

CLIMATE-FRIENDLY AREAS DESIGNATION PROCESS

COMMUNITY ENGAGEMENT APPROACH

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Climate Friendly-Areas Study

Community Engagement Plan

Contents

1	<i>Introduction</i>	1
2	<i>Project Overview</i>	2
2.1	Climate-Friendly and Equitable Communities Rules	2
2.2	Climate-Friendly Areas Designation Process	3
2.3	Equity Requirements.....	3
3	<i>Goals</i>	4
4	<i>Key Audiences</i>	4
4.1	Historically Marginalized Community Groups.....	4
4.2	Interested and Impacted Parties	6
4.3	General Public.....	7
4.4	Decision Makers.....	7
5	<i>Engagement Tools and Activities</i>	8
5.1	Informational Materials	9
5.2	Outreach Toolkit.....	10
5.3	Community Events	10
5.4	Webinars.....	11
5.5	Intercept Survey	11
5.6	Online Survey.....	12
5.7	Focus Groups/Listening Sessions.....	12
5.8	Community Briefings.....	13
5.9	In-Person Open Houses.....	13
5.10	Roundtables	14
5.11	One-on-one Interviews.....	15
5.12	Advisory Group or Committee	15
5.13	Engagement with Decision-makers.....	16
5.14	Summary of Activities.....	16
6	<i>Best Practices for Engagement of Historically Marginalized Community Groups</i> ...	17

7 *Engagement Timeline and Approach*..... 19

8 *Key Messages*..... 24

9 *Evaluation and Reporting* 24

 9.1 Quantitative Metrics 24

 9.2 Qualitative Metrics..... 24

APPENDIX: Community Leader Interview Summaries..... 26

1 INTRODUCTION

In July 2022, the Oregon Land Conservation and Development Commission adopted the Climate-Friendly and Equitable Communities (CFEC) rules to reduce climate pollution by making it easier for climate-friendly development to happen within Oregon communities.

The new rules require local governments, including Eugene, to designate Climate-Friendly Areas (CFAs). These areas are intended to be places where people can meet most daily needs without having to drive, and to accomplish this, they must accommodate a portion of the city's housing, jobs, and services in dense, urban development. The areas must be served by high-quality pedestrian, bicycle, and transit infrastructure to make it safer and easier for people to travel without a car.

As outlined in the rules, there are two phases of the CFA Designation process:

- 1) **Study Phase:** The first phase requires Eugene to study and identify potential locations for CFAs. This includes technical work, such as spatial and capacity analyses, as well as engagement work, including developing an engagement plan and gathering input from historically marginalized community groups¹ to support an engagement-focused equity analysis.
- 2) **Adoption Phase:** After the study phase, Eugene will begin the process of determining which areas will be designated as CFAs. There will likely need to be zoning and code amendments in these areas to make them comply with the state standards for CFAs. Additionally, cities must adopt a CFA element into their comprehensive plans.

This Community Engagement Approach (Approach) serves as a guide for when and how to engage stakeholders in the CFA Designation process. It lays out:

- The context for the CFA Designation process and the goals for engagement
- The different audiences that will be engaged
- A summary of potential engagement activities and key considerations for using them
- Best practices for engaging historically marginalized community groups based on input from community leaders
- An overview of key milestones in the CFA Designation process, along with the engagement objectives and potential tactics for each milestone

¹ Defined in the CFEC rules as “underserved populations” and described further in Section 4.1.

- Guidance for measuring and evaluating the effectiveness of engagement activities

This approach provides an overarching framework for engagement throughout the CFA Designation process. Project staff will tailor implementation of the strategies and tactics for each milestone based on outcomes of the technical work and the resources available for engagement. By developing and implementing this approach, the City will comply with state mandates.

This approach will be folded into a formal Public Involvement Plan for the City's Urban Growth Boundary (UGB) Update.

2 PROJECT OVERVIEW

2.1 Climate-Friendly and Equitable Communities Rules

The State of Oregon has a legislatively set policy and goal to reduce Oregon's climate pollution by 75% (of 1990 levels) by 2050 to avoid disastrous impacts to the environment, communities, and economy. Oregon is currently not on track to meet this goal, especially regarding reducing pollution from transportation. In response, in 2020, Governor Kate Brown directed state agencies to promote cleaner vehicles, cleaner fuels, and less driving. Additionally, the State of Oregon is grappling with a troubling history and current patterns of inequity and discrimination, including in its land use, zoning, and transportation investment decisions.

In 2020, the Oregon Land Conservation and Development Commission (LCDC) launched a rulemaking process² and directed the Department of Land Conservation and Development (DLCD), Oregon's land use planning agency, to draft changes to Oregon's administrative rules that guide the planning system in Oregon's eight most populous areas.

On July 21, 2022³, LCDC officially adopted the [Climate-Friendly and Equitable Communities \(CFEC\) rules](#). The rules expand the requirements for Oregon's transportation and housing planning in regions with populations over 50,000 (Albany, Bend, Corvallis, Eugene/Springfield, Grants Pass, Medford/Ashland, Portland Metro, and Salem/Keizer). The rules require those communities to change their local transportation and land use plans to comply with CFEC requirements. LCDC's stated intent in adopting the CFEC rules was to improve equity, and help community

² Climate-Friendly and Equitable Communities Outreach and Engagement Report: https://www.oregon.gov/lcd/LAR/Documents/CFEC_Rulemaking_Engagement.pdf

³ However, DLCD filed the permanent rules with the Oregon Secretary of State on August 17, 2022.

transportation, housing, and planning to serve all Oregonians, particularly those traditionally underserved.

2.2 Climate-Friendly Areas Designation Process

One part of the CFEC rules is the requirement for applicable communities to designate “Climate-Friendly Areas” (CFAs) through a two-step process: 1) study potential CFAs and then 2) adopt regulations within CFAs that align with state requirements.

As defined in the CFEC rules, CFAs are areas where people can meet most of their daily needs without having to drive. These areas are existing or planned urban mixed-use areas that contain, or are planned to contain, a greater than average mix and supply of housing, jobs, businesses, and services, and a higher intensity of development. The rules include mandatory requirements for CFAs. These requirements can be met by adopting and applying the minimum standards set forth in the rules, or by a process for local governments to craft alternative standards that meet the rules’ requirements. DLCDC expects that many of these areas will be established in existing downtowns or other established urban centers.

The rules require that jurisdictions complete and submit the CFA Study to DLCDC by December 31, 2023. On August 18, 2022 the DLCDC Director approved an alternative deadline of December 31, 2026 for the City of Eugene to complete CFA Adoption.

2.3 Equity Requirements

As part of the CFA Study Phase, the rules require cities to develop a community engagement plan with an emphasis on centering and elevating the voices of historically marginalized community groups to prioritize equitable outcomes.

The rules also require cities to evaluate whether CFA designation may lead to the displacement of historically marginalized community groups, as well as identify strategies to avoid, minimize, or mitigate those risks. This process will use both quantitative analysis and community engagement.

Project staff will coordinate with the City’s Office of Equity and Community Engagement to achieve the equity requirements of the CFEC rules, as well as meet the City of Eugene’s equity and engagement standards. Additionally, an internal CFA Study Equity Working Group will inform both quantitative and engagement-based equity work, representing various city departments involved in CFEC rules implementation.

3 GOALS

Robust community involvement is a pillar of effective governance in Eugene. The [City of Eugene Values and Principles of Public Participation](#) will guide the project from start to finish. The following goals will guide Eugene CFA project and consultant teams as they conduct engagement throughout the CFA Designation process:

- **Build awareness.** Strive for stakeholders, affected interests, and the public to be aware of the timeline, process, intended outcomes, and decision-making structure for the CFA Designation process and how it fits in with other city planning processes.
- **Center equity.** Ensure that voices of historically marginalized community groups, particularly those disproportionately harmed by past land use and transportation decisions, are engaged in ways that best meet their unique needs, to the extent that the CFEC rules and available resources provide flexibility to accomplish this goal.
- **Foster understanding.** Provide project information in ways that are accessible and relevant to a diversity of stakeholders so that they can confidently and accurately provide input.
- **Seek meaningful feedback.** Work to identify how public participation efforts can have the greatest impact within the requirements of the rules and related state laws.
- **Demonstrate accountability.** Be open to all ideas, critiques, comments, and praise, and report back on how input has influenced the process and decisions and/or why it did not.
- **Be consistent.** Ensure the community engagement process is consistent with applicable state and federal laws and requirements, and is sensitive to local policies, goals, and objectives to the extent allowed under the rules.
- **Be realistic.** Understanding the limitations of funding, resources, and timeline for CFA community engagement activities, provide stakeholders, affected interests, and the public clarity regarding the constraints, scope, and level of engagement so that their input can be meaningful and focused in areas where they can have the most impact.

4 KEY AUDIENCES

4.1 Historically Marginalized Community Groups

The CFEC rules require that, to the extent possible, the designation process centers the voices of historically marginalized community groups.

Per the rules, the list of historically marginalized community groups (underserved populations) includes, but is not limited to:

- (a) Black and African American people;
- (b) Indigenous people (including Tribes, American Indian/Alaska Native and Hawaii Native);
- (c) 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);
- (d) Immigrants, including undocumented immigrants and refugees;
- (e) People with limited English proficiency;
- (f) People with disabilities;
- (g) People experiencing homelessness;
- (h) Low-income and low-wealth community members;
- (i) Low- and moderate-income renters and homeowners;
- (j) Single parents;
- (k) Lesbian, gay, bisexual, transgender, queer, intersex, asexual, or two-spirit community members; and
- (l) Youth and seniors.

The City of Eugene chose to add students and veterans to this list.

Below is a list of groups and organizations in the Eugene area that work with one or more of the populations listed above. This list is not comprehensive and is intended to be a starting point for engagement in this process.

- American Association of Retired Persons (AARP)
- Arc of Lane County
- The Asian American Council of Oregon
- Associated Students of the University of Oregon
- Bethel School District
- Better Housing Together
- Beyond Toxics
- Black Cultural Festival
- Carry it Forward
- Catholic Community Services
- Center for Family Development
- Chinese American Benevolent Association
- Community Outreach through Radical Empowerment (CORE)
- Cornerstone Community Housing
- Daisy C.H.A.I.N. Lane
- Disability Services Advisory Council
- Easter Seals
- Escudo Latino
- Eugene Arte Latino
- Eugene 4J School District
- HIV Alliance
- Homes for Good
- Housing our Veterans
- Ideal Option
- Lane Black Student Union

- Lane Community College Long House
- Lane Council of Governments
- Lane County African American Black Student Success
- Lane County Developmental Disability Services
- Lane Independent Living Alliance
- Lane Mental Health Services
- Latino Leaders Network
- Latino Professionals Connect
- Laurel Hill Center
- League of Women Voters of Lane County
- Looking Glass Community Services
- Migrant Education Program
- Mobility International
- National Association for the Advancement of Colored People (NAACP) Lane County
- Noche Cultural
- Plaza de Nuestra Ciudad
- Queer Eugene
- Restored Connections Peer Center
- Safe Routes to School
- Shelter Care
- Springfield Eugene Tenants Association
- SquareOne Villages
- St. Vincent de Paul
- Timber Pointe Senior Living
- TransPonder
- United Way of Lane County
- University of Oregon Diversity, Equity, and Inclusion
- University of Oregon Nations Longhouse
- University of Oregon Indigenous Teachers Program
- Veterans Legacy
- White Bird Clinic
- Youth Era

The CFA Study Phase will include focused engagement with some of these groups to better understand general concerns and opportunities of the CFA Designation process on historically marginalized community groups. Once Eugene has identified more promising CFA locations, engagement will focus on the groups and communities that could be most impacted by potential CFA locations.

4.2 Interested and Impacted Parties

There are several groups, organizations, and individuals that may be particularly interested in and/or impacted by the CFA Designation process. These include but are not limited to:

- City departments and committees/boards/commissions
 - City of Eugene Planning Commission and CFEC Subcommittee
 - City of Eugene Sustainability Commission
 - City of Eugene Human Rights Commission
 - City of Eugene Active Transportation Committee
 - City of Eugene Envision Eugene Technical Advisory Committee
 - Intergovernmental Housing Policy Board

- Mayor's Youth Advisory Council
- Neighborhood Associations
- Neighborhood Leaders Council
- Property owners, businesses, and residents within promising CFAs
- Neighborhood and business associations within or near promising CFAs
- Lane Transit District
- Social service providers
- Freight interests
- Tourism agencies and interests
- Housing and community development interests
- Transportation advocates
- Environmental advocates
- Health equity advocates
- Advocates for people experiencing homelessness
- Emergency services providers
- Natural disaster risk management agencies

Focused engagement with these groups will take place based on the level of impacts, interests, and requests from these groups and organizations.

4.3 General Public

Communications and engagement for the general public will be aimed at keeping all community members up to date with project progress, ensuring clarity and consistency in messaging with other city efforts, and highlighting opportunities to get involved in project-specific involvement opportunities.

City outreach and communication channels (including the [project website](#), [Engage Eugene page](#), newsletters, social media, etc.) will be used as a foundation for sharing project information.

4.4 Decision Makers

There are two primary decision-makers for the CFA Designation process:

- **Planning Commission.** The Eugene Planning Commission, serving as the City's Committee on Citizen Involvement (CCI), will approve the Public Involvement Plan for the City's UGB Update, which will include a refined approach for CFA Designation process. The Planning Commission will make recommendations to the City Council on CFA Designation, including specific locations and subsequent land use code and comprehensive plan amendments to comply with CFEC rules. Project staff will provide regular updates and briefings to the Planning Commission on CFA technical analysis and community engagement throughout

the process. The Planning Commission will hold a public hearing as a part of the recommendation process.

- **City Council.** The Eugene City Council will ultimately adopt land use code and comprehensive plan amendments, including CFA Designation. Project staff will provide written updates to City Council on CFA technical work and community engagement throughout the process. City Council will hold a public hearing as a part of the adoption process.

5 ENGAGEMENT TOOLS AND ACTIVITIES

A variety of engagement tools and activities can be used to accomplish the engagement goals outlined in Section 3. Below is an overview of tools and strategies for engaging communities at different milestones in the process, based on decision points, resources, and intended audiences. The selected tools will depend on the outcomes of technical work to determine where there is opportunity to impact the outcome based on the CFEC rules and requirements.

This section includes a summary of each tool along with an at-a-glance breakdown of some of the key considerations for using each tool, including:

- **Level of Engagement:** What level of engagement is this tool best suited for to help with decision-making? (Based on the [IAP2 Spectrum of Engagement](#))
- **Reach:** What is the breadth of public input that can be expected from this tool? (Broad, Medium, Focused)
- **Resource Level:** What is the level of staff and financial resources required to implement this tool? (High, Medium, Low)

5.1 Informational Materials

Informational materials can be developed at key milestones in the process to keep people informed about technical work, decision points, and opportunities to provide input. Including maps and graphics can also help people easily see the potential locations of CFAs and what these areas could look like in the future based on new rules and regulations. They can be developed in a variety of mediums including:

Level of Engagement	Inform
Reach	Broad
Resource Level	Low

- Project fact sheets
- [Project webpage](#) and [Engage Eugene page](#)
- Email and social media notifications
 - Planning Division: EUG Planning Newsletter, Facebook, Instagram
 - Transportation Planning: InMotion Transportation Newsletter, Facebook, Instagram
 - Building and Permit Services: News to Build On Newsletter
 - City of Eugene: Facebook, Instagram, Engage Eugene landing page, Aqui en la Ciudad, Neighborly News
- News releases through the City’s media contacts list serve
- Maps and infographics, including a Story Map and online/interactive map of promising Climate-Friendly Areas and underlying technical analysis layers (i.e., transportation networks, development potential)
- Mailings
- Formal land use notifications to people living within Designated CFAs (when appropriate)

Equity and Accessibility Considerations

To make informational materials as accessible as possible, use graphics and imagery as much as possible, avoid jargon (use clear and simple language) and explain any technical terms. Translating documents for specific groups and audiences is also important. Consider working with community leaders to workshop and vet language and content to make it relevant and accessible to their communities. For materials posted to the web, use an accessibility analysis tool (included with Word and Adobe Acrobat) to ensure your documents are accessible to people with disabilities.⁴

⁴ See [Section 508 Amendment of the Rehabilitation Act of 1973](#).

5.2 Outreach Toolkit

An outreach toolkit is a package of information that is sent directly to key community leaders and partners that allows them to easily disseminate project information out to their wider communities and members through existing channels, such as social accounts, newsletters, or community bulletin boards. An outreach toolkit can include simplified project information, draft email, newsletter, and social media content, and flyers and posters.

Level of Engagement	Inform
Reach	Medium
Resource Level	Medium

Equity and Accessibility Considerations

Conduct necessary research to understand the history, culture, and values of the community you are targeting, to tailor the messaging and approach in a way that resonates with the community. For materials, use culturally appropriate language and imagery and use language that is understandable and accessible, and reflects the community's values and norms. Provide ample time to advertise events/input opportunities (at least 6 weeks in advance). Engage community leaders who can help connect with members of the community and promote outreach efforts. If these leaders are willing, co-create outreach materials with community leaders and have them vet language/materials before sharing them out more broadly.

5.3 Community Events

Attending community events, such as farmers markets or community celebrations, can be a valuable way to meet people where they are and engage people that may not actively participate in other engagement activities, such as an open house or online survey.

Level of Engagement	Inform/Consult
Reach	Focused
Resource Level	High

Equity and Accessibility Considerations

Attending culturally specific events can be a particularly valuable tool for reaching historically marginalized communities. Talk to community leaders to identify the best events and activities to attend, and how your attendance can be culturally respectful of the event, such as what types of giveaways to provide. Have materials available in the languages of the community and if possible, have a staff member who can communicate in the language of the community.

5.4 Webinars

Webinars can attract larger, broad, and diverse audiences, though they have limitations on soliciting meaningful input. Webinars near the beginning of the process can be a tool to share information about the overall process and initial analysis work and answer general questions. Webinars could also be used at the end of the study phase to share the findings of the study.

Level of Engagement	Inform/Consult
Reach	Broad
Resource Level	Medium

Equity and Accessibility Considerations

Webinars can be difficult for those that have visual or hearing impairments, and those that have less familiarity with webinar software. For those with visual impairments, be sure to talk through all imagery and slide content, and explicitly spell out any websites, phone numbers, or email addresses. For those with hearing impairments, use closed captioning and/or American Sign Language (ASL) interpretation. Be sure to provide contact information, preferably a phone number, for those that need assistance with technical issues and provide clear directions both in the chat and in the presentation on how to access any special webinar features, such as using the "raise hand" feature to ask a question.

5.5 Intercept Survey

Intercept surveys are short surveys or questionnaires that are conducted at a community event or activity, and similarly, engage people that may not actively participate in other engagement activities, such as an open house or an online survey. Intercept surveys could be used in tandem with attending community events to solicit input on housing and transportation needs, or desired outcomes for the designation of CFAs. Once potential locations and/or potential zoning and code changes have been identified, they could also be used to gather preferences to help narrow or refine locations.

Level of Engagement	Consult
Reach	Medium
Resource Level	Medium

Equity and Accessibility Considerations

Intercept surveys are a good tool for gathering input from historically marginalized community members. Make sure to keep surveys very short with simple, accessible questions. Incentives may be offered for participating in the survey to encourage participation and show appreciation for the community's time and effort.

5.6 Online Survey

An online survey can be a tool to gather broad input on promising CFAs and understand larger sentiments on the project from different geographic areas or demographic groups. Once a list of suitable areas is identified, a survey can be used to solicit preferences in areas or to gather concerns or considerations for these areas to help the project team refine the area boundaries.

Level of Engagement	Consult
Reach	Broad
Resource Level	Medium

Equity and Accessibility Considerations

Simple, online surveys are generally a good tool for reaching a wide array of people. Keep survey questions short and simple. Including multiple choice questions can encourage participation for those that may not want to type out an entire comment. Offer compensation as a way to encourage participation and show appreciation for the community's time and effort. For those that may not be as comfortable or familiar with online tools, provide an option to print surveys and mail them or drop them at a physical location. It can also be helpful to ask demographic questions to track how well the survey is reaching target populations and use messaging and outreach strategies to address gaps.

5.7 Focus Groups/Listening Sessions

Focus groups or listening sessions bring together a small group of people (8-10 individuals) to answer questions in a moderated setting. Focus groups and listening sessions can be a useful way to gather input from historically marginalized communities that are not well represented in other engagement activities.

Level of Engagement	Consult
Reach	Focused
Resource Level	High

Equity and Accessibility Considerations

Focus groups/listening session can be a valuable tool to gather input from historically marginalized community members. It is important that events foster a sense of comfort and ease; hold these meetings at an accessible and familiar location to the community (such as church, community center, etc.) and provide food, refreshments, and childcare as needed. The intention/objective of engagement and steps of the process should be clear and transparent from the start. Be flexible and willing to adjust the format of the event to accommodate cultural norms. Offer multiple ways to provide input (oral and written). Make sure to follow up with participants after the event with answers to their

questions and to share how their feedback is being used. Offer compensation to encourage participation and show appreciation for the participants' time and effort.

5.8 Community Briefings

Briefings with cultural interest groups, neighborhood groups, and advocacy groups offer a chance to share information, usually tailored to the groups' interests, gather feedback, and discuss key issues or concerns.

Level of Engagement	Consult/Involve
Reach	Focused
Resource Level	Low

They could be used with groups that may be particularly impacted based on the displacement analysis to better understand the potential impacts and identify ways to minimize or mitigate impacts. Community briefings with neighborhood groups can also be useful to help refine the boundaries of promising CFAs.

Equity and Accessibility Considerations

Community briefings can be a good way to reach groups that may not otherwise engage. Work with community leaders to identify the best venues and activities to provide a briefing and understand how to make the topic relevant to the community. Confirm any protocols or norms to ensure cultural respect at the event. Be interactive in these community briefings and engage participants in discussion and feedback. Make sure to follow up with participants after the briefing with answers to their questions and to share how their feedback is being used.

5.9 In-Person Open Houses

In-person open houses provide people a chance to learn about a project and engage directly with the project team and other community members. In-person open houses could be used once promising locations for CFAs have been identified. They would ideally take place within potential locations. The format could include a short presentation and then open time for attendees to review and mark up maps with project team staff members to understand potential impacts and opportunities.

Level of Engagement	Consult/Involve
Reach	Medium
Resource Level	High

Equity and Accessibility Considerations

It is important to make an open house as easy and accessible as possible to engage historically marginalized community members. To do so, consider partnering with a community group to host the event at an accessible and familiar location. Provide food, refreshments, childcare, and compensation to make it easy for people to participate and

show your appreciation for attendance. If using translation/interpretation, be sure to translate all materials, including outreach and messaging materials related to the event, and ensure that there are staff who can interpret and answer questions in a language other than English. It can also be helpful to ask demographic questions as part of a sign-in process to check if you are reaching target populations. Consider a location that is easy to get to by a variety of transportation methods for those that may not have access to a vehicle.

5.10 Roundtables

Roundtables are a way to bring together a diverse group of community leaders to solicit input at key milestones in the process. A roundtable focused on equity and displacement considerations for designating CFAs can be a useful way to gather input from key community leaders. One discussion could occur near the outset of the project to get initial input on desired community outcomes and examples of key past land use, transportation, and other decisions that allowed specific climate disruption and racism-based problems to occur. Another discussion could be a chance to review and provide input on the displacement analysis and solicit feedback on specific strategies to create greater equity and minimize negative consequences, such as those in the *Anti-Displacement Toolkit*.⁵

Level of Engagement	Collaborate
Reach	Medium
Resource Level	High

Equity and Accessibility Considerations

Hosting roundtable discussions can be a great tool to reach historically marginalized communities. When possible, work with community leaders to build an agenda and event format that is most relevant to the community; and potentially even co-facilitate the event with community leaders. Provide food, refreshments, and childcare as needed. Offer compensation to participants as an incentive and to show appreciation for their participation. Meet at locations that are accessible and convenient to the community and offer at times that the community members can attend. Make the roundtable interactive and engage participants in a variety of ways so they can provide input in ways that are most comfortable for them (oral, written, etc.). Make sure to follow up with participants after the roundtable and provide updates/share how their feedback is being used.

⁵ Anti-displacement Toolkit Guide: https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf

5.11 One-on-one Interviews

Interviews are a great tool to gather input about lived experience in a setting that allows people to be more open and candid. Interviews with community leaders could be used at the beginning of the process to better understand the issues and concerns that may arise from various groups in the designation process.

Level of Engagement	Consult
Reach	Focused
Resource Level	Medium

Equity and Accessibility Considerations

Conducting one-on-one interviews with historically marginalized community leaders can be a valuable way to build relationships and trust. Be respectful of these leaders' time and work to make the interview as easy as possible for them and provide compensation as needed to show your appreciation for their time and knowledge. When coming to the community member, be clear about the intention of the interview and how their feedback will be used in the process. Avoid tokenizing interviewees or asking them to speak on behalf of a larger group if they don't feel comfortable doing so. Use appropriate and accessible language in the interview, in the questions, and in materials. Provide background and context prior to the interview and hold a bit of space to run through that information during the interview and allow them to ask questions. Use active listening skills to ensure concerns and perspectives are heard. Follow up with the community member after the interview to answer questions and show their feedback was valued.

5.12 Advisory Group or Committee

An advisory committee could be formed to recommend CFAs to the Planning Commission and City Council. Exploration and recruitment could take place during the study phase with a formal group launched after the publication of the study and running through the adoption of code and zoning changes.

Level of Engagement	Collaborate
Reach	Medium
Resource Level	High

Equity and Accessibility Considerations

Building an advisory group or committee that includes diverse community interests is critical to an equitable advisory group. Develop a recruitment process that is accessible and focuses on equity, and work with community leaders to encourage applications from historically marginalized community groups. During meetings, work to create a safe space for people to share by using inclusive language and provide materials in advance to give people time to prepare as they need. Offer one-on-one support to help members understand the issues and challenges and more fully participate in meetings.

You can also host check-ins to get feedback on the process and adapt as needed. Offer compensation to show your appreciation for the time and commitment of members.

5.13 Engagement with Decision-makers

Throughout the study process, Eugene staff will engage with the City Council and Planning Commission to keep them informed about the process and solicit guidance at key milestones. Final decision on the designation of CFAs and associated code and zoning changes will require recommendations from the Planning Commission and adoption by the City Council.

Level of Engagement	Empower
Reach	Focused
Resource Level	Medium

Equity and Accessibility Considerations

Equity-focused decision-making is critical to a good process. If possible, make it easy for historically marginalized community members to attend and provide comments at meetings with decision-makers by hosting them at accessible times and locations. When presenting options, highlight how impacts and benefits will be distributed equitably to help inform the decision-making process. When possible and appropriate, invite community leaders from marginalized communities to help present or make comments on a proposal so that their input is shared first-hand.

5.14 Summary of Activities

Below is a table that summarizes the list of engagement activities above.

Tools and Activities	Level of Engagement	Reach	Resource Level
Informational Materials	Inform	Broad	Low
Outreach Toolkit	Inform	Medium	Medium
Community Events	Inform/Consult	Focused	High
Webinars	Inform/Consult	Broad	Medium
Intercept Survey	Consult	Medium	Medium
Online Survey	Consult	Broad	Medium
Focus Groups/Listening Sessions	Consult	Focused	High
One-on-one Interviews	Consult	Focused	Medium
Community Briefings	Consult/Involve	Focused	Low
In-Person Open Houses	Consult/Involve	Medium	High
Roundtables	Collaborate	Medium	High
Advisory Group or Committee	Collaborate	Medium	High
Engagement with Decision-makers	Empower	Focused	Medium

6 BEST PRACTICES FOR ENGAGEMENT OF HISTORICALLY MARGINALIZED COMMUNITY GROUPS

As part of the early CFA Study Phase, Eugene employed consultants to conduct interviews with key community leaders to gather input on best practices for engaging historically marginalized community groups in local transportation and housing planning projects. The community key leaders represented the following groups:

- American Association of Retired Persons
- Asian Celebration and Disorient Film Festival
- Lane Independent Living Alliance
- Migrant Education Program
- NAACP of Lane County
- ShelterCare
- Springfield Eugene Tenants Association
- Springfield School District
- TransPonder
- United Way of Lane County

Below is a summary of the common themes that these community leaders shared on how to best engage with their communities.⁶ For more details on the interviews, review the full summaries in the appendix.

- **Engage communities on their terms.** Strive to reduce barriers to engagement as much as possible by ensuring the needs of the participating community members and families are met. This can be:
 - Engaging communities at their meetings, events, and activity centers.
 - Providing refreshments and free food when possible
 - Considering kid-friendly events with childcare or activities for young people
 - Offering multiple channels and avenues for information sharing and providing input (e.g. multiple meeting dates/times, hybrid and in-person options, surveys options)
 - If possible, having presenters or speakers communicate in the same language of the meeting participants and avoid having a translator alongside a speaker
 - Considering when translation and interpretation is needed
 - If possible, offering compensation or incentives for community members to participate

⁶ These takeaways also include information from Stephanie Tabibian's (Indigenous Communities liaison) Tribal Community Planning Dialogue Event Summary Willamalane Park and Recreation District & City of Springfield report from 10/22/22 to inform how to approach tribal engagement.

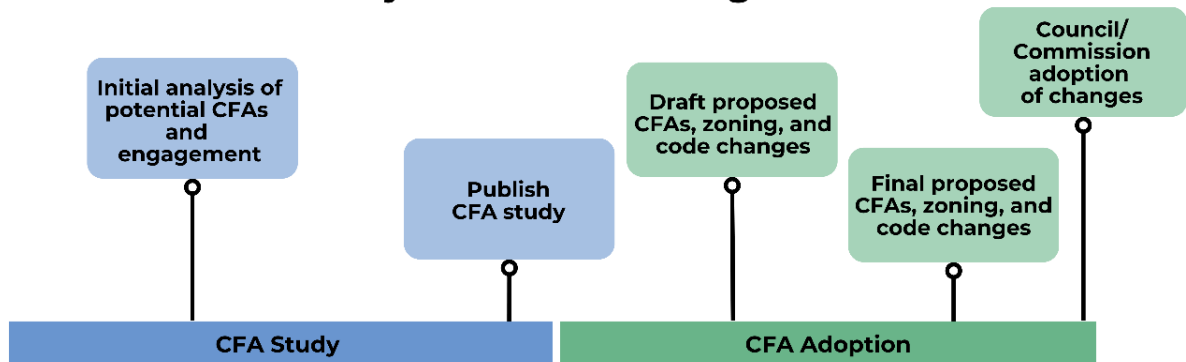
- Providing ample time to advertise events and input opportunities, aim for six weeks in advance as a goal
- Updating people on how their input was used
- **Do the work to establish trust.** Building and maintaining trust takes time and effort. At a minimum, strive for a two-step process that includes introductions and follow-up outreach. Foster trust and relationships with community ambassadors who can help spread the word about projects and input opportunities within their wider communities.
- **Strive to co-create.** Community members are often asked to come up with solutions for an environment they did not create. Avoid going to a community just for solutions but bring in information and co-create with the community.
- **Be clear about your intentions.** The intention and objective of the engagement, and how the feedback will be used, should be clear and transparent from the start.
- **Tailor the message to the audience.** Agencies often ask communities for input without clearly connecting the issues to the needs or interests of the community. Ensure materials and language are accessible, understandable, and reflective of the communities. It can be valuable to employ someone knowledgeable of the community and culture who can review the language and materials first, before sharing them more broadly. For meetings, consider co-facilitating with members of a community.
- **Be careful of tokenizing.** It is important to understand that all communities are made up of different individuals with a variety of values, interests, opinions, and lived experience. Organizational and community leaders can provide important insights but avoid over-generalizing individual input as representative of entire demographics. Strive for diverse representation in all engagement activities and celebrate intersectionality.

Community leaders provided information on what activities work well for gathering input from communities they represent, as well as what types of channels work well for sharing information. View the full meeting summaries in the appendix to learn more about the types of engagement activities and information channels that work best for each organization.

7 ENGAGEMENT TIMELINE AND APPROACH

This section provides an overview of the primary engagement milestones in the CFA Designation process along with engagement objectives and recommended tactics Eugene could use within each milestone. Actual engagement activities will depend on available resources at the time of engagement.

Climate-Friendly Areas (CFA) Designation Process



CFA Study		
Initial Engagement: Winter 2023 – Fall 2023 (<i>Inform/consult</i>)		
Engagement Objectives: General Public	Engagement Objectives: Historically Marginalized Community Groups	Potential Engagement Tactics
<ul style="list-style-type: none"> • Introduce the project, timeline, process, and expected outcomes • Develop and refine key messages 	<ul style="list-style-type: none"> • Introduce the project, timeline, process, and expected outcomes • Develop and refine key messages • Best practices for engaging underserved communities and groups • Understand potential opportunities and concerns from CFAs 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage updates • Project factsheet • Social media • Engage Eugene updates <p>Underserved Communities</p> <ul style="list-style-type: none"> • One-on-one interviews • Community events • Factsheet (<i>translated</i>) <p>Interested Parties</p> <ul style="list-style-type: none"> • Briefings <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission/CCI approval of UGB Update PIP (including CFA approach)

Publish CFA Study: Winter 2024 (<i>Inform</i>)		
Engagement Objectives: General Public	Engagement Objectives: Historically Marginalized Community Groups	Potential Engagement Tactics
<ul style="list-style-type: none"> • Share results of study, including: <ul style="list-style-type: none"> • Promising CFA locations • Displacement analysis and potential mitigation strategies 	<ul style="list-style-type: none"> • Share results of study, including: <ul style="list-style-type: none"> • Promising CFA locations • Displacement analysis and potential mitigation strategies • Share how input from initial engagement helped shape the study and displacement analysis 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage and Engage Eugene updates • Link to full study • Factsheet of key elements from study including maps • StoryMap and online interactive map of promising CFAs • Email/social media updates • Webinar/online open house <p>Historically Marginalized Communities</p> <ul style="list-style-type: none"> • Email update • Briefings • Outreach toolkit • Factsheet (<i>translated as needed</i>) • Community events <p>Interested Parties</p> <ul style="list-style-type: none"> • Briefings • One-on-one meetings <p>Decision-Makers</p> <ul style="list-style-type: none"> • City Council briefing • Planning Commission briefing

CFA Selection and Adoption		
Select Most Promising CFAs: 2024 (<i>Inform/Consult/Involve</i>)		
Engagement Objectives: General Public	Engagement Objectives: Historically Marginalized Community Groups	Potential Engagement Tactics
<ul style="list-style-type: none"> • Seek input on Suitable CFAs identified in CFA Study • Solicit additional promising CFAs • Involve in selecting most promising CFAs for Council decision 	<ul style="list-style-type: none"> • Seek input on Suitable CFAs identified in CFA Study • Involve in selecting the most promising CFAs • Understand equity considerations for Suitable CFAs • Identify any critical concerns or issues that need to be addressed • Prioritize displacement mitigation strategies 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage and Engage Eugene updates • Informational handout • Email/social media updates • Open House (virtual/in-person) • Online comment opportunity (survey/questionnaire) • Community events <p>Historically Marginalized Communities</p> <ul style="list-style-type: none"> • Email update • Briefings • Focus groups/listening sessions • Outreach toolkit • Factsheet (<i>translated as needed</i>) • Community events/intercept survey <p>Interested Parties</p> <ul style="list-style-type: none"> • Direct mail campaign to property owners, business owners, and renters within promising CFAs • Briefings • One-on-one meetings <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission briefing • City Council direction on Preferred CFA configuration

Final CFA Adoption: 2025 - 2026 (Inform/Consult)		
General Public Engagement	Engagement Objectives: Historically Marginalized Community Groups	Potential Engagement Tactics
<ul style="list-style-type: none"> • Share draft proposed CFAs and proposed zoning and code changes • Share details of final proposed CFAs and package of amendments • Highlight any revisions from draft to final based on stakeholder input • Provide opportunities for public comment and testimony prior to decisions • Clarify how CFAs are integrated with the UGB Update and Comprehensive Plan Update 	<ul style="list-style-type: none"> • Share draft proposed CFAs and proposed zoning and code changes • Share details of final proposed CFAs and package of amendments • Highlight any revisions from draft to final based on stakeholder input • Ensure opportunities for public comment and testimony prior to decisions are accessible • Share proposed housing production, preservation, and protection strategy (as a part of UGB Update) 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage and Engage Eugene updates • Informational handout • Email/social media updates • Public Hearing <p>Historically Marginalized Communities</p> <ul style="list-style-type: none"> • Email update • Direct outreach (phone, direct email) • One-on-one meetings with key stakeholders • Public Hearing <p>Interested Parties</p> <ul style="list-style-type: none"> • Direct mail campaign to property owners, tenants, and surrounding properties as required by city code • One-on-one meetings with key stakeholders • Public Hearing <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission public hearing and recommendation • City Council public hearing and decision

8 KEY MESSAGES

Key messages will be developed to maintain consistent messaging about the project's goals, process, and outcomes. These messages will be used as a basis for developing project materials including fact sheets, web content, presentation materials, etc. These messages may evolve throughout the project. Questions that key messages will aim to address include but are not limited to:

- What is this project?
- What is a climate-friendly area?
- Why is this project important?
- What is the process?
- How does this process build on past efforts in our community?
- How is equity considered in this process?
- How will the community be able to provide input to this process?
- How will this process inform future planning efforts?

9 EVALUATION AND REPORTING

The primary evaluation of community engagement will be based on the established Community Engagement Goals listed in Section 3. Both quantitative and qualitative metrics will be used to assess whether the goals of engagement are being met throughout the project. Below are a series of metrics and questions that can be used for evaluation, as appropriate, in engagement summaries, reports, and report outs.

9.1 Quantitative Metrics

- Attendance at engagement activities
- Engagement with project communications (i.e., website views, social media engagement, email opens and clicks, etc.)
- Responses to input opportunities (i.e., public commenters, survey respondents, etc.)
- Demographics of attendees and commenters where possible, including as related to historically marginalized community groups
- Number of media stories

9.2 Qualitative Metrics

General

- Are the questions and input received from stakeholders relevant, indicating that the informational materials are clear and accessible?

- Is input from stakeholders clearly documented and shared with the project team?
- Is input from stakeholders meaningfully informing the process and outcomes of the project?
- Are stakeholders made aware of how their input has been used?
- Do stakeholders feel that the process has been open, transparent, and accessible, even if they do not fully agree with the outcomes?
- Do stakeholders feel that the outreach is not repetitive to previous outreach or projects?

Equity Focused

- Are underserved communities well-represented in engagement events?
- Is input from underrepresented communities clearly highlighted and shared with the project team?
- Is input from underrepresented communities centered in the process and outcomes of the project?
- Is the project process helping to strengthen relationships between underserved communities and jurisdictions?

