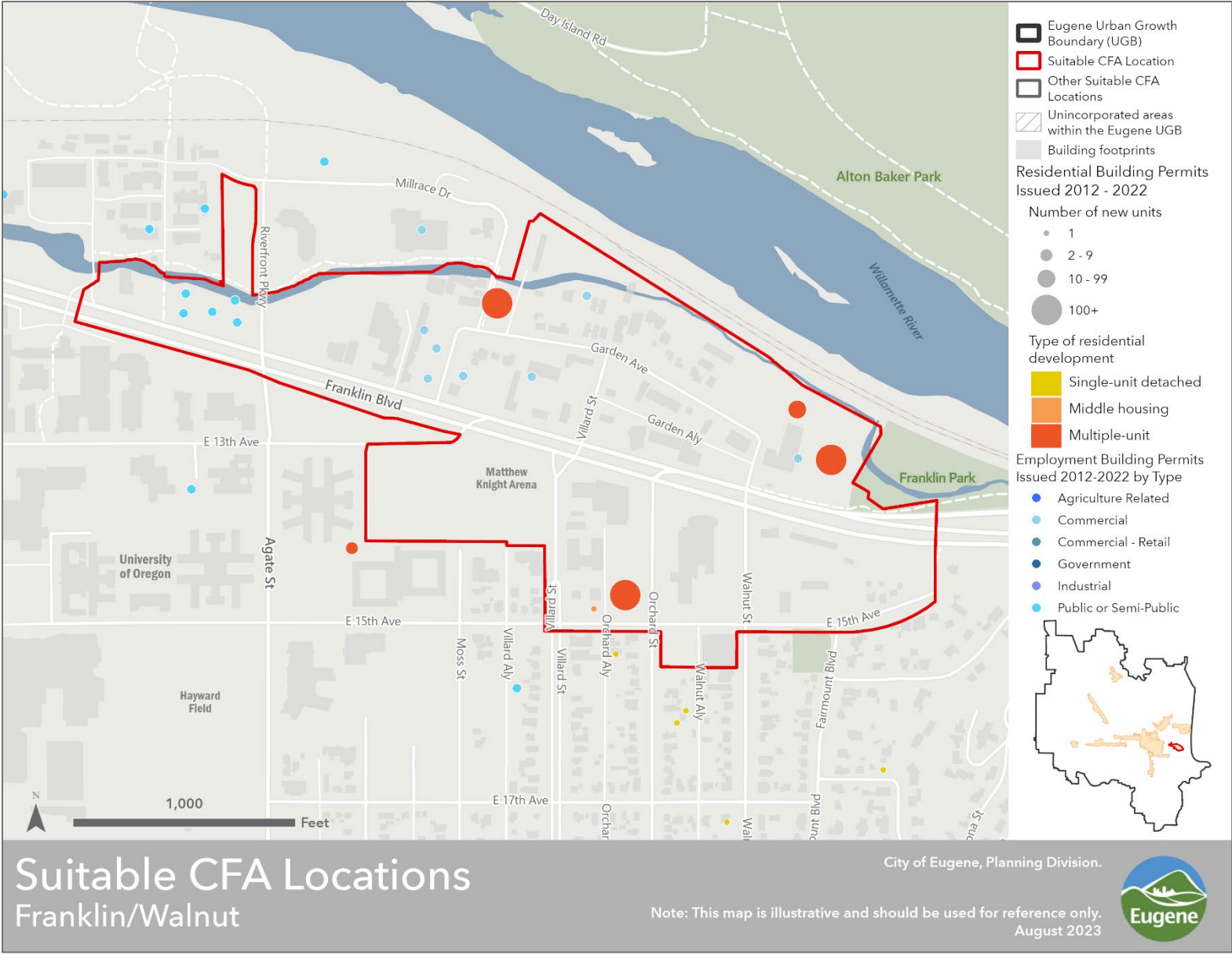


FIGURE 27. FRANKLIN/WALNUT SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 6: Highway 99

The Highway 99 Suitable CFA is 194 acres in size. It is the fourth largest of the nine suitable locations. The location is a linear area following the frequent transit corridor along both sides of Highway 99, west of the railroad.

Demographic Profile and Displacement Risk

There are four census block groups in the Highway 99 Suitable CFA. Based on the displacement risk area typology outlined in **Section 5.2**, one block group is considered “Vulnerable” and one is considered “Early Gentrification,” which also crosses into the West 11th Avenue and Far West 11th Avenue Suitable CFAs. Two are unassigned, which means they do not fit one of the six area typologies, as illustrated in Figure 44 (page 108). Table 9 below summarizes the total acres by area type within the Highway 99 Suitable CFA.

TABLE 9. HIGHWAY 99 SUITABLE CFA - AREA TYPOLOGY BY ACRES

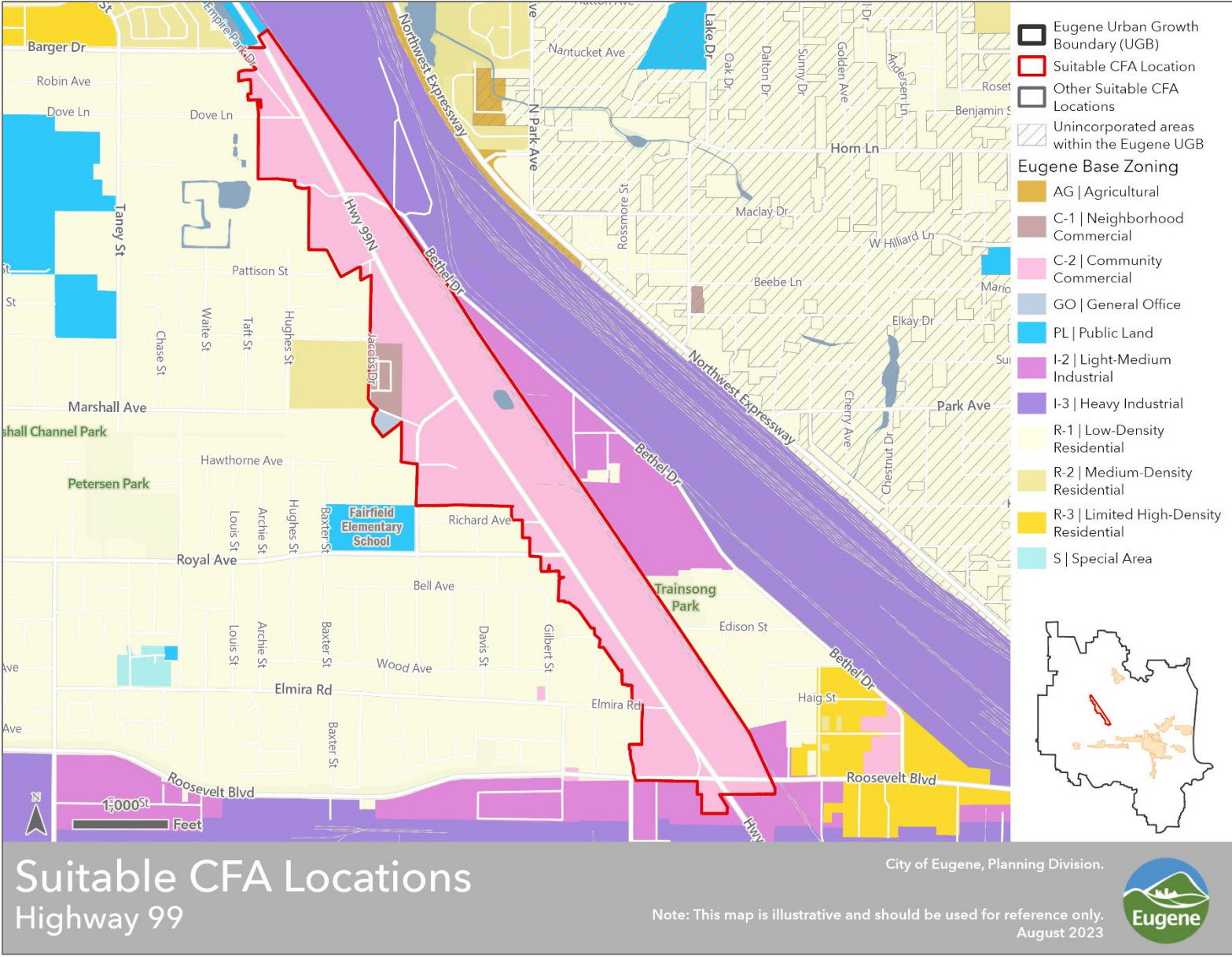
Area Typology	Acres
Vulnerable	116.9
Early gentrification	30.8
Unassigned	45.9
Total	193.6

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- The displacement analysis and area typology cannot adequately consider housing trends in areas that are primarily industrial development, as is the case in part of this Suitable CFA.
- The population of this Suitable CFA is relatively small, given the commercial/industrial nature of the area. Residents were more racially diverse, more likely to have a disability, and had lower incomes than the city as a whole.
- Housing market activity and housing costs were uneven across the Suitable CFA between 2008-2012 and 2015-2019.
- The Suitable CFA did not experience demographic shifts to indicate ongoing displacement between 2008-2012 and 2015-2019.

A full demographic profile of the Highway 99 Suitable CFA is available in **Appendix C**.

FIGURE 29. HIGHWAY 99 SUITABLE CFA - BASE ZONING



Development Regulation Compliance

As illustrated in Figure 29 (page 70), the Highway 99 Suitable CFA is primarily zoned C-2 Community Commercial (about 187 acres), with small pockets of C-1 Neighborhood Commercial (6 acres) and GO General Office (less than 2 acres).

- **Permitted Uses:** C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review overlay zone. This overlay zone requires a land use application process and makes otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. Though not extensive, there are pockets of /SR overlay in the Suitable CFA. Neither GO nor C-1 are highly compliant and, in this location, the C-1 zoned areas have the compliance-reducing /SR overlay.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards, as none of the applicable zones have minimum densities in place.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 comply with both Primary and Secondary CFA criteria, however areas zoned GO only comply with Secondary CFA criteria. C-1 areas do not comply with either Primary or Secondary CFA building height requirements.

Dwelling Unit Capacity

Using all zoned areas, the Highway 99 Suitable CFA meets **15%** of the needed housing capacity as a Primary CFA and **8%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Highway 99 Suitable CFA is not near other high-density, mixed-use areas. East of the railroad are industrially zoned lands (I-3 Heavy Industrial and I-2 Light-Medium Industrial). Adjacent to the west of the location are relatively extensive R-1 Low Density Residential zoned lands. There is some R-3 Limited High-Density Residential and additional C-2 land to the southeast of the Suitable CFA, separated by I-2 areas. The Suitable CFA itself is currently developed as auto-oriented commercial uses.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

Trainsong Park, a small neighborhood park, is the only park adjacent to the Suitable CFA. Empire Pond Natural Area is a small open space to the north. Fairfield Elementary School is the only adjacent public land on the west side of the Suitable CFA.

Active Transportation Facilities

The Highway 99 Suitable CFA is not well-served by active transportation facilities. The Highway 99 corridor is characterized by auto-oriented commercial and industrial uses. While there are bike lanes and sidewalks on both sides, the major arterial and freight route features high volumes of fast-moving car traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or biking. Highway 99 is a five-lane cross section, which can increase the risk for people crossing. Moving Ahead, a study by LTD and City of Eugene, identified a high-level vision for where enhanced corridor investments could go on Highway 99, including enhanced bicycle and pedestrian infrastructure and design elements such as queue jumps that will help buses get through traffic.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the Highway 99 Suitable CFA is Commercial and Commercial Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the Highway 99 Suitable CFA is primarily Developed, as illustrated on Figure 30 (page 73). There are some Undeveloped and Partially Vacant parcels scattered across the Suitable CFA, all in C-2 areas. As illustrated in Figure 31 (page 74), there were several commercial and agricultural related building permits issued between 2012-2022, and one small multi-unit housing development within the Suitable CFA.

FIGURE 30. HIGHWAY 99 SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

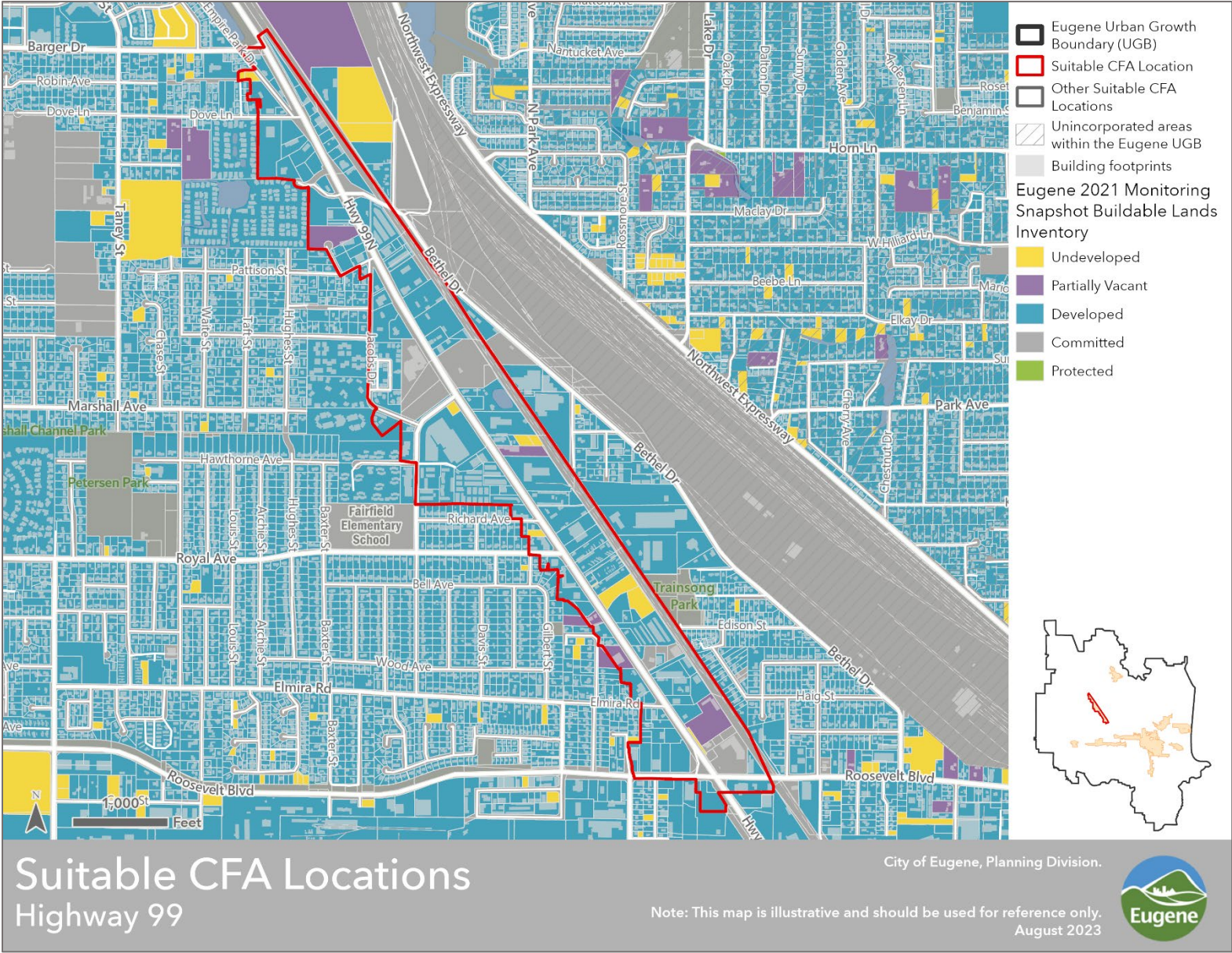
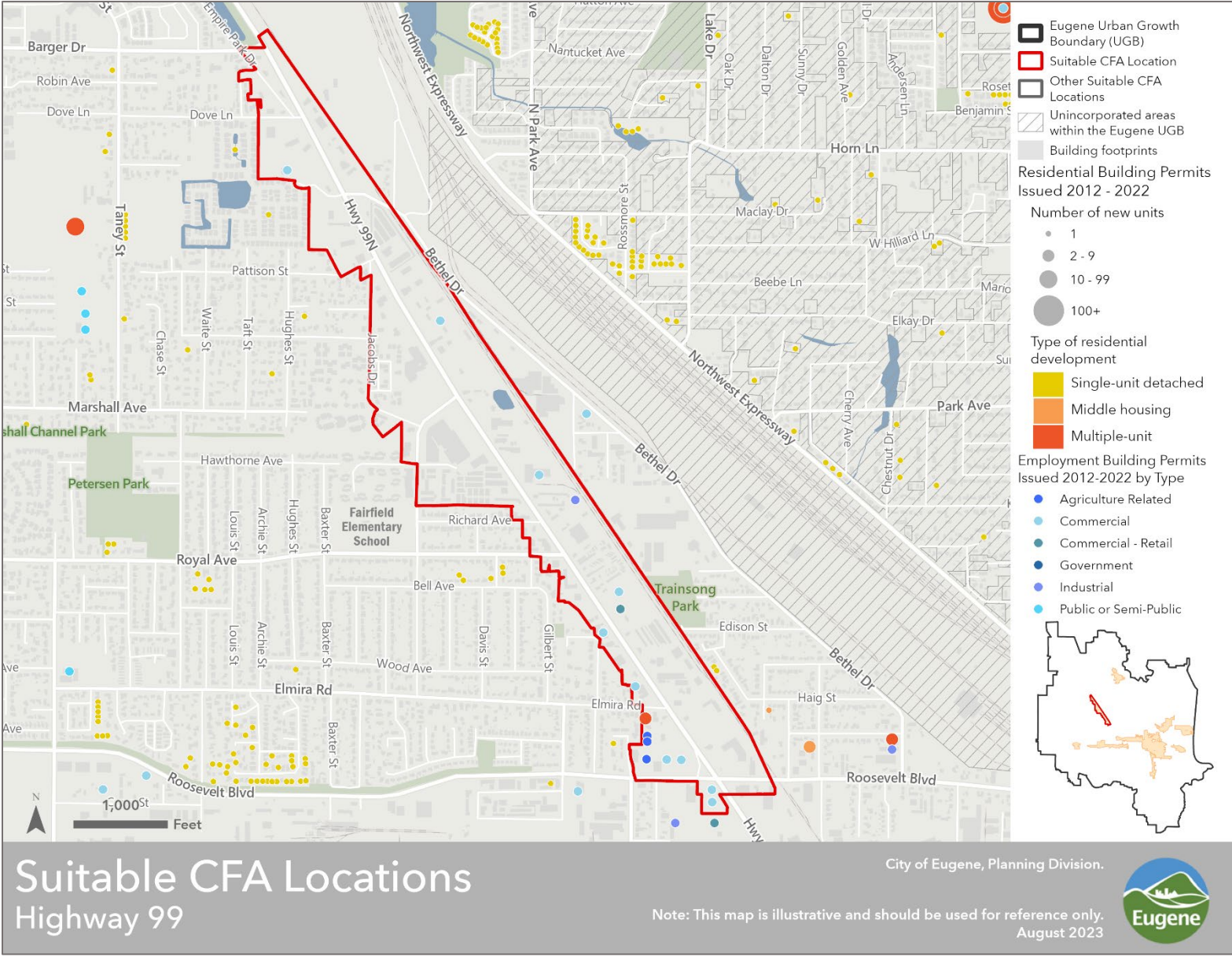


FIGURE 31. HIGHWAY 99 SUITABLE CFA - BUILDING PERMIT ACTIVITY (2012-2022)



Location 7: Santa Clara Station

The Santa Clara Station Suitable CFA is 135 acres in size. It is the fourth smallest of the nine suitable locations. It encompasses the large commercial district at the intersection of River Road and Division Avenue/Beltline Highway and extends north along River Road from Corliss Lane to Azalea Drive.

