June 27, 2023

TO: Ashland Planning Commission

FROM: Bob Cortright[1]

SUBJECT: CLIMATE FRIENDLY AREA STUDY SUGGESTIONS

As you review the draft study of Climate Friendly Areas (CFAs) please consider and focus on the goal and intended outcome of this work: which is that at least 30% of the city's <u>total</u> housing units would be located in CFAs.   For Ashland, that means by 2041 a total of about 3500 housing units would be in CFA neighborhoods.   It is not clear from the CFA study whether the city will achieve this goal.

I have two suggestions for your consideration:

1. **Direct city staff to calculate how much of the city's <u>future</u> housing growth will need to be located in CFAs to meet the 30% goal.**   As noted above, the CFA study indicates that about 3500 housing units will be needed in CFAs.   However, while the study estimates the housing capacity of proposed CFAs, it does not indicate how much housing is currently located in these areas.   That's significant because the city expects only about 900 additional housing units to be built in the city by 2041. (Packet, page 175)   Consequently, unless there are about 2600 housing units currently in these CFAs and "abutting areas"[2] it's unclear that the city will reach the 30% goal.

   Census information is readily available to estimate how much housing is currently in these areas.   In addition, the city should estimate how much housing is expected in each of these areas under existing adopted plans.   Local and regional transportation plans include detailed housing allocations to specific areas - transportation analysis zones - TAZs which provide this information.

2. **Encourage the city staff to use the alternative path allowed by CFEC rules to prepare a more realistic estimate of the capacity of proposed CFAs.**   The draft study uses the "prescriptive" path in the CFEC rules to estimate housing capacity of proposed CFAs.   It should be apparent that the prescriptive method- which assumes

---

[1] Retired Transportation Planner.   For 25 years, I served as the lead transportation planner for the Oregon Department of Land Conservation and Development (DLCD).   I currently work with several environmental and climate advocacy groups in Oregon to support efforts to revise state, regional and local land use and transportation plans to meet state goals to reduce climate pollution.
[2] CFEC rules allow the city to count "abutting" or adjoining areas with high density residential that are outside of CFAs as part of CFAs for purposes of meeting the 30% goal.   The idea is to include areas that are "close enough" to CFAs so that they function as part of a CFA because people might walk or bike to the CFA.   The CFEC rule requires that such areas be within a 1/2 mile "walking distance" of a CFA in order to qualify.

that lands within CFAs will be uniformly developed or redeveloped at high densities (50-70 units per acre) dramatically overestimates the capacity of these areas to accommodate new development over the next 20 years.

While the CFEC rules include the "prescriptive method" they also allow cities to use alternative methods that better reflect local plans and conditions.   In January, 1000 Friends and I wrote to metropolitan cities alerting them to likely problems with DLCDs "prescriptive method" and [recommending use of the alternative option](#) allowed by the CFEC rules.   As the city moves forward, you should take advantage of this alternative approach to use local knowledge and information to develop a more reasonable and realistic estimate of the capacity of these areas to accommodate new housing over the next 20-25 years.

RE: Climate Friendly Area Question

YOUNG Kevin * DLCD <Kevin.YOUNG@dlcd.oregon.gov>

Wed 2023-08-02 12:27 PM

To:Derek Severson <derek.severson@ashland.or.us>

Cc:Brandon Goldman <brandon.goldman@ashland.or.us>

[EXTERNAL SENDER]
Hello Derek and Brandon,

I know that Bob is concerned about reaching our goal of having at least 30% of total housing within climate friendly areas by 2050, as am I. However, our rules for CFAs are focused on establishing zoned capacity for housing, and doing what we can to promote housing (and other) development in climate-friendly areas. Our strategy is to identify some of the key characteristics of a highly walkable, mixed-use area that will support alternative transportation choices. Those include higher densities, a variety of allowed uses, less accommodation of vehicles and more accommodations for humans, and excellent transportation facilities and services for pedestrians, cyclists, and transit-users. Those characteristics are critical if CFAs are to be successful and to make significant contributions to VMT reduction in the area. We are not telling cities where housing development must happen, but trying to optimize conditions to support climate-friendly development where it makes sense.

One area where Bob and I agree is in acknowledging that smaller scale CFAs also have a role to play. We have significantly simplified our rules in OAR 660-012-0320(9) to allow cities to designate less intensive CFAs in areas where a neighborhood center can help to reduce vehicle trips and support other transportation options. I encourage you to consider such CFAs (even beyond the 30% capacity) if there are areas in Ashland where that would make sense. (and if there are some walkable mixed-use areas that don't quite meet all the CFA requirements, they will still support our climate and equity goals, even if they're not called "CFAs")

As we implement this program, we will be using the housing production strategy work to monitor housing production in CFAs, with an eye towards reaching our 30% target over time (see OAR 660-008-0050(4)(a). I expect we will learn what is working and what is not working to promote climate-friendly development through that mechanism, which will allow local governments and DLCD to make adjustments if needed. However, there is no requirement in the rules to meet the 30% target by 2041.

Kevin Young, AICP

Senior Urban Planner | Community Services Division | Cell: 503-602-0238

Pronouns: He/Him

kevin.young@dlcd.oregon.gov| www.oregon.gov/LCD

From: Derek Severson <derek.severson@ashland.or.us>
Sent: Wednesday, August 2, 2023 11:17 AM
To: YOUNG Kevin * DLCD <Kevin.YOUNG@dlcd.oregon.gov>
Cc: Brandon Goldman <brandon.goldman@ashland.or.us>
Subject: Climate Friendly Area Question

Kevin,

We had an interesting question raised about Climate Friendly Areas at our last Planning Commission meeting by Bob Cortright.

Between now and 2041, the City of Ashland forecasts a need for 858 new dwelling units, but CFEC calls for zoning CFA's to accommodate 30 percent of our total population which equates to 3,469 dwelling units. That discrepancy has been a fundamental concern of ours as we are being asked to plan for four times the growth we anticipate based on pretty consistent historic growth rates...

But, we've been proceeding on the assumption that we need to identify CFA's with the capacity to accommodate 30 percent of our total future population. Mr. Cortright submitted comments suggesting that if we only anticipate 858 new units, we need to include 2,611 existing dwelling units within the CFAs so that we can demonstrate that 30 percent of our population will be living in the selected CFA's by 2041.

Before I assume that Mr. Cortright is just misunderstanding the rules, I wanted to clarify with you whether the intent was to identify CFAs with the capacity to accommodate 30 percent of future population or if we need to be thinking about configuring the CFAs to demonstrate 30 percent of the total population will actually be living in them by 2041.

Thanks,

Derek Severson, Planning Manager

Pronouns He/him/his

City of Ashland

Community Development

51 Winburn Way, Ashland, Oregon 97520

541.552.2040 | TTY 800.735.2900

derek.severson@ashland.or.us