APPENDIX: COMMUNITY LEADER INTERVIEW SUMMARIES

In Winter 2022-2023, Kearns & West met with key community leaders in the Eugene/Springfield region to gather input on best practices for engaging historically underrepresented communities in local projects. These interviews were conducted to help inform a community engagement plan and engagement activities as Eugene and Springfield begin to implement the Climate-Friendly and Equitable Communities Rules, including designating climate-friendly areas. The half-hour interviews took place over Zoom. A series of questions were sent to interviewees prior to the interview and were used as a guide for the conversation. Below are the notes that Kearns & West captured from each conversation.

Organization	Interview Date
Springfield Eugene Tenants Association	12/20/22
Asian Celebration and Disorient Film Festival	12/21/22
ShelterCare	12/22/22
NAACP of Lane County	1/17/23
Lane Independent Living Alliance	1/20/23
AARP	1/25/23
United Way of Lane County	1/25/23
Migrant Education Program	2/2/23
TransPonder	2/6/23
Springfield School District – Equity and Inclusion Program	2/21/23

SPRINGFIELD EUGENE TENANTS ASSOCIATION

December 20, 2022

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- Messages must be tailored to renters to receive input. Affordable housing is a priority to many renters and should be used as the framework for messaging. For example, “this project will lead to more housing and bring the cost of rent down” or “the electrification of Eugene will lower bills”.
- HB2001 Middle Housing Engagement: The City of Eugene did a fine job engaging the community however the usual voices came to the table. The City of Springfield did less community engagement but more movement. Overall, community engagement is a balancing act, and the more communities are engaged, the more options are available, however, this can affect the pace of action.
- Renters are more likely to have lower income and are not usually the type of group to engage due to various circumstances (e.g., moving more often).

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- Eugene Tenant Alliances (advocacy lobbying organization): Over 1000 renters were engaged. The messaging was explicitly about the top renter concern. It is important to message in an appealing manner to renters, and not just homeowners or landlords.
- The neighborhood associations in the City of Eugene consist more of older white men of a higher income. The member makeup of these associations influences outcomes for the community. There are different housing conversations happening within and between the two cities, therefore it is important to audit what community engagement looks like in these communities.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization’s capacity and willingness to support those activities to connect with the people you serve?

- Utilize simple google form surveys. This is a very grassroots approach but has been successful for the Eugene Tenant Alliance in getting hundreds of responses.
- Springfield Eugene Tenants Association (SETA) monthly newsletter.
- Providing an image of a map with the City of Eugene's wards and asking for people to fill out which ward number they are located in can help better identify where input is coming from.

4. What channels work best for sharing information with the people your organization serves?

- Direct poster or community flyer outreach at spaces heavily frequented by renters (e.g., large apartment dwellings, laundromats, grocery stores, and public libraries). SETA can provide a list of locations.
- It would be useful to build a list of consistent renters who desire to be engaged and use that list of contacts for future efforts.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Affordable housing and non-payment evictions. The cost-effective solution to preventing local renters from becoming unhoused would be short-term emergency payments to cover bills until the renter can find work or another solution.
- Climate change directly impacts and affects renters (e.g., heatwaves or freezes) because they have less direct control of their housing amenities.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Regarding transportation, renters primarily have less access to vehicles than homeowners, so more dense, walkable areas are needed.
- The issue between EV charging and multi-family housing dwellings. Renters usually cannot purchase EV vehicles without the ability to charge them at home, which landlords must approve. This is the same for solar panels.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- SETA is interested as it is the only tenant-only service provider in Oregon and the most active in the Lane County area.
- The largest communities that struggle the most with rental units are seniors, the disabled community, and families with children. There are acute issues with BIPOC communities in the cities as the rental market is rising and becoming unaffordable.

ASIAN CELEBRATION AND DISORIENT FILM FESTIVAL

December 21, 2022

Background

- Mark was on the HB2001 Middle Housing Roundtable, representing the Disorientation Film Festival of Oregon (also a social justice organization). This organization creates films through the lens of Asian Americans.
- According to Mark, there is no cohesive Asian American community in Eugene.
- The Asian Council is an umbrella organization that may have other suggestions for whom to contact.
- There are Asian Americans and immigrants that get overlooked when decisions are made and there is also a diversity of income levels.
- Mark offered the answers below from an individual perspective and experience and not from the community in its entirety.

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- Much of the membership of the Disorient organization consists of demographically older white members, especially in Eugene. A large number of Asian Americans in the community are students and are not engaged as much since they usually move away.
- Historically the Asian American communities have had direct experiences with bias and discrimination, but not so much in recent generations.
- It is difficult and tokenizing to ask one person to represent an entire community.

- There are many nuances when it comes to planning work and that can be challenging to ask community members (without a planning background) to participate in certain projects that require this knowledge.
- It is challenging to receive the voices of people not usually heard. People are busy and do not have the time that someone else may have. For example, people with young families typically do not have as much time.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- Experience from Middle Housing: Financial situations determine the choices of housing, so the recommendation for middle housing was to ensure affordable and equitable options amongst different neighborhoods.

Climate-Friendly and Equitable Communities Planning

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- There is concern about creating denser, transit-oriented areas before the need is there. Portland has neighborhoods that have become walkable communities however Eugene is not big enough for that, though there are opportunities for areas such as the riverfront for these services.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- DisOrient's primary way of advocacy is through the lens of films. This organization does not have the capacity to engage in the CFA process. It would be too out of the field for the organization to participate in, especially considering it is not the spokesperson for Asian Americans.

8. Who else should we reach out to?

- People have different backgrounds, and there are immigrants and refugees to also consider.

SHELTERCARE

December 22, 2022

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- Fast turnarounds and deadlines for responses are problematic and should be avoided.
- Make it easy for people to participate and be clear on the objective of the meeting and how people should expect to be involved.
- Provide multiple ways for the community to provide input: verbal, in-person/zoom, written, etc. Surveys are helpful for some, but not all.
- Some of the people we work with have cell phones (lifeline) and are very tech savvy, Others do not, so ensure there is space available for all to provide input.
- ShelterCare is working on creating an advocacy board. People with lived experience will be represented on that board. This may be a good group to engage once they are established.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- Eugene Middle Housing was positive – created multiple opportunities for engagement with advance deadline dates. There were in-person events and surveys. Communication is key as is giving enough time for people to respond.
- The City of Eugene’s downtown strategy group has provided multiple opportunities for participation.
- It is critical to capture the lived experiences in engagement.
- ShelterCare can promote messaging regarding the CFA effort.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization’s capacity and willingness to support those activities to connect with the people you serve?

- It is helpful if food is provided at events as it usually leads to a good turnout.

4. What channels work best for sharing information with the people your organization serves?

- Locations for targeted outreach include: grocery stores, laundromat, urgent care centers, apartments, neighborhood grocery stores, and other places where people congregate.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Displacing people to areas where there is no access to service will have unintended consequences.
- Important to keep in mind that an unaesthetically pleasing building most likely houses people in need, and if it were torn down that would displace many people.
- The two main areas of focus of ShelterCare are behavioral health and housing.
- Unhoused population – a good portion are demographically aging and have a physical disability.
- The Eugene-Springfield area has some of the worst access to affordable housing.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- People with lived experiences have a passion for various things and will come to speak about them. Transportation is a major interest and concern.
- Affordable housing is only good by location if needs or services are close by, including transit options.

8. Who else should we reach out to?

- Other to reach out to include:
 - Kris McAlister, Carry It Forward
 - Dan Bryant, SquareOne Villages

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP OF LANE COUNTY)

January 17, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- Generally, cities and institutions address issues in a downstream approach, and oftentimes unique barriers or burdens on community members are identified, and these community members are then asked to come up with solutions for an environment they did not create. It is important to heed the insights that are guided by marginalized communities, however, do not create a situation that is entirely contingent on these very same communities coming up with the solutions to issues. For example, the NAACP has found that when solutions are not offered, institutions tend to pull back and nothing ends up happening.
- Proactivity is a crucial mindset and framework to maintain moving forward. It is more difficult to solve a problem than it is to prevent it. Cities, institutions, and leaders must try to anticipate and understand future issues or situations based on the information (data metrics, trendlines, etc.) available currently.
- It is important to co-create with the community, rather than just co-solve issues. Community members must feel they have a sense of ownership and agency.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- Members of the NAACP are available to have a conversation with any government entity at any time and share their experiences and ideas on how to move forward.
- Jerrel Brown, NAACP Environmental Climate Justice Organizer, can provide information on process and engagement with the community. Jerrel is very knowledgeable about Environmental Justice issues and gets involved in projects as a representative from the NAACP.

4. What channels work best for sharing information with the people your organization serves?

- While there is an abundance of people with different backgrounds moving into the Eugene/Springfield area, the organization is struggling in finding where these people are. It is difficult to do direct outreach (such as canvassing or mailing pamphlets) if the organization doesn't know where people are.
- When doing outreach, it is important to do a two-step process that begins with introductions and then follow-up outreach. Doing this can foster and build trust in the community.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Housing doesn't really exist as a possibility for many.
- Cities do not always utilize budgets in the best interests of all of the community (i.e., historically underserved communities). For example, the City of Eugene is beautifying and restoring its park dedicated to Dr. Martin Luther King Jr., however, the city is not meeting the basic needs of community members (no warming shelters or shelters in general). Beautification of areas is for the privileged few, and not so much for people worried about their next meal, shower, or surviving the elements.
- Cities must be intentional with their spending as it relates to tackling improvements in housing, and transportation, and providing community services that meet basic human need.
- Eugene has not addressed their houseless issue and has pushed people experiencing homelessness outside of the city.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Jerrell Brown may have more information regarding transportation.

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Engage early and often. Don't go to the community just for solutions but bring in information and co-create with the community. It is important to show up, have positivity, encourage, and find ways to bring people in so they can provide their full voice.
- Ensure language is accessible and reflective of the community.

- Representation and identifying who will reach out to the community is not just a racial or identity-based dynamic, but it's what trust and solidarity has been fostered.
- Lean into belonging and ask questions such as how the community would like to be engaged, and from whom.

LANE INDEPENDENT LIVING ALLIANCE

January 18, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- LILA functioned differently before COVID regarding their staff and programs available.
- Prior to COVID, LILA had a robust ADA team and people on staff with extensive knowledge regarding accessibility. LILA used to serve several businesses to be accessible, however, LILA no longer has the same capacity as they did before.
- LILA is working on rebuilding itself. As this CFA project moves along, LILA will want to bring along a person they are onboarding to potentially help if needed.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- LILA was involved in Envision Eugene and participated in the River Road Santa Clara Neighborhood Planning project.
- They used to have a staff on the bike advisory committee in Eugene.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- LILA has many people who use different modes of transportation and/or mobility devices. LILA is happy to draw on people in our network to see if they are interested in participating in a focus group or listening session.

- It is important to remember that people have different disabilities, including physical and mental. Also, keep in mind parents who travel with kids in their strollers.
- LILA used to do many of their events in person but has not been able to since COVID. Virtual meetings do not work for everyone because some may not have access to technology.
- LILA can host events, including a focus group of up to ten people. LILA has a well-sized conference room that is easy for people to get to from a nearby bus stop, and the building is accessible.
- LILA has not offered compensation to participate in the past but has heard that this is becoming more common.

4. What channels work best for sharing information with the people your organization serves?

- LILA is working with a marketing consultant to launch a new website and develop general marketing materials for consumers but doesn't currently have any broad communications channels that we use.
- LILA can tap into its network to find the right people and find who is the most helpful to come in and support a process focused on transportation, or for participating in specific focus groups.
- LILA can help get specific information to an individual or focus group, but not so much broadly spreading the word.
 - LILA can provide materials to consumers when they come in, however, the building is not yet fully open, and people are only coming on for one-on-one appointments.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- The lack of affordable housing is a big issue for LILA's consumers, especially for those who live on social security payments. LILA gets calls from consumers often who are looking for housing, but there is little available. This is especially hard on people without housing, and staff because there is nothing to offer.
- Housing must be near transportation and have accessible pathways for people with mobility needs.
- People with disabilities are often forgotten about in processes.
- Do not build housing that is just for people with disabilities, it should be a mix of people in housing complexes. CoHo Ecovillage in Corvallis is an example of an

intentional community that houses young families, people with disabilities, older people, and more.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- There is a good, accessible transportation system in Eugene. Regardless, improvements can be made.
- Building places far away from services or access to transportation is not good. For example, someone who lacks transportation and may have a disability would need to walk to the grocery store and only take home what they carry.
- Regarding ADA, it is important to remember that everyone's disability looks different.
- Many of LILA's consumers cannot afford a vehicle, or even a bus ride. They are very much dependent on transit or walking. It is important to get information from consumers as they are the ones experiencing the transportation system daily.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- LILA is interested in participating and hopes to bring other staff to be involved, particularly the staff person working on ADA.
- Scott at LILA is involved in climate issues and has worked with the Human Rights Commission.
- Kathy Dusing is another great resource and has worked with the Commission for the Blind.
- LILA does not have much information on those who are deaf or hard of hearing but does have relationships. They could most likely find someone from the deaf community to connect with this work if needed.

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- There is a mental health drop-in center downtown. It would be good to communicate with them and seek their input.

AMERICAN ASSOCIATION OF RETIRED PERSONS

January 25, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- Listening sessions have worked well for AARP. AARP is about to launch a series of listening sessions in Springfield with its members to discuss livable communities with a focus on the Main Street Safety project; there are 5,000+ members in Springfield.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- AARP has engaged a group of community leaders in writing an age-friendly action plan and would be interested in seeing that used to inform projects moving forward.
- The City of Eugene did a good job engaging the public for the Middle Housing project. There were several opportunities to engage through online and in-person meetings and surveys. AARP engaged members in this, asking them what services they would want nearby.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- Providing free food at events is highly suggested to increase turnout at events.
- We have found success with our listening sessions, where we start with a few brief remarks followed by a question-and-answer session/discussion with the community.
- Approaching places of worship to get in touch with older people has been helpful, as the demographics of these places tend to be older.
- AARP has had success in speaking with community members at coffee shops in town. AARP staff will notify their members that they will be at a coffee shop at a certain time of day and invite members for a free coffee and the opportunity to discuss or ask any questions to staff.

4. What channels work best for sharing information with the people your organization serves?

- The Willamalane Adult Activity Center is a potential place to conduct outreach as some of the demographic that frequents the Center may not be online.

- Going directly out to the community or community events to share information has worked well for AARP.
- AARP puts on free movies occasionally and will make pertinent announcements before the movie starts. Once the movie finishes, AARP staff will usually get some people interested and wanting to learn more.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Regarding middle housing, people want to downsize generally as they get older, which opens up larger houses for families, however, there is no middle housing that is affordable. Many of these members have money and have planned well, but cannot afford to live in a nicer, smaller place near services.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- It is important to focus on walkable communities or public transportation where people can access services.
- There are issues with transportation in Lane County. Currently, there are no Lane Transit District (LTD) routes to and from senior centers.
- Currently, bus stops are spaced at ½ mile or a ¼ mile, this is not okay for older adults, they need and want them closer. Additionally, bus stops have to be safe places for older people to want to go to, which can be difficult when many houseless people hang around these bus stops, usually for shelter.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- AARP is willing to share information about climate-friendly areas.

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Being age-friendly areas means building communities for all ages. The world is aging with about 10,000 boomers turning 65 every day, and the largest segment of that population is 85+. People are not only aging but living longer and cities

are not prepared for the influx of older adults that will come from the millennial generation. This impacts everyone in the community.

- “Older adult” is the more appropriate term and preferred language over “senior” when describing a group of people over 50 years.

UNITED WAY OF LANE COUNTY

January 25, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- It is the goal of United Way of Lane County to connect with the community through direct service. It is important to make decisions that are informed by the community and people who are impacted.
- United Way of Lane County recently launched the Racial Justice Fund. They attempted to reach out to anyone that could have been impacted by the decisions of this grant.
- Always consider who is and isn't at the table, and make sure to bring people along who are missing. Additionally, it is important to ensure people understand the intention and objective of why they are at the table. Trust is not always there, especially from historically underserved communities, so it is crucial to bring on people who have trust with these communities and let them understand the importance of their ambassadorship.
- Follow up with people after they have been engaged. It is important to report back on how the community's input was used.
- Ensure a neutral safe space for people to share and make it clear that the intention is not to add trauma to a situation.
- Requiring RSVP has been a challenge before the pandemic and especially in current times.
- Have and maintain an advisory council of diverse community members; this builds trust with the community and adds credibility to the process.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- Make it easy for community members to attend events. Meet people where they are and provide food at events.
- Holding listening sessions outside in the summertime has been successful.
- Be prepared to tailor the meeting structure appropriately. For example, if sixty people are expected and only five show up, be prepared to make the meeting more of an intimate gathering.
- Virtual and in-person meetings are both useful and provide different opportunities.
- For Zoom meetings, it's important to have an option for others whose first language is not English. For example, United Way of Lane County provided zoom options in Spanish, led by Spanish-speaking people. They had their website translated into Spanish, and a survey was also available in Spanish.
 - United Way has tried working with Centro Latino and others from Springfield regarding accessibility for the Spanish-speaking community.
- Make an intentional commitment to accessibility.
- Regarding the timing of a meeting, the organization has found that providing options after hours and during the day is helpful.
- Provide some form of childcare at events, and snack/food options for people.
- Providing some options for anonymously giving input is good, such as sending input via text message.
-

4. What channels work best for sharing information with the people your organization serves?

- Getting the word out about input and engagement opportunities is critical.
- A long lead time for notification is also important. We tried to do it at least six weeks in advance, though even longer is better.
- Have ambassadors or staff at community events with flyers in Spanish and English.
- Facebook has worked well, particularly for families.

Climate-Friendly and Equitable Communities Planning

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- Lack of access to goods and services is a concern of United Way. United Way started a pilot ride program for people during the pandemic who lacked transportation. United Way partnered with DoorDash to deliver food, medicines,

and other essential items. United Way noted many people applied for this, including those from rural communities or from people who lacked mobility.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- United Way is willing to share information and engage its community.
- United Way has a good network of “unlabeled” community leaders that they can help connect you with.

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Engage with representatives from school districts.
- There are Pacific Islander community groups in Salem that may be able to share and connect with the communities in Eugene/Springfield. A group out of Seattle recently translated all of their materials into different Pacific Islander languages and has a lot of best practices the Cities can learn from.

MIGRANT EDUCATION PROGRAM

February 02, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- It has been successful to engage communities by going where they live rather than asking them to travel somewhere for an event. The program has seen the most participation take place when people are located within their communities as it is a safe and comfortable space.
- Offer compensation if asking people to travel for an event.
- Have presenters or speakers communicate in the same language of the meeting participants and avoid having a translator alongside the speaker. Using a translator alongside a speaker has not proved successful and can cause feelings of “Othering” as people may feel called out during a meeting due to the constant pauses and back-and-forth translation that occurs. When these situations arise, people tend to not contribute, and connections are not easily made between people.

- Be mindful of culture and family.
- Be respectful of community spaces. No micro-aggressions or cultural appropriation of any kind.
- Be transparent and clear on what the community is being asked to do and what will happen with that information and participation. For a successful partnership, have clarity around objectives and expected outcomes of the engagement and ensure the needs of the participating community members and families are met.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- In Springfield, the Migrant Education Program (MEP) and other community partners held a couple of events at mobile home communities. They made arrangements with the community and opened the event to everyone. Food was provided, people could easily come out of their homes to participate, and kids were playing nearby. The space felt like home and was very well attended with great participation from community members. The Eugene Library was one of the community partners at the event and noted they had never seen so many library applications filled out at an event.
- MEP partners with several organizations for events, especially in the summer. For example, the program partnered with a cultural relations summer school for kids, and at the end of the summer they held a Mercado where they displayed students' work and there was food and music; up to 300 community members attended. MEP has also partnered with Catholic Community Services regarding utility support and food pantries.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- Childcare and food need to be provided at meetings.
- If possible, have someone knowledgeable of the community and culture vet the language, materials, and presentations that will be used.
- Have materials available in the languages the community speaks.
- Recognize the potential literacy and technology challenges of community members and provide materials in an accessible format. Use images instead of a lot of text in materials, if possible.
 - With COVID, technology literacy has increased. MEP supported many families who had little to no previous knowledge of what a computer is but have become more familiar with connecting via technology through the

pandemic. It is important to recognize the variety of needs of the community members and adapt to the needs of the audience.

4. What channels work best for sharing information with the people your organization serves?

- Flyers have worked well, but with follow-up texts and/or phone calls.
- Individual invitations have worked well. Be enthusiastic and welcoming when communicating with the community.
- It is important to reach out with reminders several times as family or work schedules can change. Many of the families the MEP serves are typically not working within the defined 8 am-5 pm work schedules.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- We receive several requests a month for rent assistance. There was a lot more funding for this at the beginning of the COVID pandemic and it now has been reduced.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- There are not many concerns regarding transportation outside of student-specific school transportation.
- Families seem to access the bus easily and a lot of carpooling occurs in the neighborhoods. Many community members travel to the more rural parts of the region to work where public transportation may not be an option.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- MEP has partnered with cities in the past. MEP has a representative on several different planning committees and serves families and pre-school to graduating high schoolers in various school districts. They have also partnered with Early Learning Hubs and United Way of Lane County.

- To partner with MEP on the CFA work, ensure transparency around the intended outcome of the engagement.

Next Steps

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Recommendation to connect with Centro Latino Americano (Ana is on the Board).

TRANSPONDER

February 06, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- It is important to have adequate representation (and not tokenization) of transgender and gender diverse persons on committees or involved in projects like these. All perspectives must be included.
- Ensure that basic accessibility is met. The LGBTQIA2S community has higher rates of disabilities than others. If meetings or events are not easily accessible, then it's likely that a portion of this community will not participate.
- It can be difficult to conduct focus groups when looking at a niche population.
- Many groups within TransPonder are more designed to be support groups.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- TransPonder sent a representative to be part of the Ad Hoc Police Reform Committee who helped draft policy.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- TransPonder conducts an annual community assessment survey in Lane County. In 2022, they received 22 responses and in 2021 they received 52 responses. The questions on the survey ask how people engage with TransPonder, where they find information, and gather demographic information including gender identity, age, sexual orientation, if they have a disability, and what county they are located in. Most people are in Lane County, but there are a few in Douglas County. The survey also inquired if they need housing and/or have healthcare coverage. Ben noted he could share some of this information separately if needed.
- Someone from the city can visit TransPonder as allies during social hours or work with TransPonder to set up a time at a coffeehouse with pamphlets and information to hold more informal conversations with the community.
- Virtual information sessions and town halls haven't been well attended but TransPonder does not want to give up on those. It may be beneficial to pair a town hall with something else that is community focused.
- It is useful to conduct surveys, especially considering town halls are not the best place to receive everyone's feedback in this community.
- TransPonder is part of a strong network of organizations that meets the needs of the larger community, such as HIV Alliance, CORE, and Looking Glass Community Services. These groups can possibly join and form a larger town hall for a future event.

4. What channels work best for sharing information with the people your organization serves?

- Email or the platform Discord work well for sharing information and having conversations in this community.
- TransPonder also has an Instagram, Facebook, TikTok, and LinkedIn page.
- The platform Meetup is another place to share information in addition to groups that are featured on Eugene's SceneThink platform.
- TransPonder has seen the most success in starting conversations via email groups or on Discord. People engage more and hold back and forth dialogue.
- Regarding age, most people in the program are adults and a small percentage are youth. The younger audience tends to prefer online/virtual engagement whereas the older population are more likely to meet in-person.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- If cities are funding development of the buildings in a CFA, then they must follow city guidelines for anti-discrimination. This community faces invisible discrimination and often gets overlooked for employment or housing.
- A lot of residential units are privately owned, so it's harder to enforce the anti-discrimination policy. It would be beneficial if TransPonder or others in the community could get on a board to address the inequity this community faces and help inform policies and procedures.
- TransPonder partners with SquareOne Villages often.
- A large portion of this community is low-income and faces displacement (including from domestic abuse or abuse from property owners/roommates). There is a great need for affordable housing.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- A good portion of this community uses public transportation or bikes. A rail system would be a very beneficial and needed mode of transportation in these cities, especially considering bus trips take longer than personal vehicle trips.
- Support for dense, mixed use affordable areas for all underserved populations.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- TransPonder works with several organizations in Lane County, including the HIV Alliance and are working on building a partnership with the NAACP. TransPonder wants to bring awareness of the work they do, and also understand what work is happening elsewhere. TransPonder would like to continue to be engaged in this effort and can potentially help by sharing information.

Next Steps

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Recommendation to reach out to the following groups/people:
 - Centro Latino Americano
 - [Noche Cultural](#)
 - Eugene Arte Latino

- Tina Gutierrez-Schmich, Director of Teaching and Learning for Equity, Access & Inclusion, Bethel School District
- Antonio Huerta, Regional Health Equity Coalition Manager, TransPonder
AntonioH@transponder.community
- Other groups that were shared:
 - CORE, Daisy CHAIN, Ideal Option, PSLC Developments Inc., South Lane Mental Health Services, Youth Era, Emergence, Center for Family Development, Housing Our Veterans, Laurel Hill Center, Looking Glass Community Services, Restored Connections Peer Center, Shelter Care, Veteran's Legacy, White Bird Clinic, Queer Eugene, and HIV Alliance.

SPRINGFIELD SCHOOL DISTRICT – EQUITY AND INCLUSION PROGRAM

February 21, 2023

General Engagement

1. What do you think makes it easy for you and the people your organization serves to meaningfully engage in community conversations like these? Have you or your organization engaged in past planning, transportation, and land use projects in the region?

- People are fatigued by the lack of action after participating in processes or filling out surveys. It is important to follow up with people after they have been engaged to foster trust and encourage future participation in engagement processes.
- Have an identified goal and process to share with communities being engaged. Communicate steps in the process and when/if progress has been made.
- Have more than one person representing their community at events or in processes to avoid feelings of isolation or tokenization; also, do not make the single person or group feel like they must fix a problem they did not cause. Make sure groups are appropriately represented and diverse.
- Encourage flexibility in engagement plans. When introducing an engagement plan to the community, be flexible and responsive in feedback/requested changes to the design of the engagement process. It is important to have buy-in from communities on how they want to be engaged. If time allows, focus groups can be a successful mechanism for establishing a community engagement plan.

2. Are there other examples of a City of Eugene or City of Springfield project that your organization/people you serve engaged in successfully? What about that engagement made it effective/meaningful?

- The Springfield School District is in the process of establishing an equity advisory committee for the school board (required by state law). To form the committee,

the District launched an open application process to the community and directly invited people. The District is reviewing the initial pool of applicants to determine which voices are missing, and who to reach out to fill those in.

3. Our upcoming planning work will gather input for a variety of reasons, for example, to inform the project approach and to identify past harms in housing and transportation. What activities work best for gathering input from the people your organization serves and what is your organization's capacity and willingness to support those activities to connect with the people you serve?

- To foster successful collaboration within a long-standing committee, it is important to put time and attention into getting to know the different engagement styles within the group, establishing principles, and ensuring the group knows how to work together and feel supported as members of a committee.
- Flexible timing is especially important when engaging parents. Offer multiple opportunities for the same event at different times. For example, offer a drop-in session several weeks in a row, at different times of the week, and stagger the times of day offered.
- Offer hybrid in-person and virtual participation at events/meetings. A virtual participation option allows for parents and other members of the community who may not be able to travel or have children to still join a call and offer their feedback.
- Survey options are always a good way to ask for feedback and provide a mechanism for those who would rather write their feedback than verbally share it.

4. What channels work best for sharing information with the people your organization serves?

- The District has a communications department that issues information through the website, social media outlets, and emails to a listserv.
- The District produces a monthly newsletter with the platform *Smore*.
- Establishing relationships with key partners/contacts of the community and organizations. Through these relationships, information can be shared, and the partners can then share the information more broadly with their representative group.
- Relationships and information sharing with key contacts leverages credibility and trust with the community.

Climate-Friendly and Equitable Communities Planning

5. What are some existing priorities and concerns for you and the people your organization serves around housing? What factors related to housing may affect

you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- The rising cost of renting and the housing market is the main concern for this community. Some families, including middle-class or financially secure families, are diverting resources from other basic needs to meet housing costs.

6. What are some existing priorities and concerns for you and the people your organization serves around transportation? What factors related to transportation may affect you and the people your organization serves regarding a sense of safety and belonging to the Eugene/Springfield area?

- For the Main Street project, there were many vocal members of the communities/local businesses that had concerns regarding car access. Input was also provided on a series of roundabouts proposed to slow traffic and increase pedestrian- and bike-friendly access. Safety has been a concern of the community.

7. As we begin the initial work to designate climate-friendly areas in our region, with which elements of the work discussed in the CFA summary might you and the people your organization serves be interested in engaging?

- The School District is the most connected to school-age children and parents. From a communications standpoint, the Springfield School District is willing to share information.

Next Steps

8. Any other ideas, suggestions, or recommendations for who to reach out to, to help us do for more equitable engagement?

- Safe Routes to School is another place where the City and School District collaborate and could be a useful contact to reach out to.

Appendix B. LCOG Technical Analysis Package

Lane Council of Governments (LCOG) completed the technical analysis supporting this Climate-Friendly Areas (CFA) Study. Their work takes the form of seven technical memorandums. ***The information and details expressed in the CFA Study supersede details in this technical analysis package.*** Table B1 below lists the seven memorandums developed by LCOG, in order of completion.

Between the completion of the LCOG technical analysis (July 2023) and the final development of the CFA Study (December 2023), City staff requested some small changes to correct errors or otherwise clarify the analysis. Rather than revising the original memos, any substantive changes are reflected in the CFA Study and described below.

TABLE B1. 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 CFA Locations. This analysis addressed basic locational requirements for CFAs, specifically urban centers within the Urban Growth Boundary, high-quality transit infrastructure, and areas that allow development based on Goal 7: Areas Subject to Natural Disasters and Hazards restrictions.

No substantive changes from the memo dated March 7, 2023.

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. Both Technical Memo #2.1 and **Section 5** of this CFA Study expand on this work.

Substantive changes from the memo dated May 10, 2023 include:

Upon further review of the results of the anti-displacement spatial analysis, City staff identified several necessary revisions. Resolution of these issues changed the results of the spatial analysis and required revised maps. The maps provided in Section 5 of the CFA Study use the corrected results. The changes to

the analysis resulted in 10 census block groups being assigned a new area typology (e.g., from Vulnerable to Early Gentrification, or from Unassigned to Vulnerable). Only 7 census block groups intersecting with Suitable CFA Locations were affected.

- **Data Suppression:** Certain data, when analyzed at the block group level, is suppressed due to a high margin of error or to protect individual identities. This was especially relevant for housing data such as median home value and median gross rent. The original analysis did not properly consider where individually suppressed indicators affected the results of an indicator set. The updated analysis considers suppressed values to be no data and removes the indicator(s) from the calculation of relevant indicator sets. Therefore, if a block group has a suppressed value for gross rent change, then the block group would not be required to meet three of the four indicator criteria to be considered an Active Housing Market. Instead, with only three indicator values in the Active Housing Market set having non-suppressed values, only two of the remaining indicator criteria would need to be met for the block group to be classified as an Active Housing Market.
- **Citywide Census Data:** The anti-displacement analysis compares census block groups to citywide data for a variety of indicators. Several data points, including the number of renter-occupied households, racial identity, and total population were incorrect in the original analysis. With updated citywide data, this subsequently changes whether an individual block group falls above or below the city average.
- **Inflation Adjustment:** The updated analysis includes 2019 inflation adjustments for 2012 data as relevant, including median household income, median gross rent, and median household income.

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.

No substantive changes from the memo dated May 21, 2023.

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 CFA areas 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.

No substantive changes from the memo dated June 30, 2023.

Technical Memo #3c - Capacity

Technical Memo #3c provided an analysis of the theoretical residential capacity of the Suitable CFA Locations. 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.

Substantive changes from the memo dated June 21, 2023 include:

The three variations of the Downtown/Campus Suitable CFA Location and their capacity calculations incorrectly included extra parcels or were missing small parcels during the initial GIS analysis (due to an auto-suppression error). These incorrect inclusions/exclusions were corrected for the CFA Study, resulting in slightly different capacity calculations as well as maps of each variation.

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.

Substantive changes from the memo dated June 29, 2023 are described in Technical Memo #2 above.

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 CFA areas 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.

No substantive changes from the memo dated June 30, 2023.



CITY OF EUGENE CLIMATE-FRIENDLY AREA STUDY

NICK SEIGAL, JACOB CALLISTER, CHLOE TRIFILIO, RACHEL DORFMAN

LANE COUNCIL OF GOVERNMENTS - 859 Willamette Street, #500, Eugene OR 97401



CONTENTS

- INTRODUCTION 5
 - Background*..... 5
 - Project Outline*..... 6
 - Overview of Technical Memorandums*..... 7
- TECHNICAL MEMORANDUM #1 – POTENTIAL CFA**..... 9
- PURPOSE 12
- BACKGROUND..... 12
- REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS 13
 - Approaches to the Rule*..... 13
 - Requirements Based on Population*..... 13
 - Locational Requirements*..... 14
- ANALYSIS 15
 - Methodology Overview*..... 15
 - Results* 17
 - Urban Centers.....17
 - High-Quality Active Transportation and Transit19
 - Safe from Natural Disasters and Hazards (Developable)27
 - Near High-Density Mixed Uses29
 - Minimum Width.....29
 - Suitable Locations for Eugene CFAs.....29
- CONCLUSIONS AND NEXT STEPS 33
 - Conclusions* 33
 - Next Steps* 33
- TECHNICAL MEMORANDUM #2 – ANTI-DISPLACEMENT** 34
- PURPOSE 36
- BACKGROUND..... 36
- REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS 37
- ANALYSIS 39
 - Methodology Overview*..... 39
 - Results* 40
 - Demographic Context40
 - Fair and Equitable Housing Policy Context42
 - Displacement Risk Analysis52
- CONCLUSIONS AND NEXT STEPS 71
 - Conclusions* 71
 - Demographic Context71
 - Displacement Risk Analysis71
 - Displacement Risk in Potential CFAs72
 - Next Steps* 74

More Detailed Results	74
Business Displacement Risk	75
Integrated Community Engagement Results on Equity, Gentrification, and Displacement	75
Mitigation of Displacement Risk	75
Consideration of Equity in Selecting CFA Locations.....	76
TECHNICAL MEMORANDUM #3A – SUITABILITY	77
CONTENTS.....	78
MAPS.....	79
PURPOSE	80
BACKGROUND.....	80
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	81
<i>Approaches to the Rules</i>	81
<i>Requirements Based on Population</i>	82
<i>Locational Requirements</i>	82
<i>Dimensional Requirements</i>	83
ANALYSIS.....	83
<i>Methodology Overview</i>	83
Criteria Previously Evaluated	84
Deferred Criteria	84
Special Note: New Area Added to Potential CFA Locations.....	85
<i>Results</i>	87
Suitable Width	87
Suitable Size	92
Suitable Locations for Eugene CFAs.....	92
CONCLUSIONS AND NEXT STEPS	104
<i>Conclusions</i>	104
Primary and Secondary Areas.....	104
<i>Next Steps</i>	105
TECHNICAL MEMORANDUM #3B – POLICY	106
PURPOSE	109
BACKGROUND.....	109
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	110
<i>Eugene’s Suitable CFAs</i>	110
<i>Applicable Zones in Eugene’s Suitable CFAs</i>	112
Overlay Zones	112
Zoning and Plan Designations.....	114
ANALYSIS.....	118
<i>Overview of Methods</i>	118
OAR 660-012-0320 (2 & 4): Outright Permitted Uses In CFAs	118
Analysis Implication	119

<i>Comparative Analysis of OAR 660-012-0320 (2 & 4) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	120
Comparison Matrix	120
Other Residential Building Types	127
Public and Semi-Public Uses	127
Streetscape	127
<i>OAR 660-012-0320 (5): Block Length</i>	127
Analysis Implication.....	128
<i>Comparative Analysis of OAR 660-012-0320 (5) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	128
Block Length.....	128
<i>OAR 660-012-0320 (7): Transportation, Parking and Broader Land Use Requirements</i>	129
Analysis Implication	129
<i>Review of OAR 660-012-0320 (7) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	130
<i>OAR 660-012-0320 (6, 8 & 9): Density and Height</i>	135
Analysis Implication	136
<i>Comparative Analysis of OAR 660-12-0320 (6 & 8) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	137
CONCLUSION	141
<i>Relative Compatibility of Zones and Suitable CFAs</i>	141
TECHNICAL MEMORANDUM #3C – CAPACITY	146
PURPOSE	148
BACKGROUND.....	148
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	150
ANALYSIS.....	151
<i>Methodology Overview</i>	151
<i>Determining Needed Housing Units</i>	151
Rule Requirements.....	151
Methodology	152
Results.....	152
<i>Calculate Dwelling Unit Capacity</i>	152
Rule Requirements.....	152
Methodology	154
Results.....	156
CONCLUSIONS.....	168
NEXT STEPS.....	168
TECHNICAL MEMORANDUM #2.1 – EQUITY ANALYSIS	169
PURPOSE	171
BACKGROUND.....	171
REQUIREMENTS FOR CFAS.....	172
ANALYSIS.....	174
<i>Overview of Method</i>	174

RESULTS	176
<i>Area Typologies in Potential CFAs</i>	176
<i>Housing Production Strategies</i>	180
Active Gentrification Summary	188
Early Gentrification Summary	192
Vulnerable Summary	196
CONCLUSIONS & NEXT STEPS	197
<i>Conclusions</i>	197
<i>Next Steps</i>	197
TECHNICAL MEMORANDUM #4 – MOST PROMISING	198
PURPOSE	200
BACKGROUND	200
ANALYSIS	201
<i>Methodology Overview</i>	201
A Narrowing Process	201
Determine the Most Promising CFA Locations	202
Downtown/Campus Variations	204
Criteria Met by All Areas	204
Evaluation Criteria	205
<i>Location Summaries</i>	206
Location 1: Chase Village	209
Location 2: Downtown/Campus	215
Location 3: Far West 11th Avenue	223
Location 4: Ferry Street Bridge	228
Location 5: Franklin/Walnut	234
Location 6: Highway 99	239
Location 7: Santa Clara Station	244
Location 8: South Willamette	250
Location 9: West 11th Avenue	255
<i>Configuration Variations</i>	259
Location 10: Downtown/Campus, Variation A	262
Location 11: Downtown/Campus Variation B	269
Location 12: Downtown/Campus Variation C	275
CONCLUSIONS AND CONSIDERATIONS	279
<i>Conclusions</i>	279
Most Promising Suitable CFA Locations by Criterion	279
<i>Considerations for CFA Selection</i>	281
NEXT STEPS	282

INTRODUCTION

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown's *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon's climate pollution reduction targets while ensuring equitable outcomes for underserved populations. *Executive Order 20-04* directed the Department of Land Conservation and Development (DLCDD), Oregon's land use planning agency, to amend rules governing Oregon's planning system for communities in Oregon's eight most populated areas.