Demographic Profile and Displacement Risk

There are six census block groups that cross into the Santa Clara Station Suitable CFA. Based on the displacement risk area typology outlined in **Section 5.2**, one block group is considered “Early Gentrification” as illustrated in Figure 44 (page 108). Five are “Unassigned” which means they do not fit one of the six area typologies. Table 10 below summarizes the total acres by area type within the Santa Clara Station Suitable CFA.

TABLE 10. SANTA CLARA STATION SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	32.1
Unassigned	103.1
Total	135.2

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- One block group demonstrated several indicators of displacement risk, including a higher percentage of households with lower income, a lower median household income, and the presence of communities vulnerable to displacement.
- Several other block groups also had a higher percentage of communities vulnerable to displacement, including people of color, people with disabilities, and single-parent households, but were not considered lower income areas.
- Home values were generally lower in this Suitable CFA than the city as a whole in 2015-2019. That said, median gross rents increased more significantly in the time period analyzed than in the city as a whole.

Other indicators of demographic shifts were more variable across the six block groups. A full demographic profile of the Santa Clara Station Suitable CFA is available in **Appendix C**.

FIGURE 32. SANTA CLARA STATION SUITABLE CFA

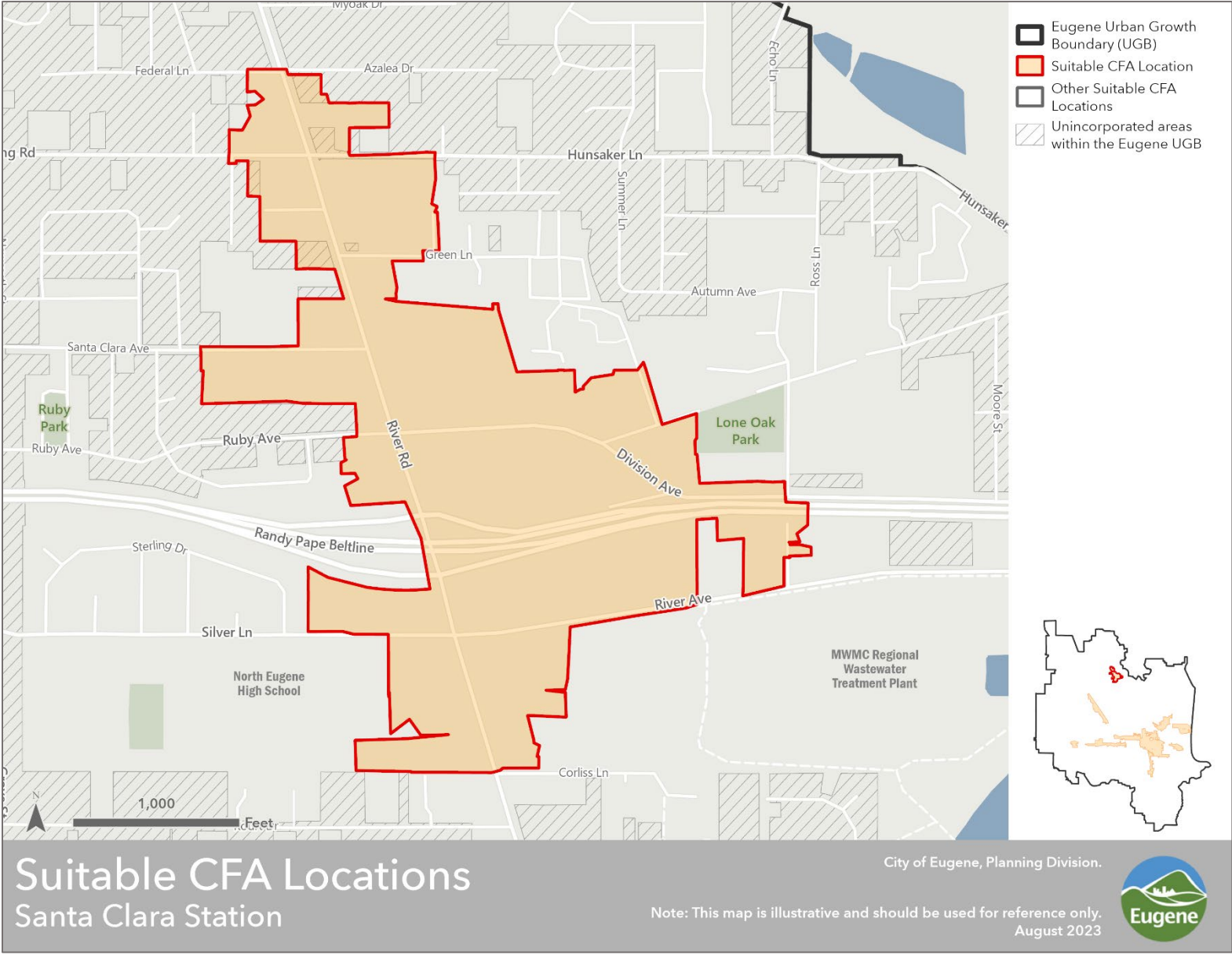
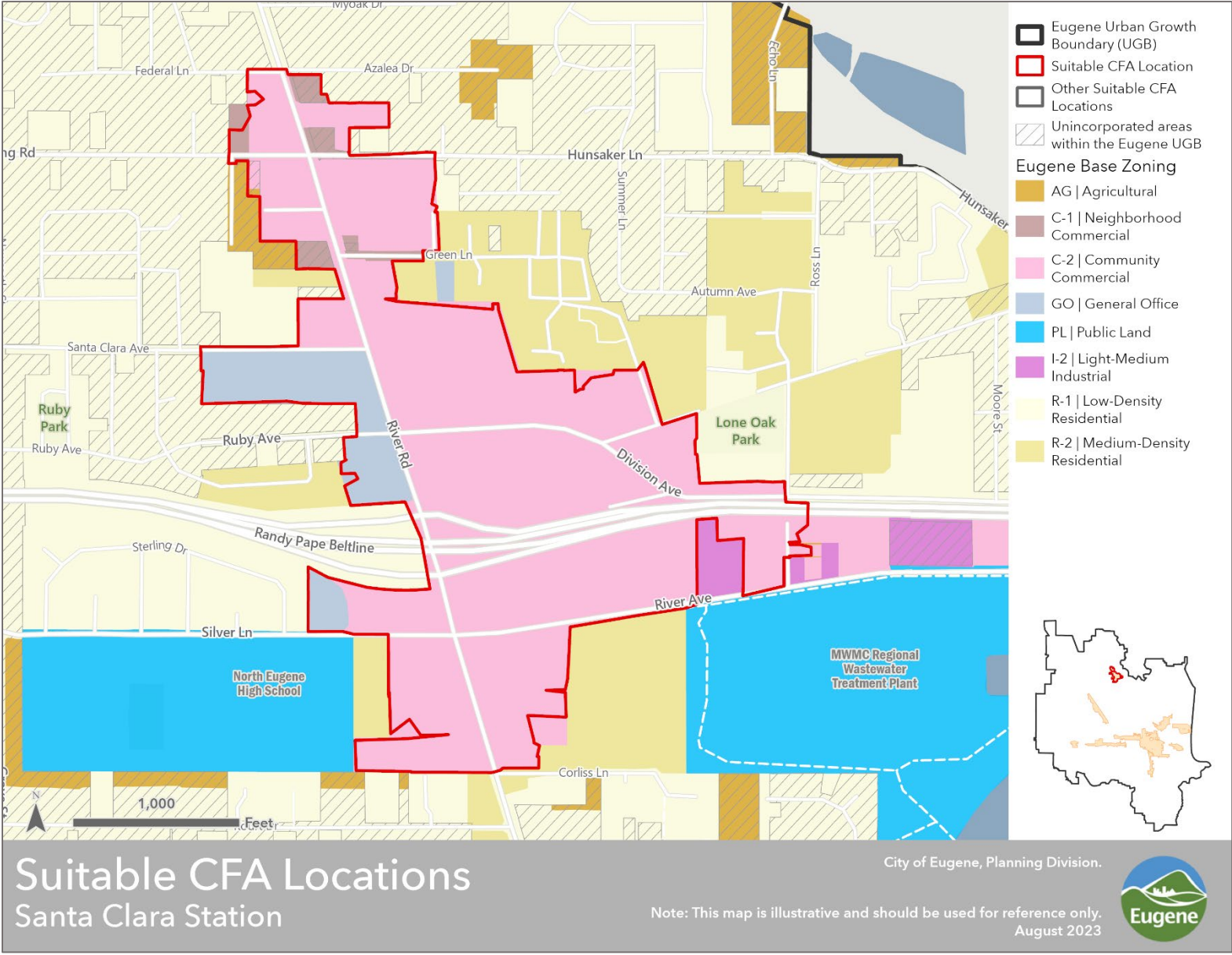


FIGURE 33. SANTA CLARA STATION SUITABLE CFA – BASE ZONING



Development Regulation Compliance

As illustrated in Figure 33 (page 77) the Santa Clara Station Suitable CFA is primarily zoned C-2 Community Commercial (about 118 acres), with small pockets of GO General Office (13 acres) and C-1 Neighborhood Commercial (4 acres).

- **Permitted Uses:** C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review and/or /PD Planned Unit Development overlay zone. These overlay zones require a land use application process and make otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. The /SR overlay covers most of this Suitable CFA. Neither GO nor C-1 are highly compliant but, in this location, they also tend to have the /SR overlay, rendering these areas even less compliant.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards, as none of the applicable zones have minimum densities in place.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 comply with both Primary and Secondary CFA criteria, however areas zoned GO only comply with Secondary CFA criteria. C-1 areas do not comply with either Primary or Secondary CFA building height requirements.

Dwelling Unit Capacity

Using all zoned areas, the Santa Clara Station Suitable CFA meets **10%** of the needed housing capacity as a Primary CFA and **6%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The Santa Clara Station Suitable CFA is planned as a high-density, commercial area, but is not near other high-density or mixed-use areas. A substantial amount of the land adjacent to the location is R-1 Low Density Residential with potential implications for building step-backs and other height transitions. Much of this R-1 zoned land is also unincorporated. There is also a significant amount of R-2 Medium Density Residential zoned land adjacent to the Suitable CFA, providing a transition between C-2 and R-1 areas.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

At the north end of the Suitable CFA, on the southeast corner of the River Road and Hunsaker Road intersection, is LTD’s Santa Clara Station. Adjacent to the transit station is LTD surplus property that has potential for mixed-use development and possibly a neighborhood park. To the southeast, the Suitable CFA is bound by the regional wastewater facility adjacent to the Willamette River on PL Public Land, which includes a connection to the Willamette River greenway and parks and recreation system. To the southwest of the Suitable CFA is North Eugene High School, zoned as PL Public Land. Part of the school property is planned as a youth sports facility. Abutting this Suitable CFA to the east is Lone Oak Park, an undeveloped neighborhood park.

Active Transportation Facilities

The Santa Clara Station Suitable CFA straddles River Road and Beltline Highway, two major arterials, and is not currently well served by safe and comfortable active transportation facilities. The area connects to the Ruth Bascom Riverbank Path System along the Willamette River, providing biking and walking access to regional key destinations. While there are bike lanes and sidewalks on both sides of River Road, the

major arterial features high volumes of fast-moving car traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or biking. Protected bike lanes are planned for the southern portion of River Road, including a portion of the Suitable CFA. A bike lane is planned for Hunsaker Lane, as is an extension of the shared use West Bank Path connecting Santa Clara to the rest of the Ruth Bascom Riverbank Path System. The City is currently constructing the first protected intersection at River Road and Hunsaker Lane within the Suitable CFA, which will improve safety for people walking and biking. Additionally, the City plans to build a series of three roundabouts on Division Avenue from River Road to the east along with safer bike lanes and pedestrian crossings. Moving Ahead, a study by LTD and City of Eugene, identified a high-level vision for where enhanced corridor investments could go on River Road, including enhanced bicycle and pedestrian infrastructure and design elements such as queue jumps that will help buses get through traffic.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the Santa Clara Station Suitable CFA is primarily Commercial and Commercial-Residential Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the Santa Clara Station Suitable CFA is primarily Developed, as illustrated on Figure 34 (page 80). There are some Undeveloped and Partially Vacant parcels scattered across the Suitable CFA, all in C-2 areas. Notably, this Suitable CFA has a large amount of adjacent land with development potential, including Undeveloped and Partially Vacant R-2 zoned land to the east surrounding Lone Oak Park, an undeveloped neighborhood park. Some of those Undeveloped parcels near the Suitable CFA have recently issued building permits for middle housing projects, as illustrated in Figure 35 (page 81). Other building permit activity between 2012-2022 in the Suitable CFA includes improvements to the Santa Clara Station property, owned by LTD, and two commercial project permits on either side of Beltline Highway.

FIGURE 34. SANTA CLARA STATION SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

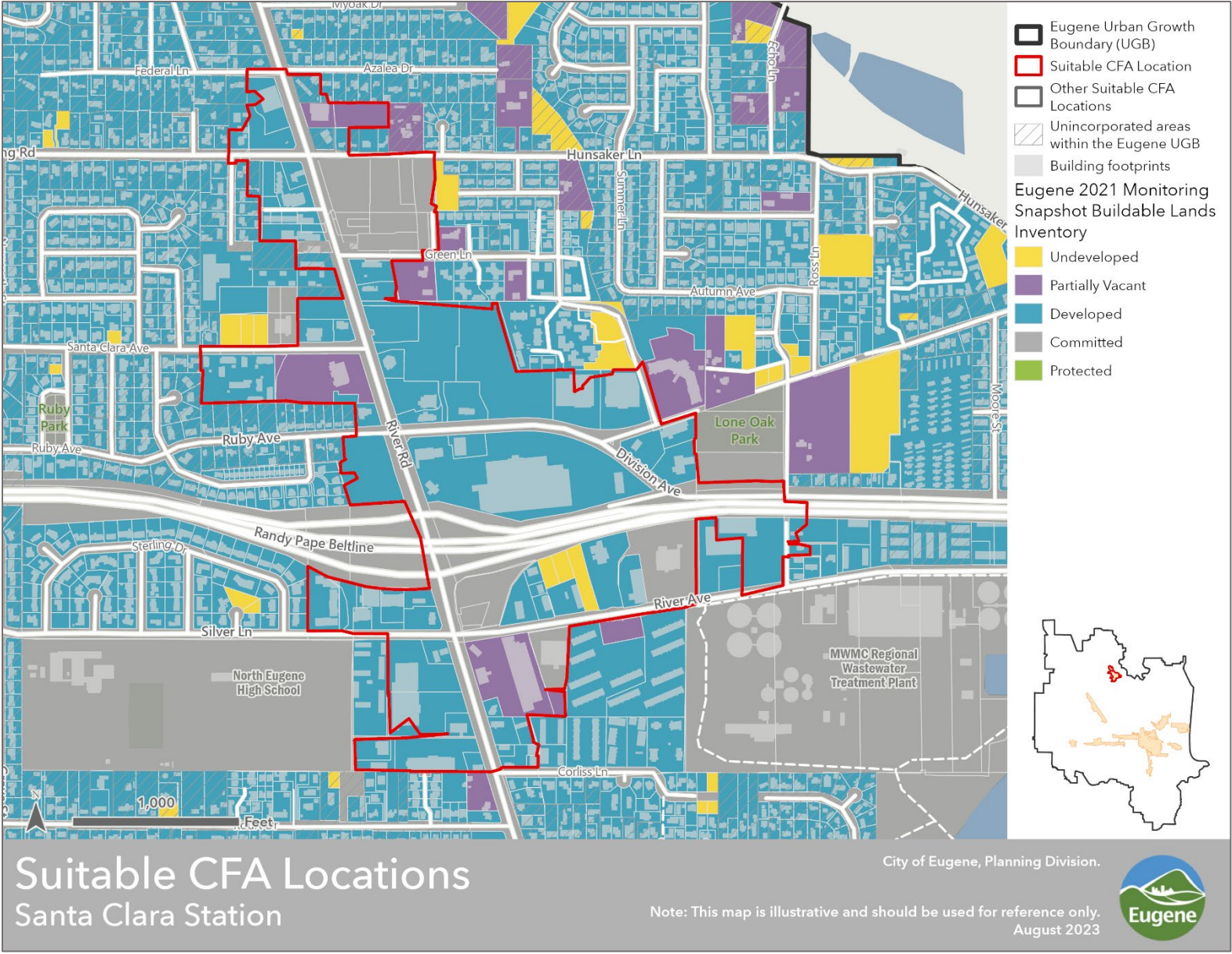
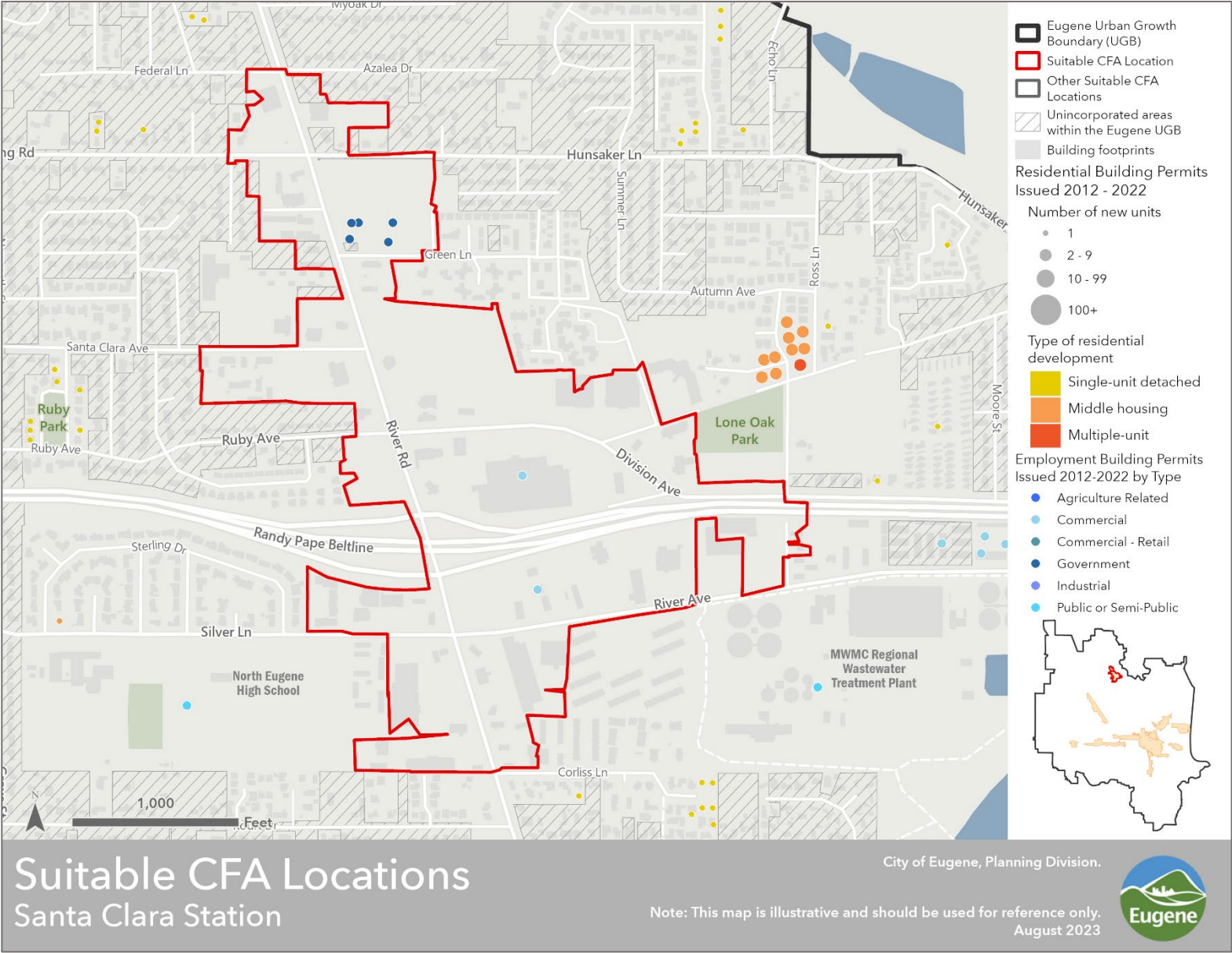