CFAs are areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.¹

The rules require cities (and some urbanized county areas) 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 defined CFAs within their Urban Growth Boundary (UGB). CFAs will be sized to accommodate a portion of the community's housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may currently allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, requiring either adoption of the set of prescriptive development standards set out in the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

The rules also require cities to take steps to redress long-standing inequities in land use, zoning, and transportation investment (and disinvestment) decisions in the state of Oregon, a state with a long history of discrimination and racism. The rulemaking focused on reducing greenhouse gas emissions from vehicles while also building a more equitable city by improving transportation choices and creating communities where daily needs can be met by walking, biking, or taking transit.

One central outcome of this rulemaking is an increased emphasis on equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes

¹ OAR 660-012-0005(10). <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292987>

Statement,² and it included a racial equity analysis of the rules and an analysis of how the rules could be improved to serve people with disabilities. The rules use the term “Underserved Populations”, which comes from OAR Division 12 – Transportation Planning (OAR 660-012-0125) and includes a list of populations that have historically and currently experienced marginalization. The City of Eugene has elected to use the term ‘historically marginalized community groups’ and added students and veterans to the list populations. Other historically marginalized community groups include but are not limited to Black and African American people, Indigenous people, People of Color, people with limited English proficiency, people with disabilities, low-income Oregonians, youth, seniors, and more. The rules require mapping of historically marginalized community groups, local consideration of a set of anti-displacement actions, centering the voices of these groups in decision-making, and regular reporting on efforts to engage them.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete the CFA study. Kearns & West are providing public involvement assistance with a focus on developing a community engagement plan and eliciting equity and displacement concerns from the community.

PROJECT OUTLINE

The following table provides an overview of steps for LCOG’s technical analysis.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A2(2). Analysis of Most Promising CFAs (anti-displacement)	Technical Memorandum #2.1
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

² <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

OVERVIEW OF TECHNICAL MEMORANDUMS

The CFA Study takes the form of seven technical memorandums. These technical memos are attached as appendices to this section. They are summarized below for quick reference. Note that these memos were developed in the order presented below and some details expressed in later memos supersede details in earlier memos.

TECHNICAL MEMO #1 – POTENTIAL CFA

Technical Memorandum #1 is the first step in analyzing and identifying potential Climate-Friendly Areas (CFAs) in the City of Eugene. This analysis addresses locational requirements for CFAs (*OAR 660-012-0310(2)(a)-(e)*), specifically urban centers, high-quality transportation services, and areas that allow development based on Goal 7 restrictions. Further requirements - such as CFA dimensions, equity, suitability, capacity, and policy – are addressed in subsequent memos and used to select the “most promising” CFA configuration options, per *OAR 66-012-0315(4)(a)*.

OARs Addressed: OAR 660-012-0310(2); OAR 660-012-0315(4)(a)

TECHNICAL MEMORANDUM #2 – ANTI-DISPLACEMENT

Technical Memorandum #2 provides a citywide demographic profile and spatial analysis of historically marginalized community groups, an inventory of fair and equitable housing policies, and an anti-displacement analysis. The purpose of the memo is to address requirements in OAR 660-012-0315, present equity information to decision-makers to inform future Climate-Friendly Area (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.

OARs Addressed: OAR 660-012-0135; OAR 660-012-0315(4)(c); OAR 660-012-0315(4)(f)

TECHNICAL MEMORANDUM #3A - SUITABILITY

Technical Memorandum #3a identifies potential Climate-Friendly Areas (CFAs) in the City of Springfield and addresses locational requirements for CFAs (*OAR 660-012-0310(2)(a)-(e)*). Further requirements—such as CFA policy and capacity compliance with the rules—will be addressed in subsequent memos and used to select the “most promising” CFA configuration options, per *OAR 66-012-0315(4)(a)*.

OARs Addressed: OAR 660-012-0315(4)(b)

TECHNICAL MEMORANDUM #3B - POLICY

Technical Memorandum #3b provides an initial evaluation of the policy and regulatory context for Suitable Climate-Friendly Areas (CFAs) established through the preceding analyses (Technical Memos 1 and 3a). These areas are depicted in Map 1. The purpose of this memo is to continue the refinement process to identify the most promising CFAs. This memo specifically addresses compatibility through the lens of CFA code and policy requirements (outlined in OAR 660-012-0320). This evaluation will inform policy and code adjustments Eugene would need to incorporate as part of CFA adoption.

OARs Addressed: OAR 660-012-0315(4)(d)

TECHNICAL MEMORANDUM #3C - CAPACITY

This memo provides an analysis of residential capacity, which is a core part of the Eugene Climate-Friendly Areas (CFA) Study. This is one of three technical memos for analysis Step A3 of the study. It takes in data from a GIS analysis which uses data from the previous suitability analysis in Technical Memo #3a: Suitability (TM3a), as well as zoning data from the City. The capacity analysis also integrates development regulation (zoning) evaluation information from Technical Memo #3b: Policy Analysis (TM3b).

OARs Addressed: OAR 660-012-0315(4)(e)

TECHNICAL MEMORANDUM #2.1 – EQUITY ANALYSIS

Technical Memorandum #2.1 provides a summary of the results of the anti-displacement analysis (see Technical Memorandum #2) and begins to review housing production strategies that include the potential to mitigate displacement pressures for each context. The purpose of the memo is to continue addressing requirements in OAR 660-012-0315 by presenting equity information to decision-makers to inform future Climate-Friendly Area (CFA) designation.

OARs Addressed: OAR 660-012-0120; OAR 660-012-0135; OAR 660-012-0315(4)(f)

TECHNICAL MEMORANDUM #4 – MOST PROMISING CFA

Technical Memorandum #4 provides a cumulative evaluation of the factors contributing to a narrowing of “Potential” and then “Suitable” Climate-Friendly Areas to the “Most Promising” Climate Friendly Areas. The purpose of this memo is to organize these factors by Suitable CFA areas and provide a relative assessment of each area. This memo specifically addresses the requirements outlined in OAR 660-012-0315(4). This evaluation will inform the next steps Springfield will need to take as part of CFA adoption.

OARs Addressed: OAR 660-012-0315(4)(a)

TECHNICAL MEMORANDUM #1 – POTENTIAL CFA

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #1

POTENTIAL CFA

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: 3/7/2023

CONTENTS

PURPOSE	12
BACKGROUND.....	12
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	13
<i>Approaches to the Rule</i>	13
<i>Requirements Based on Population</i>	13
<i>Locational Requirements</i>	14
ANALYSIS.....	15
<i>Methodology Overview</i>	15
<i>Results</i>	17
Urban Centers 17	
High-Quality Active Transportation and Transit 19	
Safe from Natural Disasters and Hazards (Developable) 27	
Near High-Density Mixed Uses 29	
Minimum Width 29	
Suitable Locations for Eugene CFAs 29	
CONCLUSIONS AND NEXT STEPS	33
<i>Conclusions</i>	33
<i>Next Steps</i>	33

TABLES

Table 1. Technical Analysis Overview.....	13
Table 2. Urban Centers Data Source.....	17
Table 3. Urban Centers Zoning Classifications	17
Table 4. High-Quality Transit Data Sources	19
Table 5. High-Quality Pedestrian Services Data Sources.....	22
Table 6. High-Quality Bicycle Network Data Sources.....	22
Table 7. Safe from Natural Disasters and Hazards (Developable) Data Source.....	27

MAPS

Map 1. Urban Centers.....	18
Map 2. High-Quality Transit Services.....	20
Map 3. High-Quality Pedestrian Services.....	23
Map 4. High-Quality Bicycle Services	24
Map 5. High-Quality Active Transportation and Transit Services.....	26
Map 6. Safe from Natural Disasters and Hazards (Developable).....	28
Map 7. Combined CFA Locational Criteria.....	30
Map 8. Potential CFA Locations	32

Note: All maps included in this memo are illustrative and should be used for reference only. All maps are also available as georeferenced PDF files in A4 page size. These allow a much higher-resolution view of each map, as well as the ability to view them in GIS or CAD software.

PURPOSE

Technical Memorandum #1 is the first step in analyzing and identifying potential Climate-Friendly Areas (CFAs) in the City of Eugene. This analysis addresses locational requirements for CFAs (OAR 660-012-0310(2)(a)-(e)), specifically urban centers, high-quality transportation services, and areas that allow development based on Goal 7 restrictions. Further requirements - such as CFA dimensions, equity, suitability, capacity, and policy - will be addressed in subsequent memos and used to select the “most promising” CFA configuration options, per OAR 66-012-0315(4)(a).

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown’s *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon’s climate pollution reduction targets 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 Oregon’s eight most populated areas.

CFAs are areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.

The rules require cities (and some urbanized county areas) 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 defined CFAs within their Urban Growth Boundary (UGB). CFAs will be sized to accommodate a portion of the community’s housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may currently allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, requiring either adoption of the set of prescriptive development standards set out in the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete the CFA study. K&W are providing public involvement assistance with a focus on developing a community engagement plan and eliciting equity and displacement concerns from the community.

Table 1 provides an overview of steps for LCOG’s technical analysis.³ This Technical Memorandum addresses the first step in the study phase: identification of potential CFAs in the City of Eugene.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
⇒ Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS

APPROACHES TO THE RULE

An element of the final CFA study, as described in *OAR 660-012-0315(4)(a)*,⁴ is to map all “potential” CFA options. The way the rule is written, jurisdictions have some flexibility in how they approach the study phase. LCOG identified two general approaches to conducting CFA studies: the “expanding” approach and the “narrowing” approach. The “expanding” approach involves picking one or more CFA candidate areas (using some other criteria) to evaluate against the criteria in the rule and then expanding iteratively until the CFA(s) meet the requirements. The “narrowing” approach involves looking citywide at all potential locations that could serve as CFAs and then narrowing to select top candidates through an iterative process based on the criteria in the rule. The City of Eugene has chosen the “narrowing” approach.

REQUIREMENTS BASED ON POPULATION

There are different requirements in the rule based on jurisdiction population. Given a 2022 official population estimate⁵ of 178,259,⁶ the City of Eugene is subject to requirements for cities greater than 10,000, including designating one or more CFA with enough theoretical residential capacity to

³ LCOG is the technical lead for the CFA study, and K&W is leading public outreach that will be ongoing throughout the CFA study process.

⁴ <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293018>

⁵ City population is as determined by the most recently certified Portland State University Population Research Center population estimate, per *OAR 660-012-0310(4)*.

⁶ Portland State University Population Research Center, *2022 Certified Population Estimates, July 1*. Retrieved from <https://www.pdx.edu/population-research/population-estimate-reports> on 12/21/2022.

accommodate 30% of current and future housing needs from the City's most recently adopted and acknowledged housing capacity analysis. CFA theoretical zoned housing capacity will be addressed in a subsequent memo.

Additionally, because Eugene's population is over 25,000, the City must adopt at least one CFA with a minimum of 25 acres which includes the most intensive development standards required per local government size, as provided in *OAR 660-012-0320(8)* or *(9)*. These areas are called "Primary CFAs." For these larger local governments, additional ("secondary") CFAs may be designated with less intensive standards as provided in the rule to achieve the required housing capacity. CFA dimensions will be addressed in a subsequent memo.

LOCATIONAL REQUIREMENTS

The locational requirements for a CFA are identified in *OAR 660-012-0310(2)(a)-(f)*⁷ and are also described in the *Climate-Friendly Areas Methods Guide*.⁸

Per the rule, potential CFA locations are:

- **Urban Centers** – In existing or planned urban centers, such as:
 - Downtowns
 - Neighborhood Centers
 - Transit-Served Corridors⁹
 - Other Similar Districts
- **Inside the City's Urban Growth Boundary** – Inside city limits or - subject to additional conditions¹⁰ - inside the UGB.
- **Accessible via High-Quality Active Transportation and Transit** – Served by existing or planned high-quality pedestrian, bicycle, and transit infrastructure.
- **Safe from Natural Disasters and Hazards ("Developable")** – The rule requires that CFAs 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 in those areas.
- **Near High-Density Mixed Uses** – Within or near areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities.

⁷ <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293019>

⁸ *Climate-Friendly Areas Methods Guide*. DLCDC. 2022. p.3. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022.

⁹ The relevant area for high-quality transit corridor is typically defined in *OAR 660-012* as within a half-mile of the transit corridor. See for example, *OAR 660-012-440*.

¹⁰ Contiguity with the city limits; readily serviceable with urban water, sewer, stormwater, and transportation; has a historical precedent for timely annexation; has compatible future zoning; and has compatible plan designations; per *OAR 660-012-0310(2)(e)*.

- **A Minimum of 750 Feet Wide** – CFAs shall have a minimum width of 750 feet, including any internal rights of way that may be unzoned. Contiguous CFAs with distinct land use requirements will meet the minimum width requirements. Some exceptions to the minimum width may be allowed.¹¹

OAR 660-012-310(2)(a) specifies that CFA locations support development consistent with CFA land use requirements. In the *Climate-Friendly Areas Methods Guide*,¹² DLCD recommends that the following be addressed to meet this requirement:

- **Served by Adequate Infrastructure** – Able to support development consistent with the land use requirements of a CFA, including having existing and planned water, sewer, and stormwater infrastructure capacity.
- **Ready for Development** – Areas with sufficient development and redevelopment potential to support development for at least the next 5 years.

ANALYSIS

METHODOLOGY OVERVIEW

The locational criteria described in the preceding section were assessed for all areas within the City of Eugene UGB. In a few cases, locational criteria were either *skipped* or *deferred* to a later step in the analysis. Locational criteria were *skipped* if they did not add any spatial refinement (i.e., if other criteria had already adequately narrowed the study area):

- Additional criteria associated with locating a CFA outside of city limits can be skipped, because the analysis of the base criteria did not identify any locations suitable for potential CFAs outside of Eugene’s city limits. Additional requirements for areas outside the city limits can be revisited, if any such areas are selected later, with the help of Eugene Public Works staff, in Step A4 or thereafter.

Locational criteria were *deferred* to a later step in the analysis (1) if it was deemed to be more efficient to analyze them later once the field of potential CFAs has been narrowed or (2) if there is a mismatch with the locational analysis phase (i.e., the criterion doesn’t lend itself to area interpretation):

- Typically, the criterion that a CFA be in or near existing or planned high-density mixed-use areas is already partially met by an urban center (by definition, a planned high-density mixed-use area) and by the intent of the land use requirements of the CFA itself (by definition, any CFA will be a planned high-density mixed-use area). This criterion can also be interpreted as an additional “narrowing” or “suitability” criterion that helps identify the best CFA option from a pool of candidates. For example, one potential CFA might be “more

¹¹ 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.

¹² *Climate-Friendly Areas Methods Guide*. DLCD. 2022. p.11. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022.

promising” or suitable than another because it is adjacent to or near existing or planned high-density mixed-use areas and the other is not. This analysis suggested that we move this consideration to the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.

- For efficiency reasons, City staff directed LCOG to analyze only the most promising CFA options for (1) infrastructure capacity and (2) development readiness potential. This moved the assessment of these two criteria to the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*. Urban centers identified in this memo will already tend to meet these criteria.
- There is considerable overlap between high-quality active transportation and high-quality transit. For this phase of the analysis, access to high-quality transit (defined as within half mile walking distance of a frequent transit corridor) was used as a proxy for high-quality active transportation, which will be examined more closely in the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.
- Dimensional requirements will be met in a later step by adjusting the potential CFA boundaries and zoning the additional area to meet requirements for CFAs. It will be more efficient to analyze these criteria during the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.
 - For the 750-foot minimum requirement, a method of calculation will need to be developed, and once applied, it will be used to fine-tune potential CFAs selected for consideration based on other criteria.
 - The 25-acre minimum requirement for at least one primary CFA is being treated as a suitability classifier (potential primary CFA must be over this size, so all potential CFAs will be classified into candidates for primary or secondary CFA by size).

The remaining three locational criteria - Urban Centers, High-Quality Transit Corridors, and Developable - were assessed using a GIS analysis, with the output of that analysis being a GIS layer representing areas that meet that criterion (see Results). Input layers and definitions were provided by the City and all analysis was performed by LCOG. See the Results section for additional notes on methodology specific to each locational requirement.

RESULTS

Urban Centers

Map 1 (page 9) shows urban centers. The City of Eugene chose to define their existing and planned “urban centers and similar districts” in terms of zoning. Table 3 lists the zones used in the analysis. These zones were dissolved to create a single Urban Centers by Zoning layer.

TABLE 2. URBAN CENTERS DATA SOURCE

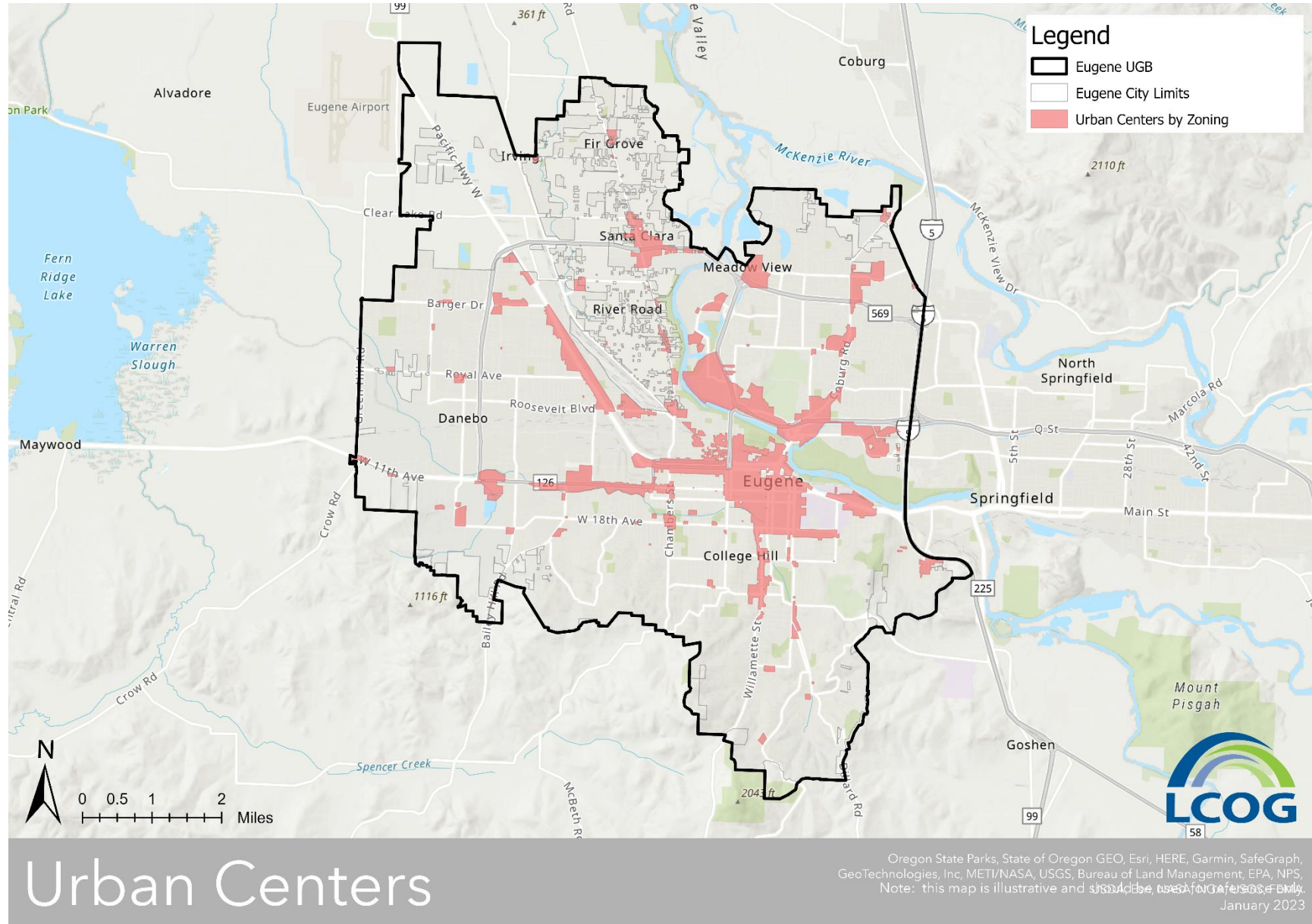
Item	Source
Eugene Zoning	LCOG (Eugene) ¹³

TABLE 3. URBAN CENTERS ZONING CLASSIFICATIONS

Zone Name and Code
NEIGHBORHOOD COMMERCIAL -- C-1
COMMUNITY COMMERCIAL -- C-2
MAJOR COMMERCIAL -- C-3
GENERAL OFFICE -- GO
LIMITED HIGH-DENSITY RESIDENTIAL -- R-3
HIGH-DENSITY RESIDENTIAL -- R-4
CHAMBERS SPECIAL AREA/COMMUNITY COMMERCIAL -- S-C/C-2
DOWNTOWN RIVERFRONT SPECIAL AREA/MIXED USE -- S-DR/MU
DOWNTOWN RIVERFRONT SPECIAL AREA/MIXED-USE/ACTIVE -- S-DR/MU/1
DOWNTOWN RIVERFRONT SPECIAL AREA/MIXED-USE/PEOPLE -- S-DR/MU/2
DOWNTOWN WESTSIDE SPECIAL AREA -- S-DW
FIFTH AVENUE SPECIAL AREA -- S-F
ROYAL NODE SPECIAL AREA/MAIN STREET COMMERCIAL -- S-RN/MSC
ROYAL NODE SPECIAL AREA/COMMERCIAL MIXED USE -- S-RN/CMU
WALNUT STATION SPECIAL AREA/FRANKLIN CORRIDOR -- S-WS/FC
WALNUT STATION SPECIAL AREA/GARDEN AVENUE -- S-WS/GA
WALNUT STATION SPECIAL AREA/TRANSITION EDGE 15TH -- S-WS/TE-15
WHITEAKER SPECIAL AREA -- S-W

¹³ Data retrieved from RLIDGeo regional geodatabase on 2/22/2023.

MAP 1. URBAN CENTERS



High-Quality Active Transportation and Transit

HIGH QUALITY TRANSIT

The rules do not define “high-quality” transit services but do provide some language that can guide us:

- *OAR 660-012-0710(1)* describes CFAs as having connected local **transit networks** that serve key destinations and can be accessed by housing and jobs within the planning area.
- *OAR 660-012-0360(1)* describes “**key destinations**” as destinations determined locally that are expected to attract a higher-than-average rate of pedestrian, bicycle, or transit trips.

The City of Eugene has worked with LCOG to develop the following definition of high-quality transit services:

- **High-Quality Transit Services** – Areas within a half-mile walkable distance to frequent transit corridors.

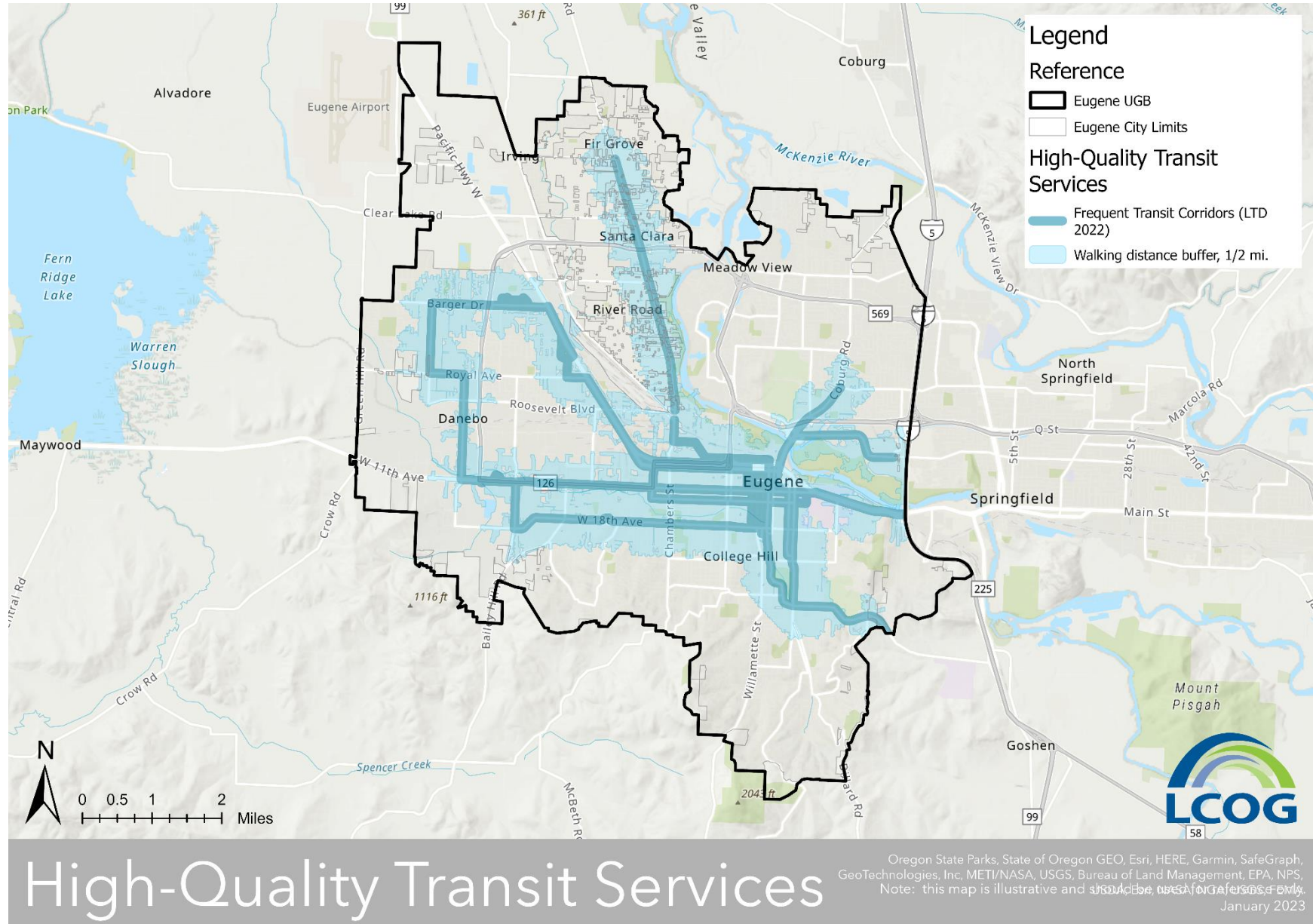
Map 2 (page 11) shows high-quality transit services. The City chose to use the frequent transit corridors provided by Lane Transit District (LTD). In previous work performed to support the parking reform required under *OAR 660-012-0400* to *-0450*, LCOG staff performed an analysis to find the half-mile walkable distance from the frequent transit corridors and that buffer area was used as the area served by high-quality transit.

TABLE 4. HIGH-QUALITY TRANSIT DATA SOURCES

Item	Source
2022 Frequent Transit Corridors	Lane Transit District ¹⁴
Half-Mile Walking Distance Buffer	LCOG

¹⁴ Retrieved from Regional GIS Data archive on 1/25/2023. Source Lane Transit District, 2022.

MAP 2. HIGH-QUALITY TRANSIT SERVICES



HIGH-QUALITY PEDESTRIAN AND BICYCLE SERVICES

Similar to “high-quality” transit service, the CFA rules do not explicitly define “high-quality” pedestrian or bicycle services. The intent is to demonstrate a baseline of existing and planned facilities – shared use paths, sidewalk paths, protected bike lanes, accessways, and neighborhood greenways – that are appropriate for all ages and abilities. For bicycle facilities, all ages and abilities includes: (a) school-age children; (b) people over 65 years of age; (c) women; (d) people of color; (e) low-income riders; (f) people with disabilities; (g) people moving goods, cargo, or other people; and (h) people using shared mobility services.¹⁵ Additionally, the Transportation Planning Rule (Division 12) does provide some language that can guide us:

- OAR 660-012-0005(10) describes CFAs as having **pedestrian services** that are well-designed and a connected pedestrian environment that provides direct and convenient connections to **key destinations** within the city.
- OAR 660-012-0610(2) describes CFAs as having **bicycle services** that are “a connected network of bicycle facilities that provides a safe, low stress, direct, and comfortable experience for people of all ages and abilities.”
- OAR 660-012-0360(1) describes “**key destinations**” as destinations determined locally that are expected to attract a higher-than-average rate of pedestrian, bicycle, or transit trips.

The City worked with LCOG to develop the following definitions of high-quality pedestrian and bicycle services:

- **High-Quality Pedestrian Services** – Areas served by *complete* and connected, direct and convenient, well-designed, and *well-illuminated (with LED lights)*, accessible pedestrian services (sidewalks and paths) that provide a safe, low-stress, and comfortable experience for people of all ages and abilities. [*Note: components in italics are currently quantifiable with available data.*]
- **High-Quality Bicycle Services** – Areas served by *complete* and connected, direct and convenient, well-designed, and *well-illuminated (with LED lights)*, accessible bicycle services (paths and corridors) that provide a safe, low-stress, and comfortable experience for people of all ages and abilities. [*Note: components in italics are currently quantifiable with available data*]

Map 3 (page 14) and Map 4 (page 15) show pedestrian services and bicycle services, respectively. The City does not currently have area-based GIS layers that reflect these definitions. However, the City identified several available layers that represent aspects of high-quality pedestrian services (sidewalk network presence/absence, crossing safety and accessibility, street, and park lighting) and high-quality bicycle services (bicycle facility network presence/absence, street, and park lighting).

Since service area data are not available yet for high-quality pedestrian and bike services, only the pedestrian and bicycle network feature presence/absence data are shown in the maps below. Areas served by high-quality services are not yet delineated. For the purpose of this analysis, the

¹⁵ OAR 660-012-0610(2).

areas of higher line density suggest where high-quality services are most available (e.g., downtown). ADA ramps and traffic signals were evaluated but are not shown on the map since they cannot be shown effectively at this scale, especially with the pedestrian network on the map. These elements will be shown later in the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)* when CFA candidate areas are mapped at a more granular level.

TABLE 5. PEDESTRIAN SERVICES DATA SOURCES

Item	Pedestrian Network Source
Planned pedestrian improvements	2017 Eugene Transportation System Plan (TSP) ¹⁶
Sidewalks	Eugene Mapping Hub ¹⁷
Streetlights and park lights	Eugene GIS ¹⁸ (<i>not shown on map</i>)
ADA ramps	Eugene Mapping Hub ¹⁹ (<i>not shown on map</i>)
Traffic signals	Eugene Mapping Hub ²⁰ (<i>not shown on map</i>)

TABLE 6. BICYCLE SERVICES DATA SOURCES

Item	Bicycle Network Source
Planned bicycle improvements	2017 Eugene TSP ²¹
Bike Network	Central Lane Metropolitan Planning Organization ²²
Streetlights and park lights	Eugene GIS ²³ (<i>not shown on map</i>)

¹⁶ Source data extracted from <https://mapping.eugene-or.gov/datasets/Eugene-PWE::eugene-2017-bike-and-pedestrian-tsp-project-hub/about> on 1/25/2023.

¹⁷ Source data extracted from <https://mapping.eugene-or.gov/datasets/Eugene-PWE::eugene-sidewalks-hub/about> on 1/25/2023.

¹⁸ Source data received in file geodatabase format from the City on 1/25/2023.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

²² Data maintained by CLMPO and retrieved from the RLIDGeo regional geodatabase on 1/25/2023.

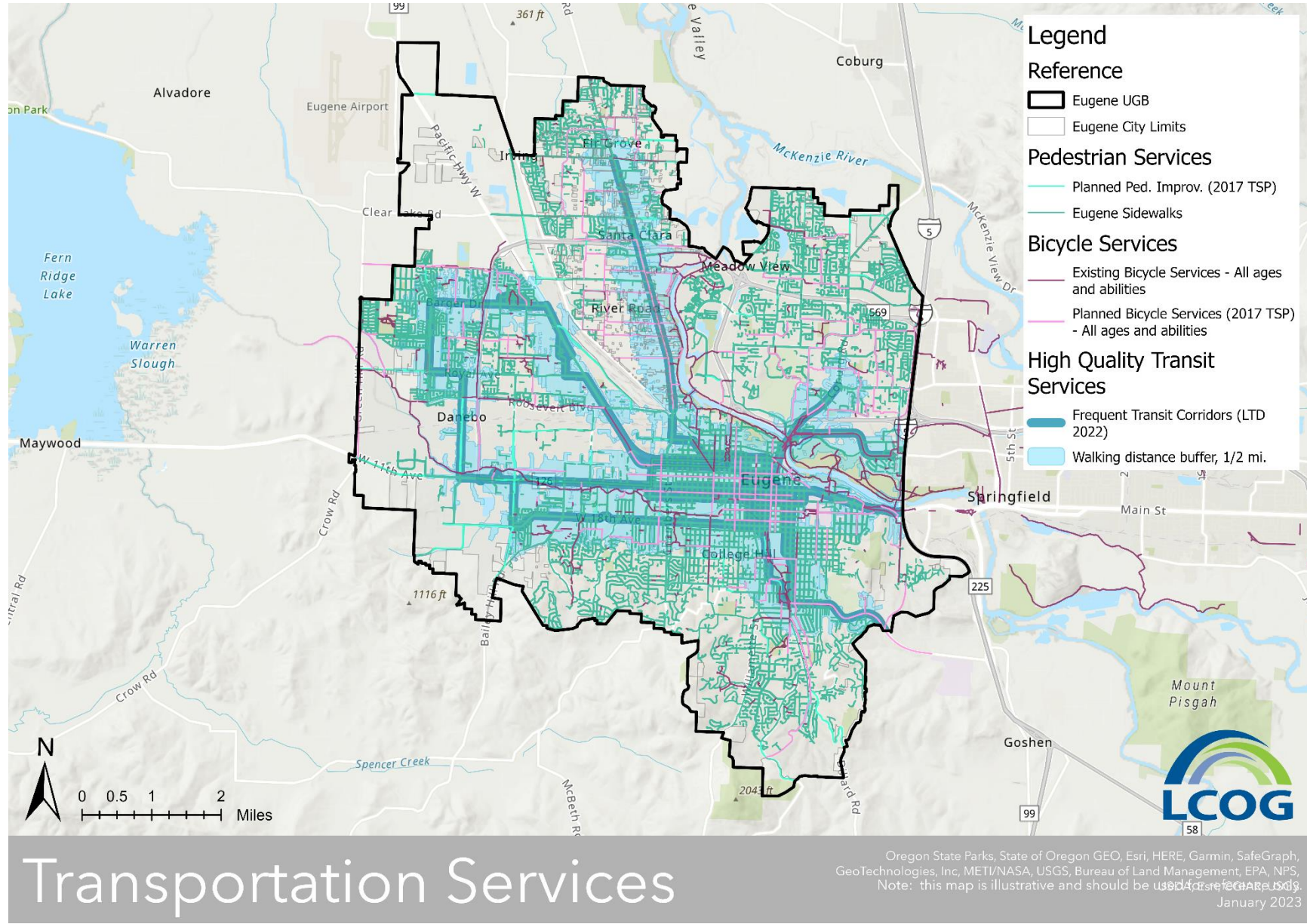
²³ Source data received in file geodatabase format from the City on 1/25/2023.

ACTIVE TRANSPORTATION AND HIGH-QUALITY TRANSIT COMPOSITE

Map 5 (page 17) shows the composite of active transportation and high-quality transit facilities in the Eugene UGB.

Area-based data on high-quality active transportation in the Eugene-Springfield area were not available at the time this memo was created, and a more complete analysis was not possible given the current scope and budget. Because locations with high-quality active transportation largely intersected with areas with high-quality transit (with a few exceptions) and because bicycle and pedestrian infrastructure tended to cluster in urban centers that were likely to be selected as potential CFAs anyway, LCOG recommends deferring this analysis until *Step A4: Most Promising CFAs*. At that time, a more granular analysis of the quality of access to active transportation can be completed on only those areas that have been advanced as promising CFA locations through the earlier steps, rather than city-wide. At that time, high-quality active transportation can be used as a way to further narrow and define promising CFA candidates (e.g., if two areas are identified earlier in the process as meeting other requirements for CFAs, but upon further analysis it is clear that one area has a more complete high-quality active transportation network, that area may be preferred over another with less access).

MAP 5. ACTIVE TRANSPORTATION AND HIGH-QUALITY TRANSIT SERVICES



Transportation Services

Safe from Natural Disasters and Hazards (Developable)

This analysis considers a subset of hazards identified under Goal 7. Goal 7 identifies the following hazards:

- Floods
- Wildfires
- Landslides
- Coastal Erosion
- Earthquakes and Tsunamis

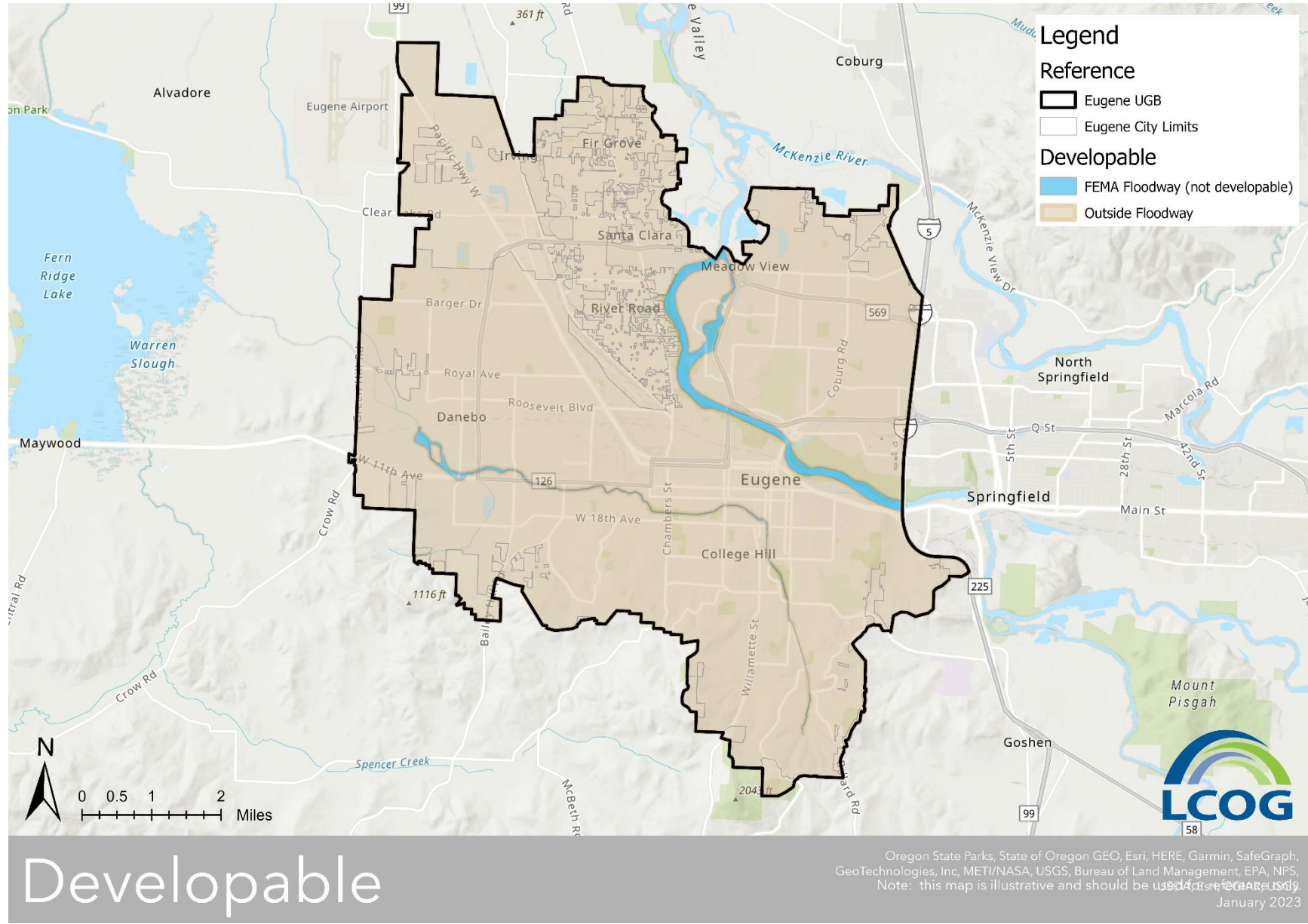
The City determined that areas of steep slope or landslide susceptibility, earthquake risk, or wildfire risk were mitigated by current land use regulations and tend to be far from urban centers and along the south edge of the Eugene UGB. Coastal erosion and tsunamis do not apply. The only applicable hazard remaining for this analysis was riverine flooding. The FEMA Floodway was used to represent this hazard. Development in Special Flood Hazard Areas (FEMA 100-year Floodplain) is allowed with certain additional standards. These development constraints may be considered in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.