FIGURE 35. SANTA CLARA STATION SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 8: South Willamette

The South Willamette Suitable CFA is 109 acres in size. It is the third smallest of the nine suitable locations. It is a long linear location, generally following the frequent transit corridor along both sides of South Willamette Street from 16th Avenue to 30th Avenue. It encompasses two commercial clusters at either end of the Suitable CFA; at the south end near the intersection of 29th Avenue and Willamette Street and at the north end near the intersection of 18th Avenue and Willamette Street. It is separated from the Downtown/Campus Suitable CFA to the north by the Amazon Creek Canal.

Demographic Profile and Displacement Risk

There are seven census block groups crossing into the South Willamette Suitable CFA. Based on the displacement risk area typology outlined in **Section 5.2**, one block group is considered “Vulnerable” as illustrated in Figure 44 (page 108). Six are unassigned, which means they do not fit one of the six area typologies, including two that also cross into the Downtown/Campus Suitable CFA. Table 11 below summarizes the total acres by area type within the South Willamette Suitable CFA.

TABLE 11. SOUTH WILLAMETTE SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	10.5
Unassigned	98.4
Total	108.9

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- Housing was generally more expensive in this Suitable CFA than the city as a whole, but households ranged across a mix of income levels in 2015-2019.
- This Suitable CFA had fewer residents considered vulnerable to displacement in 2015-2019.
- Demographics changed in the Suitable CFA but did not follow any notable pattern during the period analyzed.

A full demographic profile of the South Willamette Suitable CFA is available in **Appendix C**.

FIGURE 36. SOUTH WILLAMETTE SUITABLE CFA

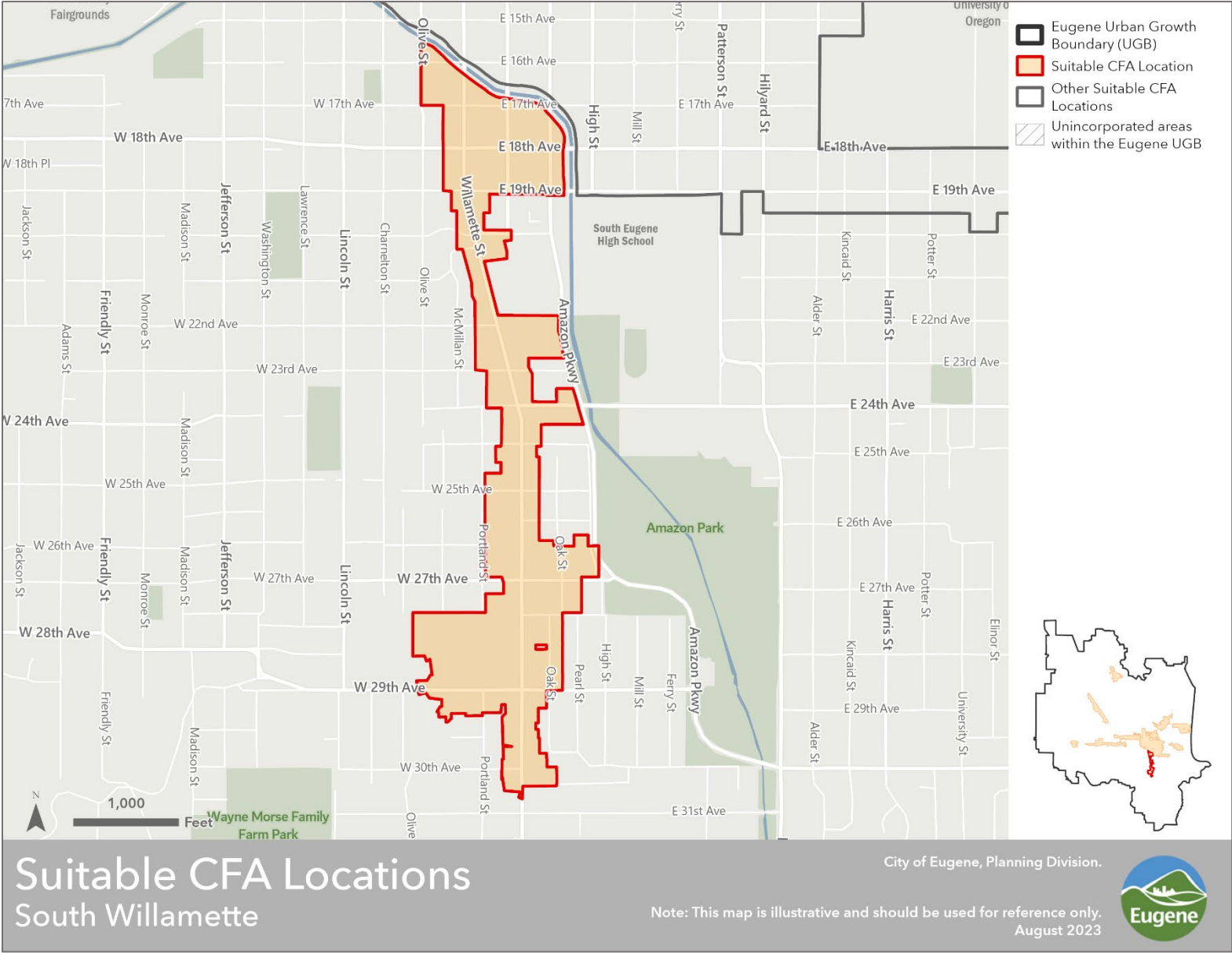
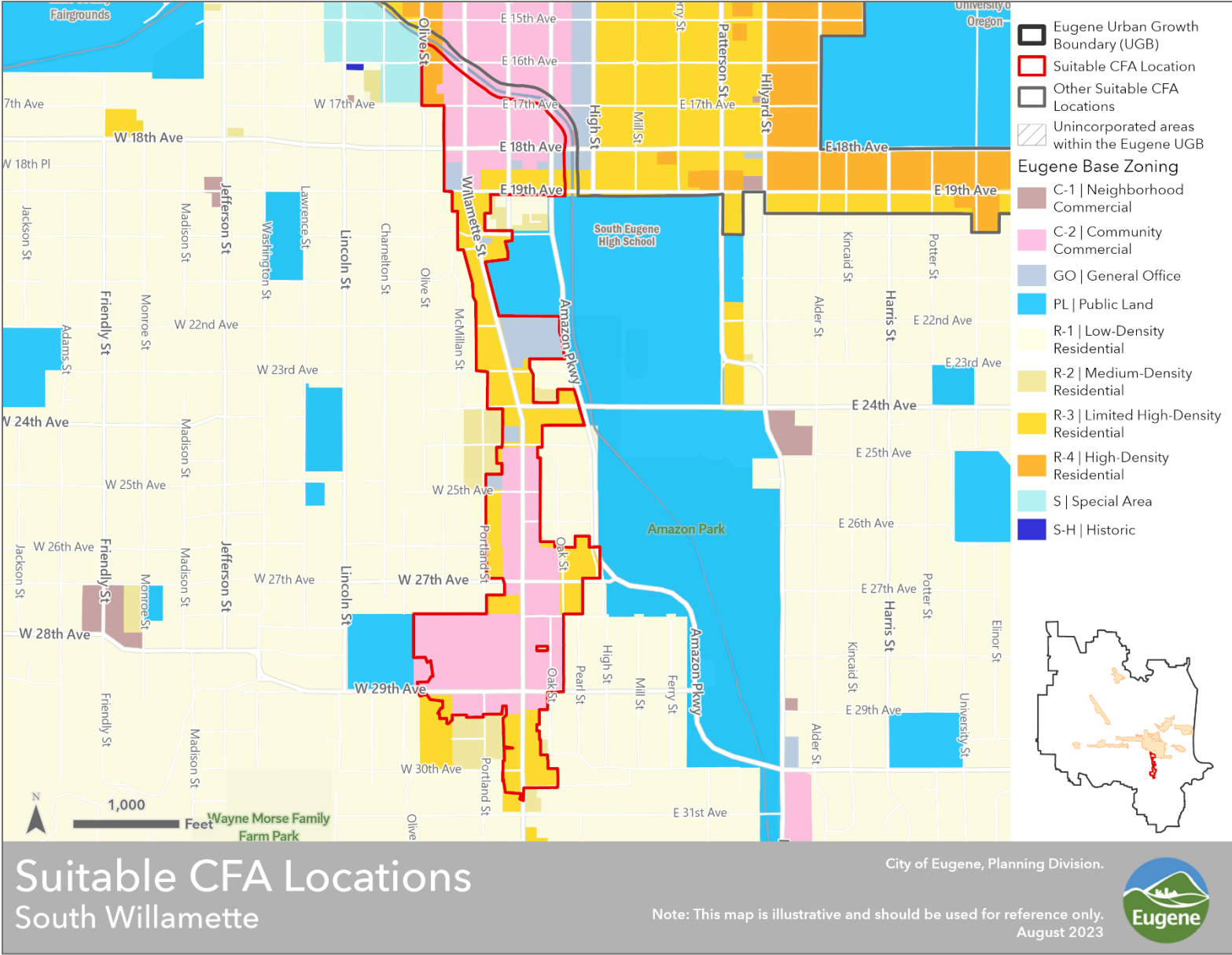


FIGURE 37. SOUTH WILLAMETTE SUITABLE CFA - BASE ZONING



Development Regulation Compliance

As illustrated in Figure 37 (page 84) the South Willamette Suitable CFA is primarily zoned C-2 Community Commercial (about 59 acres), with substantial segments of R-3 Limited High-Density Residential (40 acres), including a stretch in the middle of the Suitable CFA along Willamette Street from 19th Avenue to 24th Place. There are also small segments of GO General Office (8 acres) and R-4 High-Density Residential (less than 3 acres).

- **Permitted Uses:** C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review and/or the /PD Planned Unit Development overlay zone. These overlay zones require a land use application process and make otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. However, the /SR and /PD overlays apply to very few parcels in the Suitable CFA. GO is medium compliant, while both R-3 and R-4 have low compliance ratings for CFA-required outright permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards, as areas zoned C-2 and GO do not have minimum densities in place. Areas zoned R-3 and R-4 achieve Secondary CFA compliance.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 and R-4 comply with both Primary and Secondary CFA criteria, however areas zoned R-3 and GO only comply with Secondary CFA criteria.

Dwelling Unit Capacity

Using all zoned areas, the South Willamette Suitable CFA meets **7%** of the needed housing capacity as a Primary CFA and **4%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The South Willamette Suitable CFA is a long linear area zoned for high-density and commercial areas. It is bounded primarily by R-1 Low Density Residential with smaller areas of R-2 Medium Density Residential and PL Public Land.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

The South Willamette Suitable CFA is adjacent to Amazon Park to the east along most of its length, a large regional park with a full suite of recreational facilities and natural areas. Also, to the east and connected to Amazon Park, are South Eugene High School and Roosevelt Middle School with various playing fields.

Active Transportation Facilities

The South Willamette Suitable CFA is a relatively narrow, linear area following Willamette Street, a minor arterial providing a connection between downtown and the residential areas in south Eugene. Willamette Street has newly improved bike lanes and sidewalks, but many commercial driveways increase the potential for conflict between people driving and those walking or biking. Willamette Street is a three-lane cross section, which is narrower than some of the other Suitable CFAs following transit corridors (e.g., Highway 99, West 11th Avenue). 29th Avenue also has bike lanes on either side, with fewer commercial access points and providing a facility to both Amazon Park and adjacent residential areas. Amazon Park has a shared use path providing access to key regional destinations as well as South Eugene High School. There is also a shared use path through Civic Park (youth sports complex) that connects to South Eugene High School.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the South Willamette Suitable CFA is a mix of Commercial, Commercial Mixed Use, and Medium Density Residential. If CFA designation results in more commercial development than currently projected, the volume of runoff generated for the area would likely be higher. The City's stormwater management planning team would need to evaluate the storm system under the higher impervious surface area conditions to see if any flooding/conveyance issues are predicted.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the South Willamette Suitable CFA is fully Developed, as illustrated on Figure 38 (page 87). Building permit activity between 2012-2022 included several small multi-unit and middle housing projects both within and adjacent to the Suitable CFA, as illustrated in Figure 39 (page 88). There were also building permits issued for public/semi-public projects (including a youth sports complex on Amazon Parkway, adjacent to the Suitable CFA), as well as commercial permits along Willamette Street.

FIGURE 38. SOUTH WILLAMETTE SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

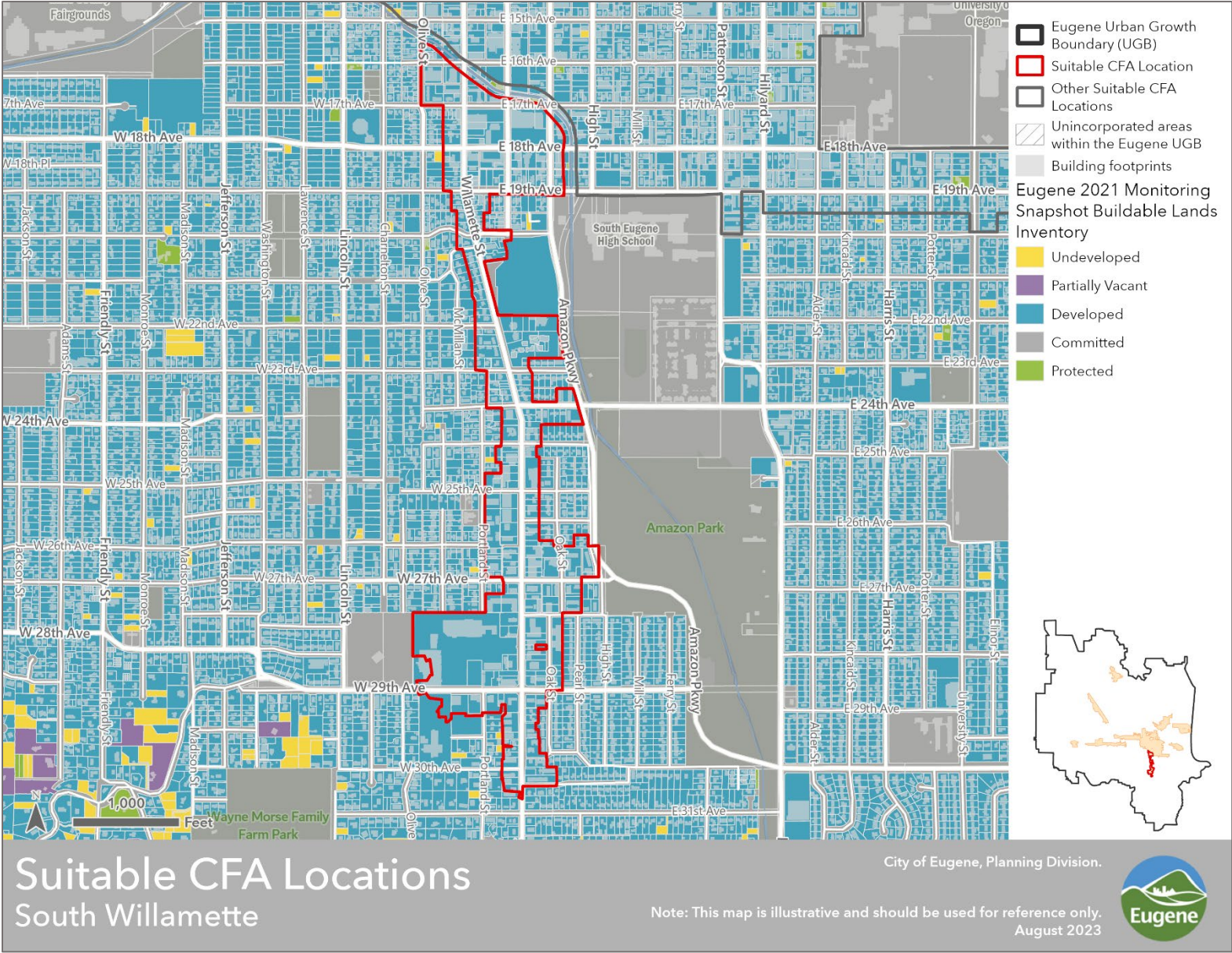
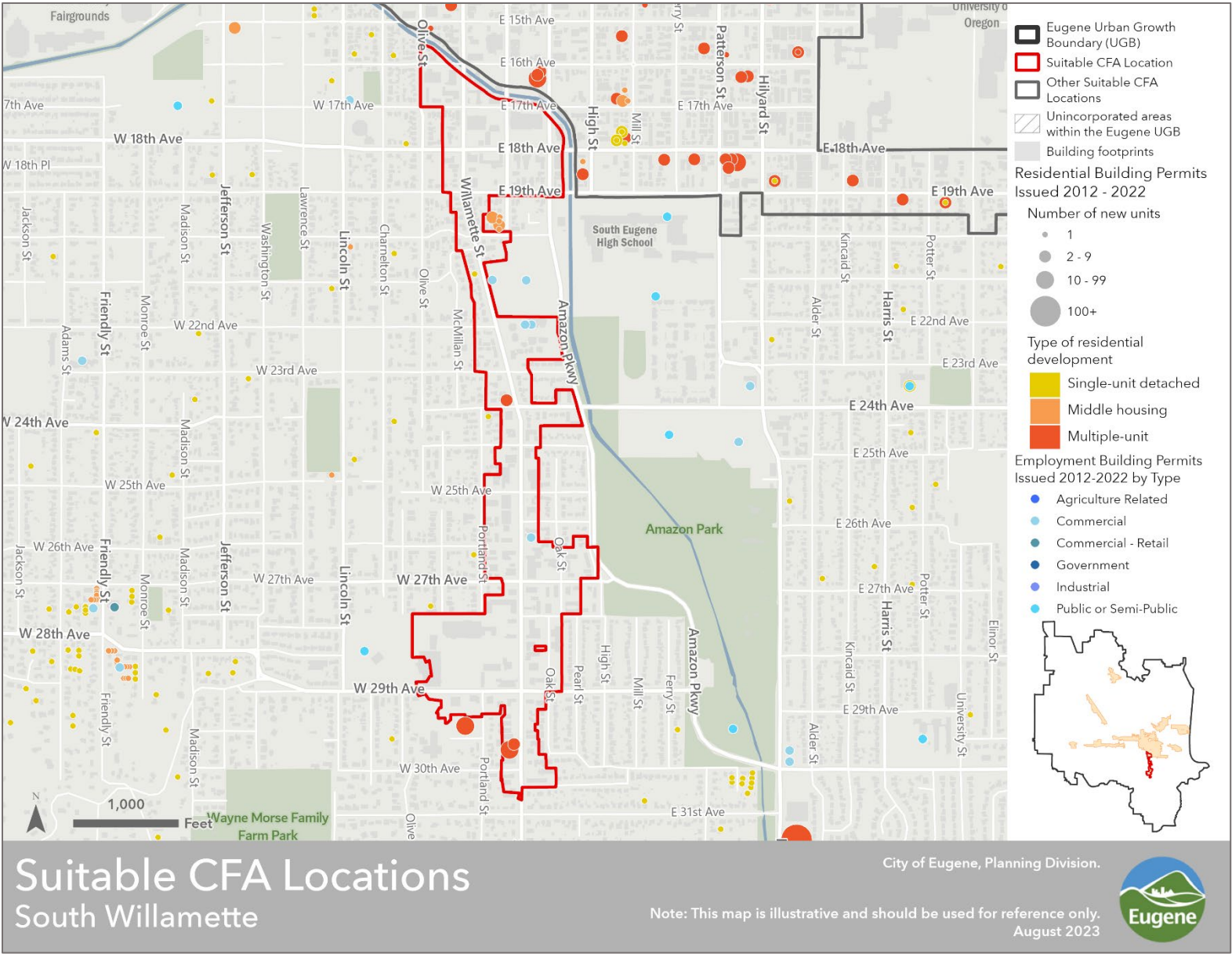


FIGURE 39. SOUTH WILLAMETTE SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



Location 9: West 11th Avenue

The West 11th Avenue Suitable CFA is 204 acres in size. It is the second largest of the nine suitable locations. This Suitable CFA is generally a long linear area following the frequent transit corridor along both sides of 11th Avenue/Oregon Highway 126, but the boundary bumps out to include the large commercial area at West 11th Avenue and Seneca Road. It runs from Wallis Street in the west to Fillmore Street in the east and is bounded by Amazon Creek to the south.

Demographic Profile and Displacement Risk

There are four census block groups that cross into the West 11th Avenue Suitable CFA. Based on the displacement risk area typology outlined in **Section 5.2**, one block group is considered “Vulnerable,” and one block group is considered “Early Gentrification” as illustrated in Figure 44 (page 108). Two are unassigned, which means they do not fit one of the six area typologies. Table 12 below summarizes the total acres by area type within the West 11th Avenue Suitable CFA.

TABLE 12. WEST 11TH AVENUE SUITABLE CFA - AREA TYPOLOGY BY ACRES

Area Typology	Acres
Vulnerable	31.5
Early Gentrification	65.6
Active Gentrification	43.2
Unassigned	63.2
Total	203.5

The following findings emerged from the demographic profile and displacement risk analysis based on 2008-2012 and 2015-2019 5-Year ACS data:

- The displacement analysis cannot adequately consider housing trends in areas that are primarily industrial development, as is the case in part of this Suitable CFA.
- This Suitable CFA had residents that are vulnerable to displacement, including a higher percentage of communities of color and people with disabilities in all four block groups.
- There were slightly more households with lower incomes in this Suitable CFA compared to the city as a whole.
- More residents in this Suitable CFA lived in multi-unit housing and renter-occupied units.
- The cost of housing increased significantly in the Suitable CFA during the period analyzed.
- Demographic changes did not indicate ongoing displacement but may signal future risk.

A full demographic profile of the West 11th Avenue Suitable CFA is available in **Appendix C**.

FIGURE 40. WEST 11TH AVENUE SUITABLE CFA

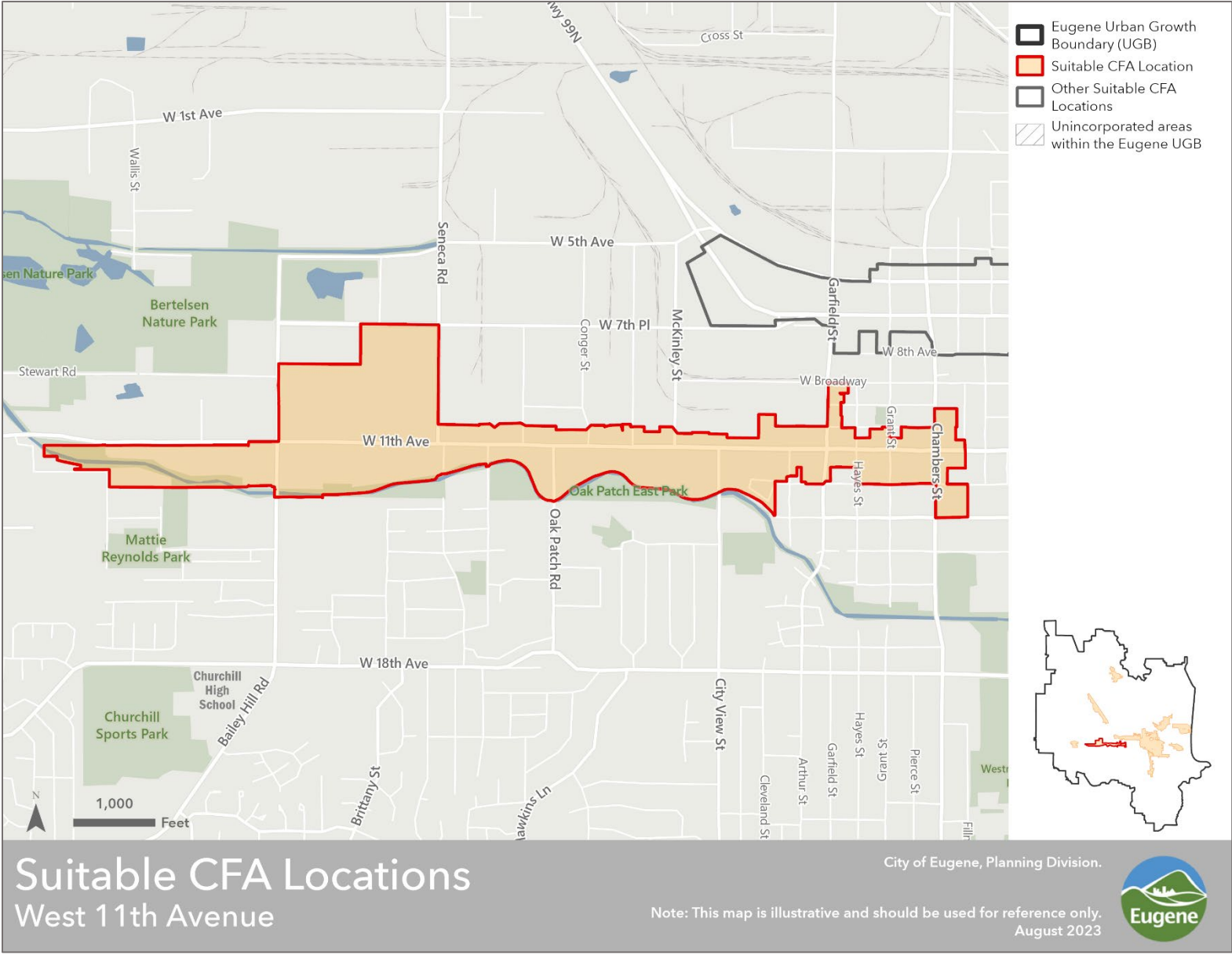
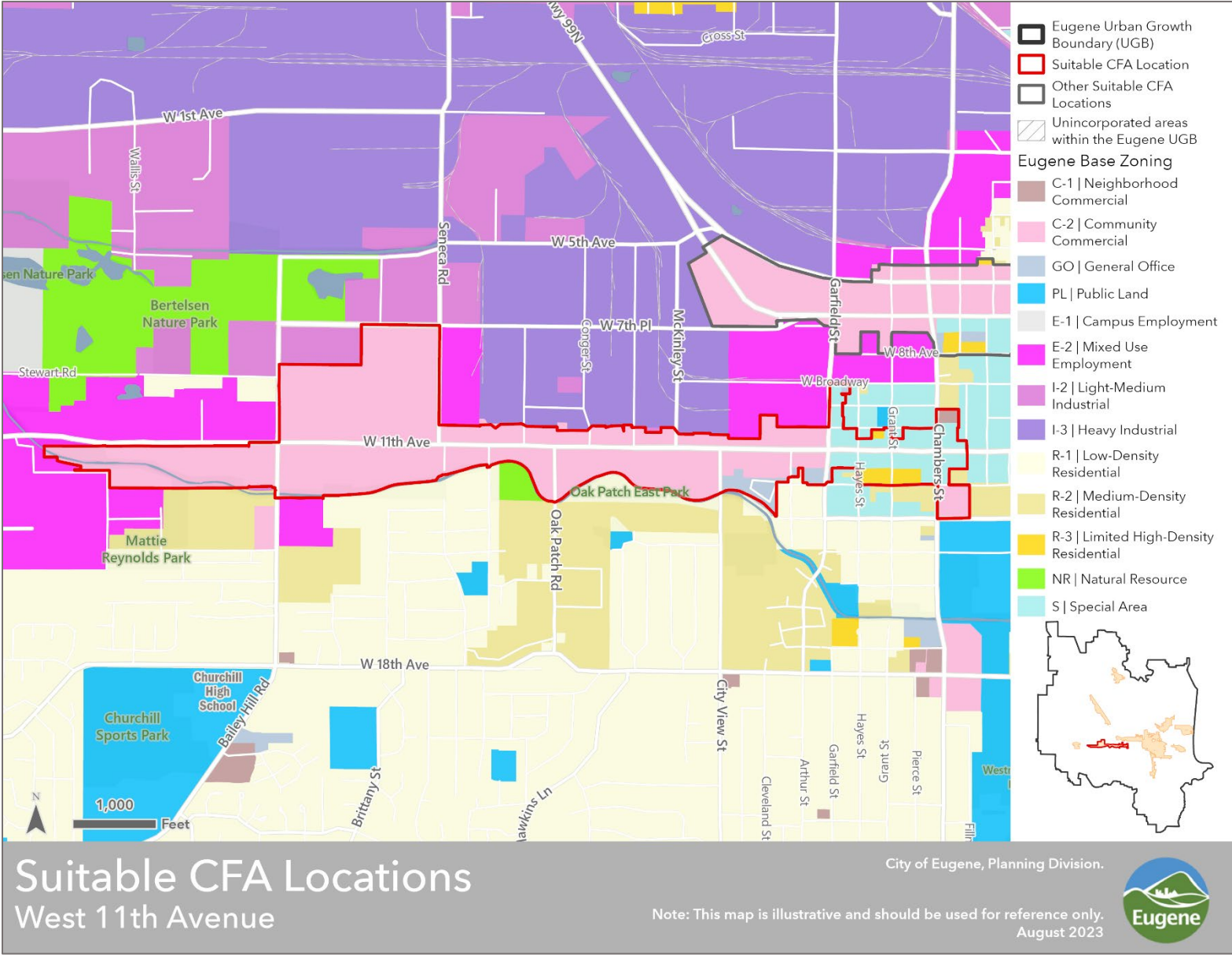


FIGURE 41. WEST 11TH AVENUE SUITABLE CFA – BASE ZONING



Development Regulation Compliance

As illustrated in Figure 41 (page 91), the West 11th Avenue Suitable CFA is primarily zoned C-2 Community Commercial (about 172 acres), with small pockets of GO General Office (6 acres), C-1 Neighborhood Commercial (1 acre), and R-3 Limited High Density Residential (4 acres). The east end of the Suitable CFA includes the S-C Chambers Special Area Zone subarea /C-2, which is generally consistent with C-2 standards (20 acres).

- **Permitted Uses:** C-2 and S-C/C-2 are highly compliant zones, except where C-2 overlaps with the /SR Site Review overlay zone. This overlay zone requires a land use application process and makes otherwise permitted uses no longer “outright permitted,” thus making the area medium compliant. The /SR overlay applies to numerous parcels in the Suitable CFA. Neither GO nor C-1 are highly compliant and, in this location, they also have /SR overlay, rendering these areas even less compliant. R-3 has low compliance ratings for CFA-required outright permitted uses.
- **Density Minimums:** Density minimums for Primary CFA compliance are not met by current zoning and development standards, as areas zoned C-1, C-2, S-C, and GO do not have minimum densities in place. Areas zoned R-3 achieve Secondary CFA compliance.
- **Building Height:** Maximum allowable building heights in areas zoned C-2 comply with both Primary and Secondary CFA criteria, however areas zoned GO only comply with Secondary CFA criteria. C-1 areas do not comply with either Primary or Secondary CFA building height requirements.

Dwelling Unit Capacity

Using all zoned areas, the West 11th Suitable CFA meets **15%** of the needed housing capacity as a Primary CFA and **9%** of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

The West 11th Avenue Suitable CFA is primarily zoned as a commercial area and includes some existing higher-density residential development in R-3 and GO areas. The Suitable CFA is bounded by industrial land to the north (I-2 Light-Medium Industrial and I-3 Heavy Industrial). The west end is adjacent to E-2 Mixed Use Employment areas, which are zoned to provide areas for a mixture of compatible employment opportunities – industrial, office, and commercial. The Suitable CFA is bounded to the south by Amazon Creek, with R-1 Low Density Residential and R-2 Medium Density Residential beyond Amazon Creek.

The Suitable CFA contains a portion of, and is bounded by, the S-C Chambers Special Area Zone, which in part, is intended to create transitions between higher intensity commercial land uses and residential neighborhoods, as well as promote a general increase in density with a mix of multi-unit, middle housing, and single-unit residential development that contributes positively to the neighborhood pattern.

The Downtown/Campus Suitable CFA is just a few blocks to the north of the east end of this location. This section of the Downtown/Campus Suitable CFA is the 6th/7th Avenue Corridor, another frequent transit corridor, but this portion does not include high density or mixed-use development. Between the two transit corridors lies E-2 zoned areas.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

The Suitable CFA is bounded to the south by Amazon Creek and the Fern Ridge Path. The shared use path is adjacent to several small parks and open spaces, including Berkley Park and Gudukut Natural Area Park. To the northwest is Bertelson Nature Park. The 34.5-acre natural area is co-owned and managed by the City of Eugene and BLM. Martin Luther King Jr. Park is a neighborhood park abutting the Suitable CFA's northern R-3 zoned area. Additionally, adjacent to this Suitable CFA is Mattie Reynolds Park. Currently undeveloped, this 5-acre site will be developed as a "Neighborhood Park Plus" with construction expected to be completed in 2025.

Active Transportation Facilities

West 11th Avenue is a main east-west connector, eventually transitioning into Oregon Highway 126 connecting Eugene with Florence and the Oregon Coast to the west, and Springfield to the east. The Suitable CFA is bounded to the south by Amazon Creek and the Fern Ridge Path, providing walking and biking access to the central city that is generally separated from auto traffic. West 11th Avenue transitions from a minor arterial to a major arterial within the Suitable CFA. The corridor is characterized by auto-oriented commercial and industrial uses. The major arterial section features high volumes of fast-moving car traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or taking transit. There are no bike lanes on West 11th Avenue, but there are several existing or planned on the north-south connectors to the Fern Ridge Path, including Garfield (planned), Seneca Road, and Bailey Hill Road. There is EmX bus rapid transit service on West 11th Avenue through almost the entire length of the Suitable CFA, from Garfield Street to the west.

Adequate Infrastructure

- **Electricity:** EWEB staff did not note any concerns with possible increased development in this Suitable CFA.
- **Stormwater:** The projected land use for the West 11th Avenue Suitable CFA is primarily Commercial and Commercial-Residential Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.
- **Water:** EWEB staff did not note any concerns with possible increased development in this CFA. All Suitable CFAs are located within the base level reservoir service area and would not require new reservoirs or pump stations. Some site-specific water main extensions may be required for service.
- **Wastewater:** The City's wastewater team did not note any concerns with possible increased development in this Suitable CFA.