Map 6 (page 19) shows the remaining land in Eugene's UGB that is not in the FEMA Floodway and is considered otherwise theoretically developable for these purposes and as described in Division 12. It is important to note that developable does not mean the land is vacant, it only means that it is not constrained by the presence of the hazards like the floodway.

TABLE 7. SAFE FROM NATURAL DISASTERS AND HAZARDS (DEVELOPABLE) DATA SOURCE

Item	Source
Flood Prone Areas (FEMA Floodway)	FEMA/City of Eugene

MAP 6. SAFE FROM NATURAL DISASTERS AND HAZARDS (DEVELOPABLE)



Near High-Density Mixed Uses

No additional analysis was performed for this criterion. Planned or existing dense mixed-use tends to already occur in locations planned for urban centers, which are covered above.

Minimum Width

Although the 750-foot width criterion is raised in *OAR 660-012-0310(2)(f)*, it is not a characteristic of the landscape, but of the potential CFA. It makes more sense to assess it once potential CFAs have been identified. Furthermore, DLCD is reviewing this section of the rule and plans to clarify it and provide more guidance on how to calculate the width of potential CFAs. This requirement can be used to fine-tune potential CFA locations in the suitability analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.

Suitable Locations for Eugene CFAs

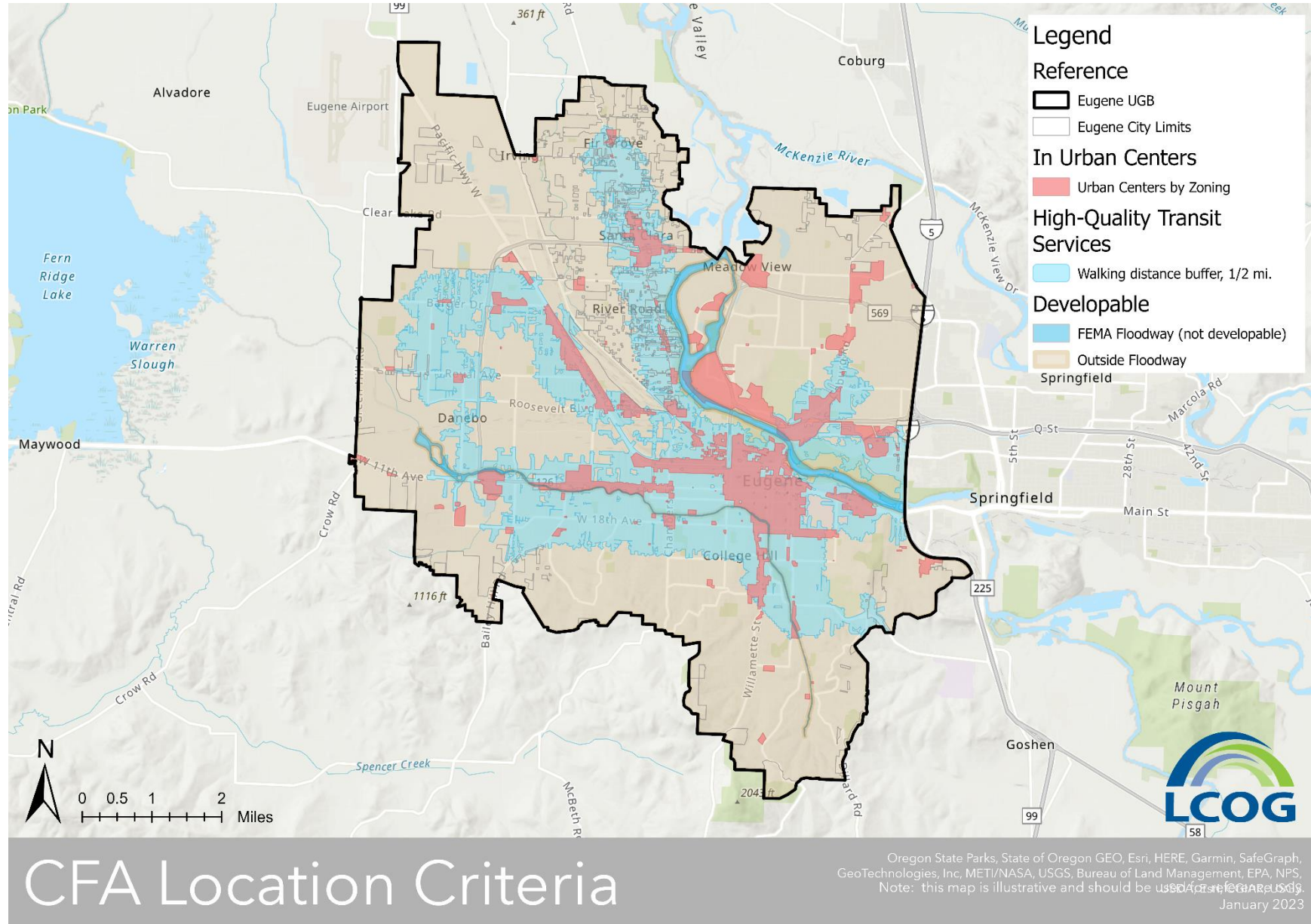
COMBINING THE LOCATIONAL CRITERIA

Map 7 (page 20) illustrates the three locational criteria considered relevant in this step of the analysis. The layers were combined to visualize where they co-occur:

- Urban Centers
- High-Quality Transit Corridors
- Developable Lands

It may not be entirely evident given the scale of the following map (larger maps are available, see above), but areas served by high-quality transit corridors are typically in areas of developable land and urban centers are typically within high-quality transit corridors.

MAP 7. COMBINED CFA LOCATIONAL CRITERIA

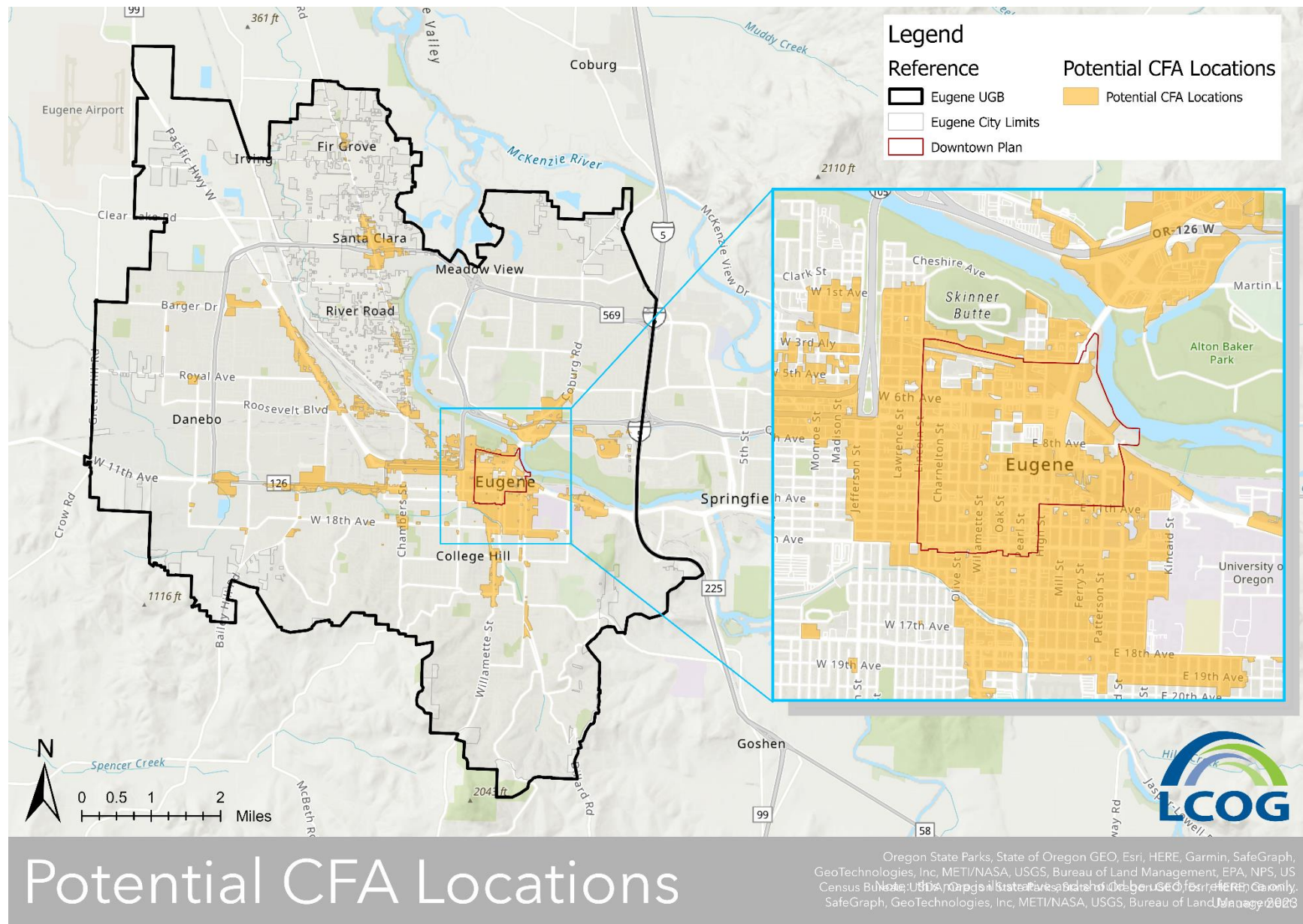


FINDING INTERSECTION OF THE CRITERIA

Map 8 (page 23) shows potential CFA locations in the City of Eugene based only on this first stage of analysis. The areas where existing and planned urban centers, high-quality transit corridors, and developable lands are present were found by finding the intersection of the GIS layers. These intersection areas represent potential locations within Eugene's UGB where CFAs could be located based on the locational criteria provided in *OAR 660-012-0310(2)*.

As noted in the previous section, there are special requirements associated with locating CFAs outside of city limits. Based on this analysis, it is unlikely that the City of Eugene will site any potential CFAs outside of its city limits, because none of these areas will meet the basic locational requirements in *OAR 660-012-0310*. These additional criteria can therefore be skipped.

MAP 8. POTENTIAL CFA LOCATIONS



Potential CFA Locations

CONCLUSIONS AND NEXT STEPS

CONCLUSIONS

The area where all considered CFA locational criteria intersect is large. It constitutes approximately 2,115 acres, including rights of way and public lands, which can be included in the CFA to meet minimum area requirements. Many of those areas appear to be large enough to meet the minimum width requirement, particularly the areas that are most central and appear to be best served by active transportation and transit services. This is not the assessment of maximum theoretical zoned housing capacity to be performed as part of the capacity analysis in *Step A3: Analysis of Potential CFAs (suitability, policy, capacity)*.

NEXT STEPS

Further analysis related to CFA location is required to address the following:

- Equity and displacement (*Step A2*)
- Further exploration of active transportation service levels, suitability of public infrastructure, and development readiness in the promising CFA locations (*Step A3, Suitability*)
- Minimum CFA width (*Step A3, Suitability*)
- Land use regulations and other policies that may need to change to conform with the rules (*Step A3, Policy*)
- Theoretical zoned housing capacity of suitable areas (*Step 3, Capacity*)
- Determine the most promising areas and their optimal size (*Step A4*)

City staff input will be needed to help define these analyses more clearly and provide needed data. These further analyses will occur in subsequent steps, as noted above.

TECHNICAL MEMORANDUM #2 – ANTI-DISPLACEMENT

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #2

ANTI-DISPLACEMENT

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: May 10, 2023

CONTENTS

PURPOSE	36
BACKGROUND.....	36
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	37
ANALYSIS.....	39
<i>Methodology Overview</i>	39
<i>Results</i>	40
Demographic Context 40	
Fair and Equitable Housing Policy Context 42	
Displacement Risk Analysis 52	
CONCLUSIONS AND NEXT STEPS	71
<i>Conclusions</i>	71
Demographic Context 71	
Displacement Risk Analysis 71	
Displacement Risk in Potential CFAs 72	
<i>Next Steps</i>	74
More Detailed Results 74	
Business Displacement Risk 75	
Integrated Community Engagement Results on Equity, Gentrification, and Displacement 75	
Mitigation of Displacement Risk 75	
Consideration of Equity in Selecting CFA Locations 76	

PURPOSE

Technical Memorandum #2 provides a citywide demographic profile and spatial analysis of historically marginalized community groups, an inventory of fair and equitable housing policies, and an anti-displacement analysis. The purpose of the memo is to address requirements in OAR 660-012-0315, present equity information to decision-makers to inform future Climate-Friendly Area (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.

BACKGROUND

The Climate-Friendly and Equitable Communities rules require cities to take steps to redress long-standing inequities in land use, zoning, and transportation investment (and disinvestment) decisions in the state of Oregon, a state with a long history of discrimination and racism. The rulemaking focused on reducing greenhouse gas emissions from vehicles while also building a more equitable city by improving transportation choices and creating communities where daily needs can be met by walking, biking, or taking transit.

One central outcome of this rulemaking is an increased emphasis on equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes Statement,²⁴ and it included a racial equity analysis of the rules and an analysis of how the rules could be improved to serve people with disabilities. The rules use the term "Underserved Populations", which comes from OAR Division 12 – Transportation Planning (OAR 660-012-0125) and includes a list of populations that have historically and currently experienced marginalization. The City of Eugene has elected to use the term 'historically marginalized community groups' and added students and veterans to the list populations. Other historically marginalized community groups include but are not limited to Black and African American people, Indigenous people, People of Color, people with limited English proficiency, people with disabilities, low-income Oregonians, youth, seniors, and more. The rules require mapping of historically marginalized community groups, local consideration of a set of anti-displacement actions, centering the voices of these groups in decision-making, and regular reporting on efforts to engage them.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete Eugene's CFA study. K&W are providing public involvement assistance with a focus on developing a community engagement plan and gathering feedback on equity issues from the community.

The following table provides an overview of steps for LCOG's technical analysis.²⁵ This Technical Memorandum addresses the second step in the study phase: analysis of potential CFAs for equity and displacement.

²⁴ <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

²⁵ LCOG is the technical lead for the CFA study, and K&W is leading public outreach that will be ongoing throughout the CFA study process.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
⇒ Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS

There are several equity-related requirements for CFA studies, some of which fall under the purview of K&W and are therefore only referenced for context in Technical Memorandum #2.

Per OAR 660-012-0315(4)(f), CFA studies must include plans for achieving fair and equitable housing outcomes for implementing CFAs following the provisions in OAR 660-008-0050(4)(a)-(f). CFA studies must include a description of how cities will address each of the following factors:²⁶

- a) Location of Housing**—How the City is striving to meet statewide greenhouse gas emission reduction goals by creating compact, mixed-use neighborhoods available to members of state and federal protected classes.

Note: To fulfill this requirement, cities must describe actions taken by the City to:

- *Promote the production of regulated affordable units²⁷*
- *Promote the production of accessible dwelling units²⁸*
- *Mitigate or avoid the displacement of members of protected classes*
- *Remove barriers and increase housing choice for protected classes*

- b) Fair Housing**—How the City is affirmatively furthering fair housing for all state and federal protected classes.

²⁶ The CFA study does not require a full Housing Production Strategy Report, which requires an analysis of the six equitable and fair housing factors described in OAR 660-008-0050(4)(a)-(f). However, Eugene will be required to complete this work by 2025 as part of an Urban Growth Boundary analysis with adoption by 2026. The inventory provided in this Technical Memorandum is intended to feed into the larger Housing Production Strategy Report that will be required at that time.

²⁷ 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.

²⁸ 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. [OAR 660-008-0050(4)(a)]

Note: 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.

- c) **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.

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

- d) **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.
- e) **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.
- f) **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.

“**Gentrification**” is defined as an increase in college-educated individuals’ demand for housing in initially low-income, central city neighborhoods.²⁹

“**Displacement**” occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.³⁰

Per 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.

Technical Memorandum #2 focuses on assessment of fair and equitable housing requirements and anti-displacement analysis referenced in OAR 660-012-315(4)(f). Although the CFA rules prioritize anti-displacement analyses for housing, it is worth noting that neighborhood investment can also result in business displacement. The methodology used to meet the CFA rules does not include data collection on businesses, but this topic is briefly considered in the conclusion section.

²⁹ 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>.

³⁰ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

ANALYSIS

The following analysis looks at displacement risk and fair housing policies citywide rather than only considering the potential CFA locations identified in Step A1: Identify Potential CFAs. The results will not be used to narrow the field of potential candidate CFAs at this stage; the purpose of a citywide analysis is to provide information to decision-makers for consideration when it comes time to designate CFAs.

METHODOLOGY OVERVIEW

For the purposes of fulfilling the requirements of the CFA study, DLCD has placed primary emphasis on the spatial anti-displacement analysis mentioned in OAR 660-008-0050(4)(f). Per DLCD, other requirements mentioned in OAR 660-008-0050(4)(a)-(e) as referenced in OAR 660-012-315(4) may be addressed to a lesser extent as desired by the jurisdiction—these rules were written for the purpose of developing a full Housing Production Strategy (HPS) report, which is not required as part of the CFA study. From DLCD’s perspective, the CFA study should focus on the spatial anti-displacement analysis as a means to identify and mitigate any potential displacement that may occur when a CFA is designated.

To ensure full compliance with the rule, to work toward both equitable process and outcomes, and to gain efficiencies with future HPS processes, the City of Eugene has opted to conduct a more robust analysis, including:

- **A citywide demographic profile** that provides important context for decision-makers. The demographic profile provides a citywide overview of the presence of historically marginalized community groups in Eugene.
- **An inventory of fair and equitable housing policies and practices** that will more comprehensively address the requirements in OAR 660-008-0050(4) and feed into the City’s future HPS.
- **An anti-displacement spatial analysis** that follows DLCD’s recommended approach³¹ but utilizes a more granular dataset that will enhance the analysis and make the results more specific to the Eugene context. The City of Eugene’s Housing Implementation Pipeline calls for the development of a citywide Anti-Displacement Plan, work the City intends to pursue in the near future. While the CFA study is focused on displacement pressures resulting from CFA designation, a citywide analysis will support later action planning to mitigate displacement.³²

³¹ Guidance on OAR 660-012-0315, Anti-Displacement Analysis in CFAs. DLCD, 2022. (https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf) and Anti-Displacement Toolkit Guide for Cities. DLCD, 2021. (<https://www.oregon.gov/lcd/UP/Documents/Anti-Displacement%20Toolkit%20Guide.pdf>).

³² Eugene’s Housing Implementation Pipeline (HIP) 5-Year Internal Work Plan covers July 1, 2022 – June 30, 2027, and it will be reviewed and updated on a two-year schedule to occur in year 3 (FY25) and year 5 (FY27). The Anti-Displacement Plan is listed as a 2-year goal.

RESULTS

Demographic Context

DEMOGRAPHIC PROFILE

Historically and currently marginalized community groups deserve prioritized attention regarding transportation and land use planning. The following demographic profile provides a citywide overview of the presence of historically marginalized community groups in Eugene.³³ The profile includes a comparison to Oregon.

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
People experiencing homelessness – (PIT)**	2,165 (Lane County)	0.6%	15,876	0.4%	2019 HUD Continuum of Care
Low-income households***	32,280	45.9%	691,950	42.9%	2015-2019 ACS HUD CHAS ³⁴
Low-income renter households***	23,770	33.4%	377,910	23.4%	2015-2019 ACS HUD CHAS

³³ OAR 660-012-0125 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. Additionally, the City of Eugene identified students and veterans as underserved populations to be addressed in this study.

³⁴ 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>

Historically Marginalized Community Group	Eugene Number	Eugene Percent	Oregon Number	Oregon Percent	Source
Moderate-income renter households***	4,075	5.8%	66,715	4.1%	2015-2019 ACS HUD CHAS
Low-income homeowner households***	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

*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.

**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.

***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.

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 Number 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 taps into an existing Homeless Management Information System (HMIS) in Lane County. It captures individuals who are or are no longer homeless by their interaction with 29 participating agencies who add to a collaborative database. This method is more dynamic and provides more than a snapshot of people experiencing homelessness on a given night, which is how the PIT count works. The difference in these methods is reflected in the results. The HBNL indicates that 4.2% of Eugene's population experienced homelessness in 2019, while the PIT count found 0.6% of Lane County's population were experiencing homelessness on a single night in January of 2019. Using the HBNL data better reflects the weight of this historically marginalized group in Eugene.

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 low- and moderate-income renters in Eugene than in Oregon overall. These groups are at a greater risk of displacement. Having high proportions of low- and moderate- income renters means that more of the population is susceptible to displacement forces.

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.

DEMOGRAPHIC DATA GAPS

Several historically marginalized communities are not represented in the demographic profile above. Reliable data sources are not available for tribal members, low-wealth individuals or households, and lesbian, gay, bisexual, transgender, queer, intersex, asexual, or two-spirit (LGBTQ+) community members. Without quantitative data, the City will work to collect qualitative data by reaching out to these communities during public involvement for CFA designation.

Fair and Equitable Housing Policy Context

OVERVIEW OF FAIR HOUSING PLANS, PROGRAMS, AND POLICIES

The following table presents an overview of the City of Eugene’s plans, programs, and policies relating to fair and equitable housing that directly address the requirements in OAR 660-008-0050(4)(a)-(f). Each of these is described in more detail in the subsequent sub-sections.

CFA Rule Requirements	Policy, Plan or Program
(a) Location of Housing	<ul style="list-style-type: none"> • Housing Implementation Pipeline³⁵ • Housing Tools and Strategies (2019-2021)³⁶ • Envision Eugene³⁷ • Middle Housing Code Amendments (HB 2001)³⁸ • Accessory Dwelling Units³⁹ and Pre-Approved Accessory Dwelling Unit Plans⁴⁰ • Clear and Objective Housing Approval Criteria⁴¹ • Growth Monitoring Program⁴² • HOME Funds • Low-income Housing Property Tax Exemptions⁴³ • Multi-Unit Property Tax Exemption Program⁴⁴

³⁵ <https://www.eugene-or.gov/4889/Housing-Implementation-Pipeline-HIP>

³⁶ <https://www.eugene-or.gov/3960/Housing-Tools-and-Strategies>

³⁷ <https://www.eugene-or.gov/760/Envision-Eugene>

³⁸ <https://www.eugene-or.gov/4244/Middle-Housing>

³⁹ <https://www.eugene-or.gov/DocumentCenter/View/63361/Ord-20659-ADU?bidId=>

⁴⁰ <https://www.eugene-or.gov/4707/Pre-Approved-ADU-Plans>

⁴¹ <https://www.eugene-or.gov/3947/Clear-Objective>

⁴² <https://www.eugene-or.gov/2081/Growth-Monitoring>

⁴³ <https://www.eugene-or.gov/1401/LITE-LIRHPT>

⁴⁴ <https://www.eugene-or.gov/829/Multi-Unit-Property-Tax-Exemption>

CFA Rule Requirements	Policy, Plan or Program
	<ul style="list-style-type: none"> • Urban Renewal⁴⁵ • Regulatory Incentives • Accessibility Improvement Program⁴⁶
(b) Fair Housing	<ul style="list-style-type: none"> • Fair Housing Plan⁴⁷ • Analysis of Impediments to Fair Housing Choice⁴⁸ • Fair Housing Outreach and Education⁴⁹ • Fair Housing Hotline⁵⁰ • Tenant Hotline⁵¹ • Intergovernmental Housing Policy Board⁵²
(c) Housing Choice	<ul style="list-style-type: none"> • Middle Housing Code Amendments (HB 2001) • Accessory Dwelling Units and Pre-Approved Accessory Dwelling Unit Plans • Clear and Objective Housing Approval Criteria • Growth Monitoring Program • Local Affordable Housing Trust Fund⁵³
(d) Housing Options for Residents Experiencing Homelessness	<ul style="list-style-type: none"> • Housing Implementation Pipeline • City-Supported Shelters⁵⁴ & Safe Sleep Sites⁵⁵ • Lane County Homeless Services System Implementation⁵⁶ • Community Safety Initiative
(e) Affordable Homeownership and Affordable Rental Housing	<ul style="list-style-type: none"> • Housing Implementation Pipeline • Racial Equity & Accessibility Lens (REAL) Toolkit⁵⁷ • Middle Housing Code Amendments (HB 2001) • Local Affordable Housing Trust Fund • Affordable Housing Development Programs⁵⁸
(f) Gentrification, Displacement, and Housing Stability	<ul style="list-style-type: none"> • Housing Implementation Pipeline • Renter Protections⁵⁹ • Condo and Mobile Home Park Conversion Regulations⁶⁰

(A) LOCATION OF HOUSING

The following plans, programs, and policies directly address the requirements relating to location of housing in OAR 660-008-0050(4)(a). This rule generally requires cities to create compact

⁴⁵ <https://www.eugene-or.gov/3240/Urban-Renewal>

⁴⁶ <https://www.eugene-or.gov/4051/Accessibility-Improvement-Program>

⁴⁷ <https://www.eugene-or.gov/4045/Housing-and-Human-Service-Plans>

⁴⁸ <https://www.eugene-or.gov/DocumentCenter/View/2019/Fair-Housing-Plan-Analysis-of-Impediments>

⁴⁹ <https://www.eugene-or.gov/840/Fair-Housing-and-Illegal-Housing-Discrim>

⁵⁰ IBID

⁵¹ IBID

⁵² <https://www.eugene-or.gov/838/Housing-Policy-Board>

⁵³ <https://www.eugene-or.gov/4232/Affordable-Housing-Trust-Fund>

⁵⁴ <https://www.eugene-or.gov/4903/Shelter>

⁵⁵ <https://www.eugene-or.gov/4701/Safe-Sleep-Sites>

⁵⁶ https://www.eugene-or.gov/DocumentCenter/View/45881/TAC-Report_Final

⁵⁷ <https://www.eugene-or.gov/4889/Housing-Implementation-Pipeline-HIP>

⁵⁸ <https://www.eugene-or.gov/4160/Affordable-Housing-Development-Programs>

⁵⁹ <https://www.eugene-or.gov/4885/Renter-Protections-Process>

⁶⁰ <https://www.eugene-or.gov/4055/Condominium-and-Mobile-Home-Park-Convers>

neighborhoods, promote regulated affordable units, promote production of accessible dwelling units, and mitigate displacement of members of state and federal protected classes.

- Housing Implementation Pipeline
- Housing Tools and Strategies (2019-2021)
- Envision Eugene
- Middle Housing Code Amendments (HB 2001)
- Accessory Dwelling Units and Pre-Approved Accessory Dwelling Unit Plans
- Clear and Objective Housing Approval Criteria
- Growth Monitoring Program
- HOME Funds
- Low-income Housing Property Tax Exemptions
- Multi-Unit Property Tax Exemption Program
- Urban Renewal
- Regulatory Incentives
- Accessibility Improvement Program

HOUSING IMPLEMENTATION PIPELINE

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. The HIP goals are further categorized by time span: 2-year goals and 5-year goals. As it relates to housing location and designating CFAs, the HIP contains several specific housing production and preservation goals. Over five years (July 2022 – June 2027), the City of Eugene would like to issue permits for the construction of 6,000 housing units, or 1,200 units per year. Specifically, increasing the amount of housing in Downtown Eugene by 50%. Through land use code updates, incentives, tax exemptions, System Development Charges (SDCs) assistance, policy implementation and more, the City of Eugene can guide the location of the anticipated units. On April 6, 2023, the City published an update report that tracks the progress of the HIP for the first six-month period (July 1 – December 31, 2022). According to the progress update,⁶¹ the City is on track to exceed the 50% increase in housing downtown goal without further intervention based on the projects that are currently underway.

Prior to development of the HIP, the City advanced a strategic planning effort called Housing Tools and Strategies (2019-2021). Through this effort, the City worked to increase housing affordability, availability, and diversity of housing type through land use projects, process efficiencies, and fair housing opportunities. The document primarily contains tools and strategies rather than the location of future housing.

ENVISION EUGENE

Envision Eugene is the community's vision for how Eugene will accommodate the next 20 years of growth. Two pillars of Envision Eugene are most relevant to CFA designation: (1) provide housing

⁶¹ <https://www.eugene-or.gov/DocumentCenter/View/69617/April-2023--HIP-6-month-update->

affordable to all income levels, and (2) promote compact urban development and efficient transportation options. The City has advanced a variety of code amendments to support more compact development, including:

- Implementing Middle Housing Code Amendments (directed by House Bill 2001) to expand opportunities for a variety of housing types in traditionally lower density neighborhoods
- Removing development barriers to Accessory Dwelling Units (ADU), including 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 being built, and the status of the City's adopted undeveloped 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 location. A Growth Monitoring update is expected in mid-2023 and should provide a more complete understanding of the effectiveness of various housing development programs and policies thus far.

DOWNTOWN HOUSING STRATEGIES

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 urban growth boundary adoption. Support for housing development downtown is facilitated through:

- Affordable Housing investments
 - HOME Funds
 - Low-income Rental Housing Property Tax Exemption and Low-Income Housing Property Tax Exemption
- Tax exemption through the Multi-Unit Property Tax Exemption (MUPTE) program
- Urban Renewal
- Regulatory incentives

ACCESSIBILITY IMPROVEMENT PROGRAM

Through the federal Community Development Block Grant (CDBG) program, the City of Eugene offers assistance for very low-income homeowners, and tenants with disabilities may be eligible for assistance to make accessibility improvements to remove architectural barriers and install strobe smoke alarms.

(B) FAIR HOUSING

The following plans, programs, and policies directly address the requirements relating to fair housing in OAR 660-008-0050(4)(b). Specifically, how will cities address disproportionate housing needs, patterns of integration and segregation, racially or ethnically concentrated areas of poverty, and disparities in access to housing opportunity.

- Fair Housing Plan

- Analysis of Impediments to Fair Housing Choice
- Fair Housing Outreach and Education
- Fair Housing Hotline
- Tenant Hotline
- Intergovernmental Housing Policy Board

FAIR HOUSING PLAN

Eugene’s Fair Housing Plan strives to assure that persons of a protected class have choice in the location of their housing. The current Fair Housing Plan covers the years 2020-2024. 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. Designating a CFA may also require land use code amendments and rezoning. In that effort, the Analysis of Impediments to Fair Housing recommends that the City integrates equity and impact assessments into the policy and planning process.

OTHER ACTIVITIES

The City of Eugene engages in a number of activities related to fair housing.⁶² These activities include: fair housing outreach and education for community members, non-profits, and landlords; contracting with Fair Housing Council of Oregon to support a fair housing hotline; contracting with Springfield Eugene Tenant Association (SETA) to support a tenant hotline and take calls from community members of protected classes; and staffing the Intergovernmental Housing Policy Board,⁶³ which acts as a forum for public input into the community issues related to affordable housing. The Eugene Office of Equity and Community Engagement provides support, referrals, and access to grievance processes for people who believe they have been subject to illegal housing discrimination.

(C) HOUSING CHOICE

The following plans, programs, and policies directly address the requirements relating to housing choice in OAR 660-008-0050(4)(c). Housing choice means ensuring that people of protected classes have access to housing located in neighborhoods with high-quality amenities, schooling, employment and business opportunities, and a healthy and safe environment.

- Middle Housing Code Amendments (HB 2001)
- Accessory Dwelling Units and Pre-Approved Accessory Dwelling Unit Plans
- Clear and Objective Housing Approval Criteria
- Growth Monitoring Program
- Local Affordable Housing Trust Fund

⁶² <https://www.eugene-or.gov/840/Fair-Housing-and-Illegal-Housing-Discrim>

⁶³ <https://www.eugene-or.gov/838/Housing-Policy-Board>

SUMMARY OF KEY STRATEGIES

In recent years, City staff have advanced the following strategies related to housing choice:

- Local Affordable Housing Trust Fund, which is support through a construction excise tax (CET) and the City General Fund
- Implemented Middle Housing Code Amendments (directed by House Bill 2001) to expand opportunities for a variety of housing types in traditionally lower density (single family) neighborhoods
- Removed the term “family” from land use code, shifting terminology to single-unit, multi-unit, etc.
- Removed development barriers to ADUs, including SDC credits, code changes, and Pre-Approved ADU Plans
- Adopted Clear and Objective Housing Approval Criteria within land use code provisions, making the permitting process more efficient to develop much needed housing

GROWTH MONITORING PROGRAM

The Growth Monitoring Program, mentioned in (a) Location of Housing above, includes monitoring the housing types of new development, household income, housing rent and sales, cost-burdened households, and other housing affordability indicators to assess the effectiveness of housing strategies.

(D) HOUSING OPTIONS FOR RESIDENTS EXPERIENCING HOMELESSNESS

The following plans, programs, and policies directly address the requirements relating to housing options for residents experiencing homelessness in OAR 660-008-0050(4)(d). Specifically, 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.

- Housing Implementation Pipeline
- City-Supported Shelters and Safe Sleep Sites
- Lane County Homeless Services System Implementation
- Community Safety Initiative

HOUSING IMPLEMENTATION PIPELINE

One of the primary focus areas of the previously mentioned HIP is Homelessness. The HIP includes a variety of priorities and policies related to homelessness and the creation of new permanent supportive housing, including temporary shelter, service navigation, enhancing supporting services, and more. The HIP breaks its goals into two-year and five-year categories. The two-year goals of the HIP include 250 new Safe Sleep site spaces by the end of FY 23, adding 75 low-barrier shelter beds. In addition, the HIP goals on homelessness include enhanced outreach to unsheltered individuals and increasing connections to support and coordinated responses.

Eugene collaborates with Lane County to provide operating support to human services providers. This collaborative funding model uses available federal, state, and local funds to efficiently support local agencies. The Human Services Commission is the intergovernmental body that guides the use

of funds and oversees the activities of agencies receiving the funds. The supported agencies include: Womenspace, First Place Family Shelter, Food for Lane County Distribution, Food for Lane County Dining Room, Relief Nursery, Catholic Community Services, and Lindholm Service Station.

Additionally, Eugene provides capital grants for public facilities operated primarily by nonprofit service providers, including those addressing the priority needs of the homeless and special needs population.

OTHER SUPPORT FOR PEOPLE EXPERIENCING HOMELESSNESS

Other City priorities to support people experiencing homelessness include:

- City-supported shelters and Safe Sleep Sites
- Working with Lane County to implement the Lane County Homeless Services System recommendations (Technical Assistance Collaborative report)⁶⁴ including street outreach to unsheltered individuals in Eugene and completing the new Emergency Shelter and Navigation Center which added 75 low-barrier shelter beds in a permanent facility
- Implementing strategies outlined in the City's Community Safety Initiative, including increased support for alternative shelter programs and Resource Center for people experiencing homelessness
- Improving current programs and building strong, collaborative, community networks that are coordinated and responsive to different needs, including those around camp clean-up and response

(E) AFFORDABLE HOMEOWNERSHIP AND AFFORDABLE RENTAL HOUSING

The following plans, programs, and policies directly address the requirements relating to affordable homeownership and affordable rental housing in OAR 660-008-0050(4)(e). They describe how the city is supporting and creating opportunities to encourage the production of affordable rental housing and the opportunity for wealth creation via homeownership, especially for protected classes who have been disproportionately impacted by past housing policies.

- Housing Implementation Pipeline
- Racial Equity & Accessibility Lens (REAL) Toolkit
- Middle Housing Code Amendments (HB 2001)
- Local Affordable Housing Trust Fund
- Affordable Housing Development Programs
- Condo and Mobile Home Park Conversion Regulations

HOUSING IMPLEMENTATION PIPELINE

One of the primary focus areas of the previously discussed HIP is Income-Qualified Housing. The HIP includes a variety of priorities and policies related to affordable housing, including permanent supportive housing, City fee assistance for housing development, tax exemptions, land banking, and more – all directed towards creating new affordable rental and homeownership units. The HIP lays out specific two-year housing goals and the progress towards these goals have been

⁶⁴ https://www.eugene-or.gov/DocumentCenter/View/45881/TAC-Report_Final

documented in the six-month progress update.⁶⁵ The HIP's two-year goals for income qualified housing targets include 95 existing units of existing housing preservation (48 are in-progress and 5 are complete), and the development of 310 new units (123 units are in-progress and 104 are complete). In meeting these targets, the HIP calls for investment in 50 of the new units to be Permanent Supportive Housing (16 in-progress, and 45 complete). The HIP also calls for 120 units of Affordable Homeownership support by preserving 60 units (12 units in-progress and 5 are complete) and investing in the development of 60 new ones (101 units in-progress).

An action identified within the HIP is the creation of an Anti-Displacement Plan. City staff anticipate the CFA anti-displacement analysis will inform the development of this plan. The HIP also includes implementation of a Racial Equity and Accessibility Toolkit (REAL Toolkit) to align policy areas with identified strategies to evaluate the potential for harm or benefit to at-risk communities. The REAL Toolkit is Appendix H of the HIP and has recently been published on the City's HIP webpage. The toolkit process operationalizes anti-racist and inclusionary planning practices to 1) address racial impacts in the decision-making process at a systemic/institutional level, and 2) address the intersectional needs that determine adequate access to safe and affordable housing for broader marginalized communities, including cultural, physical, developmental, and geographical needs.