Development and Redevelopment Conditions

According to the 2021 BLI snapshot, the West 11th Avenue Suitable CFA is primarily Developed land, as illustrated on Figure 42 (page 94). There are some Undeveloped, C-2 zoned parcels on the west side of the Suitable CFA. Notably, Undeveloped parcels lie outside of the current CFA boundaries to the southwest, primarily zoned E-2 Mixed Use Employment. Between 2012-2022, building permit activity included two housing development projects on the east end of the Suitable CFA along Chambers Street, as well as a variety of commercial projects along West 11th Avenue, as illustrated in Figure 43 (page 95). While there has been minimal housing development within this primarily commercial corridor, to the south of the Suitable CFA boundaries, several housing developments (including three larger multi-unit projects) received permits.

FIGURE 42. WEST 11TH AVENUE SUITABLE CFA - MONITORING SNAPSHOT BUILDABLE LANDS INVENTORY (2021)

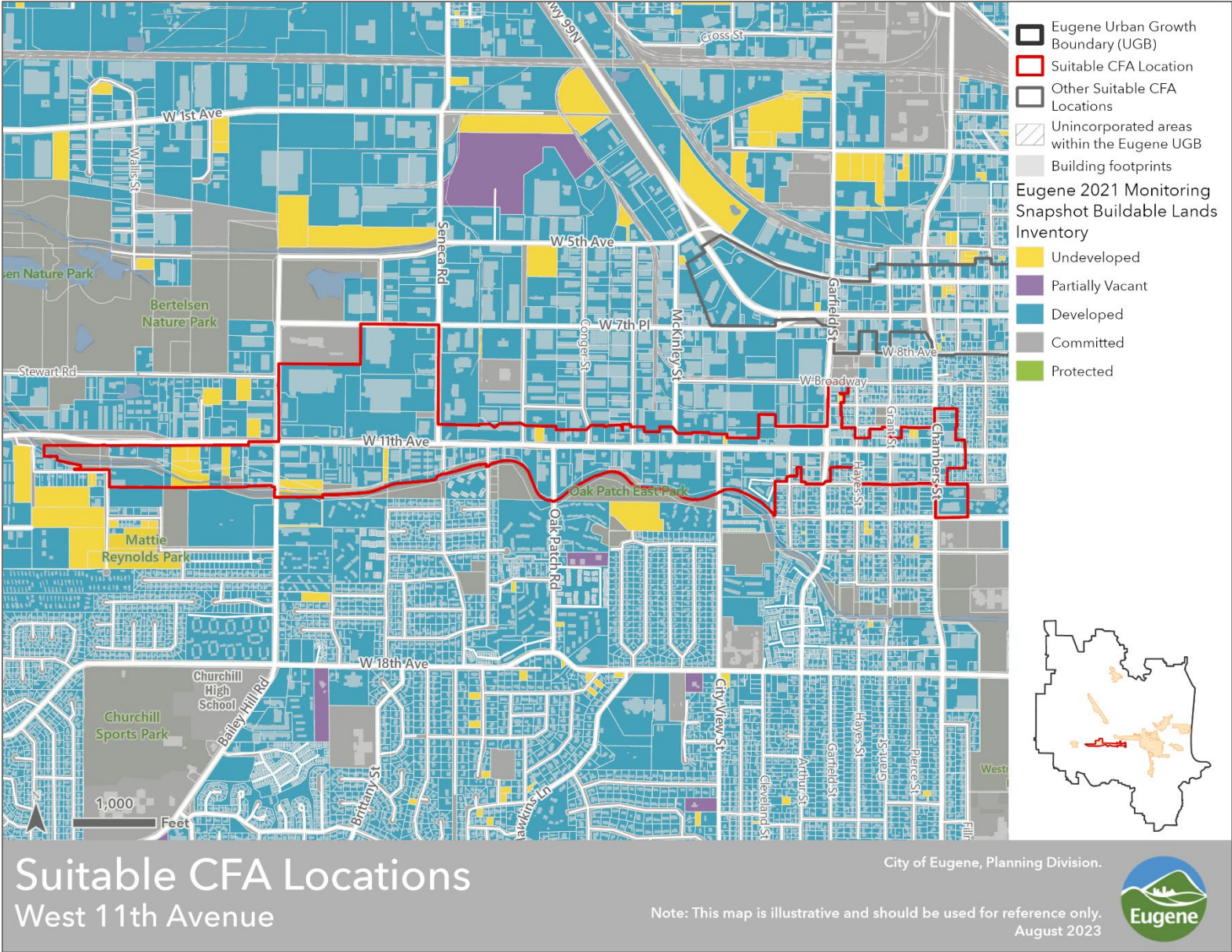
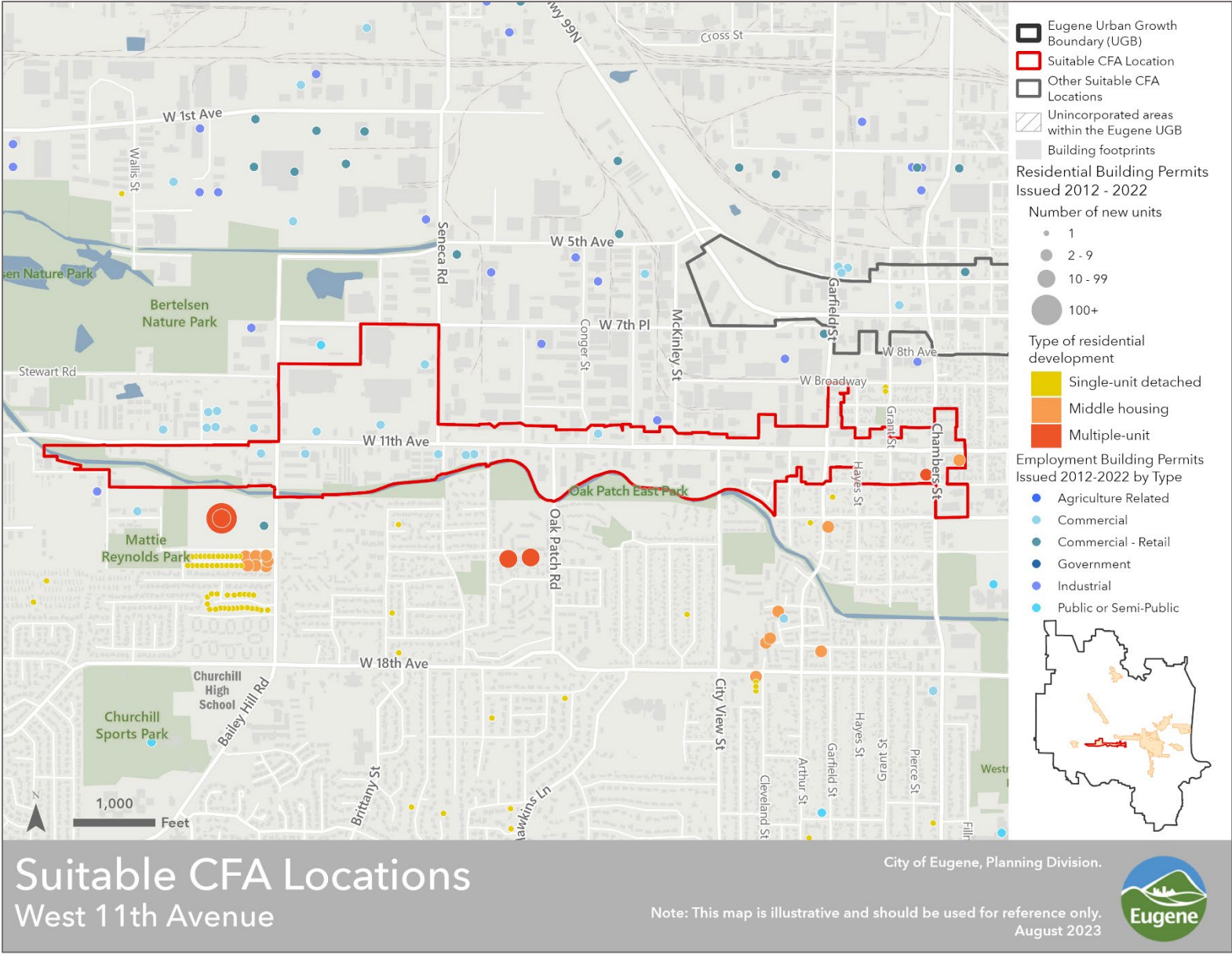


FIGURE 43. WEST 11TH AVENUE SUITABLE CFA – BUILDING PERMIT ACTIVITY (2012-2022)



4.4 Most Promising CFA Locations

This section identifies and summarizes the three most promising Suitable CFAs under each criterion, based on the analysis described in the previous sections. The best variation on Downtown/Campus is selected where appropriate. Table 13 highlights the top three most promising locations by criterion; where the table is blank the Suitable CFA did not fall within the top three for compliance with that criterion. Staff determined that the demographic profile and displacement analysis, as well as adequacy of infrastructure, are not appropriate ranking criteria. A description of those criteria by Suitable CFA is included in the previous section.

TABLE 13. MOST PROMISING CFAs BY CRITERION

Suitable CFA Location	Development Regulations	Dwelling Unit Capacity	High-Density, Mixed-Use Areas	Parks and Amenities	Active Transportation	Development/Redevelopment Conditions
Chase Village						
Downtown/Campus (or variation)	#2 (Variation B)	#1	#1 (Variation C)	#1	#1 (Variation A)	#1 (Variation C)
Far West 11th Avenue						
Ferry Street Bridge	#1		#2			
Franklin/Walnut			#3	#3	#2	
Highway 99	#3	#3				
Santa Clara Station						#2
South Willamette				#2	#3	
West 11th Avenue		#2				#3

Development Regulation Compliance

1. **Ferry Street Bridge:** This Suitable CFA has only a few base zones and is dominated by the highly compliant C-2 Community Commercial zone. It also has few compliance-reducing overlay zones.
2. **Downtown/Campus, Variation B:** The Downtown/Campus variations contain a range of base zones. The variations are all dominated by the highly compliant C-2 zone. The zones that are retained in Variation B are either highly compliant (C-2, C-3, S-C, and S-F) or medium compliant (S-DW, S-DR, and GO) for outright permitted uses as well as removing two zones (R-3 and S-W) that did not achieve compliance with required building heights.
3. **Highway 99:** This Suitable CFA is almost entirely made up of highly compliant C-2 zoning. Compliance-reducing overlays are also very limited in this Suitable CFA.

Dwelling Unit Capacity

1. **Downtown/Campus:** Using all zoned areas, this Suitable CFA meets 59% of the needed housing capacity as a Primary CFA and 33% of the needed housing capacity as a Secondary CFA. When considered individually, each of the three variations achieve higher dwelling unit capacities than any of the other Suitable CFAs.
2. **West 11th Avenue:** Using all zoned areas, this Suitable CFA meets 15% of the needed housing capacity as a Primary CFA and 9% of the needed housing capacity as a Secondary CFA.
3. **Highway 99:** Using all zoned areas, this Suitable CFA meets 15% of the needed housing capacity as a Primary CFA and 8% of the needed housing capacity as a Secondary CFA.

In or Near High-Density Mixed-Use Areas

1. **Downtown/Campus, Variation C:** This Suitable CFA includes many uses within and adjacent to the area, including several areas of high-density mixed-use. Variation C retains the fewest adjacent areas that are not currently developed or planned as high-density, mixed-uses, including industrial and R-1 Low Density Residential land.
2. **Ferry Street Bridge:** This Suitable CFA constitutes a high-density, mixed-use area, but is bounded on its north and east largely by R-1 Low Density Residential land.
3. **Franklin/Walnut:** This Suitable CFA is planned for high-density, mixed-use development, but areas south of the Suitable CFA are zoned R-1 Low Density Residential.

Containing or Near Parks, Open Space, Plazas, or Similar Public Amenities

1. **Downtown/Campus:** This Suitable CFA is bounded by many significant, regional parks, open spaces, and public amenities, including Downtown Riverfront Park, Alton Baker Park, Amazon Creek and Park, South Eugene High School, Roosevelt Middle School, the Downtown Park Blocks, Skinner Butte Park, the University of Oregon campus, and many other smaller amenities and public spaces.
2. **South Willamette:** This Suitable CFA is adjacent to Amazon Park along most of its length, a regional park with a full suite of recreation and parks facilities.
3. **Franklin/Walnut:** The Suitable CFA is bounded on the north by the Willamette River (across the railroad tracks) and Alton Baker Park on its opposite shore, accessible via two nearby footbridges. To the north is a large area of land owned by the University of Oregon that contains open space and a portion of the Ruth Bascom Riverbank Path System, connecting to downtown. To the southwest is the University of Oregon Campus. On the south side of Franklin Boulevard, this Suitable CFA abuts both the Franklin Park Natural Area and Fairmount Neighborhood Park.

Accessible via High-Quality Active Transportation Facilities

1. **Downtown/Campus, Variation A:** Downtown Eugene and areas adjacent to the University of Oregon campus in this Suitable CFA generally feature high-quality active transportation facilities. Variation A retains the high-quality active transportation facilities while eliminating a large section of a major arterial passing through the original Suitable CFA (6th/7th Avenue corridor).
2. **Franklin/Walnut:** This Suitable CFA is adjacent to the Ruth Bascom Riverbank Path System, connecting the location to various key destinations in Eugene and Springfield. Franklin Boulevard is scheduled for major improvements to support more safe and comfortable walking, biking, and transit, which will provide significant, positive impacts to this Suitable CFA.
3. **South Willamette:** This Suitable CFA has newly improved bike lanes and sidewalks on Willamette Street, as well as bike lanes on either side of 29th Avenue. Amazon Park, adjacent to the Suitable CFA, has a shared use path providing access to key regional destinations. Willamette Street is a 3-lane cross section, which is narrower than some of the other transit corridors (e.g., Highway 99, West 11th Avenue).

Development and Redevelopment Conditions

1. **Downtown/Campus, Variation C:** The Suitable CFA is almost entirely Developed or Committed to public uses. Nonetheless, building permit activity between 2012-2022 in the Suitable CFA included hundreds of units across several new multi-unit housing developments, as well as a smaller amount of middle housing and single-unit infill and redevelopment projects closer to the University of Oregon campus. Even with predominately Developed land, Variation C most closely aligns with the City's existing priorities for increased housing development downtown, as expressed through the Downtown Plan, Downtown Urban Renewal District, and Riverfront Urban Renewal District.
2. **Santa Clara Station:** The Suitable CFA is primarily Developed, but there are some Undeveloped and Partially Vacant parcels scattered across the Suitable CFA, all in C-2 areas. Outside the Suitable CFA boundaries, there is Undeveloped and Partially Vacant R-2 zoned land to the east surrounding Lone Oak Park, an undeveloped neighborhood park. The surplus land adjacent to LTD's Santa Clara Station is well-positioned for future, transit-oriented development.
3. **West 11th Avenue:** This Suitable CFA is primarily Developed, but contains some Undeveloped, C-2 zoned parcels on the west end. Additional Undeveloped parcels lie outside of the current CFA boundaries to the southwest, primarily zoned E-2 Mixed Use Employment. Similarly, outside of the current boundaries, several housing developments (including three larger multi-unit projects) received permits just south of the Suitable CFA. It is possible that adjustments to the current CFA boundaries could improve the development potential to include some adjacent Vacant medium-density residential and/or mixed-use employment areas.

Section 5. Displacement Risk & Mitigation Measures

In addition to considering the suitability of Climate-Friendly Areas based on zoning, development regulations, access to transportation, and other criteria outlined in **Section 4**, the City of Eugene must consider the risk of housing displacement of historically marginalized community groups stemming from CFA designation.¹⁷ An initial summary of this analysis is provided for each Suitable CFA in **Section 4.3**.

Displacement occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.¹⁸ The term housing displacement is used throughout this analysis, rather than the more familiar term – gentrification.

Gentrification is an increase in college-educated individuals' demand for housing in initially low-income, central city neighborhoods.¹⁹ While the two terms are often conflated, gentrification is typically used to describe an observed change in neighborhood character, while displacement is the negative impact often associated with such changes, and the more important trend for local governments to mitigate directly.

As an example, a coffee shop catering to younger and more affluent people may be seen as a symbol of gentrification. The coffee shop itself is not the problem but may indicate pressure on the local housing market as the area becomes desirable to more affluent, often white, college-educated young professionals who may displace current residents by driving up housing costs.

This section provides several components to analyze the relationship between Climate-Friendly Areas and displacement risk, including:

- A citywide demographic profile illustrating the presence of historically marginalized community groups in Eugene
- A spatial analysis that illustrates displacement risk citywide and within Suitable CFAs, resulting in the categorization of areas of Eugene into six displacement risk types
- An inventory of the City's current policies and practices to achieve fair and equitable housing outcomes
- A list of priority strategies to ensure fair and equitable housing outcomes within designated CFAs through increased housing production, preservation of existing affordable housing, and protection of residents at greatest risk to displacement

¹⁷ Per Oregon Administrative Rules (OAR), Chapter 660, Division 12 (OAR 660-012-0315(4)(f)), local governments shall utilize spatial and other data in this step to determine if rezoning the potential CFA(s) would be likely to displace underserved populations and identify actions to mitigate or avoid potential displacement.

¹⁸ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

¹⁹ Brummet, Quentin and Reed, Davin, The Effects of Gentrification on the Well-Being and Opportunity of Original Resident Adults and Children (2019-07-16). FRB of Philadelphia Working Paper No. 19-30, Available at SSRN: <https://ssrn.com/abstract=3421581>.

5.1 Eugene Demographic Profile

Historically and currently marginalized community groups require prioritized attention within transportation and land use planning. The following demographic profile provides a citywide overview of the presence of historically marginalized community groups in Eugene as compared to Oregon. Most of these groups are integrated within the displacement risk spatial analysis described in the following section, apart from several groups where reliable data sources are not available at the census tract or block group level. These groups include people experiencing homelessness, tribal members, low-wealth individuals or households, and lesbian, gay, bisexual, transgender, queer, intersex, asexual, or two-spirit (LGBTQ+) community members. Additionally, students and veterans are not included in the displacement risk analysis, as they are two populations added by the City of Eugene and would require additional changes to the analysis methodology. Without quantitative data, the City will work to collect qualitative data by reaching out to these communities during public involvement for CFA designation.

TABLE 14. HISTORICALLY MARGINALIZED COMMUNITY GROUPS IN EUGENE AND OREGON (2015-2019)

Historically Marginalized Community Group	Eugene Number	Eugene Percent	Oregon Number	Oregon Percent	Source
Eugene Total Population by ‘Place’	168,302		4,129,803		2015-2019 ACS Table DP05
Total Households	70,330		1,611,980		2015-2019 ACS Table S2503
Black & African American People	5,110	3.0%	119,710	2.9%	2015-2019 ACS Table DP05
Indigenous People	6,550	3.9%	162,787	3.9%	2015-2019 ACS Table DP05
People of Color	37,190	22.1%	1,003,961	24.3%	2015-2019 ACS Table DP05
Immigrants	12,767	7.6%	407,643	9.9%	2015-2019 ACS Table DP02
People with limited English proficiency	5,107	3.2%	220,027	5.6%	2015-2019 ACS Table DP02
People with disabilities	23,466	14.0%	587,093	14.4%	2015-2019 ACS Table DP02
People experiencing homelessness – HBNL	7,031	4.2%			2019 LC HSD Homeless By-Name List YTD ²⁰
People experiencing homelessness – (PIT)	2,165 (Lane County)	0.6%	15,876	0.4%	2019 HUD Continuum of Care ²¹

²⁰ Lane County Human Service Division (LC HSD) uses data tracked in Lane County’s Homeless Management Information System (HMIS) to determine who is on the Homeless By-Name List (HBNL). The ‘Eugene’ jurisdiction may vary from the ‘place’ of Eugene as used by the ACS.

²¹ The US Department of Housing and Urban Development does a Continuum of Care (CoC) Homeless Assistance Programs Homeless Populations and Subpopulations Report, which provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January, referred to as a Point-in-Time (PIT). The area covered in the local report is the Eugene/Springfield/Lane County Continuum of Care, rather than the City of Eugene alone.

Historically Marginalized Community Group	Eugene Number	Eugene Percent	Oregon Number	Oregon Percent	Source
Low-income households ²²	32,280	45.9%	691,950	42.9%	2015-2019 ACS HUD CHAS ²³
Low-income renter households	23,770	33.4%	377,910	23.4%	2015-2019 ACS HUD CHAS
Moderate-income renter household	4,075	5.8%	66,715	4.1%	2015-2019 ACS HUD CHAS
Low-income homeowner household	8,510	12.1%	314,040	19.5%	2015-2019 ACS HUD CHAS
Moderate-income homeowner households	2,880	4.1%	106,000	6.6%	2015-2019 ACS HUD CHAS
Single parent households	4,157	5.9%	86,165	2%	2015-2019 ACS Table DP02
Youth (Under 18)	28,844	17.1%	867,943	21%	2015-2019 ACS Table DP05
Seniors (65 and over)	26,951	16.0%	709,555	17.2%	2015-2019 ACS Table DP05
Students	47,500	28.2%	896,109	21.7%	2015-2019 ACS Table DP02
Veterans	9,842	7.1%	283,045	8.7%	2015-2019 ACS Table DP02

Most of the data in the demographic profile was collected by the United States Census Bureau’s American Community Survey (ACS, 2015-2019 5-Year Estimates). The only historically marginalized community group that is represented by a different data source is people experiencing homelessness. Instead, data for this population was taken from both the Lane County Health and Human Services’ Homeless by Name List (HBNL) and the US Department of Housing and Urban Development’s Continuum of Care (CoC) Homeless Assistance Programs Homeless Populations and Subpopulations Point-in-Time (PIT) count. The HBNL is generally considered to be the more accurate source.

The greatest disparities in the presence of historically marginalized communities in Eugene versus Oregon as a whole are in the renter and homeowner income categories. There is a larger proportion of renters with low- and moderate-incomes in Eugene than in Oregon overall. These groups are generally at greater risk of displacement.

Other demographic discrepancies between Eugene and Oregon include single-parent households and students. According to the ACS 2015-2019 data, Eugene consisted of 28.2% of people enrolled in school (kindergarten through higher education) compared to Oregon at 21.7%. Single-parent households constitute 5.9% of all Eugene households, but only 2% of Oregon’s households.

²² While the City of Eugene defines low-income as 80% of area median income (AMI) and moderate-income as 80-120% AMI, the ACS divides the income levels by <80% Household Area Median Family Income (HAMFI), 80-100% HAMFI. For consistency, low-income in this memo is less than 80% HAMFI and moderate-income is 80-100% HAMFI. The percentage is out of the total number of households rather than individuals.

²³ Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households. <https://www.huduser.gov/portal/datasets/cp.html>

5.2 Spatial Analysis of Displacement Risk

This section summarizes the anti-displacement spatial analysis Eugene used to explore displacement risk both citywide and in Suitable Climate-Friendly Areas. DLCD provided a suggested approach for this analysis, which the City and LCOG then modified slightly.²⁴ The DLCD approach is described in a guidance memo²⁵ and is based on the Anti-Displacement and Gentrification Toolkit Guide for Cities, a toolkit which DLCD provided to local governments for the Housing Production Strategies work required by HB 2003 (2019).²⁶ The original research for this work was performed by Portland State University.²⁷

More detail on modifications to the suggested approach can be found in **Appendix B, Tech Memo #2**.

Caveats and Considerations

To support the required spatial analysis, the City convened an interdepartmental Equity Analysis Working Group to inform any modifications to the approach, including staff from Community Development, Planning, Public Works, Equity and Community Engagement, and more. Staff shared concerns about the DLCD suggested approach and methodology in the Eugene context, including:

- **Eugene is in a housing affordability and availability crisis, citywide.** The suggested analysis approach categorizes certain areas as “Affordable and Vulnerable.” Staff expressed concern that any part of Eugene would be considered or labeled as affordable for residents.
- **Many people vulnerable to displacement, including communities of color, are dispersed across the city.** Many displacement analyses are applied in major metropolitan areas with historic pockets of certain racial or ethnic communities. Eugene, given both its smaller size and Oregon’s history of racial exclusion, does not have clearly racially defined neighborhoods or areas. People of color and other historically marginalized groups are present across the entire community and are no less vulnerable to displacement in a more stable neighborhood. Eugene continues to prioritize policy changes and investments that support vulnerable people across the entire city and address needs across the housing continuum, as articulated in the City’s [Housing Implementation Pipeline](#). That said, there continues to be a need to consider displacement risk for communities of color and people with lower incomes when making geographically specific policy decisions and investments, including the designation of Climate-Friendly Areas.
- **The spatial analysis relies on outdated and often unreliable census data.** The spatial analysis relies primarily on 2015-2019 ACS 5-year Estimates as the most recent data set that uses consistent census geographies. Not enough time has passed to use 5-year estimates with the 2020 Census boundaries, and it is widely known that 2020 Census data contains pandemic-era inconsistencies and tends to undercount some historically marginalized community groups. Census data generally is a lagging and imperfect indicator of dynamic local market trends. The

²⁴ DLCD provided cities with a suggested approach to meet the requirements of OAR 660-012-0315(4)(f) to “include analysis of spatial and other data to determine if the rezoning of potential climate-friendly areas would be likely to displace residents who are members of state and federal protected classes” in the study of potential CFAs.

²⁵ Anti-Displacement Toolkit Guide for Cities: Implementation Guidance, OAR 660-012-0315, CFA Anti-Displacement Analysis. https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf

²⁶ Anti-Displacement and Gentrification Toolkit Project: Guide for Cities Implementing HB 2003 Housing Production Strategies. <https://www.oregon.gov/lcd/UP/Documents/Anti-Displacement%20Toolkit%20Guide.pdf>

²⁷ Anti-Displacement and Gentrification Toolkit, Attachment A. https://www.oregon.gov/lcd/UP/Documents/AttachmentA_PSU%20Toolkit.pdf

suggested approach also uses census tracts, which are too large to reliably demonstrate hyper-local housing and demographic trends related to housing displacement.

- **The proposed area typologies and indicator sets are imperfect.** Staff noted several concerns, including the use of existing housing stock as an indicator of displacement risk (e.g., older or multi-unit housing is not always more affordable), as well as some of the populations considered vulnerable to displacement. Ultimately, measuring gentrification and displacement is complex. Spatial data alone cannot encompass all important indicators and factors related to displacement, and they do not fit neatly into a perfect typology that considers local context.

While the modified approach attempts to address some of these issues (e.g., using census block groups rather than census tracts, changing labels), staff are not confident in using the results of this displacement analysis to solely guide the selection of Climate-Friendly Areas. The results, alongside the supporting data, are provided as context in the evaluation of each Suitable CFA (**Section 4.3**).

Further modification to the spatial analysis approach and typology is possible, but through consultation with topic area experts, City staff determined that: 1) available data will continue to be an imperfect indicator of displacement risk, and 2) any typology will be imperfect. Spatial data alone is not enough to understand the nuances of displacement risk and its impact on vulnerable communities. As outlined in **Section 5.4**, Eugene intends to pursue strategies to mitigate displacement citywide in scope and support the production of housing affordable to all incomes, preserve existing affordable housing, and protect the people most vulnerable to displacement.

Spatial Analysis and Area Typologies

The spatial analysis conducted by LCOG aimed to identify the distribution of housing inequities by investigating disparities in people, housing, and place. The analysis used five key questions related to area demographics and housing market conditions to differentiate areas based on displacement risk:

- Where do people with lower incomes live?
- Where do Black, Indigenous, and People of Color (BIPOC) and other vulnerable people live?
- Where is older or multi-unit housing located?
- Is the housing market 'hot'?
- Are there significant changes in area characteristics that could signify ongoing displacement?

The analysis categorizes areas of the city into six different area types that are a combination of yes or no answers to each of the five questions. These area types describe the relative displacement risk in that part of the city, when compared to the city as a whole (not as compared to the rest of the state, the nation, or other geographies). Essentially, area types are identified by overlaying where vulnerable people live with housing development patterns. It is important to note that these area types are one tool intended to help provide a basis for informed decisions in housing and land use planning going forward. There are other tools and programs the City will continue to develop as CFEC work progresses.

LCOG analyzed several sets of demographic indicators. Areas were compared to the citywide median and then assigned a “yes” or “no” state depending on whether they were higher or lower than the citywide median, depending on the indicator. For example, LCOG analyzed five data sets related to whether vulnerable people lived in an area. One data set considered whether there were more BIPOC people in the area than the citywide percentage – yes or no. If there were two or more indicators where the answer was “yes,” the area was assigned a Vulnerable type.

Table 15 shows the five key questions and supporting indicators used to create the area typology.

TABLE 15. KEY QUESTIONS AND INDICATOR SETS

Low-Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
<i>Where do people with lower incomes live?</i>	<i>Where do Black, Indigenous, and People of Color (BIPOC) and vulnerable people live?</i>	<i>Where is older or multi-unit housing located?</i>	<i>Is the housing market 'hot'?</i>	<i>Are there significant changes in area characteristics?</i>
Compared to the city: <ul style="list-style-type: none"> • More low-income households • Lower median household income 	Compared to the city: <ul style="list-style-type: none"> • More BIPOC people • More households with limited English proficiency • More people with disabilities • More single-parent households • More people 65 years and older 	Compared to the city: <ul style="list-style-type: none"> • More multi-unit housing • More housing units built before 1970 	Compared to the city: <ul style="list-style-type: none"> • Greater median rent • Faster* median rent change • Greater median home value • Faster* median home value change 	Compared to the city: <ul style="list-style-type: none"> • Slower* increase in BIPOC persons • Faster* increase in persons with more educational attainment • Slower* increase in renter occupancy (decline in homeownership) • Faster* increase in median household income
BOTH TRUE LOW-INCOME	TWO OR MORE TRUE VULNERABLE	EITHER TRUE PRECARIOUS	THREE OR MORE TRUE HOT	THREE OR MORE TRUE SIGNIFICANT SHIFT
<i>*Measured by a change in value over time.</i>				

More detailed descriptions of the aspects and meaning of each area typology can be found below and are summarized in Table 16.

TABLE 16. AREA TYPOLOGY BY INDICATOR SET

Area Type	Indicator Sets				
	Low-Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
Vulnerable	Yes	Yes	Yes	No	-
Early Gentrification	Yes	Yes	Yes	Yes	No
Active Gentrification	Yes	Yes	Yes	Yes	Yes
Late Gentrification	No	Yes	No	Yes	Yes
Becoming Exclusive	No	No	No	Yes	Yes
Advanced Exclusive	No	No	No	Higher home value and rent	No
No Risk Identified / Unassigned	-	-	-	-	-

Below is a brief description of the characteristics of each area type in the typology, based on the original description in the PSU toolkit.

The first three area types in the table are designated as low-income, compared to the city as a whole.

Vulnerable

These areas are identified as low-income. These areas have a lower median household income, and their residents have lower incomes, compared to the city as a whole. These areas also include more older or multi-unit housing stock. However, the housing market in these areas is stable with no substantial changes in the period analyzed. In areas at this stage, neither housing market activity nor demographic change is significant enough to indicate displacement risk.

Early Gentrification

These areas represent the early phase in the gentrification process. These areas are identified as relatively low-income and as having relatively vulnerable people and older or multi-unit housing, compared to the city as a whole. Areas at this stage have relatively hot housing markets, yet no considerable changes are found in demographics related to gentrification.

Active Gentrification

Areas at this stage are identified as low-income with a high share of vulnerable people, older or multi-unit housing stock, and active housing markets, compared to the city as a whole. They also exhibit symptoms of displacement as indicated by demographic changes.

The next three area types on the table are designated as high-income. They have relatively hot housing markets as indicated by higher rent and home value with higher appreciation rates, compared to the city as a whole. They also do not have relatively high amounts of older or multi-unit housing. However, the first type, Late Gentrification, still has vulnerable people and experiences gentrification-related demographic changes. The last two area types indicate the most exclusive and affluent areas, compared to the city as a whole.

Late Gentrification

These areas do not have households with lower incomes, but still have populations vulnerable to displacement. Their housing market exhibits high housing prices with high appreciations, and they have a relatively low share of older or multi-unit housing. The areas experienced significant changes in demographics related to displacement.

Becoming Exclusive

These areas are designated as high-income. Their population is no longer vulnerable to displacement. Older or multi-unit housing is not found at above-average levels in these areas. However, the areas are still experiencing demographic change related to displacement and hotter than typical housing market activities, compared to the city as a whole.

Advanced Exclusive

These areas are identified as high-income. They do not have vulnerable populations and are characterized by a housing mix dominated by newer homes and single-unit homes, compared to the city as a whole. Their housing markets have higher home values and rents, compared to the city as a whole, while their appreciation is relatively slower than the city as whole. No considerable demographic change is found in these areas.

No Risk Identified/Unassigned

These areas have not experienced any of the remarkable combinations of demographic or housing market indicators identified above. These areas may have been stable with no significant change, when compared to the city as a whole, but this does not necessarily mean that there is no need for extra care compared to when considering land use changes to areas with the other above types. These areas may call for more attention to what is happening on the ground. Planners need to engage with these communities to make sure the areas are stable while aligning with community needs.

Displacement Risk by Area Typology and Suitable Climate-Friendly Areas

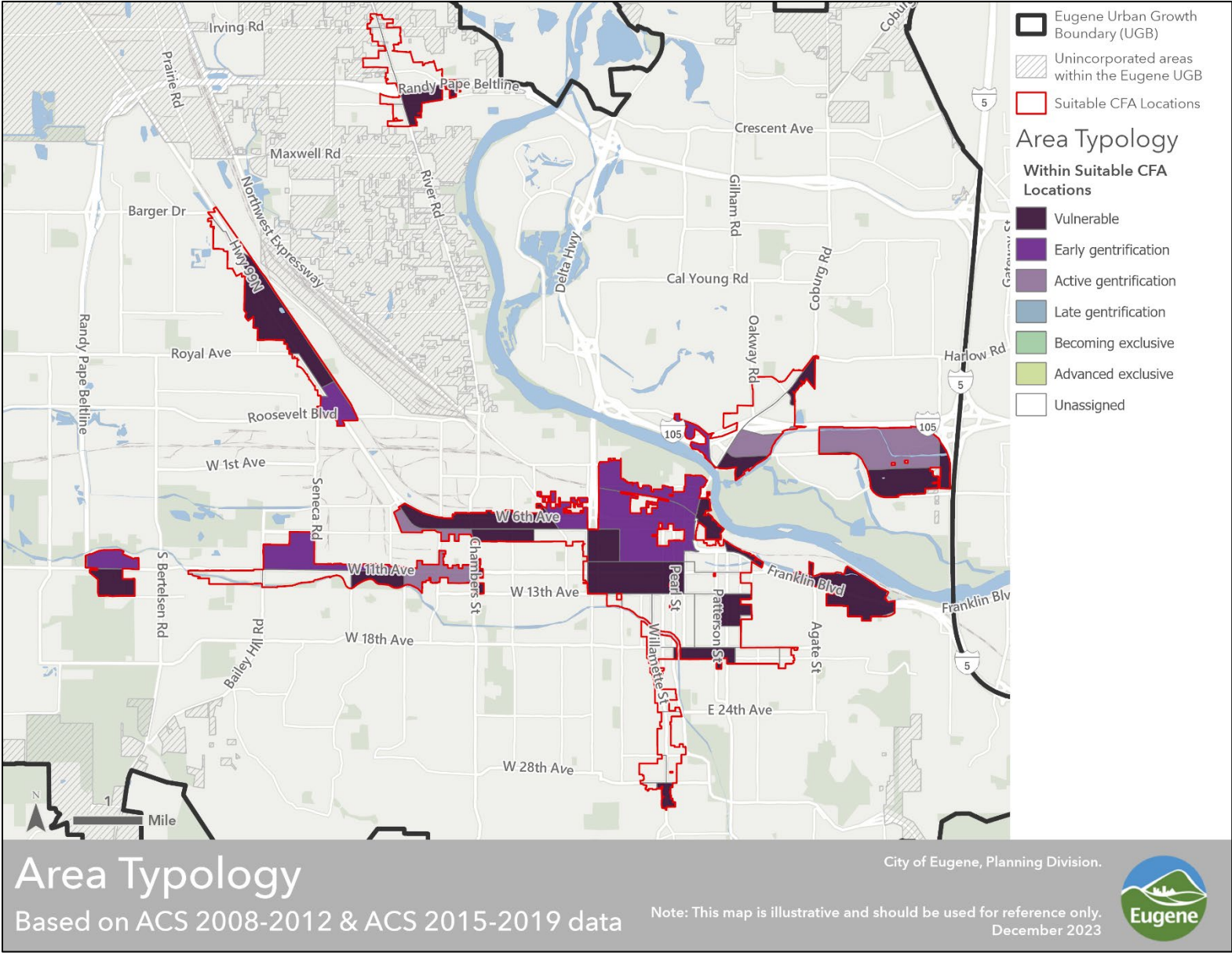
Figure 44 (page 108) illustrates the combined displacement risk factors within the area typology by Census block group within the Suitable CFAs.