AFFORDABLE HOUSING DEVELOPMENT

Programs include funding for acquisitions, new construction, rehabilitation, and project-related soft costs. Eugene awards funds in this category through an annual Housing Request for Proposals. Subsidies for development include providing the land at little cost, HOME Investment Partnership Program funds, SDC exemptions or assistance, and property tax exemptions. Regulatory incentives include density bonuses and reduced parking requirements. Projects receiving City funds include small developments for special need populations as well as medium sized affordable housing development.

AFFORDABLE HOUSING TRUST FUND

In 2019, a dedicated source of funding for affordable housing was established through the adoption of a CET on certain building permits. Funds support projects and programs that increase availability and access to owner- and renter-occupied housing that is affordable to lower-income community members.

MIDDLE HOUSING CODE AMENDMENTS

The Eugene Land Use Code was amended in 2022 to remove regulatory barriers for middle housing types and to allow middle housing land divisions, enabling more accessible and affordable home ownership opportunities.

⁶⁵ According to the "Housing Implementation Pipeline (HIP) - Six-month progress update", published April 6, 2023, there is a two-year preservation goal of 95 total units, of which there are 36 rental units and 12 home ownership unit in-progress, and 5 home ownership units complete. Also 65 rental units are in-progress or complete, 61 permanent supportive housing units are in-progress or complete, and 101 home ownership units are in-progress.

(F) GENTRIFICATION, DISPLACEMENT, AND HOUSING STABILITY

The following plans, programs, and policies directly address the requirements relating to gentrification, displacement, and housing stability in OAR 660-008-0050(4)(f). They describe how the City is seeking to mitigate impacts of displacement as a result of investment and redevelopment.

- Housing Implementation Pipeline
- Renter Protections
- Condo and Mobile Home Park Conversion Regulations

RENTER PROTECTIONS

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 the ones 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/obligations. Phase II is under consideration by the City Council.

CONDO AND MOBILE HOME PARK CONVERSION REGULATIONS

The City regulates the conversion of rental units to condominiums and the closure of manufactured home parks to provide appropriate protections and support for the tenants residing in such properties.

ADDITIONAL CONSIDERATIONS

DOWNTOWN PRIORITIES AND PROJECTS

Due to existing transportation infrastructure, commercial activity, and dense housing allowances in Downtown Eugene, the area is under consideration as a CFA. Another project that is relevant to the fair and equitable housing policy summary is the active Downtown Priorities and Projects effort. Through conversations with residents, businesses, and organizations, the City is developing a list of Downtown Priorities and Projects to guide future improvements to the area. Eugene City Council will consider this list in 2023 and begin strategizing on how to implement the priorities that come out of this process. Although this effort is still in-process, a Draft List was published on January 25, 2023. The housing-related priority is to support creation of a mix of new housing affordable across income levels. Project examples are as follows:

- 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 (MUPTE) or create 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

URBAN GROWTH BOUNDARY UPDATE

Downtown was a key focus in the City's last urban growth boundary (UGB) update. In conjunction with adoption of Eugene's 2012-2032 UGB, the City adopted several land use efficiency measures. Efficiency measures, also called development incentives, are actions the City takes to facilitate development that uses land more efficiently than would have occurred without these incentives, based on historical trends. Efficiency measures increase the expected capacity of land for additional housing (or job) development beyond what is likely to occur if the City does not make these changes or offer these incentives. The City adopted a multifaceted programmatic approach to development assistance downtown, recognizing that downtown projects often benefit from a combination of the downtown tools or programs. Additionally, the City adopted land use regulations (effective August 2013) to remove barriers to housing downtown and along the downtown riverfront (also effective August 2013, amended in 2017 and 2019). This includes development that:

- is within the Downtown Plan Area boundary, and/or
- received a MUPTE, and/or
- is within either the Downtown or Riverfront Urban Renewal Districts and received financial incentives.⁶⁶

1996 HOUSING DISPERSAL POLICY

In 1996 the City of Eugene adopted the 1996 Housing Dispersal Policy (Resolution No. 4477), which implemented policies that would maximize housing choice for low-income families who have traditionally been limited in the location of housing they could afford. It also sought to integrate low-income housing throughout the community and discourage the creation of large areas characterized by low-income housing. The ordinance utilizes the following policies:

1. The City encourages dispersal of low-income families, in subsidized housing, throughout the city. Public assistance for the construction of subsidized housing is discouraged in unsuitable areas. This policy may be balanced by the City Council against other City concerns and policies.
2. The City discourages subsidized housing developments of more than 60 units. This policy may be balanced against other City concerns and policies.

The second policy has been slated to undergo review and modernization by the Intergovernmental Housing Policy Board. As it stands, this policy must be considered when making affordable housing location decisions but is intended to be aspirational as opposed to prescriptive in nature.

⁶⁶Urban Renewal or Tax Increment Financing is a tool used by municipalities to finance improvements and redevelopment in specific areas of a city by reinvesting the increase in the area's property taxes.

Displacement Risk Analysis

METHODOLOGY OVERVIEW

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. The DLCD approach is described in a guidance memo⁶⁷ and is based on the Anti-Displacement and Gentrification Toolkit Guide for Cities (Anti-Displacement Toolkit), a toolkit which DLCD provided to local governments for Housing Production Strategies required by HB 2003.⁶⁸ The original research for this work was performed by PSU.⁶⁹

DLCD-SUGGESTED APPROACH

The suggested anti-displacement analysis approach for CFA studies presented by DLCD follows these steps:

- **Step 1. Spatial Analysis**
 - Overlay Neighborhood Typologies with potential CFAs
 - Identify areas of displacement risk
- **Step 2. Planning Analysis**
 - Look up Housing Production Strategies for each CFA
 - Review mitigation potential for each context
- **Step 3: Report**
 - Select strategies to best achieve goals and mitigate unintended consequences

MODIFIED APPROACH USED

This memo addresses Step 1 in the DLCD anti-displacement analysis methodology which describes performing a spatial analysis to explore displacement risk and assign a “neighborhood typology” based on displacement risk. As previously noted, this analysis was completed citywide. The subsequent steps in the DLCD methodology, which explore mitigating strategies, will be addressed in CFA Study Step A5 (see summary table on pg. 3).

LCOG worked with City staff to modify the DLCD approach for the displacement risk analysis in a few ways.

⁶⁷ Anti-Displacement Toolkit Guide for Cities: Implementation Guidance, OAR 660-012-0315, CFA Anti-Displacement Analysis. Retrieved from https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf on 4/26/2023.

⁶⁸ Anti-Displacement and Gentrification Toolkit Project: Guide for Cities Implementing HB 2003 Housing Production Strategies. Retrieved from <https://www.oregon.gov/lcd/UP/Documents/Anti-Displacement%20Toolkit%20Guide.pdf> on 4/26/2023.

⁶⁹ Anti-Displacement and Gentrification Toolkit, Attachment A. Retrieved from https://www.oregon.gov/lcd/UP/Documents/AttachmentA_PSU%20Toolkit.pdf on 4/26/2023.

- DLCD and OHCS collaborated on the statewide analysis based on the PSU methodology which resulted in the CFA Anti-Displacement Map. The OHCS/DLCD analysis made some changes to the original PSU methodology. The City decided to follow the original PSU anti-displacement spatial analysis methodology but made some changes as well.
- City staff provided feedback that the neighborhood typology map data produced by DLCD,⁷⁰ which used a census tract level, was not granular enough to pick up known areas of risk. The PSU methodology used tracts as well. Instead, the LCOG analysis uses ACS 5-year Census block groups. All ACS data used was based on Census data post-processed to be GIS-ready by the IPUMS project.⁷¹
- The PSU methodology was based on analysis of ACS data from two different 5-year sampling time periods. These were 2010-2014 and 2015-2019.⁷² For the current analysis, the earlier time period used was changed to 2008-2012. This earlier time period was selected as best representing the conditions at the time of the performance of the last Housing Needs Analysis by the City (2012).⁷³ The more recent ACS time period used was the same one chosen by PSU and by OHCS and DLCD for their statewide analysis and web map – 2015 to 2019.⁷⁴
- The DLCD methodology used the county as the geographic area for comparison. DLCD compared tract data to the county-wide measures (median values). In the LCOG analysis, block group data was compared to the Eugene Census Place (incorporated city limits) measures.

Overall, the methodology used to mimic the DLCD neighborhood typology at the block group level was otherwise closely based on the methodology explained by PSU in the Anti-Displacement and Gentrification Toolkit, although some terminology and definitions were changed.

- The term “neighborhood” has a different familiar definition in Eugene (i.e., neighborhood association boundaries), so instead, the LCOG analysis will refer to these demographic analysis areas (block groups) as just “areas.” The typology will be referred to hereafter as an “area typology.”
- Some of the indicator sets were renamed:
 - “Income Profile” became “Low-Income.”

⁷⁰ CFA Anti-Displacement Map: Anti-Displacement Typologies 2022 Layer. Available at: <https://geo.maps.arcgis.com/apps/mapviewer/index.html?webmap=b0f58b8dcf5b493b978bffd063b2aa98>.

⁷¹ IPUMS NHGIS, University of Minnesota, www.nhgis.org.

⁷² At the time of the development of the PSU methodology, the 2015-2019 ACS 5-year was the latest time period available for the needed data.

⁷³ 2013 Eugene Housing Needs Analysis (HNA).

⁷⁴ More recent ACS 5-year time periods were available, however they covered years that included the COVID-19 pandemic period and were not considered to be as representative of future displacement risks due to suppressed housing markets during those periods.

- “Precarious Housing” became “Older or Multi-Unit Housing.”
- “Neighborhood Demographic Change” became “Demographic Shift.”
- Some of the indicators were renamed or redefined:
 - *Change in BIPOC* and *Change in Homeownership* were defined as relatively significant when above the citywide median, rather than below.
- Some of the area types were renamed:
 - “Affordable and vulnerable” became “Vulnerable.”

SPATIAL ANALYSIS AND AREA TYPOLOGIES

The first step of the analysis aimed to identify the spatial distribution of housing inequity by investigating disparities in people, housing, and place. The analysis used the following demographic and housing market components to differentiate areas based on their gentrification and displacement risk: low income, vulnerable people, older and multi-unit housing, housing market activity, and demographic shift. These components consisted of sets of demographic indicators. Areas were compared to the citywide medians for the same indicators and then assigned a “yes” or “no” state depending on whether they were higher or lower than the median, depending on the indicator.

Each component was then also assigned a “yes” or “no” state based on rules defined for each indicator set. For example, if two or more of the five Vulnerable People indicators were a “yes” then the set was a “yes.” The permutations of yes and no for these sets were used to define the at-risk status and the area typology. The area types were defined as combinations of yes or no states on each of the five components.

The combination of the values of these indicator sets was used to characterize sections of the city into six different area types that describe the relative gentrification potential and state of displacement risk. Area types are identified by overlaying the spatial layout of vulnerable populations with housing development patterns, to examine what housing supply and spatial dynamics are occurring for each area. It is important to note that these area typologies are intended to provide a basis for cities to make informed decisions in housing and land use planning, not to make assumptions or generalize the people that live in the area.

Table 1 (following page) shows the components with key questions and indicators used to create the area typology.

TABLE 8. KEY QUESTIONS FOR COMPONENTS (INDICATOR SETS)

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

More detailed descriptions of the aspects and meaning of each area typology can be found below and are summarized in Table 2.

TABLE 9. AREA TYPOLOGY BY INDICATOR SET STATE

Area Type	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	-	-	-	-	-

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 lower median household income, and their residents are predominantly low-income, 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 gentrification as indicated by demographic change.

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 low-income households predominantly, 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 gentrification.

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 in above-average levels in these areas. However, the areas are still experiencing demographic change related to gentrification 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 fewer vulnerable populations and 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

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 change to areas with the other above types. These areas may call for more attention to what is actually happening on the ground. Planners need to engage with these communities to make sure the areas are stable while aligning with community needs and desires. One example would be neighborhoods that don't have low-income or otherwise vulnerable people but do have mostly older or multi-unit housing.

DISPLACEMENT RISK FACTOR MAPS

The following section describes each displacement risk factor indicator set in more detail and presents a map of each at the area (block group) level.

LOW-INCOME

The share of low-income households (%) in 2015-2019 and median household income (\$) in 2015-2019 are the key measures used in assigning areas as relatively “low” compared to the corresponding citywide value. Each measure was calculated at the block group level. The definition of “low-income” households is those households which fall into the lower three income tiers of the five defined by the National Low Income Housing Coalition (NLIHC). These are as follows (low-income in bold).

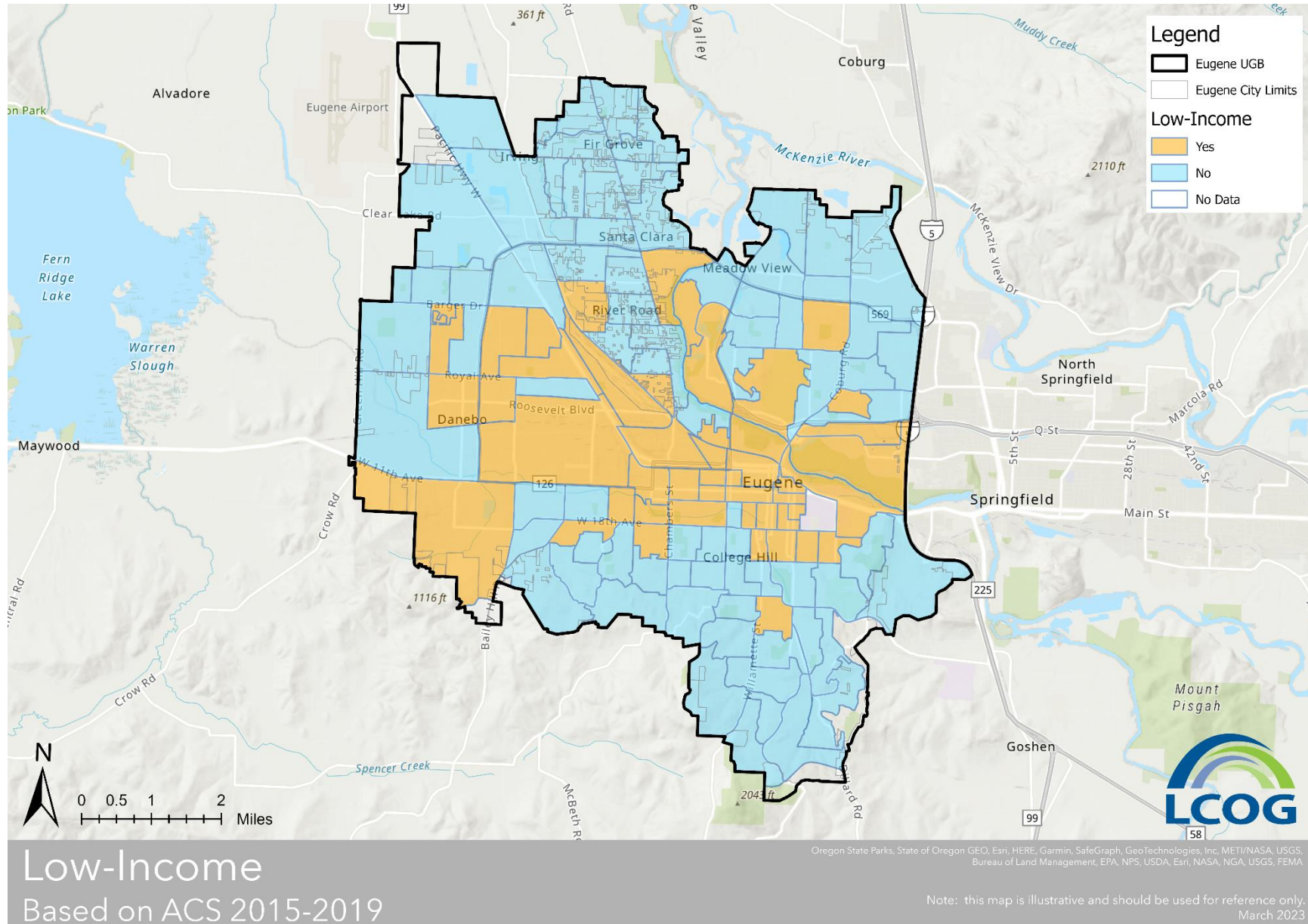
- **Extremely Low-Income (0-30% of AMI)**
- **Very Low-Income (31-50% of AMI)**
- **Low-Income (51-80% of AMI)**
- Middle-Income (81%-100% of AMI)
- High-Income (100% or more of AMI)

TABLE 3. LOW-INCOME INDICATOR SET

Low-Income	<i>Where do low-income people live?</i>	
Identifying as low-income is defined as a block group satisfying both of the following criteria:		Data Source
Low-income households	The block group has a greater percentage of households that are low-income ¹ in 2015-2019 than the citywide percent of households that are low-income	2015-2019 ACS 5-year
Median household income	The block group has a lower median household income than the city’s median in 2015-2019	2015-2019 ACS 5-year

¹ Following the National Low Income Housing Coalition (NLIHC), Low-income and below has been defined as below 80% of AMI.

MAP 10. LOW-INCOME INDICATOR SET



VULNERABLE PEOPLE

Five measures were chosen for representative characteristics of households vulnerable to displacement. Each measure was calculated at the block group level and compared to the comparable citywide value, except people with disabilities which was extrapolated to the block group level from the tract level. The extrapolation was a simple assignment of the tract value to all block groups in the tract.

TABLE 4. VULNERABLE PEOPLE INDICATOR SET

Vulnerable People	Where do BIPOC and vulnerable people live?	
Having a vulnerable population is defined as a block group where two or more of the following criteria are met:		Data Source
BIPOC ¹	Above the city average percent of BIPOC in 2015-2019	2015-2019 ACS 5-year
Limited English-proficiency households ²	Above the city average percent of people with limited English proficiency in 2015-2019	2015-2019 ACS 5-year, 2015 ACS 1-year
People with disabilities ³	Above the city average percent of people with disabilities in 2015-2019	2015-2019 ACS 5-year
Single parent households ⁴	Above the city average percent of single-parent households in 2015-2019	2015-2019 ACS 5-year
65 years and older(seniors)	Above the city average percent of people who are 65 years or older in 2015-2019	2015-2019 ACS 5-year

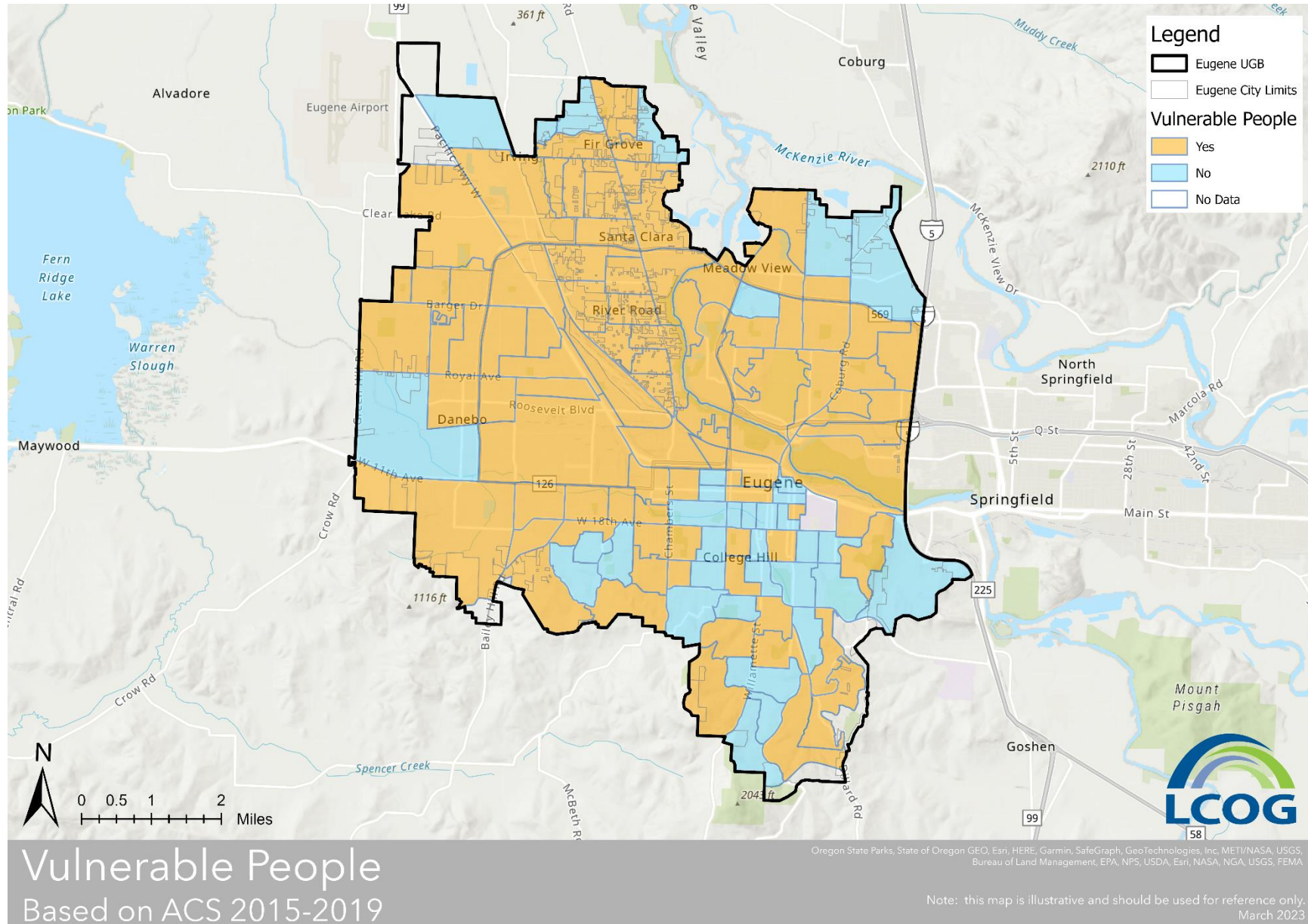
¹ BIPOC is defined as all households except for non-Hispanic whites.

² Using households rather than persons as were used by DLCD. Comparison is to 2015 ACS value citywide because 2015-2019 block group data was not available.

³ Using tract data, as was used by DLCD, due to a lack of disability data at the block group level. Potential for ecological fallacy when extrapolating block group values from tract values acknowledged.

⁴ Using single-parent household (female and male-headed) rather than female-headed household as was used by PSU.

MAP 2. VULNERABLE PEOPLE INDICATOR SET



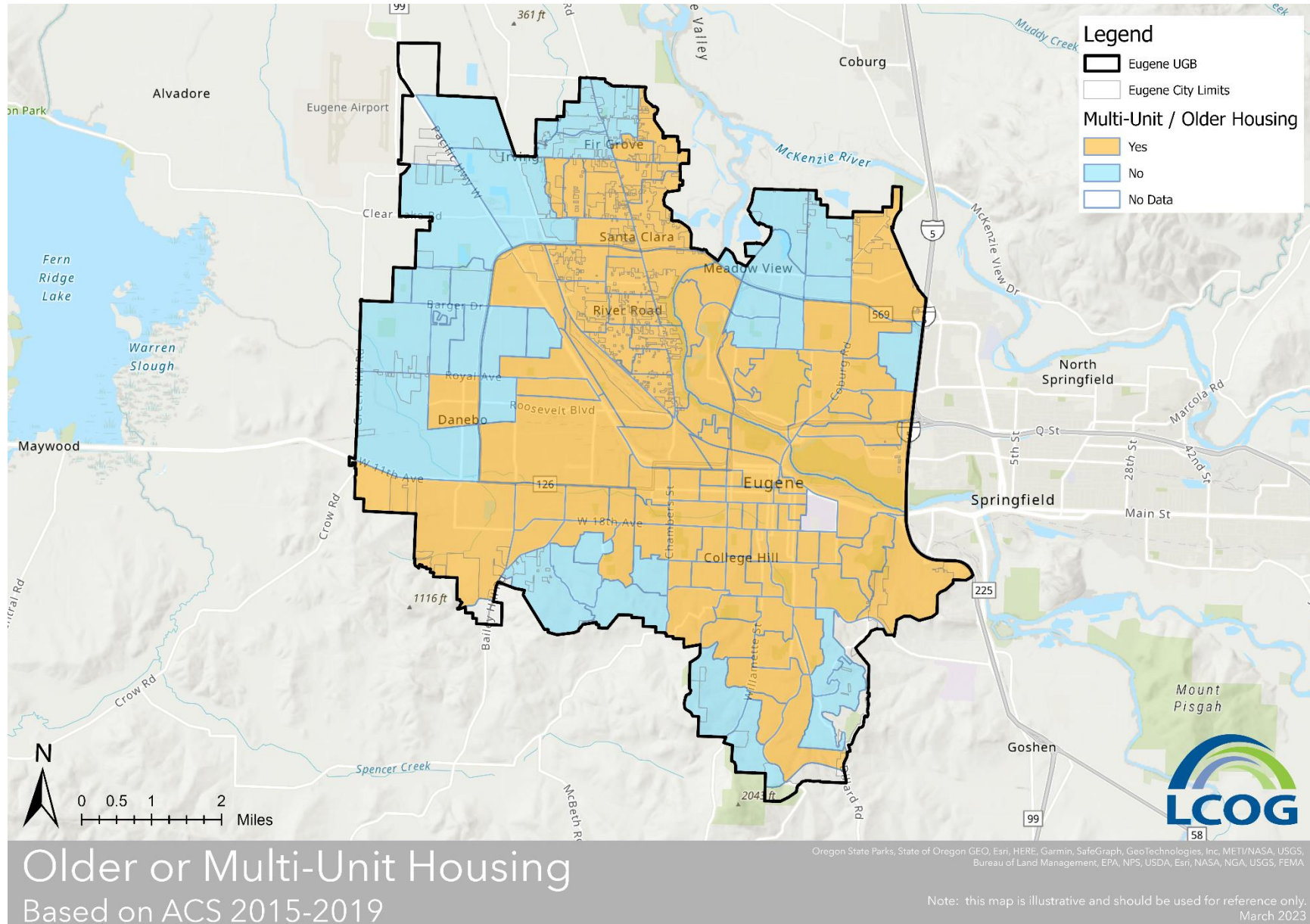
OLDER OR MULTI-UNIT HOUSING

Vulnerable housing stock was measured through two indicators, the share of multi-unit housing (%) and the share of housing units built before 1970 (%). Each indicator was also compared to the comparable citywide value. Each measure was calculated at the block group level.

TABLE 5. OLDER OR MULTI-UNIT HOUSING INDICATOR SET

Older or Multi-Unit Housing	<i>Where is older or multi-unit housing located?</i>	
Having older or multi-unit housing is defined as a block group where either of the following criteria are met:		Data Source
Multi-unit housing	Above the city average percent of multi-unit housing in 2015-2019	2015-2019 ACS 5-year
Housing units built before 1970	Above the city average percent of housing units built before 1970, as surveyed in 2015-2019	2015-2019 ACS 5-year

MAP 3. OLDER AND MULTI-UNIT HOUSING INDICATOR SET



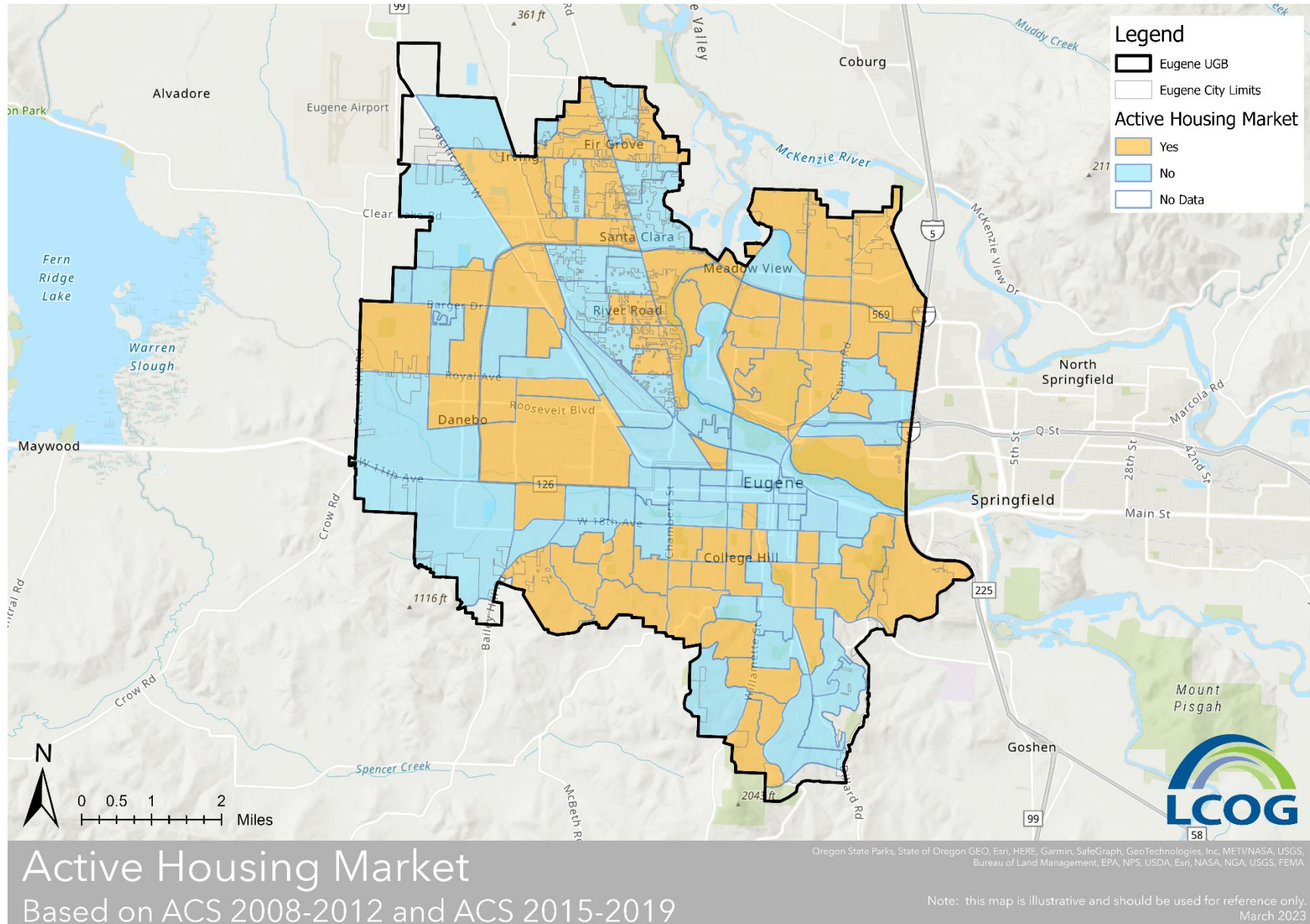
ACTIVE HOUSING MARKET

Since housing market activity focuses on housing prices and their changes, median rent and median home value were utilized in 2015-2019 and each appreciation rate was calculated between 2008-2012 and 2015-2019. Each measure was calculated at the block group level.

TABLE 6. ACTIVE HOUSING MARKET INDICATOR SET

Active Housing Market	<i>Is the housing market 'hot'?</i>	
Having a hot housing market is defined as a block group where three or more of the following criteria are met:		Data Source
Median rent	The block group has a median rent higher than the city average in 2015-2019	2015-2019 ACS 5-year
Median rent change	The block group experienced above the city's percent change in the median rent between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year
Median home value	The block group has a median home value higher than the city average in 2015-2019	2015-2019 ACS 5-year
Median home value change	The block group experienced above the city's percent change in the median home value between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year

MAP 4. ACTIVE HOUSING MARKET INDICATOR SET



DEMOGRAPHIC SHIFT

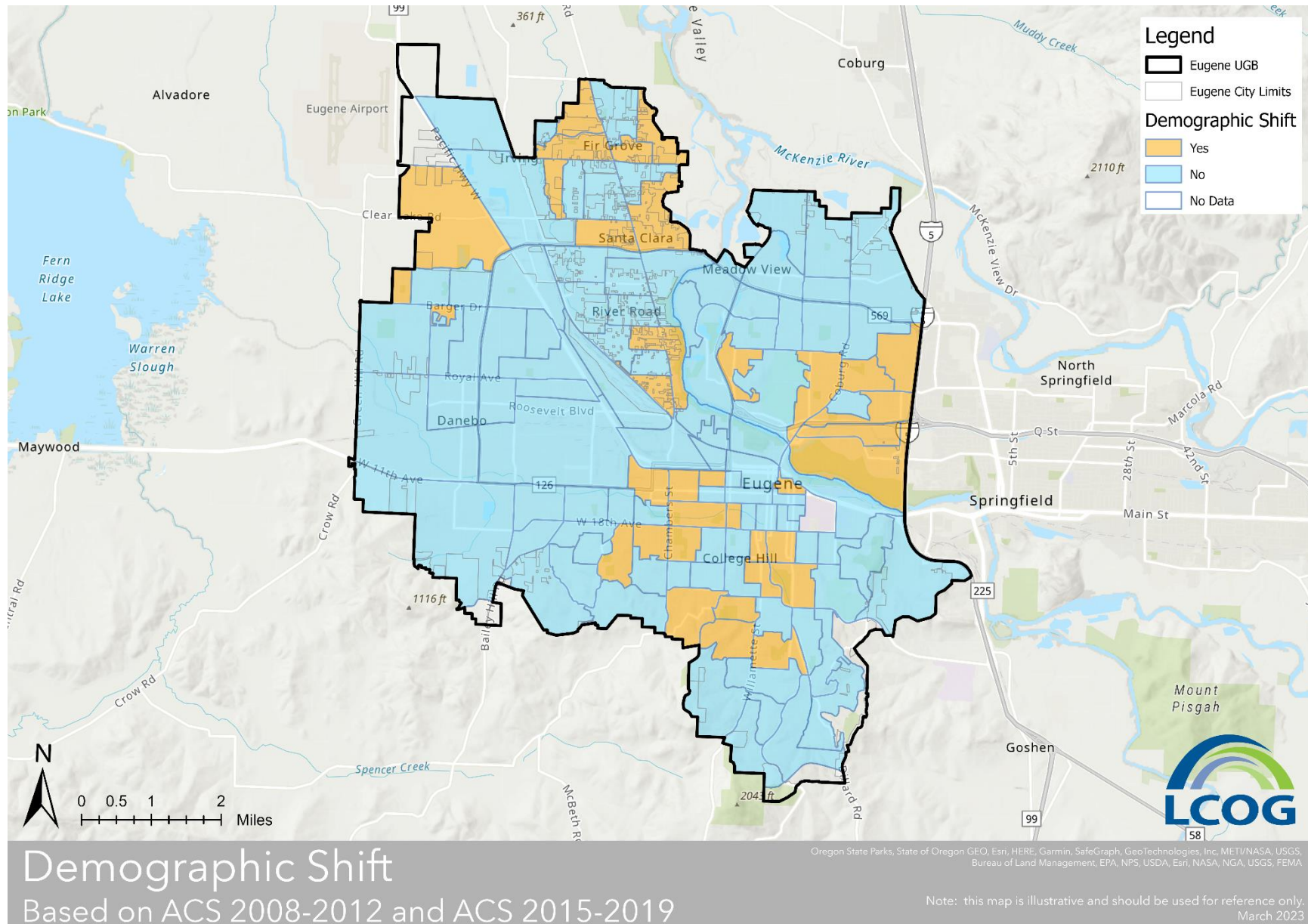
The following four measures were used to assess gentrification-related demographic change.

TABLE 7. DEMOGRAPHIC SHIFT INDICATOR SET

Demographic Shift	<i>What are the changes in area characteristics?</i>	
Having a significant demographics shift in an area is defined as a block group where three or more of the following criteria are met:		Data Source
Change in BIPOC	The block group experienced below ¹ the city's percent change in the BIPOC population between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year
Change in educational attainment	The block group experienced above the city's percent change in the population 25 years and older with a bachelor's degree or greater between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year
Change in renter population	The block group experienced below ¹ the city's percent change in the renter population between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year
Change in median household income	The block group experienced above the city's percent change in the Median Household Income between 2008-2012 and 2015-2019	2008-2012 ACS 5-year, 2015-2019 ACS 5-year

¹ PSU and DLCD used "**above**" here. Hermiston and Tigard examples from PSU used "**below.**"

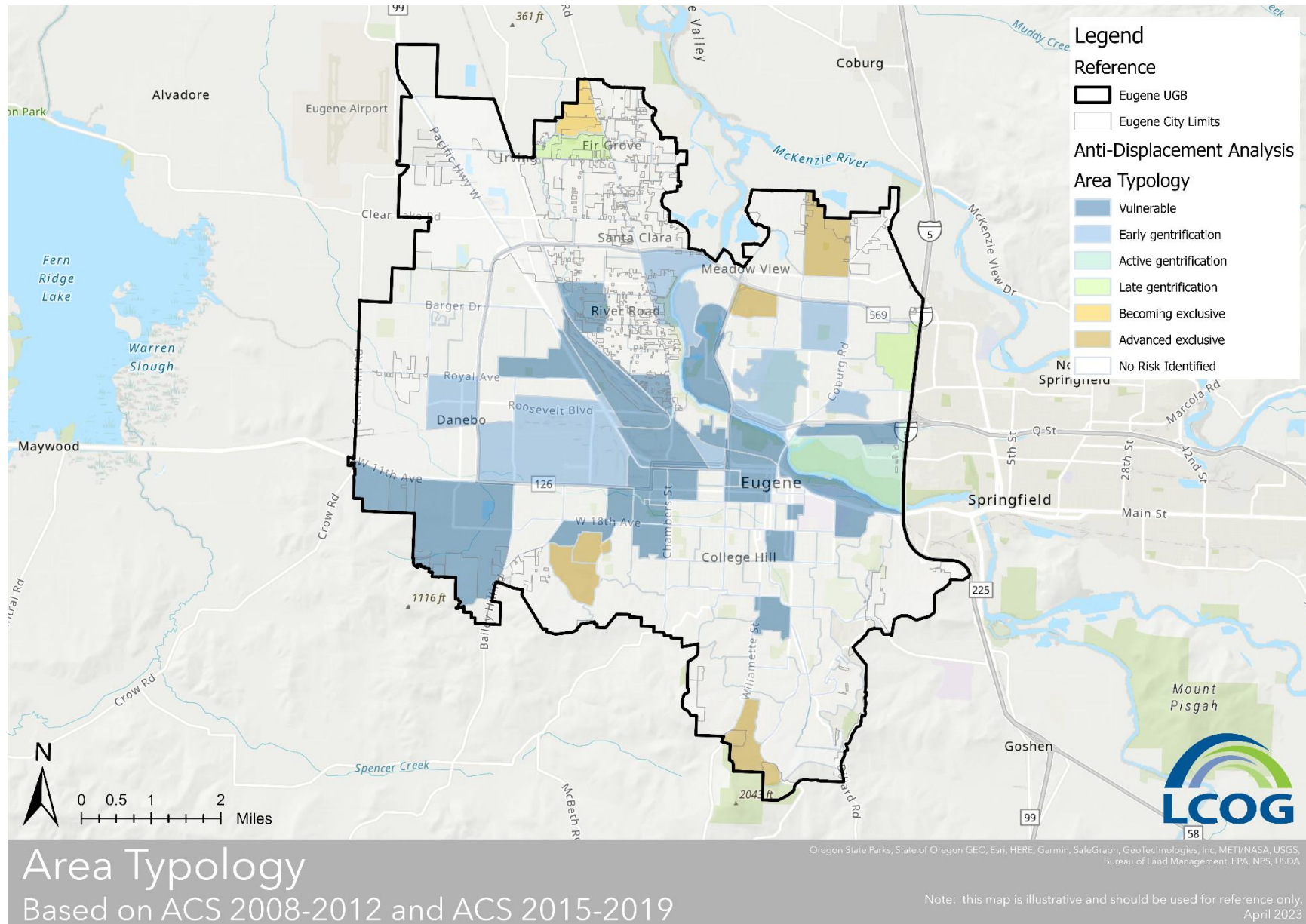
MAP 5. DEMOGRAPHIC SHIFT INDICATOR SET



DISPLACEMENT RISK AREA TYPOLOGY MAP

Map 6 (following page) illustrates the combined risk factors, based on the DLCD methodology.

MAP 6. AREA TYPOLOGY



CONCLUSIONS AND NEXT STEPS

CONCLUSIONS

Demographic Context

As documented in this technical memo, data from various sources has been collected to document the presence of each of the historically marginalized communities in Eugene as listed in OAR 660-012-0125(2) (referred to as 'underserved populations'), as well as students and veterans as requested. In particular, the presence of low- and moderate-income renters exist in Eugene at a higher rate than in Oregon overall. As Eugene plans for investment in the development of high-density Climate-Friendly Areas, it will be imperative to consider that a portion of current renters and homeowners already struggle to keep up with the cost of housing. Data was not available for the following communities: tribal members, low-wealth individuals or households, and LGBTQ+ residents. Since these groups have not been properly represented in this demographic analysis, efforts should be made to gather data through public engagement.

Displacement Risk Analysis

ADVANTAGES OF THE APPROACH USED

As the maps show, there was a clear benefit of doing this analysis at the block group level. Patterns of gentrification potential and displacement risk were more evident and better correlated with the understanding of City staff. Comparing citywide was likely more accurate and revealed more spatial differences and areas of risk than comparison with the county.

GENTRIFICATION POTENTIAL AND DISPLACEMENT RISK

According to a recent study by the National Community Reinvestment Coalition (NCRC):

"Gentrification is a powerful force for economic change in our cities, but it is often accompanied by extreme and unnecessary cultural displacement. While gentrification increases the value of properties in areas that suffered from prolonged disinvestment, it also results in rising rents, home, and property values. As these rising costs reduce the supply of affordable housing, existing residents, who are often Black or Hispanic, are displaced. This prevents them from benefiting from the economic growth and greater availability of services that come with increased investment. Gentrification presents a challenge to communities that are trying to achieve economic revitalization without the disruption that comes with displacement.

Areas experience gentrification when an influx of investment and changes to the built environment leads to rising home values, family incomes, and educational levels of residents. Cultural displacement occurs when minority areas see a rapid decline in their numbers as affluent, white gentrifiers replace the incumbent residents. ...

Does gentrification also mean displacement? Using U.S. Census and economic data, NCRC found that many major American cities showed signs of gentrification

and some racialized displacement between 2000 and 2013. Gentrification was centered on vibrant downtown business districts, and in about a quarter of the cases it was accompanied by racialized displacement. Displacement disproportionately impacted Black and Hispanic residents who were pushed away before they could benefit from increased property values and opportunities in revitalized neighborhoods.”⁷⁵

The analysis in this memo is both based on these definitions and supports these conclusions.

Conditions are likely to have gotten worse since the NCRC study was done, given the effects of the COVID-19 pandemic and the housing market recovery were not yet fully felt in 2013. Significant gentrification potential and risk of displacement exists in Eugene. Implementation of CFAs without concurrent mitigation measures (such as investments in affordable housing) is likely to exacerbate the trend towards increased risk of displacement for historically and currently underserved populations.

Displacement Risk in Potential CFAs

The displacement risk analysis was performed citywide. This may be useful as a general planning study for various purposes, but the purpose here was to compare this analysis to the potential CFAs identified in Step A1. Map 7 on the following page shows the relationship.

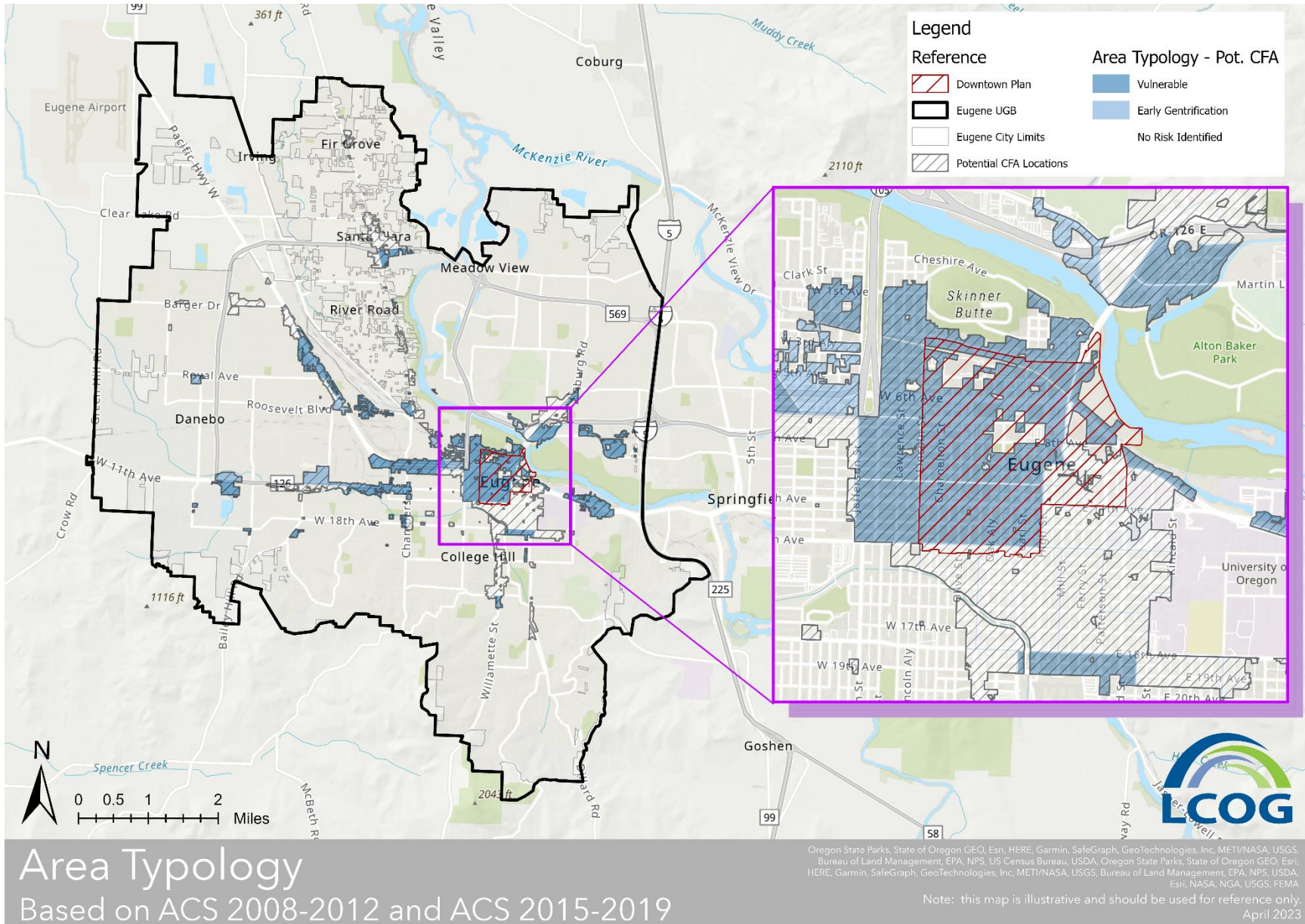
The majority of potential CFAs are intersected by an assigned area type, mostly the **Vulnerable** type. This suggests that most potential CFA locations include areas with elevated risk of displacement of traditionally underserved populations.

TABLE 8. AREA TYPES IN POTENTIAL CFA

Area Type	Acres in Potential CFAs
Vulnerable	99
Early gentrification	18
Late gentrification	<1
Unassigned	80

⁷⁵ Mitchell, Bruce & Franco, Juan. (2019). Shifting Neighborhoods: Gentrification and cultural displacement in American cities.

MAP 7. AREA TYPOLOGY COMPARED TO POTENTIAL CFAS



NEXT STEPS

More Detailed Results

AREA PROFILES

After assigning the Census block groups by area typology, City staff voiced interest in “area profiles” with supporting tabular data. Area profiles would provide a deeper dive into block groups of interest to better understand contributing demographic or housing market factors to displacement risk. City staff expect it will be a narrowed list that either 1) intersects with potential CFAs or 2) are flagged as being at some relevant stage of gentrification, such as Vulnerable, Early Gentrification, and Active Gentrification, or 3) Unassigned block groups where data may not illustrate trends observed by staff or community members. These area profiles could be added as an appendix in the final version of this technical memo.

Additional maps for each specific indicator used for the five indicator set maps may be useful for understanding the demographic and housing market variables that the risk of displacement for historically underserved populations. These maps could complement the area profiles and could be another appendix to this technical memo.

INDICATOR SET MAPS (17 INDICATORS IN 5 SETS) – VALUES: % OR \$

1. Low-Income
 - a. Pct. Households that are Low-Income, 2015-2019
 - b. Median Household Income, 2015-2019

2. Vulnerable People
 - a. Pct. Persons that are BIPOC, 2015-2019
 - b. Pct. Households with Limited-English Proficiency, 2015-2019
 - c. Pct. Persons with Disabilities, 2015-2019
 - d. Pct. Households with Single-parent Householder, 2015-2019
 - e. Pct. Persons that are 65 years or older, 2015-2019

3. Older or Multi-Unit Housing
 - a. Pct. Housing Units that are Multi-unit, 2015-2019
 - b. Pct. Housing Units that were Built Before 1970, 2015-2019

4. Active Housing Market
 - a. Median Rent (\$), 2015-2019
 - b. Median Home Value (\$), 2015-2019
 - c. Pct. Change in Median Rent, 2008-2012 to 2015-2019
 - d. Pct. Change in Median Home Value, 2008-2012 to 2015-2019

5. Demographic Shift
 - a. Pct. Change in BIPOC Population, 2008-2012 to 2015-2019

- b. Pct. Change in Educational Attainment (Persons with a Bachelor’s Degree or Higher), 2008-2012 to 2015-2019
- c. Pct. Change in Renter Occupancy, 2008-2012 to 2015-2019
- d. Pct. Change in Median Household Income, 2008-2012 to 2015-2019

Business Displacement Risk

This study was focused on the potential for gentrification and risk of residential or housing displacement. Although the CFA rules do not prioritize assessment of business displacement, there could easily be such an impact, particularly for businesses owned by, employing, or serving predominantly members of historically underserved populations. City staff noted a history of business displacement in Eugene’s Whiteaker neighborhood as one example. According to a paper published in 2020 by the National Bureau of Economic Research (NBER)⁷⁶ in the first two months of the COVID-19 pandemic (February to April of 2022) the number of active small businesses plummeted 22%. Many of the businesses owned by historically marginalized community groups were disproportionately affected (African American 41%, Latinx 32%, Asian 26%, Female-owned 25%, and Immigrants 36%). Although this was a unique and extreme scenario, it may portend the increased vulnerability of businesses owned by members of historically marginalized community groups. The current analysis was limited by a lack of available data for analyzing business displacement. There is no comparably granular dataset for business ownership or other relevant characteristics, nor was the development of a method for assessing business displacement within the budgetary scope of this project. It is recommended that the City investigate potential business displacement and mitigation of any such effect prior to designating any CFAs. The Small Business Anti-Displacement Network published the “Small Business Anti-Displacement Toolkit” (2021) that reports various strategies and tools to prevent small business displacement and may be a useful tool in pursuing businesses displacement mitigation efforts.⁷⁷

Integrated Community Engagement Results on Equity, Gentrification, and Displacement

Future integration with the results of the community engagement process should also take place and may affect the findings of this study.

Mitigation of Displacement Risk

Review and selection of strategies for mitigation of residential displacement impacts, (i.e., Step 2 and 3 of the DLCD suggested approach) will be addressed at a later step of the CFA Study.

⁷⁶ “The Impact of COVID-19 on Small Business Owners: Evidence of Early-Stage Losses from the April 2020 Current Populations Survey”, Robert W. Fairlie (NBER). Obtained from: https://www.nber.org/system/files/working_papers/w27309/w27309.pdf

⁷⁷ “Small Business Anti-Displacement Toolkit: Guide for Small Business Leaders” (2021), Small Business Anti-Displacement Network. Obtained from: https://antidisplacement.org/wp-content/uploads/2021/09/Toolkit_FINAL.pdf

Consideration of Equity in Selecting CFA Locations

Areas previously identified (in Technical Memo #1) as potential CFA locations were in existing or currently planned urban centers that were also supported by existing or planned high-quality transportation services and not in areas with unmitigated natural hazard risks. This analysis has explored the displacement risk in those locations. However, a CFA can be located anywhere in the city if the proper conditions are met. A CFA could be located in another location if its comprehensive plan designation and zoning are changed to designations and zones consistent with an urban center provided the area is also supported by existing or planned high-quality transportation services and is not in areas with unmitigated natural hazard risks. The City might consider doing this to locate a CFA where it will benefit historically underserved populations the most.

TECHNICAL MEMORANDUM #3A – SUITABILITY

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3A

SUITABILITY ANALYSIS

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: May 21, 2023

CONTENTS

PURPOSE	80
BACKGROUND.....	80
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	81
<i>Approaches to the Rules</i>	81
<i>Requirements Based on Population</i>	82
<i>Locational Requirements</i>	82
<i>Dimensional Requirements</i>	83
ANALYSIS.....	83
<i>Methodology Overview</i>	83
Criteria Previously Evaluated	84
Deferred Criteria	84
Special Note: New Area Added to Potential CFA Locations	85
<i>Results</i>	87
Suitable Width	87
Suitable Size	92
Suitable Locations for Eugene CFAs	92
CONCLUSIONS AND NEXT STEPS	104
<i>Conclusions</i>	104
Primary and Secondary Areas	104
<i>Next Steps</i>	105

MAPS

Map 1. Chase Node Addition to Potential CFA Locations	86
Map 2. Example of Applied Minimum Width Method	89
Map 3. Potential CFA Locations of Suitable and Optimal Minimum Width	91
Map 4. Suitable CFA Locations	93
Map 5. Suitable CFA Locations – Downtown/Campus	95
Map 6. Suitable CFA Locations – West 11th Avenue	96
Map 7. Suitable CFA Locations – Ferry Street Bridge	97
Map 8. Suitable CFA Locations – Highway 99	98
Map 9. Suitable CFA Locations – Santa Clara Station	99
Map 10. Suitable CFA Locations – South Willamette	100
Map 11. Suitable CFA Locations – Franklin/Walnut.....	101
Map 12. Suitable CFA Locations – Far West 11th Avenue	102
Map 13. Suitable CFA Locations – Chase Village	103

Note: All maps included in this memo are illustrative and should be used for reference only. All maps are also available as georeferenced PDF files in A4 page size. These allow a much higher-resolution view of each map, as well as the ability to view them in GIS or CAD software.

PURPOSE

Technical Memorandum #3a identifies potential Climate-Friendly Areas (CFAs) in the City of Eugene and addresses locational requirements for CFAs (OAR 660-012-0310(2)(a)-(e)). Further requirements—such as CFA dimensions, equity, suitability, capacity, and policy—will be addressed in subsequent memos and used to select the “most promising” CFA configuration options, per OAR 66-012-0315(4)(a).

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown’s *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon’s climate pollution reduction targets 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 Oregon’s eight most populated areas.

CFAs are areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.⁷⁸

The rules require cities (and some urbanized county areas) 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 defined CFAs within urban growth boundaries. CFAs will be sized to accommodate a portion of the community’s housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may currently allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, including either adoption of the set of prescriptive development standards set out in the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete the CFA study. Kearns & West are providing public

⁷⁸ OAR 660-012-0005(10). <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292987>

involvement assistance with a focus on developing a community engagement plan and eliciting equity and displacement concerns from the community.

The following table provides an overview of steps for LCOG’s technical analysis. This Technical Memorandum addresses one component (suitability analysis) of the third step in the study phase: analysis of potential CFAs suitability, policy, and capacity.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
⇒ Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS

APPROACHES TO THE RULES

An element of the final CFA study, as described in *OAR 660-012-0315(4)(a)*,⁷⁹ is to map all “potential” CFA options. The rule gives jurisdictions some flexibility and discretion in the way they approach the study phase. Critically, it is a study and not considered a land use decision.⁸⁰ LCOG has identified two general approaches to conducting CFA studies: the “narrowing” approach and the “expanding” approach. The “narrowing” approach involves looking citywide at all potential locations that could serve as CFAs and narrowing to select top candidates through an iterative process based on the criteria in the rule. The “expanding” approach involves picking one or more CFA candidate areas to evaluate against the criteria in the rule then expanding iteratively as necessary until the CFA(s) meet the requirements. The City of Eugene has chosen the “narrowing” approach.⁸¹

⁷⁹ <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293018>

⁸⁰ “The rules in this division are not intended to make local government determinations “land use decisions” under ORS 197.015(10). The rules recognize, however, that under existing statutory and case law, many determinations relating to the adoption and implementation of transportation plans will be land use decisions.” *OAR 660-012-0000(4)*

⁸¹ Eugene elected to rely on adopted policies to first identify areas with existing regulatory characteristics similar to CFAs and then narrow those to those most suitable for CFA designation.

REQUIREMENTS BASED ON POPULATION

There are different requirements in the rule based on jurisdiction population. Given a 2022 official population estimate⁸² of 178,259,⁸³ the City of Eugene is subject to requirements for cities greater than 10,000, including designating one or more CFAs with enough theoretical residential capacity to accommodate 30% of current and future housing needs from the City's most recently adopted and acknowledged housing capacity analysis. CFA theoretical zoned housing capacity will be addressed in Technical Memo #3c: Capacity.

Additionally, because Eugene's population is over 25,000, the City must adopt at least one CFA with a minimum of 25 acres which includes the most intensive development standards required per local government size, as provided in *OAR 660-012-0320(8)* or *(9)*. These areas are called "Primary CFAs." For these larger local governments, additional ("Secondary") CFAs may be designated with less intensive standards as provided in the rule to achieve the required housing capacity. CFA dimension requirements will be addressed in this memo.

LOCATIONAL REQUIREMENTS

The locational requirements for a CFA are identified in *OAR 660-012-0310(2)(a)-(f)*⁸⁴ and are also described in the *Climate-Friendly Areas Methods Guide*.⁸⁵

Per the rule, potential CFA locations are:

- **Urban Centers** – In existing or planned urban centers, such as:
 - Downtowns
 - Neighborhood Centers
 - Transit-Served Corridors⁸⁶
 - Other Similar Districts
- **Within the City's Urban Growth Boundary** – Inside city limits or—subject to additional conditions⁸⁷—inside the urban growth area.
- **Accessible via High-Quality Active Transportation and Transit** – Served by existing or planned high-quality pedestrian, bicycle, and transit infrastructure.

⁸² City population is as determined by the most recently certified Portland State University Population Research Center population estimate, per *OAR 660-012-0310(4)*.

⁸³ Portland State University Population Research Center, *2022 Certified Population Estimates, July 1*. Retrieved from <https://www.pdx.edu/population-research/population-estimate-reports> on 12/21/2022.

⁸⁴ <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062>

⁸⁵ *Climate-Friendly Areas Methods Guide*. DLC. 2022. p.3. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022.

⁸⁶ The relevant area for high-quality transit corridor is typically defined in *OAR 660-012* as within a half-mile of the transit corridor. See for example, *OAR 660-012-440*.

⁸⁷ Contiguity with the city limits; readily serviceable with urban water, sewer, stormwater, and transportation; has a historical precedent for timely annexation; has compatible future zoning; and has compatible plan designations; per *OAR 660-012-0310(2)(e)*.

- **Safe from Natural Disasters and Hazards** – The rule requires that CFAs 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 in those areas.
- **In or Near High-Density Mixed-Use Areas** – Within or near areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities.

In addition, *OAR 660-012-310(2)(a)* specifies that CFA locations support development consistent with CFA land use requirements. In the *Climate-Friendly Areas Methods Guide*,⁸⁸ DLCD recommends that the following be addressed to meet this requirement, but this is not required:

- **Served by Adequate Infrastructure** – Able to support development consistent with the land use requirements of a CFA, including having existing and planned water, sewer, and stormwater infrastructure capacity.
- **Ready for Development** – Areas with sufficient development and redevelopment potential to support development for at least the next 5 years.

DIMENSIONAL REQUIREMENTS

CFAs must also meet these dimensional requirements:

- **A Minimum of 25 Acres** -- Because Eugene’s population is over 25,000, the City must adopt at least one CFA with a minimum of 25 acres which includes the most intensive development standards required per local government size, as provided in *OAR 660-012-0320(8)* or *(9)*. These areas are informally called “Primary CFAs.” For these larger local governments, additional (“Secondary”) CFAs may be designated with less intensive development standards, as provided in the rule, to achieve the required housing capacity.
- **A Minimum of 750 Feet Wide** – Contiguous CFAs with distinct land use requirements will meet the minimum width requirements. Some exceptions to the minimum width may be allowed.⁸⁹

ANALYSIS

METHODOLOGY OVERVIEW

This memo addresses the remaining suitability criteria for the potential CFA locations identified in Technical Memo #1.

⁸⁸ *Climate-Friendly Areas Methods Guide*. DLCD. 2022. p.11. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022.

⁸⁹ 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.

Criteria Previously Evaluated

Some narrowing using some of the locational criteria above already occurred in Technical Memo #1: Identify Potential CFA Locations. In a few cases, locational criteria were either *skipped* or *deferred* to a later step in the analysis. Locational criteria were *skipped* if they did not add any spatial refinement (i.e., if other criteria had already adequately narrowed the study area). The previously evaluated locational criteria include:

- **Urban Centers**
- **Within the City’s Urban Growth Boundary and/or Within City Limits**
 - The locational criteria described in the preceding section were assessed for all areas within the Urban Growth Boundary. Additional criteria associated with locating a CFA outside of city limits can be skipped, because the analysis of the base criteria did not identify any locations suitable for potential CFAs outside of Eugene’s city limits.
- **Safe from Natural Disasters and Hazards**

The three locational criteria—Urban Centers, Within the City Limits, and Natural Disasters and Hazards— were assessed in Technical Memo #1 using a GIS analysis, with the output of that analysis being a GIS layer representing areas that meet that criterion (see Technical Memo #1 Results). Input layers and definitions were provided by the City of Eugene and all analysis was performed by LCOG. See the Results section Technical Memo #1 for additional notes on methodology specific to each locational requirement.

Deferred Criteria

Locational criteria were *deferred* to a later step in the analysis (1) if it was deemed to be more efficient to analyze them later once the field of potential CFAs has been narrowed or (2) if there is a mismatch with the locational analysis phase (i.e., the criterion doesn’t lend itself to area interpretation). These included:

- **In or Near High-Density Mixed-Use Areas** – In OAR 660-012-310(2)(b), the rule states, “To the extent practicable, climate-friendly areas should be located within, or in close proximity to, areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities.” If the potential CFA is coextensive with an area planned for, or provided with, high-density residential uses and a high concentration of employment opportunities, as would be the case in many otherwise suitable CFA locations already identified, then it appears a suitable CFA would meet the rule requirement. This rule lacks clarity on how to quantify “close proximity,” “high-density residential uses,” or “high concentration of employment opportunities.” The term “practicable” is also given no definition in this section or elsewhere in the rules. Finally, it doesn’t discern whether a CFA is required to be surrounded. There are many possible interpretations which makes analyzing the suitable CFAs for this requirement very difficult.
 - The choices cities can make to address this part of the rule is as follows:
 - Attempt to interpret the intent of the rule and define the terms.

- Consider this requirement as too ambiguous to evaluate.

Eugene has elected to consider this requirement as too ambiguous and thus will not be evaluated as a part of the technical analysis presented in this memo. Eugene will consider adjacent uses in CFA Study Step A4: Most Promising CFAs.

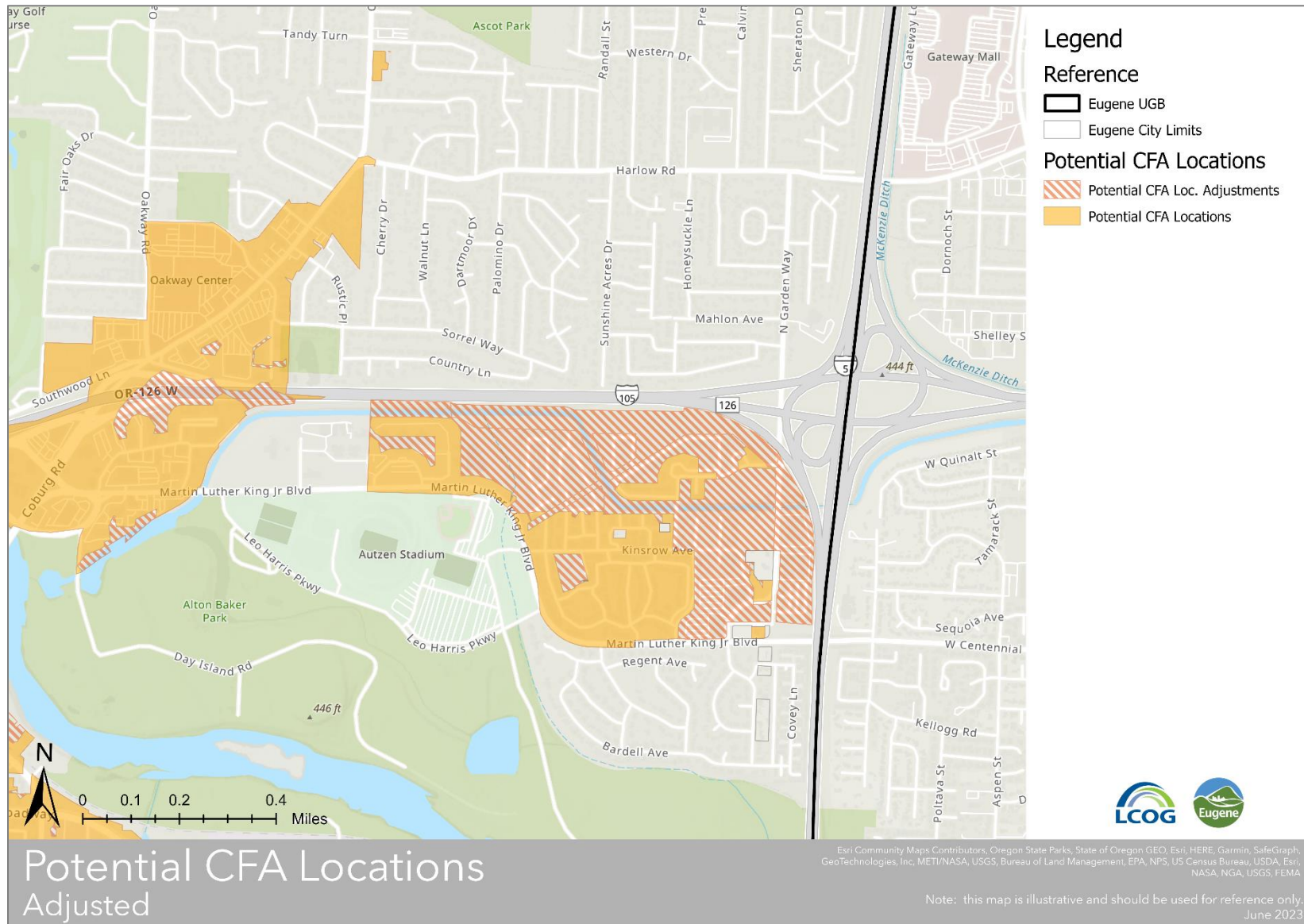
- **Served by Adequate Infrastructure and Ready for Development** – For efficiency reasons, and because these analyses are only recommended, not required, Eugene has elected to do further exploration of infrastructure capacity and redevelopment potential in the most promising CFA locations during the adoption process.
- **Accessible via High-Quality Active Transportation and Transit**
 - There is considerable overlap between high-quality active transportation and high-quality transit. For Technical Memo #1, access to high-quality transit (defined as within half-mile walking distance of a frequent transit corridor) was used as a proxy for a high-quality active transportation service area. The City has elected to do further exploration of active transportation service levels in the most promising CFA locations during the adoption process.
- **A Minimum of 25 Acres & A Minimum of 750 Feet Wide**
 - The project team decided that it would be most efficient to analyze these criteria as the next step in the narrowing process in this memo, rather than meeting the dimensional requirement in a later step by adjusting the potential CFA boundaries and zoning to meet the area requirements.
 - For the 750-foot minimum requirement, a method of calculation has been developed and has been used to fine-tune potential CFAs selected for consideration based on other criteria. This memo uses this as suitability criteria for potential CFA locations.
 - The 25-acre minimum requirement for at least one primary CFA was also evaluated in this memo.

This memo addresses the remaining suitability criteria related to dimensional requirements (width and size) for the potential CFA locations identified in Technical Memo #1, and the results of combining the suitability criteria from Technical Memo #1 and this memo.

Special Note: New Area Added to Potential CFA Locations

In reviewing previous work, City staff noted that an area had been left out of the “Urban Centers” definition. This area was the zone S-CN for the Chase Node Special Area Zone. This has been added. The following map shows the change.

MAP 9. CHASE NODE ADDITION TO POTENTIAL CFA LOCATIONS



RESULTS

Suitable Width

Per discussions with DLCD, professional peers, and City staff, this memo uses a method of assessing the minimum width of CFAs that abides by the rule in a manner that is clear, objective, and technically sound. The operational definition in this method was as follows.

Minimum Width of 750 Feet: The potential Climate-Friendly Area includes at least one portion that will entirely contain a circle of 750 feet in diameter.

DLCD explains their interpretation further in the Climate-Friendly Area Methods Guide, as follows.

“OAR 660-012-0310(2)(f) requires CFAs to have a minimum width of 750 feet, with a few exceptions. The CFA dimensional standard includes allowed exceptions to the minimum width requirement, including natural barriers, barriers in the built environment (such as freeways), and areas planned and zoned to meet industrial needs. The minimum width dimension is intended to result in a necessary concentration of uses within a proximate area to facilitate pedestrian, bicycle, and transit convenience. Another goal is to avoid over-reliance on narrow, linear corridors that would serve to sharply separate CFA areas from abutting zones. Linear corridors are less likely to foster a synergy of uses and could result in economic segregation from abutting zones. However, these considerations may be balanced with ongoing planning efforts to support transit-served corridors. Optimally, a circle 750 feet in diameter would fit within most portions of a CFA, but as a minimum requirement, a CFA must have at least one portion that is 750 feet wide. Parts of CFAs that cannot meet this criterion should be relatively limited, and such corridors should be provided with high-quality pedestrian, bicycle, and transit infrastructure.”⁹⁰

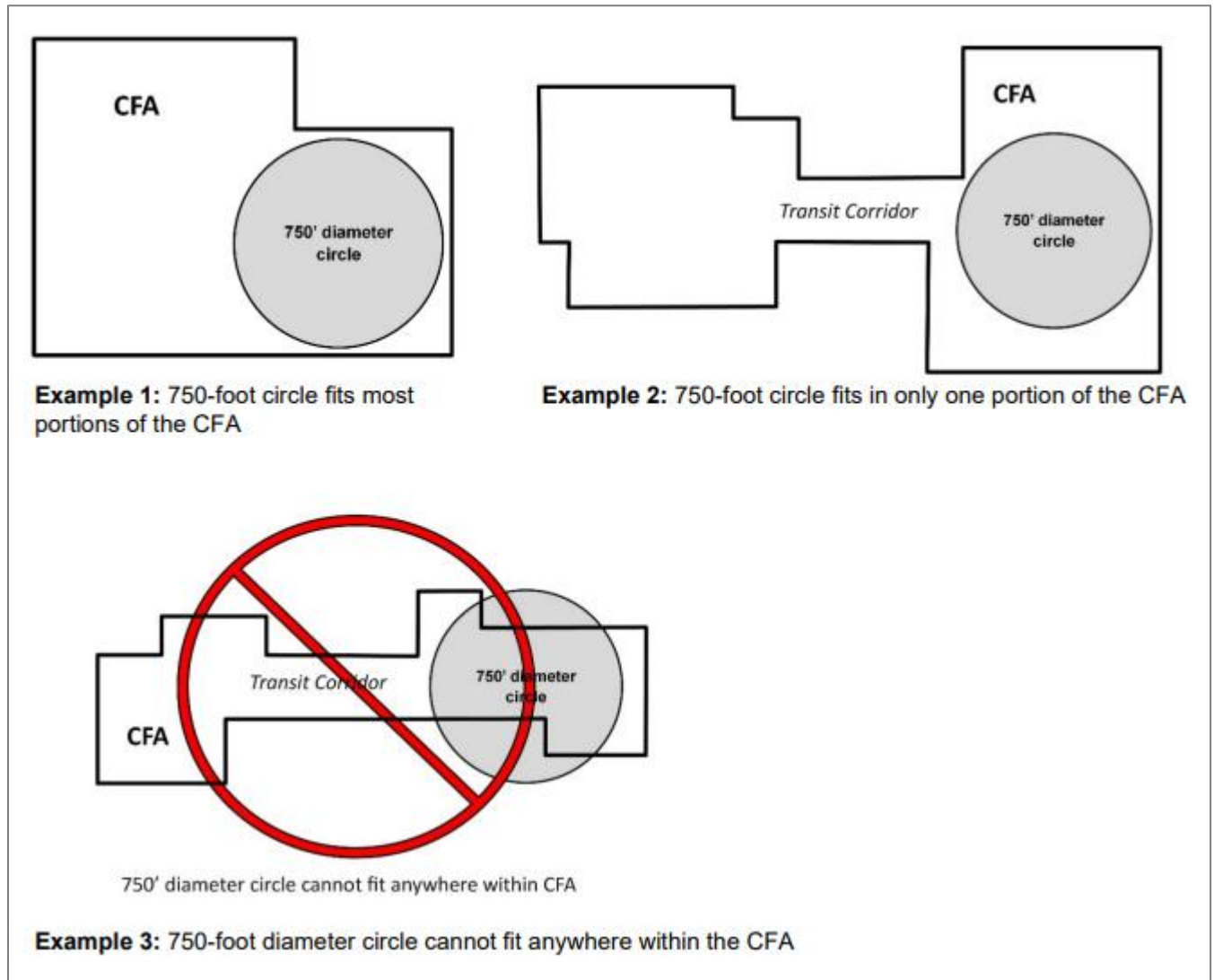
Although the above passage does not define terms like “most” or “relatively limited,” it suggests a second definition of the minimum width requirement.

Minimum Width of 750 Feet (Optimal): The potential Climate-Friendly Area includes a majority of portions (greater than 50% by area) that will entirely contain a circle of 750 feet.

Since climate-friendly areas are already required to be in areas served by high-quality pedestrian, bicycle, and transit infrastructure, that part of the passage above does not add additional requirements.

⁹⁰ Climate-Friendly Area Methods Guide, Updated April 3, 2023, p. 13.

FIGURE 1. MINIMUM WIDTH DETERMINATION



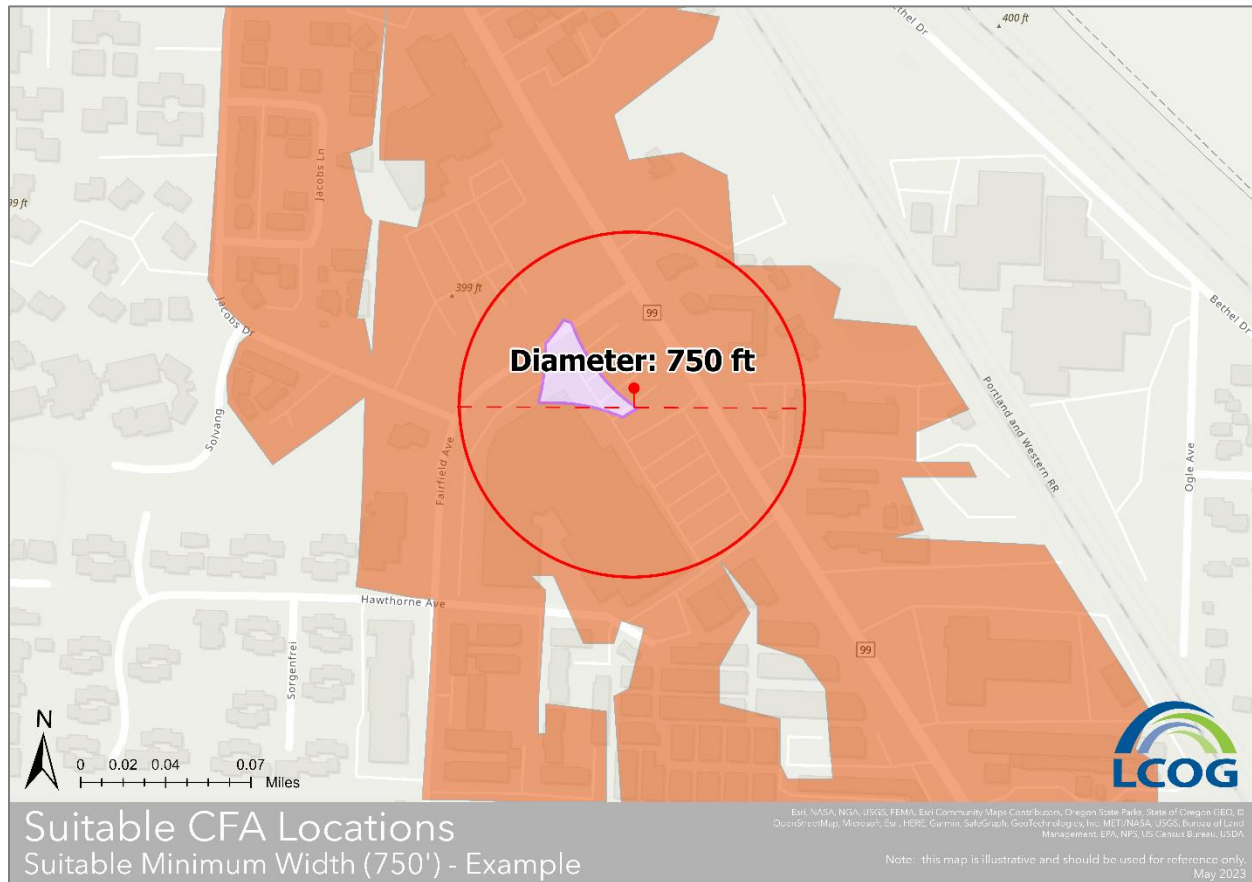
The methodology for determining which potential CFA locations meet the **minimum** operational definition was as follows.