As summarized in Table 17 below, the majority of Suitable CFAs are intersected by three of the six assigned area types. Approximately 35% of acres within Suitable CFAs are considered “Vulnerable,” 18% of acres are considered “Early Gentrification,” and another 11% of acres are considered “Active Gentrification.” It is not surprising that none of the Suitable CFAs include areas considered more exclusive, as the area typology factors in existing housing stock. The “Late Gentrification,” “Becoming Exclusive,” and “Advanced Exclusive” area types have a higher percentage of newer homes and/or single-unit homes than the city as a whole. These housing types tend to be in low-density residential areas or towards the edge of the urban area. Because the CFA Study looked first at existing zoning to identify potential locations, areas zoned for low-density residential were not included.

TABLE 17. AREA TYPES IN POTENTIAL CFA

Area Type	Acres in Suitable CFAs	Percent of Total Acres
Vulnerable	720.7	35.4%
Early gentrification	377.1	18.4%
Active gentrification	226.1	11.1%
Unassigned	714.8	35.1%
Total	2038.7	100%

FIGURE 44. ANTI-DISPLACEMENT ANALYSIS AREA TYPOLOGY COMPARED TO SUITABLE CFAS



5.3 Existing Policies to Achieve Fair and Equitable Housing Outcomes

To recommend additional strategies to mitigate displacement from Climate-Friendly Areas designation and otherwise achieve more fair and equitable housing outcomes, it was important to summarize the City's current policies, plans, and programs. They are organized within six categories:²⁸

- **Location of Housing:** How the City is striving to create compact, mixed-use neighborhoods available to members of state and federal protected classes while meeting statewide greenhouse gas emission reduction goals, including actions to:
 - Promote the production of regulated affordable units²⁹
 - Promote the production of accessible dwelling units³⁰
 - Mitigate or avoid the displacement of members of protected classes
 - Remove barriers and increase housing choice for protected classes
- **Fair Housing:** How the City is affirmatively furthering fair housing³¹ for all state and federal protected classes.
- **Housing Choice:** How the City is facilitating access to housing choice for communities of color, low-income communities, people with disabilities, and other state and federal protected classes.³²
- **Housing Options for Residents Experiencing Homelessness:** How the City is advocating for and enabling the provision of housing options for residents experiencing homelessness and how the City is partnering with other organizations to promote services that are needed to create permanent supportive housing and other housing options for residents experiencing homelessness.
- **Affordable Homeownership and Affordable Rental Housing:** How the City is supporting and creating opportunities to encourage the production of affordable rental housing and the opportunity for wealth creation via homeownership, primarily for state and federal protected classes that have been disproportionately impacted by past housing policies.
- **Gentrification, Displacement, and Housing Stability:** How the City is increasing housing stability for residents and mitigating the impacts of gentrification, as well as the economic and physical displacement of existing residents resulting from investment or redevelopment.

Table 18 lists the plans, programs, and policies that support each of these categories. A full narrative description is available in **Appendix B, Technical Memo #2**.

²⁸ Oregon Administrative Rules (OAR), Chapter 660, Division 18 (OAR 660-008-0050(4)(a)-(f))

²⁹ A regulated affordable unit is a residential unit subject to a regulatory agreement that runs with the land and that requires affordability for an established income level for a defined period of time.

³⁰ An accessible dwelling unit is a dwelling unit constructed to accommodate persons with disabilities, in compliance with the Americans with Disabilities Act and applicable construction requirements in adopted building codes.

³¹ Affirmatively furthering fair housing means addressing disproportionate housing needs, patterns of integration and segregation, racially or ethnically concentrated areas of poverty, and disparities in access to housing opportunity.

³² Housing choice includes access to existing or new housing that is in neighborhoods with high-quality community amenities, schooling, employment and business opportunities, and a healthy and safe environment.

TABLE 18. EUGENE POLICIES, PLANS, OR PROGRAMS TO ACHIEVE FAIR AND EQUITABLE HOUSING OUTCOMES

CFA Rule Requirements	Policy, Plan, or Program
Location of Housing	<ul style="list-style-type: none"> • Housing Implementation Pipeline (2022) • Housing Tools and Strategies (2019-2021) • Envision Eugene • Middle Housing Code Amendments (HB 2001 (2019)) • Accessory Dwelling Units and Pre-Approved Accessory Dwelling Unit Plans • Clear and Objective Housing Approval Criteria • Growth Monitoring Program • Downtown Housing Strategies <ul style="list-style-type: none"> ○ HOME Funds ○ Low-income Housing Property Tax Exemptions ○ Multi-Unit Property Tax Exemption Program ○ Urban Renewal ○ Regulatory Incentives • Accessibility Improvement Program
Fair Housing	<ul style="list-style-type: none"> • Fair Housing Plan • Analysis of Impediments to Fair Housing Choice • Fair Housing Outreach and Education • Fair Housing Hotline • Tenant Hotline • Intergovernmental Housing Policy Board
Housing Choice	<ul style="list-style-type: none"> • Middle Housing Code Amendments • Accessory Dwelling Units and Pre-Approved Accessory Dwelling Unit Plans • Clear and Objective Housing Approval Criteria • Growth Monitoring Program • Local Affordable Housing Trust Fund
Housing Options for Residents Experiencing Homelessness	<ul style="list-style-type: none"> • Housing Implementation Pipeline (2022) • City-Supported Shelters & Safe Sleep Sites • Lane County Homeless Services System Implementation • Community Safety Initiative
Affordable Homeownership and Affordable Rental Housing	<ul style="list-style-type: none"> • Housing Implementation Pipeline (2022) • Racial Equity & Accessibility Lens (REAL) Toolkit • Middle Housing Code Amendments • Local Affordable Housing Trust Fund • Affordable Housing Development Programs
Gentrification, Displacement, and Housing Stability	<ul style="list-style-type: none"> • Housing Implementation Pipeline (2022) • Renter Protections • Condo and Mobile Home Park Conversion Regulations
Additional Considerations	<ul style="list-style-type: none"> • Downtown Priorities and Projects • Urban growth planning (see Section 6.1) • 1996 Housing Dispersal Policy

Strategic Goals

The City of Eugene implemented numerous policies and plans over the last several years that emphasize housing as an urgent community need and demonstrate a housing prioritized agenda across the City organization. Through the [2023-2026 City of Eugene Strategic Plan](#), the City Council established several strategic goals related to housing and compact development, including:

- Mitigate the impacts of homelessness on unhoused individuals and the community
- Stabilize the cost of housing
- Increase the vibrancy, economic vitality, and livability of downtown

The actions supporting these strategic goals align closely with ongoing efforts to achieve more fair and equitable housing outcomes, including increasing capacity for shelter operations and supportive services, supporting efforts to preserve and construct Affordable Housing units, Permanent Supportive Housing units, and Moderate-Income Housing units, and developing an Anti-Displacement Action Plan, among many others.

Key Plans and Policy Guidance

In addition to the Strategic Plan, City staff rely on certain policy guidance and plans to advance projects and investments in housing choice and affordability. While these are described in further detail in **Appendix B, Technical Memo #2**, a high-level summary of key plans and policies is provided below.

The **Housing Implementation Pipeline (HIP)** is an internal, cross-departmental, 5-year work plan for the City organization. This work plan coordinates current and future City resources, goals, and priorities with a systems-thinking approach to housing across the full continuum from people experiencing homelessness to overall housing supply. The HIP generally splits actions into three focus areas: homelessness, income qualified housing, and overall housing supply.

Envision Eugene is the community's vision for how Eugene will accommodate the next 20 years of growth (2012-2032). Three pillars of Envision Eugene are most relevant to CFA designation: (1) provide housing affordable to all income levels, (2) promote compact urban development and efficient transportation options, and (3) plan for climate change and energy resiliency. The City has advanced a variety of land use code amendments and incentives to support more compact development, including:

- Implementing Middle Housing Code Amendments (directed by House Bill 2001, 2019) to expand opportunities for a variety of housing types in traditionally lower density neighborhoods³³
- Removing development barriers to Accessory Dwelling Units (ADU), including system development charge (SDC) credits, land use code changes, and Pre-Approved ADU Plans
- Adopting Clear and Objective Housing Approval Criteria within land use code provisions, making the permitting process more efficient for developing needed housing

An important strategy of Envision Eugene implementation is the **Growth Monitoring Program**, a system to efficiently collect growth-related information like population and jobs growth, the amount of housing

³³ On October 12, 2023, based on the Court of Appeals consideration, the Land Use Board of Appeals (LUBA) remanded the City's Middle Housing Ordinance. In this case, the remand renders the City's Ordinance ineffective until the City Council adopts a new Ordinance that addresses the remand. Any Middle Housing development within Eugene that was not approved before October 12, 2023, is subject to the State's Large Cities Middle Housing Model Code. City staff expect to bring a new Ordinance to City Council in early 2024.

being built, and the status of the City's adopted buildable land supply since it was inventoried in 2012. The Growth Monitoring Program supports citywide data collection and analysis to understand trends in housing development and supply, including density and location. The first Comprehensive Growth Monitoring Report (2012-2021) and the recent Annual Report (2022) provide data to assess the effectiveness of various housing development programs and policies thus far.

Eugene's **Fair Housing Plan** strives to assure that persons of a protected class have a choice in the location of their housing. The current Fair Housing Plan was published in 2020. The Eugene Analysis of Impediments to Fair Housing Choice seeks to understand potential barriers to accessing fair housing choices. It also looks at barriers to affordable housing for low- and moderate-income households, which are not a protected class but often represent a disproportionate amount of people in a protected class. The barriers identified have generally been broken into the following categories: lack of affordable housing, community and landlord education on fair housing, discrimination in renting, planning, land use, and zoning practices, and lending/sale discrimination.

Encouraging more compact development in the downtown core is a critical housing development priority for the City. Increasing housing downtown was adopted as a growth management strategy (i.e., land use efficiency measure) with Eugene's most recent UGB. In 2023, the City Council approved the **Downtown Priorities and Projects** list to guide future improvements to the area. The housing-related priority is to support the creation of a mix of new housing affordable across income levels. Project examples include:

- Incentivize market-rate and owner-occupied housing in the downtown core (e.g., cover SDCs and permits, offer reduced-cost land, low-interest loans)
- Bolster existing programs that support creation of housing for people with low and very-low incomes
- Revamp the Multi-Unit Property Tax Exemption (MUPTEx) program or create a new tax holiday program to incentivize housing
- Incentivize redevelopment of vacant office buildings into housing with ground-floor commercial (e.g., cover SDCs and permits, grants, loans)
- Encourage rehabilitation of older multi-story rental housing south and east of the downtown core

Renter Protections is a multi-phase effort to review and update various renter protections, such as the City's Rental Housing Code program which regulates rental properties in the city by creating minimum habitability standards. Renter protections can also include anti-discrimination protections like those found in Eugene's Human Rights Code. They can even include rent stabilization and limitations on no-cause evictions like those found in Senate Bill 608 (2019). Phase I of Eugene Renter Protections amended the Rental Housing Code to provide support services, require landlords to document move-in/out property condition, require landlords to provide rental history reference for a tenant who has not yet given notice, and require landlords to distribute information on renters' rights and obligations. Phase II, approved in July 2023, requires applications to be processed in the order received, generally limits security deposits to two months' rent, requires landlords to pay the tenant relocation assistance for no-cause eviction, qualified landlord-based reasons for termination, rent increases at the maximum allowed by state law, or declining to renew a fixed term lease. Phase II also requires landlords to report terminations of tenancy/evictions to the City.

5.4 Potential Strategies to Mitigate Displacement

With a better understanding of displacement risk and current City strategies to mitigate displacement and otherwise achieve more equitable housing outcomes, Eugene staff also identified actions that may be employed moving forward to mitigate or avoid potential displacement from CFA designation.

Staff reviewed the “[Housing Production Strategy Program - List of Tools, Actions, and Policies](#)” provided by DLCD. The resource is a crowd-sourced, non-exhaustive list of 100+ housing production (and preservation) strategy tools, actions, and policies, sorted into six categories.

- Category A: Zoning and Code Changes
- Category B: Reduce Regulatory Impediments
- Category C: Financial Incentives
- Category D: Financial Resources
- Category E: Tax Exemption and Abatement
- Category F: Land, Acquisition, Lease, and Partnerships

Staff reviewed the strategies and sorted them based on whether they are an existing City strategy or to explore as an immediate or longer-term strategy. Staff noted that Eugene has already implemented more than half of the suggested strategies, demonstrating a housing-prioritized agenda and an urgency to address the local housing crisis. **Appendix D** includes a complete summary of the staff review, including those actions that require more internal discussion or are already being implemented in some way. This full review will be integrated and refined within the City’s upcoming urban growth planning work, which is discussed in more detail in **Section 6. Next Steps**.

The following summary tables (Table 19 - Table 24) include a list of the strategies, organized by category, that staff preliminarily identified as more immediate priorities. The tables include any mitigating measures to ensure the strategy is applied appropriately in areas more vulnerable to displacement, as well as local considerations for future implementation.

In addition to the list of strategies provided by DLCD, City staff suggested several custom ideas to explore that may be implemented to increase the City’s ability to facilitate housing production, affordability, and choice. These ideas are further detailed in **Appendix D**.

The summary tables include several additional indicators to provide context to how each strategy might be effective, including Tenure Target, Affordability Target, and Housing Equity Impact.

Tenure Target

- **Rent:** Expected to impact rental housing stock and renters
- **Own:** Expected to impact homeownership housing stock and homeowners

Affordability Target

- **Subsidized:** Expected to impact housing stock and residents with below 30% Area Median Income (AMI)
- **Affordable:** Expected to impact housing stock and residents between 30-80% AMI
- **Workforce:** Expected to impact housing stock and residents between 80-120% AMI
- **Market Rate:** Expected to impact housing stock and residents over 120% AMI

Housing Equity Impact

- **DIRECT** strategies for meeting housing equity needs are focused on supply. They are needed immediately and persistently by groups that are vulnerable in the housing market. These strategies directly produce or protect affordable housing, especially for communities of color and other protected class communities. They have strong impacts for anti-displacement that can be seen in the short-term.
- **(DIRECT)** strategies are specific to affordable housing and/or protected classes and vulnerable populations but do not actually create housing.
- **INDIRECT** strategies allow for more housing overall.
- **(INDIRECT)** strategies are oriented towards smaller units or diverse housing types - they are more likely to address equity needs but may also require additional tools to focus on affordability, tenure, or accessibility. Likewise, strategies for housing preservation can be important for anti-displacement planning if they are focused on maintaining affordability along with quality.

Mitigating Measures

As established in the Anti-Displacement Analysis Toolkit from DLCDC (**Section 5.2**), some strategies may be more or less appropriate for certain area types (Vulnerable, Early Gentrification, etc.) Some strategies, when applied flatly across an entire city, may result in negative or inequitable outcomes for community members most at risk of displacement. The Mitigating Measures column in Table 19 - Table 24 is intended to highlight which strategies may have unintended negative impacts on particular area types or require the implementation of additional mitigation measures to ensure more equitable housing outcomes. This is not to imply that all strategies will have negative impacts on housing equity – many strategies work without particular concern across any area. However, some strategies are better suited for particular area types, and some strategies need special nuance or policy refinement to add special mitigation protections against further potential displacement impacts.

TABLE 19. CATEGORY A – ZONING AND CODE CHANGES SUMMARY TABLE

Category A: Zoning and Code Changes These are strategies that a city can take to proactively encourage needed housing production through zoning and code modifications. These strategies may also include regulations to ensure housing goals are met.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
A07: Allow for Single Room Occupancy (SRO) in Residential Zones	Rent	Subsidized Affordable Workforce Market-rate	DIRECT	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering. Not recommended in areas Vulnerable to displacement without other mitigating measures.
	Description: Allow for SRO, Adult Dorms, and Cohousing in all residential zones. Note: SROs may be favored due to their ability to serve more people for less cost; it is not always a better housing type for all populations. Considerations should be given to ADA accessibility when planning SROs.			
	Additional Local Considerations: The Oregon Legislature passed House Bill 3395 in 2023, which requires the allowance of SROs of up to six units on properties where you can build a single-unit development, as well as at the same density as multi-unit developments where they are allowed. The requirement takes effect January 1, 2024, and will require amendments to the Eugene Land Use Code.			
A14: Re-examine Requirements for Ground-floor Retail/Commercial	Rent	Subsidized Affordable Workforce Market-rate	INDIRECT	Appropriate for all area types; no mitigating measures
	Description: Critically re-assess requirements for ground floor retail; lively streetscape is a worthy goal, but not for every street. Jurisdictions can inadvertently impose massive costs on developers by requiring ground floor retail and commercial space even when it’s unlikely to be fully occupied or generate nearly enough revenue to pay for itself. Ground floor uses should be driven by market demand; with residential use more beneficial to meet needed housing in some cases.			
	Additional Local Considerations: Ground floor commercial is not required in many of the Suitable CFAs already, but where it applies, could be reconsidered. This change could be implemented through code amendments to the Eugene Land Use Code during CFA designation.			
A18: Increase Density near Transit Stations and Regional Multi-use Trails	Rent	Subsidized Affordable Workforce Market-rate	(INDIRECT)	Planning for transit extensions, especially in areas of early gentrification, is important; add incentives and programs to target affordability and increase impact for anti-displacement of transit-riding populations

Category A: Zoning and Code Changes These are strategies that a city can take to proactively encourage needed housing production through zoning and code modifications. These strategies may also include regulations to ensure housing goals are met.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
	<p>Description: Adopt increased density codes by right near transit stations, with higher levels of density near high capacity/high frequency stations, then stepping back into residential areas. Automatically upzone based on transportation corridor classifications; meaning wider ROWs get more flexibility in land use by right. This will add some flexibility for new transit stops, including bus stops. Be careful not to word the language so that people incorrectly assume that the density can only come after the transit has been put in place.</p>			
	<p>Additional Local Considerations: Increasing density along transit corridors aligns with the Envision Eugene Community Vision. As a part of upcoming urban growth planning, the City can consider zoning and density tools along already identified key corridors as a housing efficiency measure or policy implementation measure.</p>			
A20: Pre-Approved Plan Sets for Middle Housing Typologies	Rent Own	Subsidized Affordable Workforce Market-rate	(INDIRECT)	ADUs, cottage, and middle housing have a medium impact on preventing displacement, with planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
	<p>Description: Providing a pre-approved set of plans for middle housing typologies (ex. Cottage clusters, townhomes, and SROs). The plans would be highly efficient, designed for constrained lots and low-cost solutions, and would allow for streamlined permitting. This would help attract developers that typically develop only single-family housing to get into the missing middle housing production. Consider partnering with a university, design institution, or developing a competition to produce plans.</p>			
	<p>Additional Local Considerations: Eugene already has a successful Pre-Approved ADU Program that includes a dozen, pre-approved plan sets created by local designers. The City can build upon this existing program infrastructure to expand to middle housing types.</p>			

TABLE 20. CATEGORY B – REDUCE REGULATORY IMPEDIMENTS SUMMARY TABLE

Category B: Reduce Regulatory Impediments These strategies address known impediments to providing needed housing. These include but are not limited to process, permitting, and infrastructure impediments.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
B07: Flexible Regulatory Concessions for Affordable Housing	Rent Own	Subsidized Affordable	(DIRECT)	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering
	Description: Often, nonprofit housing developers and housing agencies face regulatory impediments to building affordable housing, which can often derail projects. This strategy provides a flexible framework for delivery of affordable housing including but not limited to reduced minimum setbacks, height bonuses, and/or allowing for flexibility in how units are delivered. This strategy is not intended to allow for a lower quality for affordable housing.			
	Additional Local Considerations: City staff advised a focus on regulatory incentives, rather than requirements, to implement this strategy. Staff would need to explore which incentives would make the greatest difference to affordable housing developers through future engagement.			
B13: Align Bike Parking Requirements with Actual Use	Rent	Affordable Workforce Market-rate	INDIRECT	Appropriate for all area types; no mitigating measures
	Description: Require bicycle parking requirements more in line with actual use. Example: No more than 1-1.5 bike parking stalls per unit.			
	Additional Local Considerations: The City will revise bicycle parking requirements as mandated through the CFEC rules. Additionally, staff believe there are opportunities to streamline and simplify the existing requirements to provide more flexibility and avoid any additional burden on housing development. This work is also a priority for the City’s Transportation Planning group.			
B14: Adopt Affirmatively Furthering Fair Housing as a Housing Policy in Comprehensive Plan	Rent	Subsidized Affordable Workforce Market-rate	(DIRECT)	Addressing affordability and equitable access for all people; as well as considering neighborhood clustering and neighborhood change as part of access to opportunity. It is an important undergirding for housing planning and directing resources; but does not create housing.
	Description: Amend the comprehensive plan to explicitly make Affirmatively Furthering Fair Housing a Housing Policy.			
	Additional Local Considerations: Development of the Housing chapter of the Envision Eugene Comprehensive Plan is included in the City’s Planning Division work plan for 2024-2026.			

TABLE 21. CATEGORY C – FINANCIAL INCENTIVES – SUMMARY TABLE

Category C: Financial Incentives				
These are a list of financial incentives that cities can offer to developers to encourage them to produce needed housing.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
C01: Reduce or Exempt SDCs for Needed Housing	Rent Own	Subsidized Affordable Workforce Market-rate	(INDIRECT)	Increase impacts by focusing SDC incentives on needed housing types from the equity housing needs analysis
	Description: Reducing, deferring, and/or financing System Development Charges (SDCs) at a low interest rate for needed housing types. This strategy reduces development costs.			
	Additional Local Considerations: SDC exemptions are an effective tool already being used for Affordable Housing development in Eugene. It is possible that this tool could be expanded to other housing types or sizes or in certain areas (e.g., downtown or Climate-Friendly Areas), or the cap for exemptions increased overall. There are a variety of SDCs (e.g., transportation, parks, compact development) that can all be reviewed and considered. Additionally, in 2024 City Council will consider a fee assistance program in the downtown core that uses Urban Renewal District funding to cover SDCs and other government-imposed fees for needed housing.			
C06: Publicly Funded Infrastructure Improvements	Rent	Subsidized Affordable Workforce	(DIRECT)	Appropriate for all area types; reduced fees have medium impacts on displacement
	Description: Fund off-site improvements for workforce or affordable housing (e.g., street intersection improvements triggered by development).			
	Additional Local Considerations: There may be opportunities to find a funding source to support infrastructure improvements, rather than “waiving” the cost for affordable or workforce housing all together. There may also be an opportunity to support phased improvements and reduce barriers for developers.			

TABLE 22. CATEGORY D – FINANCIAL RESOURCES SUMMARY TABLE

Category D: Financial Resources				
These are a list of resources or programs at the local, state, and federal level that can provide funding for housing projects, primarily subsidized affordable housing projects.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
D15: Bond - for Resident Support Services and Permanent Supportive Housing Services	Rent	Subsidized Affordable	DIRECT	Appropriate for all area types; no mitigating measures
	Description: Limited Tax General Obligation Bond that creates a funding source for supportive housing services, such as access to health care, mental health, and other social services that better support and stabilize residents who face complex challenges and will benefit from affordable housing programs.			
	Additional Local Considerations: The Eugene City Council is exploring funding options, including a bond or levy, to address homelessness, which could include housing production.			
D16: General Obligation Bonds – for Affordable Housing	Rent	Subsidized Affordable	DIRECT	Appropriate for all area types; no mitigating measures
	Description: Following the passage of Measure 102 Oregon local governments can now issue voter-approved general obligation bonds to provide direct funding for construction and other capital costs associated with the development and construction of affordable housing. These funds can be loaned or granted to both public and privately owned affordable housing projects. “Affordability” is required to be determined by voters and each jurisdiction and can be above or below minimum affordability levels established for the federal LIHTC program and other established federal and State affordable housing finance programs, defining affordability by reference to Area Median Income (AMI) as established by HUD. The bonds could be paired with other financing such as Low-Income Housing Tax Credits or could be used for homeownership opportunities.			
	Additional Local Considerations: The Eugene City Council is exploring funding options, including a bond or levy, to address homelessness, which could include housing production.			
D17: Use IHBG funds for Urban Native Americans	Rent	Subsidized Affordable	DIRECT	Appropriate for all area types; no mitigating measures
	Description: Mixing of Indian Housing Block Grants (IHBG), typically used for housing for Native Americans on reservation land, with other traditional affordable housing funding sources allows preference for Native members in urban affordable housing projects.			
	Additional Local Considerations: The Intergovernmental Tribal Relations Group is working to build relationships with local tribal governments. There is currently limited funding for this strategy but may be an opportunity.			

Category D: Financial Resources				
These are a list of resources or programs at the local, state, and federal level that can provide funding for housing projects, primarily subsidized affordable housing projects.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
D26: Reallocate Health and Public Safety Resources to Housing	Rent	Subsidized Affordable	DIRECT	Appropriate for all area types; no mitigating measures
	Description: Because healthy housing makes a huge difference in health care, public safety, and other costs, identify paths to redirect budgets from those sectors toward housing construction funds and supporting services. Use advanced modeling projections and adjust as needed over time.			
	Additional Local Considerations: This strategy would require considerable coordination with health and public safety providers and would depend on the amount available.			

TABLE 23. CATEGORY E - TAX EXEMPTION AND ABATEMENT

Category E: Tax Exemption and Abatement				
These are a list of tax exemption and abatement programs that are intended to encourage developers to produce housing.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
E04: Multiple Unit Property Tax Exemption (MUPTE)	Rent	Workforce Market-rate	(INDIRECT)	Calibrate incentives to needed housing types, e.g., affordability levels. Incentives for inclusion of affordable units work best in strong markets. Most appropriate in areas of Active or Late Gentrification (based on area typology).
	Description: This strategy can be used to incentivize production of multi-unit housing with particular features or at particular price points by offering qualifying developments a partial property tax exemption over the course of several years.			
	Additional Local Considerations: The City of Eugene already has a MUPTE Program (10-year tax exemption) in place in most of downtown Eugene. In 2024, City Council will consider an additional tax exemption options or refinements to the existing MUPTE, as a part of the Downtown Priorities and Projects work.			

TABLE 24. CATEGORY F – LAND, ACQUISITION, LEASE, AND PARTNERSHIPS SUMMARY TABLE

Category F: Land, Acquisition, Lease, and Partnerships These are strategies that secure land for needed housing, unlock the value of land for housing, and/or create partnerships that will catalyze housing developments.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
F02: Joint Development Agreements	Rent Own	Subsidized Affordable Workforce	(INDIRECT)	Important foundation with focus on housing for transit dependent people (Low income, renters, people of color, and immigrants)
	Description: The Federal Transit Administration (FTA) enables local transit agencies to enter into Joint Development Agreements (JDAs) with private or non-profit developers of low-income housing, market-rate housing, and/or commercial development. Joint Development is a process by which public transit or other local or state agencies agree to make land available at donated or reduced prices for private development, which may include affordable housing. Projects must demonstrate benefit to transit operations (ridership) and infrastructure and are subject to FTA approval.			
	Additional Local Considerations: This strategy would require coordination with Lane Transit District.			
F05: Preserving Low-Cost Rental Housing to Mitigate Displacement	Rent	Subsidized Affordable	DIRECT	Preservation is cost-effective compared to new construction and can prevent displacement in the immediate term for households in place.
	Description: Preventing displacement and preserving "naturally occurring" affordable housing through acquisition, low-interest loans/revolving loan fund for preservation, and/or code enforcement.			
	Additional Local Considerations: This strategy would require a new funding source.			
F06: Preserving Safe, Affordable Manufactured Homes	Rent Own	Subsidized Affordable	DIRECT	Most impactful in Vulnerable, Early Gentrification, and Active Gentrification types. Not applicable to Climate-Friendly Areas.
	Description: Manufactured home parks often provide a form of affordable housing stock, but are particularly vulnerable to redevelopment pressures since lots are temporarily leased out. To preserve safe, affordable options into the future, manufactured home parks may be protected through assistance that allows community purchase of the underlying land, manufactured homes and provide funds used to maintain upkeep of these dwelling units. This strategy is often implemented through use of Land Trusts, Resident-Owned Cooperatives, Public Ownership of Land, or Condominium Conversion of the real estate assets to preserve the community(ies). OHCS has regularly received lottery bonds or general funds from the Oregon Legislature to preserve manufactured home parks through either Resident Owned Cooperatives or Non-profit ownership.			

Category F: Land, Acquisition, Lease, and Partnerships				
These are strategies that secure land for needed housing, unlock the value of land for housing, and/or create partnerships that will catalyze housing developments.				
Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
	Additional Local Considerations: This strategy would require a new funding source. Affordable Housing staff noted that this strategy can be challenging to implement quickly enough to make an impact.			
F14: Right of First Refusal for Land Purchase	Rent Own	Subsidized Affordable	(DIRECT)	Appropriate for all area types; no mitigating measures
	Description: Affordable housing providers could be offered a Right of First Refusal for city, county, or state-owned land when the land would be used for affordable housing. Examples include a manufactured home program where residents can buy out the manufactured home park when the owner is ready to sell.			
	Additional Local Considerations: No additional notes.			
F18: Utilize Surplus Land Owned by Faith-Based Organizations for Affordable Housing	Rent Own	Subsidized Affordable	(DIRECT)	Appropriate for all area types; no mitigating measures
	Description: Over the past few decades, faith institutions across the country have been declining. This has prompted conversations within different faith communities about how to refocus their mission of social change. The housing affordability crisis in many cities around the country has brought these institutions into the work of creating affordable housing in their communities. This strategy would: 1) Identify faith and community-based organizations that are interested in offering their available land for development of affordable housing, 2) Provide design and finance consultation for three organizations to prepare them for future affordable housing development projects, and 3) Determine barriers to development and how those can be addressed and/or streamlined.			
	Additional Local Considerations: Faith-based organizations are currently considered as a part of the City's land bank strategy (Step 1). The City currently purchases properties and then works directly with affordable housing developers to support housing development.			

Section 6. Next Steps

Through the development of this CFA Study, the City of Eugene identified several important next steps to guide the selection and designation of Climate-Friendly Areas.

6.1 Urban Growth Planning

The City of Eugene adopted its urban growth boundary (UGB) in 2017, which includes enough land to accommodate 20 years of expected urban area growth (2012-2032). Subsequently, Eugene adopted Urban Reserves and established a Growth Monitoring Program to make it easier to assess the effectiveness of the City's urban growth strategies and to streamline future UGB updates. By leveraging the Envision Eugene Community Vision (2012), the recently adopted UGB (2017) and Urban Reserves (2023), and new Growth Monitoring Program data (e.g., building permits, density), the City will revisit the strategies to accommodate expected urban growth, now required every eight years for housing needs. This upcoming urban growth planning project is anticipated to begin in 2024.

Given the intertwining goals between urban growth planning and CFEC requirements related to housing and land use, the City of Eugene will integrate these two projects for a more cohesive approach to housing and growth management planning. Climate-Friendly Areas selection and designation will serve as an important urban growth strategy.

Several components of the urban growth planning work will specifically incorporate CFAs:

Housing Production Strategy

The Housing Production Strategy (HPS) includes priority tools, actions, and policies to address unmet housing needs in Eugene. The HPS Report will consider Climate-Friendly Areas and build on and supplement the City's Housing Implementation Pipeline. The HPS will include policy measures that use residential land more efficiently and facilitate housing production, affordability, and choice. Some of these policy measures may include strategies to preserve existing affordable housing or protect residents from displacement, as discussed in **Section 5.4**. The HPS will position Climate-Friendly Areas designation as a part of a suite of policies to increase housing production and facilitate housing choice within the urban area.

Redevelopment Analysis

With consultant support, the City will analyze redevelopment potential in targeted study areas, including Suitable CFAs. The analysis will estimate market-feasible redevelopment potential for a 20-year planning period within each study area under existing zoning and policy as well as proposed development regulations aligning with CFA criteria. The analysis will include multi-unit, mixed use, and stand-alone commercial development. The redevelopment analysis will determine the potential for increased density within Suitable Climate-Friendly Areas and may help further evaluate or narrow the most promising options.

Public Involvement

The Public Involvement Plan (PIP) for the urban growth planning work will consider housing needs, production strategies, and displacement concerns holistically. Building on the CFA community engagement approach provided in **Appendix A**, the PIP will outline meaningful and effective tactics that support the selection of Climate-Friendly Areas, as well as other strategies. The PIP will also comply with the requirements of an engagement-focused equity analysis, as required by the CFEC rules.

6.2 Considering What's Not Here

Through initial discussions with City staff, stakeholders, and the public, the project team recognizes there may be promising Climate-Friendly Areas that are not identified in this CFA Study. For example, several areas that are currently zoned as higher-density mixed-use and commercial centers were immediately excluded from further analysis given their lack of existing frequent transit service (e.g., Delta Ridge, Crescent Village, and Valley River Center). Other “neighborhood-scale” commercial centers were immediately excluded from further analysis because they do not achieve a suitable width based on current zoning (e.g., Barger Drive in the Bethel area) or are zoned as R-2 Medium Density Residential, which was not considered as an “existing or planned urban area” in this analysis but could be considered for Secondary CFAs.

This CFA Study evaluates an initial, but not necessarily comprehensive, group of Suitable CFAs. The final Climate-Friendly Areas may be a few or many of those identified here but may also include other areas identified by the public or decisionmakers through additional engagement and analysis. Additionally, as described below, CFA designation is not intended to be static. These areas can be considered for future designation as conditions change (i.e., increased transit service, increased development pressure).

6.3 Selection and Adoption

City staff intend to secure a CFA recommendation from the Planning Commission and direction from the City Council by December 2024. These steps would affirm the City’s preferred Climate-Friendly Areas configuration, identifying primary and any secondary areas based on technical analysis and public involvement. A preferred configuration is necessary to inform other elements of the urban growth planning work, as well as the development of land use code and plan amendments and initiate formal adoption.

Upon direction on a preferred CFA configuration by City Council, staff will identify and prepare changes to the Envision Eugene Comprehensive Plan, Eugene Transportation System Plan, Land Use Code, and rezoning, as needed. The scope and extent of these changes is somewhat unknown until the areas themselves are selected. Staff will need to determine the appropriate tool to designate the Climate-Friendly Areas and implement supporting land use requirements (e.g., overlay zone, zone change, or amendments to existing zones). Adoption of plan and code amendments designating Eugene’s Climate-Friendly Areas must be complete by December 31, 2026.³⁴

6.4 Monitoring and Updates

The City will monitor and potentially increase areas designated Climate-Friendly Areas during future urban growth planning, which is statutorily required for housing needs every eight years. Climate-Friendly Areas will function as an important land use efficiency measure, which is a strategy to address unmet housing needs within the current urban area such as by promoting compact housing development.

³⁴ On August 18, 2023, the DLCD Director approved an alternative deadline of December 31, 2026, for Eugene’s adoption of Climate-Friendly Areas. The original deadline in the CFEC rules was December 31, 2024.

Appendices

Appendices to Eugene’s Climate-Friendly Areas Study include:

[Appendix A. Climate-Friendly Areas Designation Community Engagement Approach](#)

This Community Engagement approach was developed in coordination with Kearns and West. It provides a menu of engagement strategies, organized by impact, level of effort, depth of involvement, as well as equity considerations based on interviews with local community-based organizations serving historically marginalized community groups. The City of Eugene will use this approach as a foundation for a formal public involvement plan for the City’s Urban Growth Strategies work. Climate-Friendly Areas selection and adoption will be a component of that larger package.

[Appendix B. LCOG Technical Analysis Package](#)

Lane Council of Governments (LCOG) completed the technical analysis supporting this CFA Study. Their work takes the form of seven technical memos. The information and details expressed in this CFA Study supersede details in the technical memos.

[Appendix C. Demographic Profiles by Suitable CFA](#)

This appendix provides a summary of key demographics for residents of each Suitable CFA, using American Community Survey (ACS) 5-year data analyzed for the displacement risk analysis.

[Appendix D. Staff Review of Housing Production Strategy Program - Full List of Tools, Actions, and Policies](#)

Staff reviewed the “Housing Production Strategy Program - List of Tools, Actions, and Policies” provided by DLCDC. The resource is a crowd-sourced, non-exhaustive list of 100+ housing production (and preservation) strategy tools, actions, and policies, sorted into six categories. This appendix serves a complete summary of the staff review, including those actions that require more internal discussion or are already being implemented in some way.