1. Buffer each spatially distinct potential CFA location polygon identified in Technical Memo #1 by negative 375 feet (the radius of a circle with a diameter of 750 feet). The negative buffer erases the outer 375 feet from all edges of the polygon, resulting in an “eroded”, reduced, interior polygon. Any point within the eroded polygon could serve as the center of a 750-foot diameter circle that would fit within the original potential CFA location polygon.
2. Select potential CFA polygons containing reduced polygons after the negative buffer step, as they are the potential CFA locations capable of fitting a 750-foot diameter circle *in at least one portion*.

Map 10 shows an example of this method being used. The area in light purple in the middle of the potential CFA location polygon is the “eroded” result step 1 above. The red ring shows a circle of

the required minimum width fitting in the potential CFA location (in orange). Note the odd-shaped voids shown in this example are errors introduced by the walkable distance element of the potential CFA location process and, if allowed to remain, would reduce the eroded area considerably. These problems were corrected with manual editing prior to running the minimum width calculations.

MAP 10. EXAMPLE OF APPLIED MINIMUM WIDTH METHOD



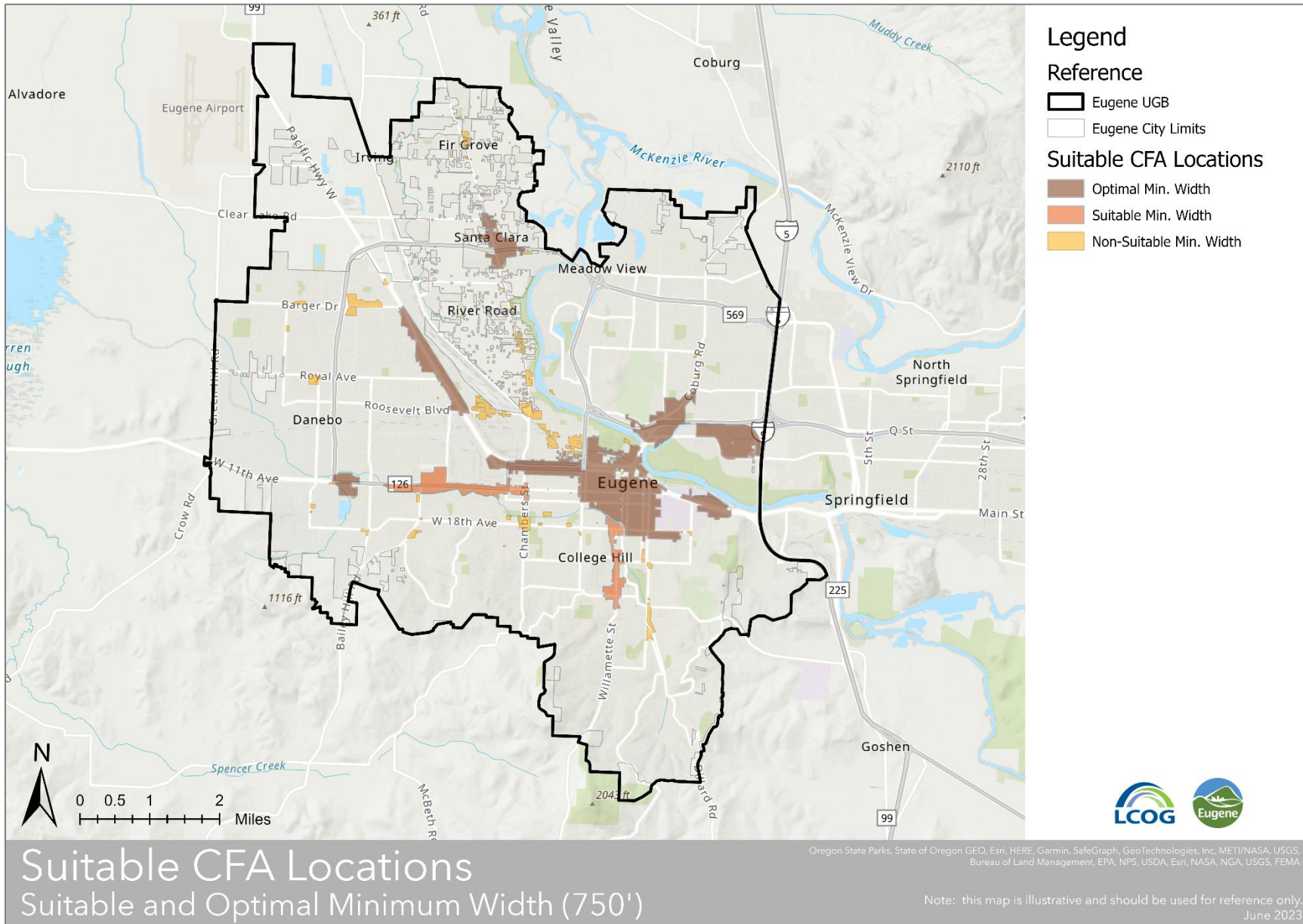
The methodology for determining which potential CFA locations meet the **optimal** width recommendation definition was as follows:

1. Buffer each spatially distinct potential CFA location polygon identified in Technical Memo #1 by negative 375 feet (the radius of a circle with a diameter of 750 feet). The negative buffer erases the outer 375 feet from all edges of the polygon, resulting in an “eroded,” reduced, interior polygon. Any point within the eroded polygon could serve as the center of a 750-foot diameter circle that would fit within the original potential CFA location polygon.
2. Buffer those eroded interior polygons by 375 feet (the radius of a circle with a diameter of 750 feet).
3. Calculate the percentage of that buffer area as a proportion of the original area of the potential CFA location polygon.
4. Filter these buffer polygons for only those over 50%.

5. Select potential CFA polygons containing the buffer polygons with over 50% of the area of the parent polygon, as these are the potential CFA locations capable of fitting a 750-foot diameter circle *in most areas*.

Map 11 shows the results of both methods citywide. Areas in light orange are potential CFA locations identified in Technical Memo #1; medium orange areas are potential CFA locations that meet the minimum width suitability criteria; and dark-orange areas are potential CFA locations that meet the optimal width suitability recommendation.

MAP 11. POTENTIAL CFA LOCATIONS OF SUITABLE AND OPTIMAL MINIMUM WIDTH



Suitable Size

Because Eugene’s population is over 25,000, the City must adopt at least one CFA with a minimum of 25 acres which includes the most intensive development standards required per local government size, as provided in *OAR 660-012-0320(8)* or *(9)*. These areas are called “Primary CFAs.” For these larger cities, additional (“Secondary”) CFAs may be designated with less intensive standards as provided in the rule to achieve the required housing capacity.

The following table shows the potential CFA locations that are of suitable width (those flagged as of optimal width are in bold), classified by size. All of the potential CFAs meet the minimum 25-acre size.

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

Suitable Locations for Eugene CFAs

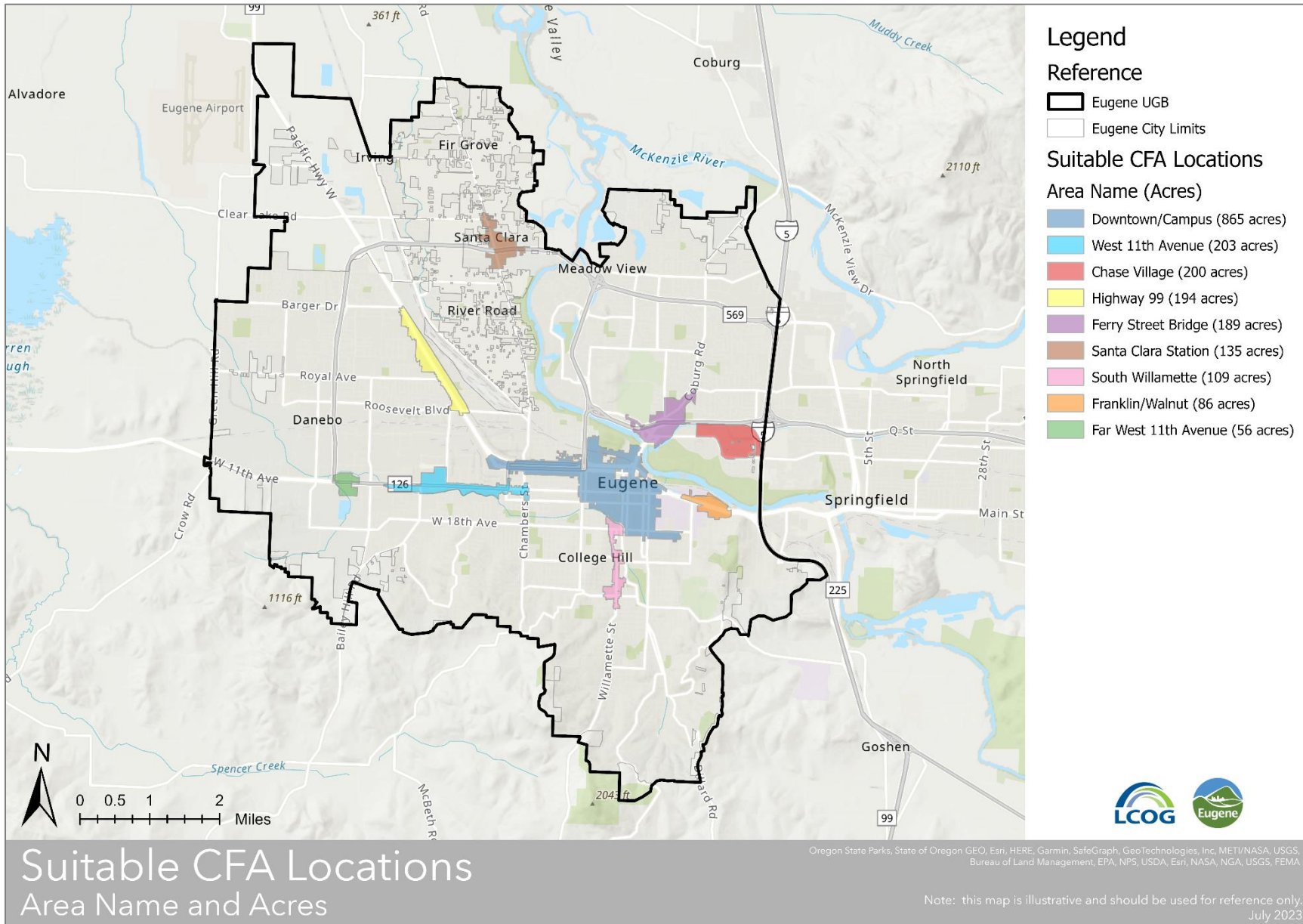
COMBINING THE SUITABILITY CRITERIA

To recap, the location and suitability criteria that were assessed so far in the analysis were as follows.

- Technical Memo #1 - Location
 - In Urban Centers
 - In High-Quality Transit Corridors (within ½ mile walking distance)
 - Natural Disasters and Hazards (not impacted by Goal 7 hazards)
- Technical Memo #3a - Suitability
- Of Sufficient Minimum Width
- At Least 25 Acres in Size (primary CFA only)

Each criterion presumes the passage of the previous one. The following map shows the resulting locations.

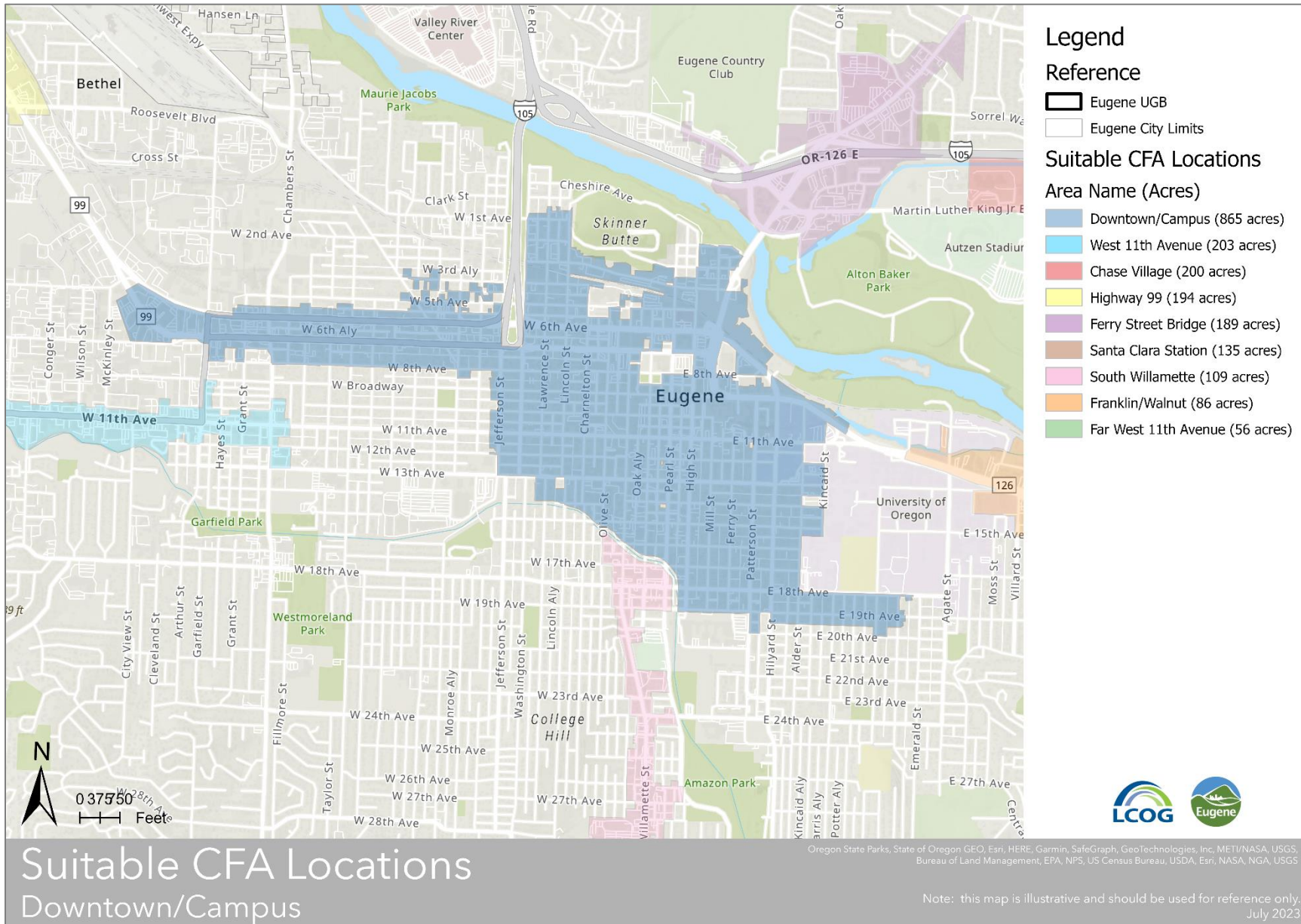
MAP 12. SUITABLE CFA LOCATIONS



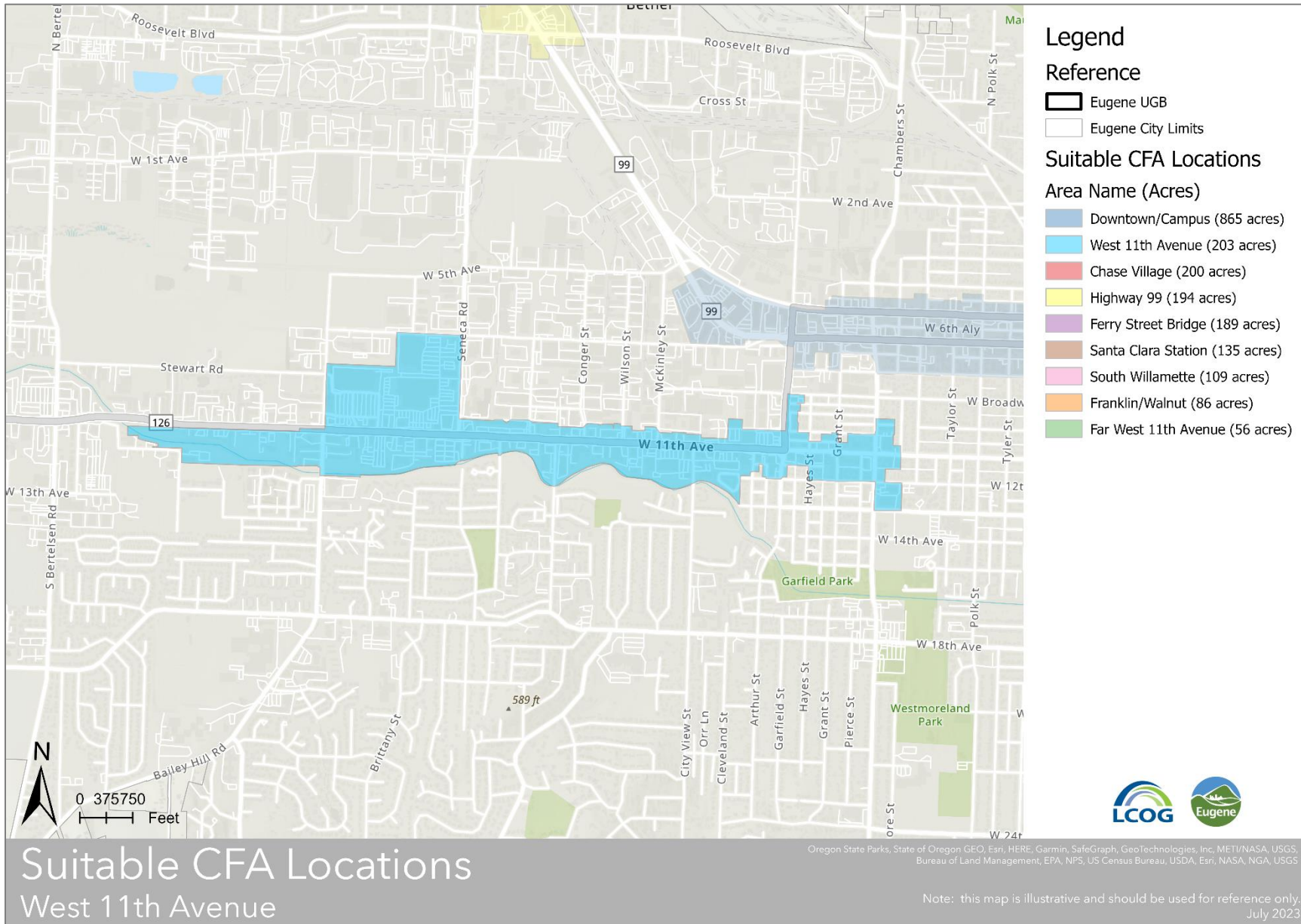
SUITABLE CFA LOCATIONS- IN DETAIL

There are nine distinct potential CFA locations that were found to be suitable. The following series of maps focus on each suitable CFA location, one at a time, in order to better understand the areas involved.

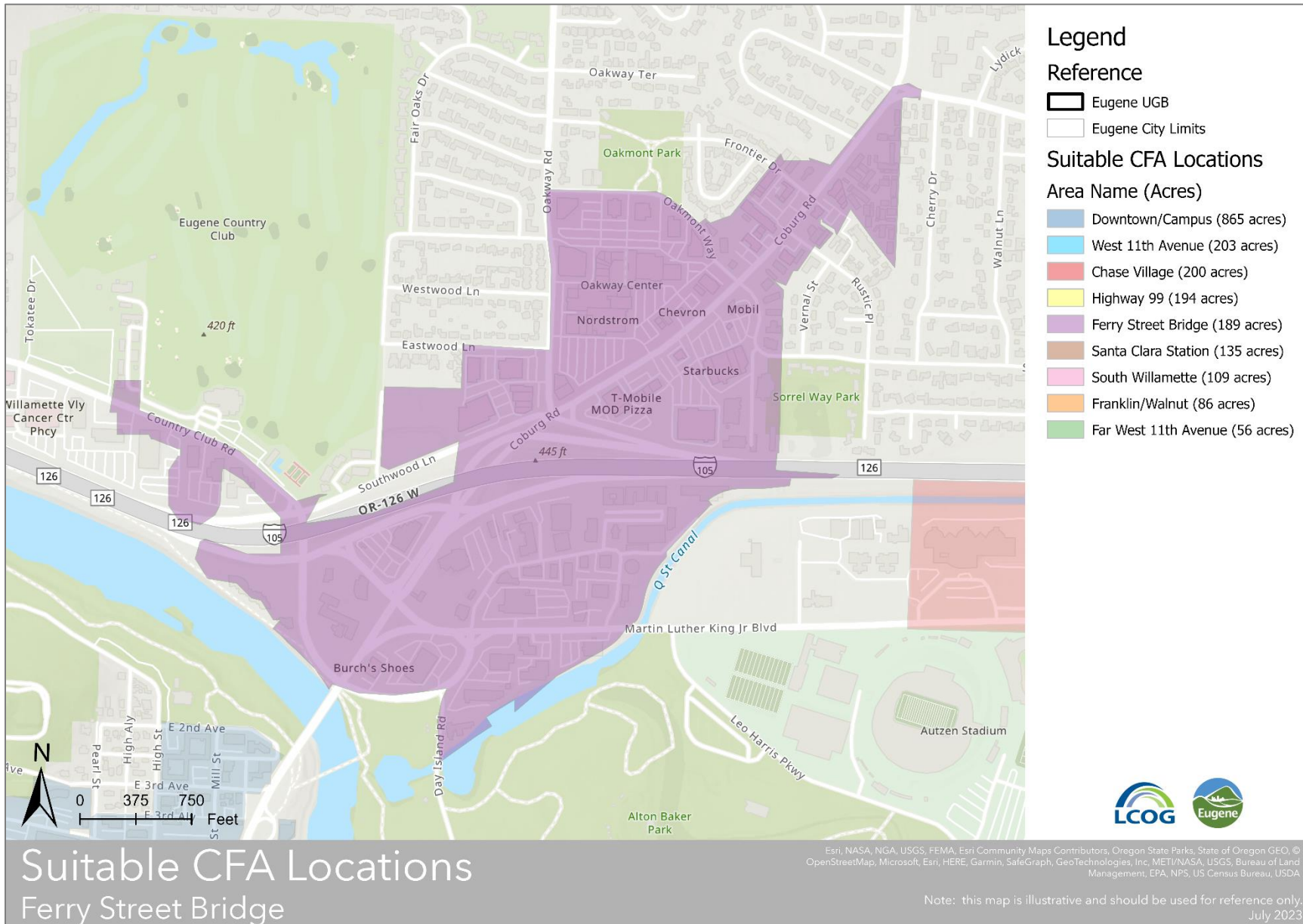
MAP 13. SUITABLE CFA LOCATIONS – DOWNTOWN/CAMPUS



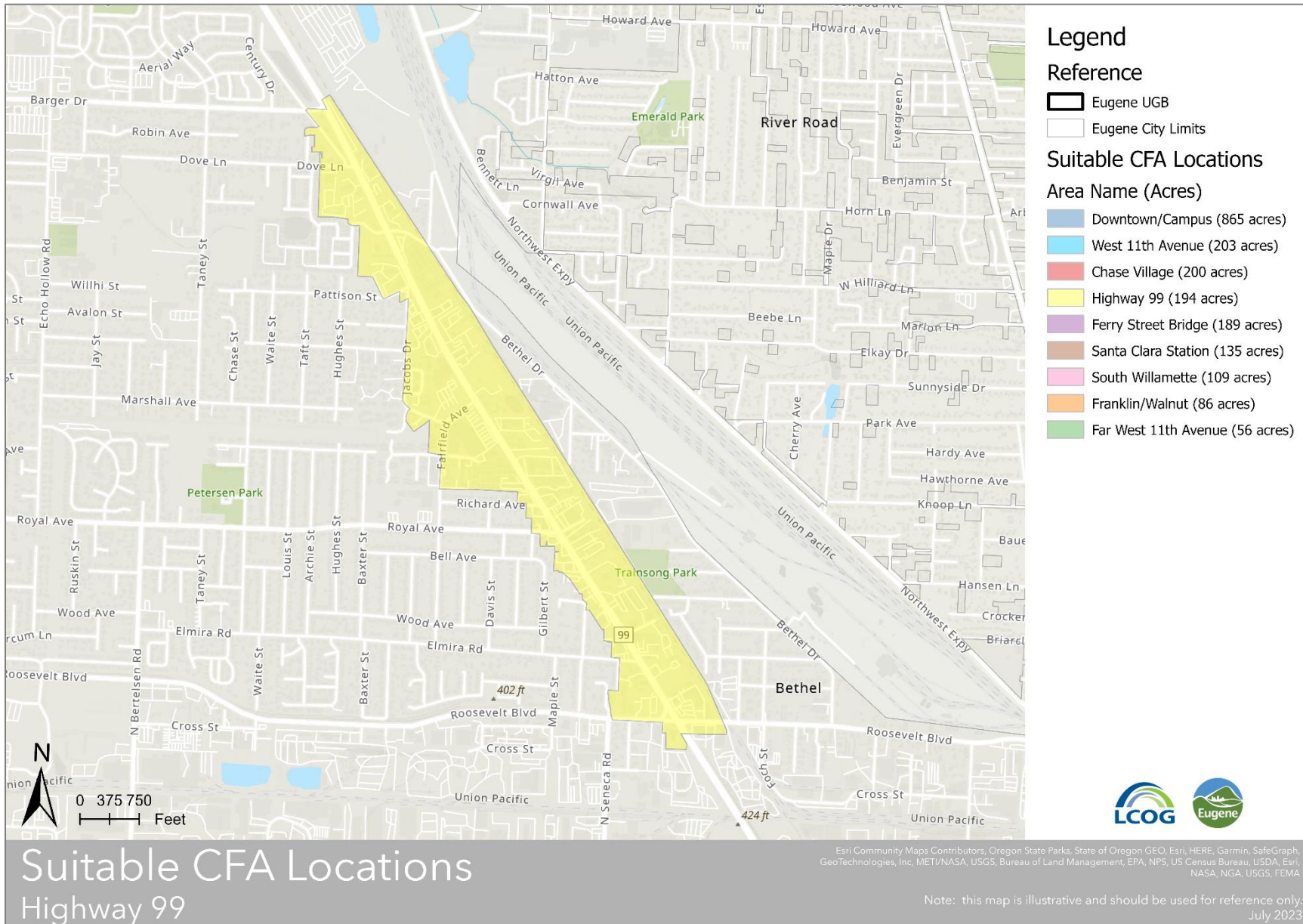
MAP 14. SUITABLE CFA LOCATIONS – WEST 11TH AVENUE



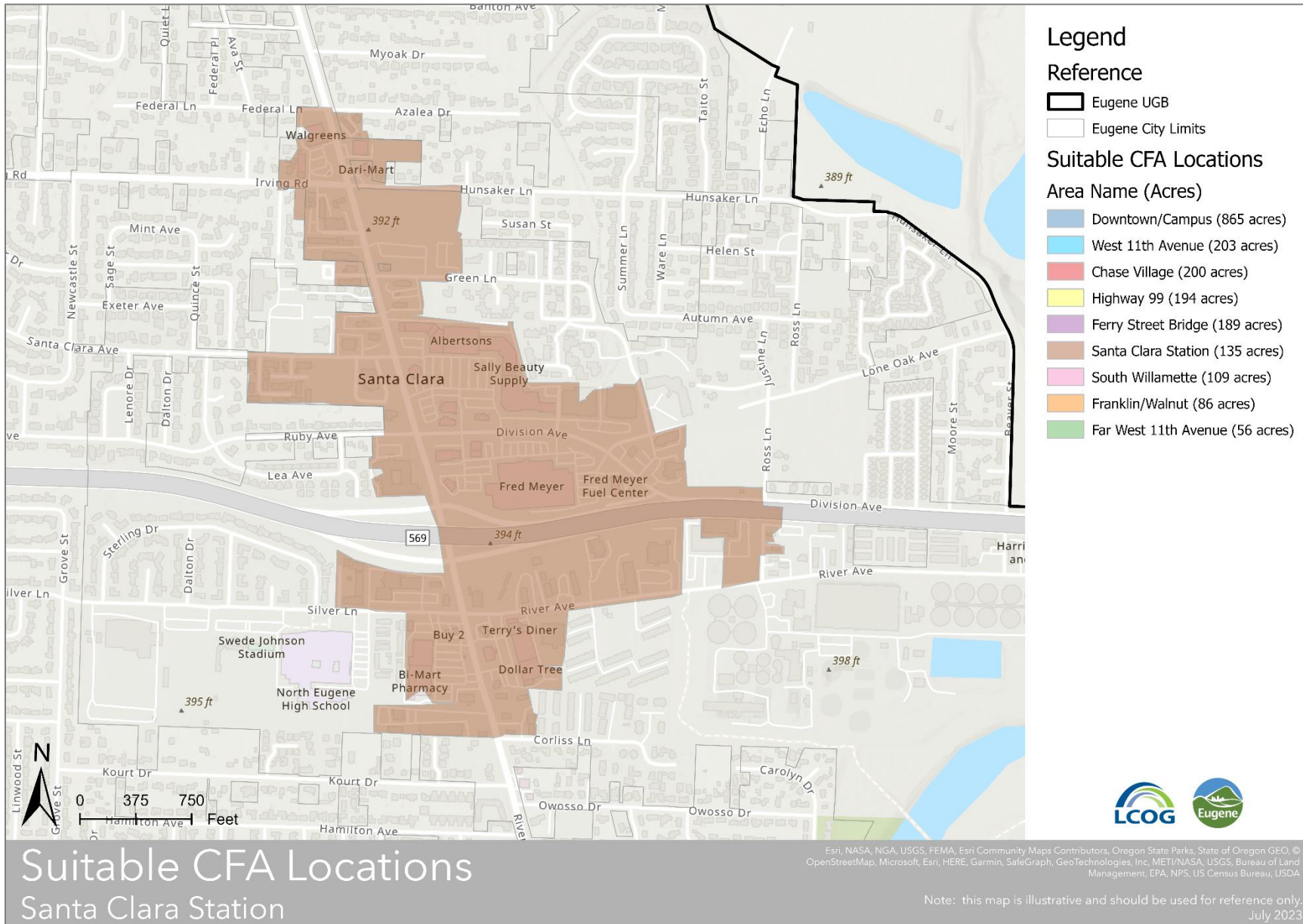
MAP 15. SUITABLE CFA LOCATIONS – FERRY STREET BRIDGE



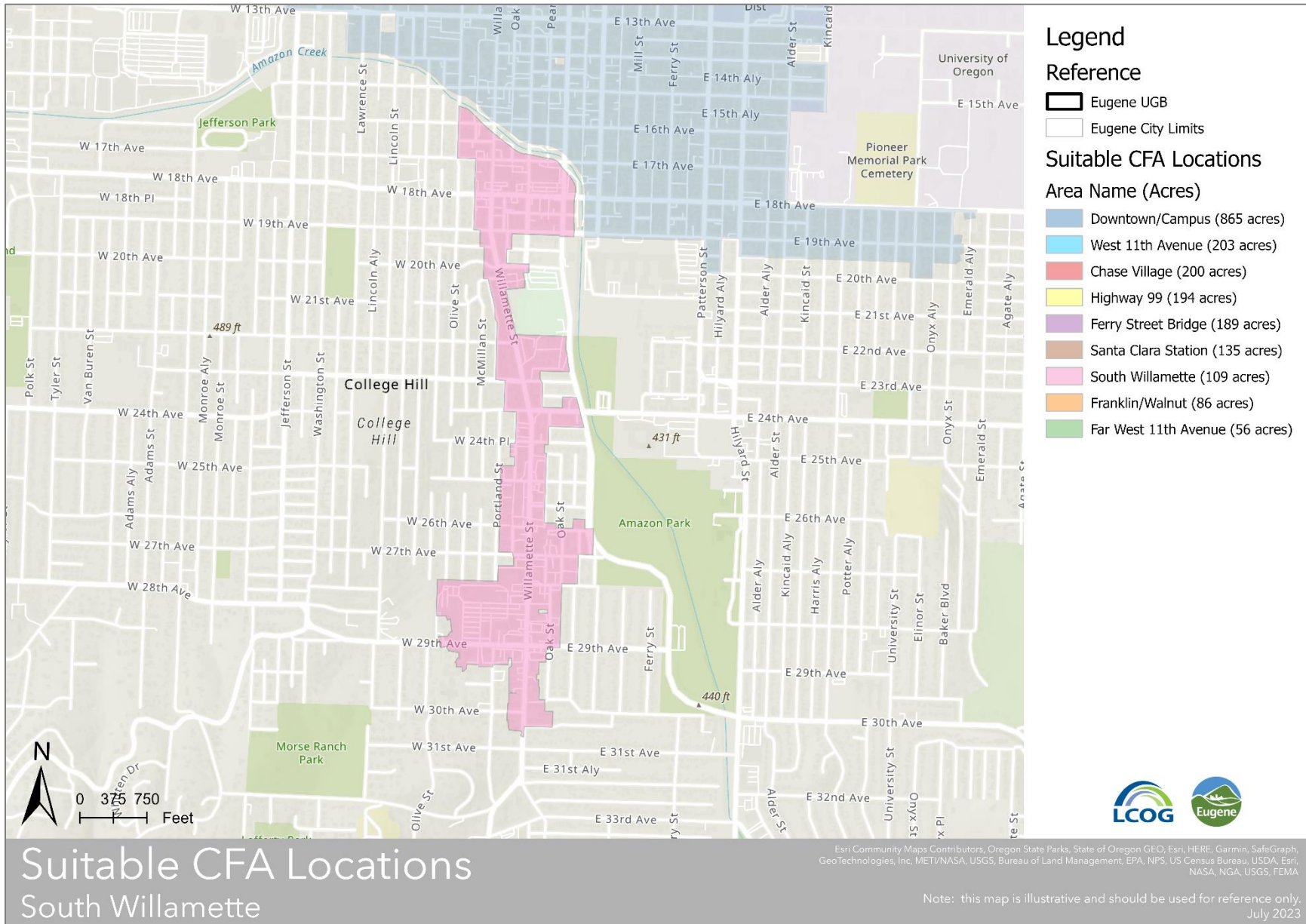
MAP 16. SUITABLE CFA LOCATIONS – HIGHWAY 99



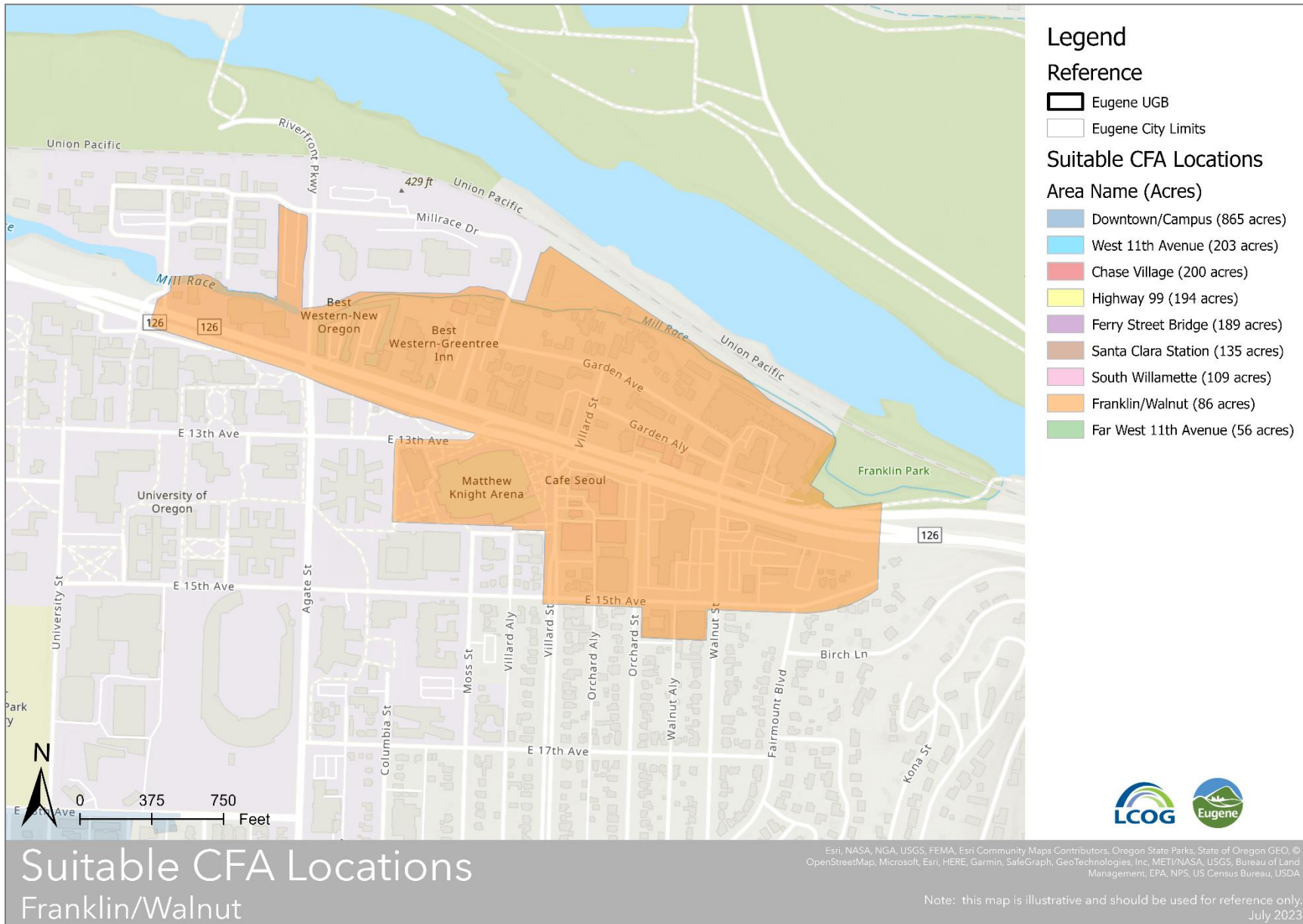
MAP 17. SUITABLE CFA LOCATIONS – SANTA CLARA STATION



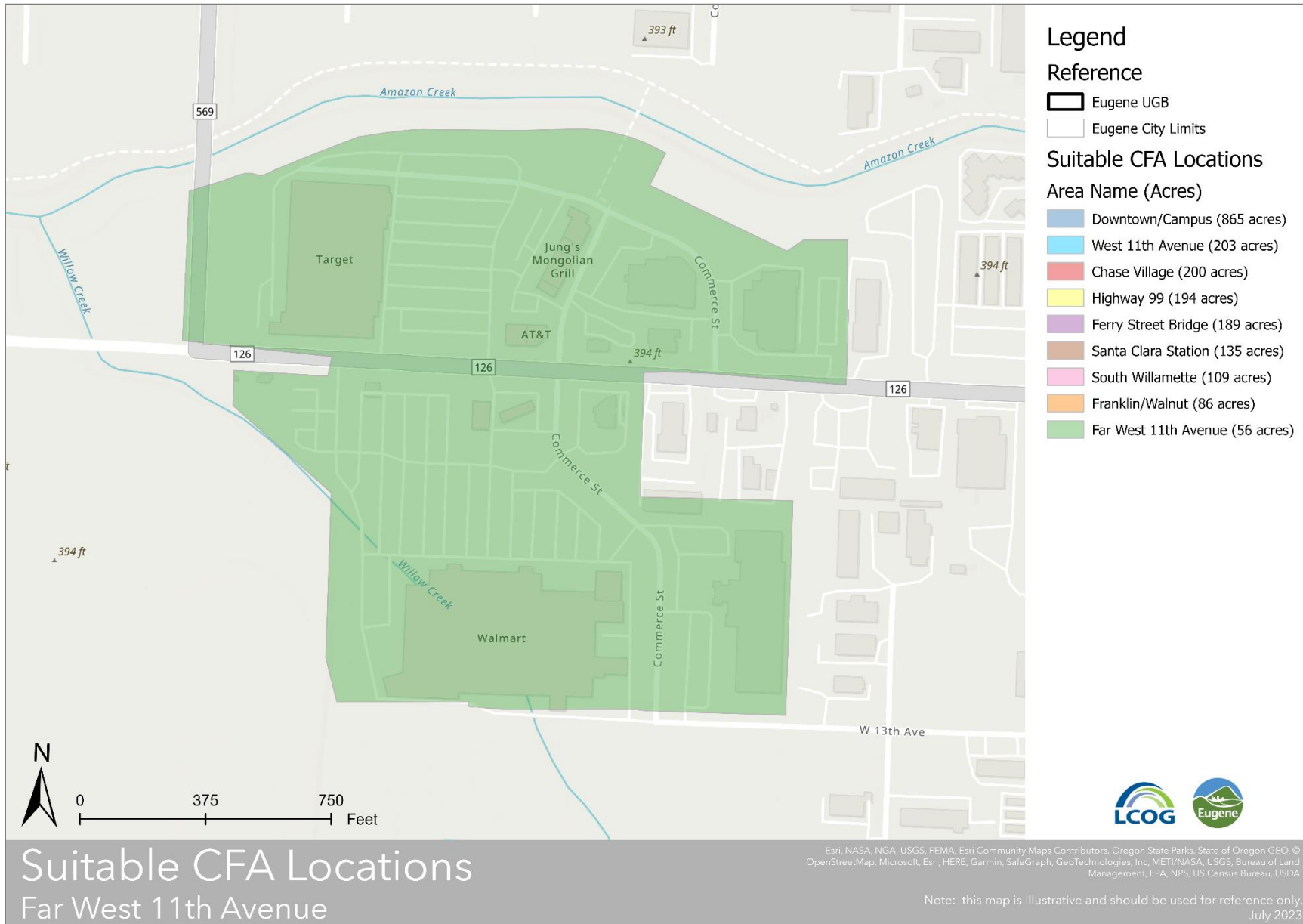
MAP 18. SUITABLE CFA LOCATIONS – SOUTH WILLAMETTE



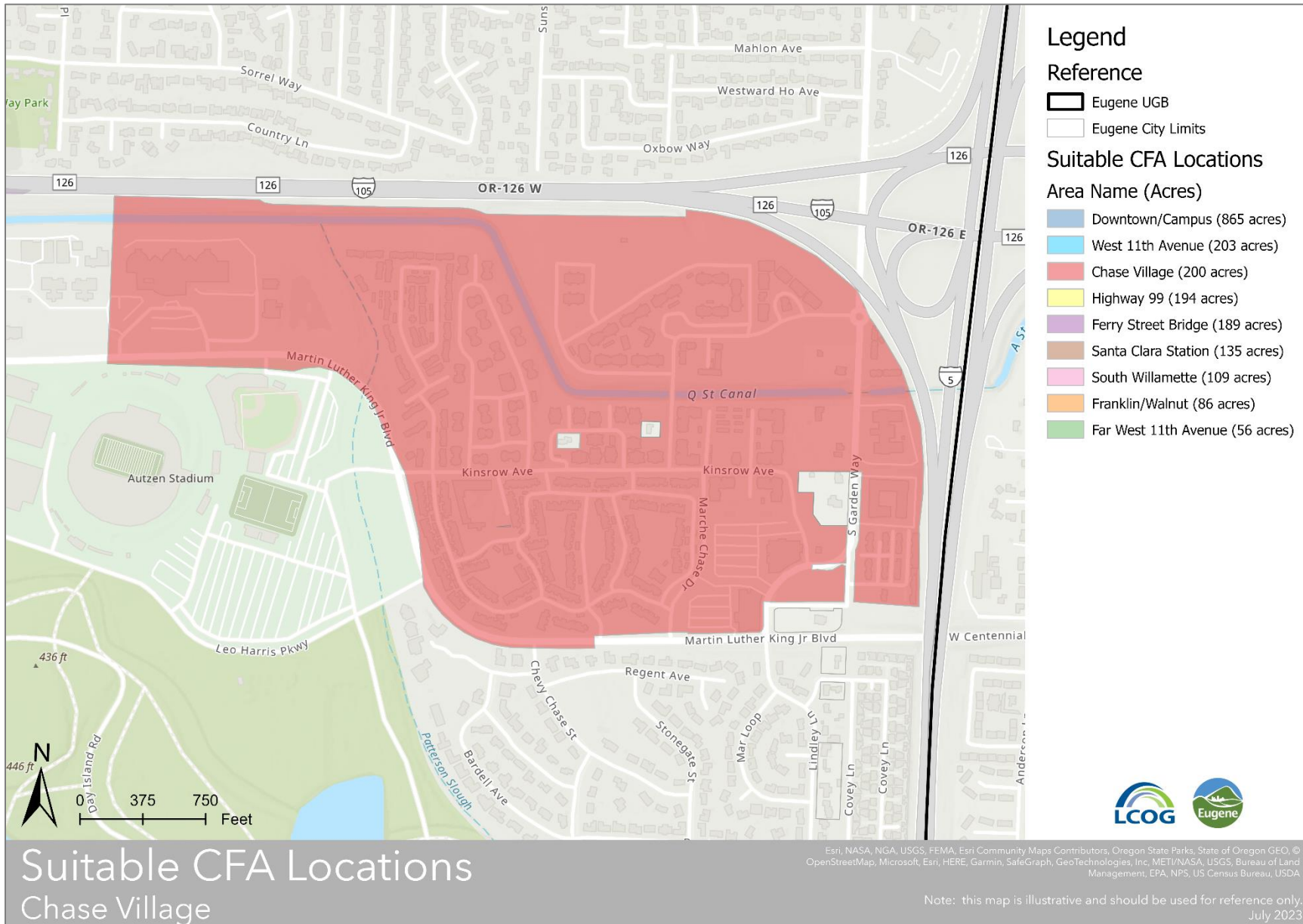
MAP 19. SUITABLE CFA LOCATIONS – FRANKLIN/WALNUT



MAP 20. SUITABLE CFA LOCATIONS – FAR WEST 11TH AVENUE



MAP 21. SUITABLE CFA LOCATIONS – CHASE VILLAGE



CONCLUSIONS AND NEXT STEPS

CONCLUSIONS

To this point the CFA Study analysis has explored the possible CFA locations and the locations of those that met further suitability criteria.

Primary and Secondary Areas

Nine suitable CFA locations were identified. Seven of the nine have an optimal minimum width. All of the suitable locations are more than 25 acres in size.

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

Since this is the case, the City will be able to select any of these areas as “Primary” CFAs or may apply additional criteria beyond those required in the rules to select the Primary CFA. Further CFAs can be selected which either share the density requirements of a Primary CFA or can have lower densities and minimum height requirements as Secondary CFAs, per OAR 660-012-0320(8) or may use the outcome-oriented path described in OAR 660-012-0320(9).

INCLUSION OF ADJACENT PUBLIC LANDS

Another issue is evident in some detailed maps above is that some areas could benefit from inclusion of adjacent parks, open space, or other public lands or rights-of-way. These inclusions are recommended in the rules and may also be beneficial to meet the minimum width requirements and to create more cohesive and connected CFAs. The City has elected to determine whether to include adjacent parks, open space, and public lands once they are to the point of actually determining CFA boundaries during the adoption process.

OTHER DEFERRED ANALYSES

The City has also elected to do further exploration of active transportation service levels, suitability of public infrastructure, and development readiness in the most promising CFA locations during the adoption process.

NEXT STEPS

Further analysis related to determining the most promising CFA location is required to address the following:

- Land use regulations and other policies that may need to change to conform with the rules (CFA Study Step A3 - Policy)
- Theoretical zoned housing capacity of suitable areas (CFA Study Step A3 – Capacity)
- Determine the most promising CFA locations and their optimal size (CFA Study Step A4)

TECHNICAL MEMORANDUM #3B – POLICY

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3B

POLICY/CODE EVALUATION

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: June 30, 2023

CONTENTS

PURPOSE	109
BACKGROUND.....	109
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	110
<i>Eugene's Suitable CFAs</i>	110
<i>Applicable Zones in Eugene's Suitable CFAs</i>	112
Overlay Zones	112
Zoning and Plan Designations.....	114
ANALYSIS.....	118
<i>Overview of Methods</i>	118
<i>OAR 660-012-0320 (2 & 4): Outright Permitted Uses In CFAs</i>	118
Analysis Implication	119
<i>Comparative Analysis of OAR 660-012-0320 (2 & 4) and Applicable Zones & Policies in Eugene's Suitable CFAs</i>	120
Comparison Matrix	120
Other Residential Building Types	127
Public and Semi-Public Uses	127
Streetscape	127
<i>OAR 660-012-0320 (5): Block Length</i>	127
Analysis Implication.....	128
<i>Comparative Analysis of OAR 660-012-0320 (5) and Applicable Zones & Policies in Eugene's Suitable CFAs</i>	128
Block Length.....	128
<i>OAR 660-012-0320 (7): Transportation, Parking and Broader Land Use Requirements</i>	129
Analysis Implication	129

<i>Review of OAR 660-012-0320 (7) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	130
<i>OAR 660-012-0320 (6, 8 & 9): Density and Height</i>	135
Analysis Implication	136
<i>Comparative Analysis of OAR 660-12-0320 (6 & 8) and Applicable Zones & Policies in Eugene’s Suitable CFAs</i>	137
CONCLUSION	141
<i>Relative Compatibility of Zones and Suitable CFAs</i>	141

PURPOSE

Technical Memorandum #3b provides an initial evaluation of the policy and regulatory context for Suitable Climate-Friendly Areas (CFAs) established through the preceding analyses (Technical Memos #1 and #3a). These areas are depicted in Map 1. The purpose of this memo is to continue the refinement process of Suitable CFAs. This memo specifically addresses compatibility through the lens of CFA code and policy requirements (outlined in OAR 660-012-0320). This evaluation will inform policy and code amendments Eugene would need to incorporate as part of CFA designation.

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown's *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon's climate pollution reduction targets 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 Oregon's eight most populated areas.

CFAs are intended to be areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.⁹¹

The rules require cities (and some urbanized county areas) 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 CFAs within urban growth boundaries. CFAs will be sized to accommodate a portion of the community's housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may currently allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, requiring either adoption of the set of prescriptive development standards set out in the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

⁹¹ OAR 660-012-0005(10). <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292987>

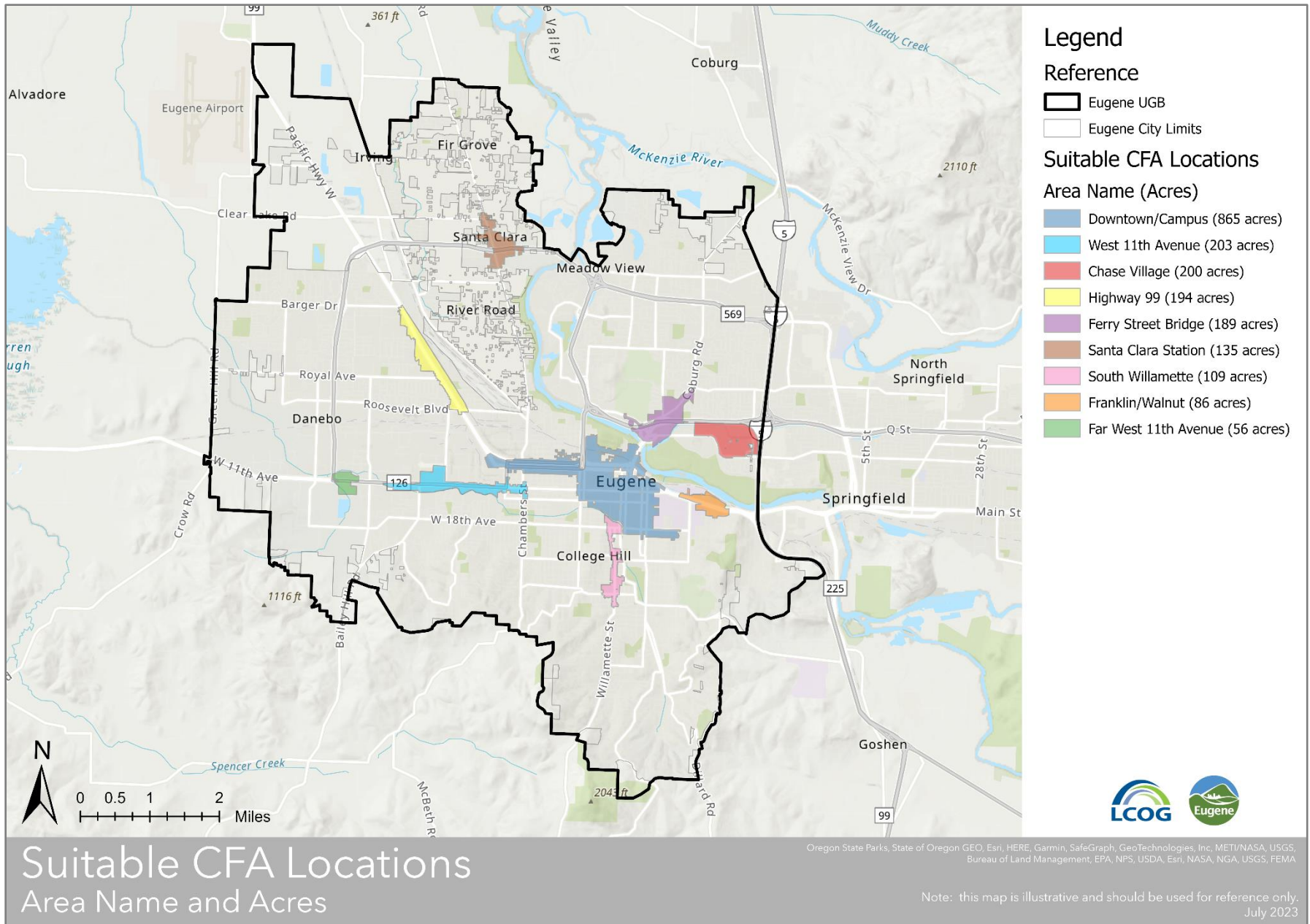
The Lane Council of Governments (LCOG) is providing technical assistance to the City of Eugene to complete the CFA study. The following table provides an overview of steps for LCOG’s technical analysis. This Technical Memorandum addresses one component (policy/code evaluation) of the third step in the study phase: analysis of potential CFAs suitability, policy, and capacity.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
⇒ Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS

EUGENE’S SUITABLE CFAS

The following map provides visual representation of the City of Eugene Suitable CFAs evaluated in this analysis.



APPLICABLE ZONES IN EUGENE’S SUITABLE CFAS

The suitability analysis in Technical Memo #3a resulted in a number of “Suitable” CFA areas within the City of Eugene, a narrowed set of areas from all the Potential CFAs identified in Technical Memo #1. The basic zoning character of these areas is summarized below in Table 1, which organizes Eugene zones in order of their size and percent of all Suitable CFAs by acreage. Base, special area, and overlay zones are evaluated both collectively and individually throughout this memo.

TABLE 1. RELATIVE AREA OF ZONES WITHIN EUGENE’S SUITABLE CFAS

Zones	Abbreviation	Acreage in CFAs	% of All CFAs
Limited High-Density Residential	R-3	235.97	11.59%
High-Density Residential	R-4	201.59	9.90%
Neighborhood Commercial	C-1	13.34	0.66%
Community Commercial	C-2	1,127.98	55.41%
Major Commercial	C-3	110.94	5.45%
General Office	GO	50.52	2.48%
Chambers Special Area	S-C	28.84	1.42%
Chase Garden Node Special Area	S-CN	77.22	3.79%
Downtown Westside Special Area	S-DW	24.40	1.20%
Downtown Riverfront Special Area	S-DR	21.01	1.03%
Fifth Avenue Special Area	S-F	8.20	0.40%
Walnut Station Special Area	S-WS	74.91	3.68%
Whiteaker Special Area	S-W	60.67	2.98%

Overlay Zones

Tables 2 and 3 provide summaries of the overlay zones within Eugene’s Suitable CFAs. Overlay zones establish additional regulations beyond the base zone to address specific community objectives, such as protection of environmentally sensitive areas or improving the efficient use of public transit. Table 2 show the general occurrence of overlay zones in the Suitable CFA base zones. Table 3 characterizes the extent of overlay zones by acreage in the Suitable CFAs by base zone.

TABLE 2. OCCURRENCE OF OVERLAY ZONES IN BASE ZONES WITHIN EUGENE'S SUITABLE CFAS

Base Zone	Overlay Zone(s)
Limited High Density (R-3)	SR, TD, WR, /40
High Density Residential (R-4)	WR, TD, SR, /82, /89
Neighborhood Commercial (C-1)	TD, WR, SR
Chambers Special Area	-
Chase Node Special Area	WQ, WR
Community Commercial (C-2)	ND, SR, TD, WR, WP, WB, /20, PD
Major Commercial (C-3)	TD, BW
General Office (GO)	PD, WR, WP, TD, SR
Downtown Riverfront Special Area (S-DR)	WR, SR
Downtown Westside Special Area (S-DW)	SR, TD, /20
Fifth Avenue Special Area (S-F)	TD, /20
Walnut Station Special Area (S-WS)	WR
Whiteaker Special Area (S-W)	SR

SR – Site Review, TD – Transit Oriented Development, PD – Planned Unit Development, ND – Nodal Development, WQ – Water Quality, WR – Water Resources, WP – Waterside Protection, WB - Wetland Buffer, BW – Broadway Overlay, (#) - maximum net density

TABLE 3. ACREAGE OF KEY OVERLAY ZONES IN BASE ZONES IN EUGENE'S SUITABLE CFAS

Overlay Zone	R-3	R-4	C-1	C-2	C-3	GO	S-W	S-DR	S-CN	S-F	S-WS
Broadway /BW					5.1						
Density /92		1.18									
Density /89		3.29									
Density /82		.49									
Density /40	1										

Density /20				2.29						0.80	
Nodal Development (/ND)				10.7							
Planned Unit Development (/PD)	19.8			21.63		6.4					
Site Review (/SR)	19.2	104.6	6.7	254.6		13.7	59.5				
Transit Oriented Development (/TD)	0.59	32.8		159.7	110.9	7.4				7.5	
Water Quality (/WQ)									11.77		
Water Resources (/WR)	4.3	34.8	0.1	23.2		0.24	19.4	12.6	31.6		22.8
Waterside Protection (/WP)				86.0		4.0					
Wetland Buffer (/WB)				21.5							

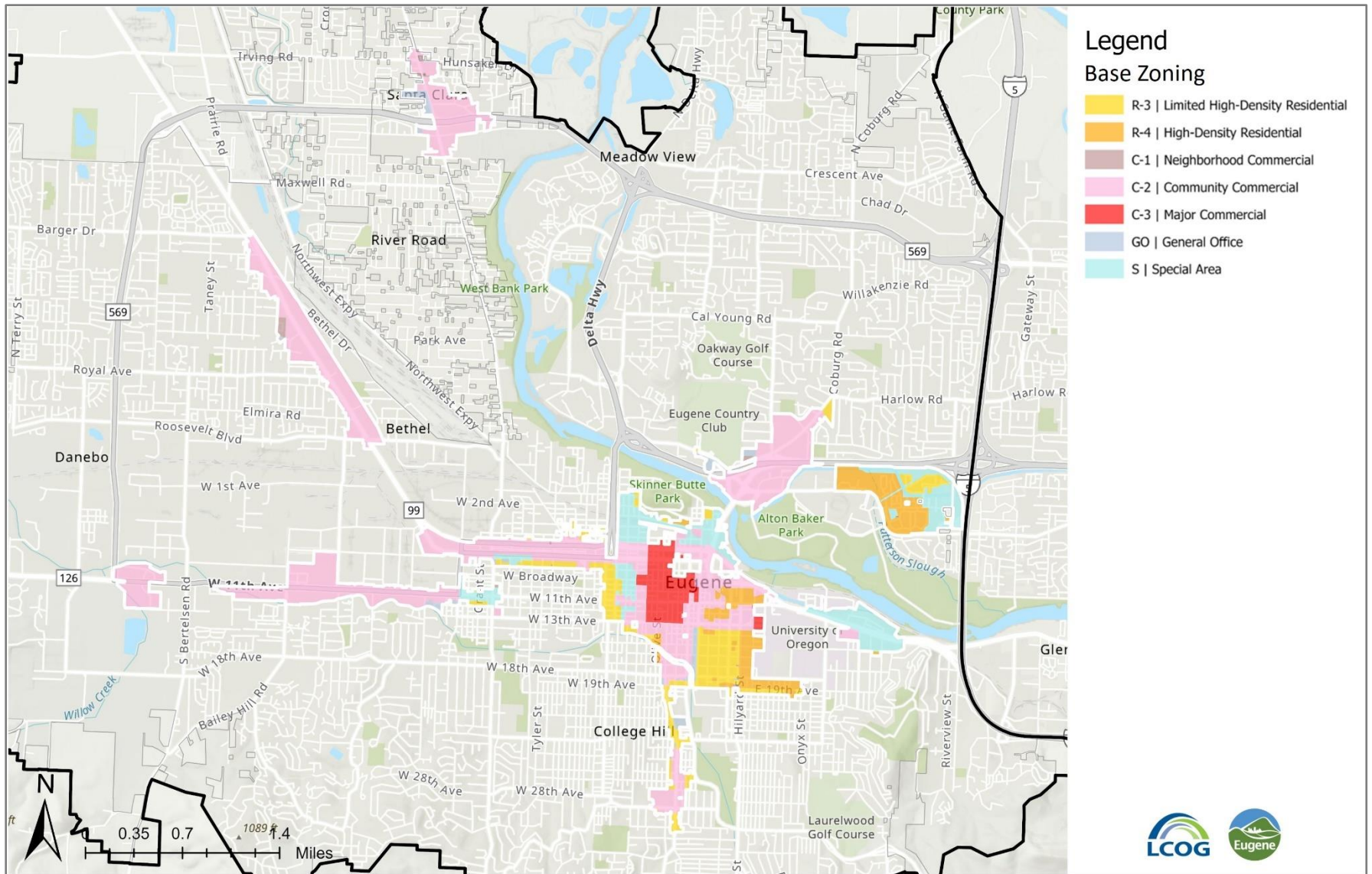
Maps 2 and 3 on the following pages provide visual representation of the base zones and overlay zones within City of Eugene Suitable CFAs evaluated in this analysis.

Zoning and Plan Designations

The Eugene-Springfield Metropolitan Area General Plan (Metro Plan) was created to serve as the official long-range comprehensive plan of metropolitan Lane County and the Cities of Eugene and Springfield, and included a shared urban growth boundary (UGB) and metropolitan wide policies. Originally adopted in 1982, it has been updated periodically to respond to changing conditions. In 2007, the Oregon Legislature enacted ORS 197.304, also known as House Bill 3337, which was the impetus for Eugene to establish a UGB separate from Springfield’s and to begin to create a Eugene-specific comprehensive plan. The goals and policies of the Envision Eugene Comprehensive Plan along with applicable policies and maps in the Metro Plan guide Eugene’s growth and development into the future.

Comprehensive Plan Maps establish “plan designations” for the use of lands in a city or county. When it comes to land use requirements, most people are more familiar with the concept of “zoning.” Zoning and plan designations are closely related, but they are separate tools. Plan designations on a Comprehensive Plan Map are used as a policy and planning tool and tend to be more high-level. They generally identify the type, location, and intensity of future land uses. Zoning, in contrast, is used as an “implementation” tool for realizing the overall vision in the Comprehensive Plan Map. Zoning is regulatory. For example, it specifies allowable uses within a specific zone and can specify standards for design and development of properties and buildings, such as building heights and lot size.

Currently, the Metro Plan Diagram (which currently serves as Eugene’s Comprehensive Plan Map) shows existing and projected land uses for Eugene, at a metropolitan scale. Although the Metro Plan Diagram designations have been transitioning over time to become parcel-specific, the Metro Plan Diagram does not meet today’s needs for showing which plan designations apply to each property within the region. In Eugene, it is possible to find various “combinations” of plan designation and zoning. Along with future zoning changes that may result from CFA designation, Eugene may need to concurrently adopt revised plan designations or amend the land use code to meet the CFA criteria.

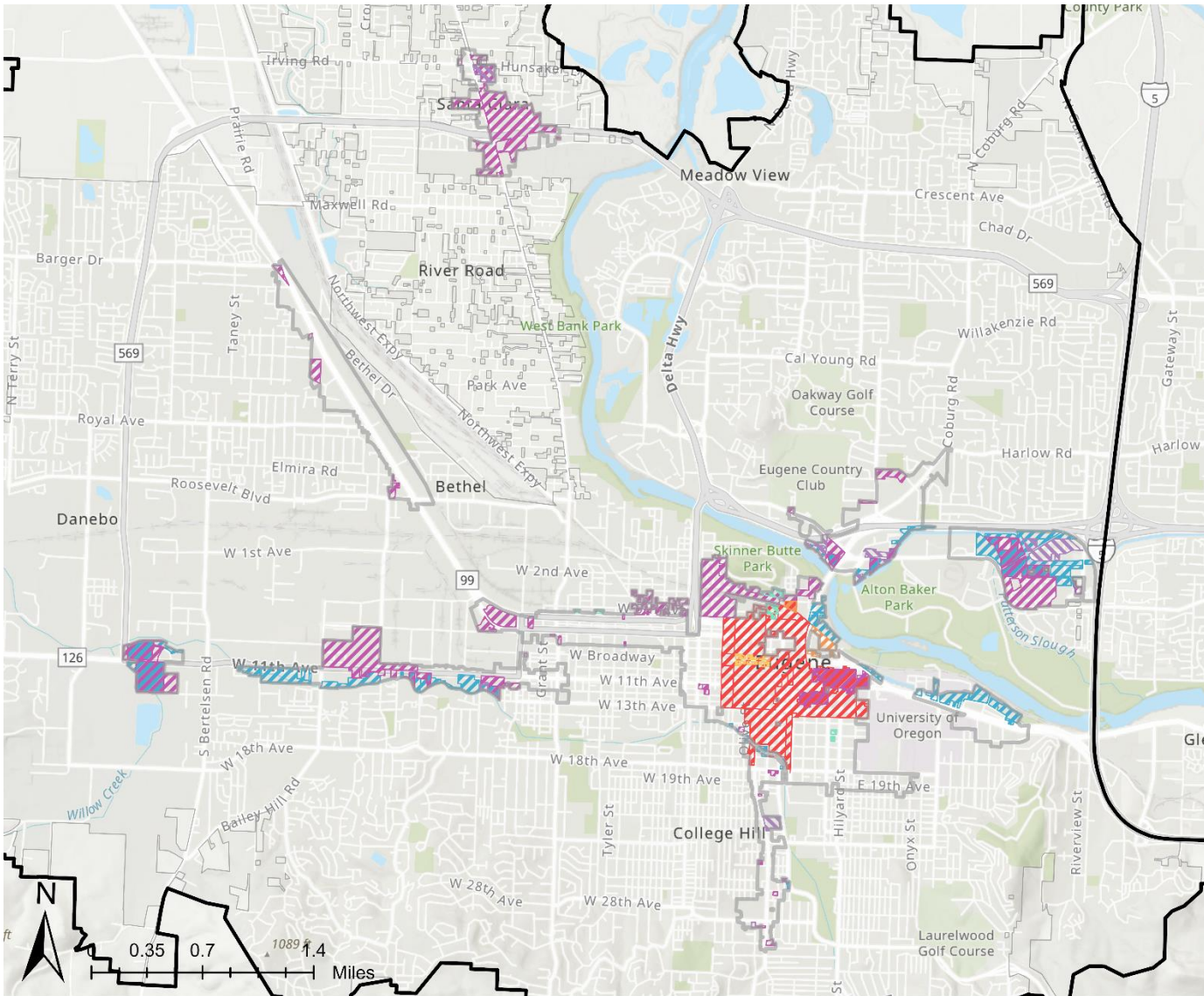


Suitable CFA Locations

Base Zoning

Oregon State Parks, State of Oregon GEO, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS

Note: this map is illustrative and should be used for reference only.
 June 2023



Legend

Overlay Zones

- Residential Density
- Broadway
- Nodal Development
- Planned Unit Development
- Site Review
- Transit Oriented Development
- Wetland and Water



Oregon State Parks, State of Oregon GEO, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS

Note: this map is illustrative and should be used for reference only.
July 2023

Suitable CFA Locations Overlay Zones

ANALYSIS

OVERVIEW OF METHODS

Cities and counties must incorporate all requirements into policies and development regulations that apply in all CFAs, outlined in OAR 660-012-0320. The following analysis provides a high-level review and discussion of how the City of Eugene's existing policies and regulations within the Suitable CFAs (identified through earlier analysis in Technical Memos #1 and #3a) compare to the requirements of OAR 660-012-0320. A key purpose of this evaluation is to provide insight to decision-makers about how existing local land use dynamics, policies, and regulations compare to CFA requirements. It may ultimately inform any designation of CFAs following the CFA study. The evaluation includes a review of the following CFA requirements:

- **Single Use, Mixed Use, and Other Outright Permitted Uses (320(2)).** CFAs must allow certain outright permitted uses. The Eugene Land Use Code organizes allowed uses and development standards by distinct zones and/or land use types. These standards are referenced to indicate which uses are currently permitted outright, which uses are permitted but subject to discretionary review, and which uses are stated as not permitted or by their exclusion from the allowed uses list are not permitted. Outright permitted uses are assumed to also include those uses which are permitted but are subject to special development standards.
- **Block Length and Streetscape Regulations (320(4)).**
- **Density, Floor Area Ratio (FAR), and Height Regulations (320(6 & 8)).** Eugene has determined to investigate, within this initial study, the "Prescriptive Standards" of 25 dwelling units per net acre (minimum) and a building height maximum of no less than 85 feet. A comparative evaluation of the existing density and height standards is presented.
- **Code Allowance for Government Facilities Providing Direct Service to the Public (320(5)).**
- **Policy and Code Related to Bicycle and Vehicle Parking, General Land Use Requirements, and Oregon's Transportation Planning Rule (320(7)).**

The remainder of the Analysis section is organized to provide the language from the relevant OAR 660-012-0320 subsection, followed by the City of Eugene's analysis of the rule, and concluding with the analysis of the existing Eugene Land Use Code compared to the rule, including a rating of compliance.

OAR 660-012-0320 (2 & 4): OUTRIGHT PERMITTED USES IN CFAS

(2) Except as noted in subsection (a) and section (3), development regulations for a climate-friendly area shall allow single-use and mixed-use development within individual buildings and development sites, including the following outright permitted uses:

(a) Multifamily residential and attached single-family residential. Other residential building types may be allowed, subject to compliance with applicable minimum density requirements in section (8) of this rule, or alternative land use requirements as provided in section (9).

Notwithstanding this section, local governments may require ground floor commercial and office uses within otherwise single-use multifamily residential buildings.

(b) Office-type uses.

(c) Non-auto dependent retail, services, and other commercial uses.

(d) Child care, schools, and other public uses, including public-serving government facilities.

(4) Local governments shall prioritize locating government facilities that provide direct service to the public within climate-friendly areas and shall prioritize locating parks, open space, plazas, and similar public amenities in or near climate-friendly areas that do not contain sufficient parks, open space, plazas, or similar public amenities. Local governments shall amend comprehensive plans to reflect these policies, where necessary. Streetscape requirements in climate-friendly areas shall include street trees and other landscaping, where feasible.

Analysis Implication

The City of Eugene understands OAR 660-012-0320 (2) and (4) to require the following:

- **Climate-Friendly Areas Shall (Must) Allow:**
 - Single-use and mixed-use development within individual buildings and development sites
 - Permitted Outright:
 - Multi-unit residential (5 or more dwelling units)
 - Attached single-unit residential (townhomes)
 - Office-type uses
 - Non-auto dependent retail, services, and other commercial uses.
 - Childcare
 - Schools
 - Public-serving government facilities
- **Climate-Friendly Areas May Allow:**
 - Other residential building types, subject to compliance with applicable minimum density requirements in section (8) of this rule, or alternative land use requirements as provided in section (9).
 - Uses not listed, allowed outright or conditionally as desired by the local government. The rule establishes no requirements for these use types.
- **Climate-Friendly Areas May Require:**
 - Ground floor commercial and office uses within otherwise single-use, multi-unit residential buildings
- **Climate-Friendly Areas must prioritize (through Comprehensive Plan updates):**
 - Government facilities that provide direct service to the public, and parks, open space, plazas, and similar public amenities (if sufficient similar public amenities do not already exist)

COMPARATIVE ANALYSIS OF OAR 660-012-0320 (2 & 4) AND APPLICABLE ZONES & POLICIES IN EUGENE’S SUITABLE CFAS

Comparison Matrix

Table 4a and Table 4b are a summary of the comparison of the permitted land uses (as well as those subject to discretionary review and not permitted) for CFA relevant zones within Eugene’s existing Land Use Code. This includes an assessment of whether both single-use and mixed-use are allowed on development sites and within buildings within the zones, as well as an indication of whether a discrete list of uses are permitted outright as part of those developments.

For the purposes of this evaluation, Eugene has concluded that 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.

Uses necessitating “special standards” such as Eugene’s Multiple-unit Standards (EC 9.5500), Site Development Standards (EC 9.6700), Landscape Standards (EC 9.6200), or Public Improvement Standards (EC 9.6500) can be required of developments and still considered “permitted outright” as these requirements establish a set of clear and objective (predictable) criteria. In November 2022, Eugene City Council adopted amendments to the Eugene Land Use Code to update clear and objective approval criteria for housing development.

If any process is viewed as so rigorous as to restrict development below CFA levels, then those standards would arguably either need to be amended, or the areas subject to those standards would not qualify as CFAs.

Evaluation results in Table 4a and Table 4b are summarized generally as follows:

	Compliance with the Requirement (e.g., Use Permitted Outright)
	Non-Compliance with the Requirement (e.g., Single Use only)
	Indicates Either a Noted Element of Nuance or Medium Compliance (in Aggregate) for a Zone

TABLE 4A. EVALUATION OF EUGENE LAND USE CODE FOR APPLICABLE ZONES AGAINST THE CFA REQUIREMENTS OF OAR 660-012-320(2)

Outright Permitted									
Zone	Single and Mixed-Use (Within Buildings and Development Sites)	Single-unit Attached (Town-house)	Multi-unit (5+ units)	Office Type	Non-Auto Commercial, Retail, Services	Childcare (standards for 4-16 Children/17+ Children)	Schools	Government Facilities	Aggregate Subsection 320(2&4) Compliance Rating
Limited High Density Residential (R-3) EC 9.2720	Single Use and Mixed Use	Special Standards	Special Standards	Not Permitted	C-1 Uses Subject to PUD or CUP	Special Standards/ Conditional	Site Review	Permitted	Low
High Density Residential (R-4) EC 9.2140	Single Use and Mixed Use	Special Standards	Special Standards	Not Permitted	C-1 Uses Subject to PUD or CUP	Special Standards/ Conditional	Site Review	Permitted	Low
Neighborhood Commercial (C-1) EC 9.2161(6)	Single Use and Mixed Use	Special Standards	Special Standards	Permitted (size limits)	Permitted (size limits)	Special Standards/ Conditional	Not Permitted	Permitted	Medium
Community Commercial (C-2) EC 9.2161(6)	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted	Permitted	Permitted	Permitted	High
Major Commercial (C-3) EC 9.2161 (7)	Single Use and Mixed Use	Not Permitted	Special Standards	Permitted	Permitted	Permitted	Permitted	Permitted	Medium

Outright Permitted

Zone	Single and Mixed-Use (Within Buildings and Development Sites)	Single-unit Attached (Town-house)	Multi-unit (5+ units)	Office Type	Non-Auto Commercial, Retail, Services	Childcare (standards for 4-16 Children/17+ Children)	Schools	Government Facilities	Aggregate Subsection 320(2&4) Compliance Rating
General Office (GO) EC 9.2140	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Special Standards (floor area limitations)	Permitted	Not Permitted	Permitted	Medium
Chambers Special Area (S-C/C-2) EC 9.2605 Same as C-2	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted	Permitted	Permitted	Permitted	High
Chase Node Special Area (S-CN/C) EC 9.3100	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted (size limits)	Permitted	Conditional	Permitted	Medium
Chase Node Special Area (S-CN/HDR/MU) EC 9.3100	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted (with various limits)	Permitted	Conditional	Permitted	Medium
Chase Node Special Area (S-CN/HDR)	Single Use and Mixed Use	Special Standards	Special Standards	Not Permitted	Not Permitted	Permitted	Conditional	Permitted	Medium

Outright Permitted									
Zone	Single and Mixed-Use (Within Buildings and Development Sites)	Single-unit Attached (Town-house)	Multi-unit (5+ units)	Office Type	Non-Auto Commercial, Retail, Services	Childcare (standards for 4-16 Children/17+ Children)	Schools	Government Facilities	Aggregate Subsection 320(2&4) Compliance Rating
EC 9.3100									
Chase Node Special Area (S-CN/PL) EC 9.3100	Single Use	("Special Housing" only)	("Special Housing" only)	Conditional	Conditional	Conditional	Conditional	Permitted	Low
Chase Node Special Area (S-CN/PRO) EC 9.3100	Single Use	Not Permitted	Not Permitted	Not Permitted	Not Permitted	Not Permitted	Not Permitted	Not Permitted	Low
Downtown Riverfront Special Area (S-DR/MU) EC 9.3135	Single Use and Mixed Use	Permitted (above ground floor only for MU/1)	Permitted (above ground floor only for MU/1)	Permitted (above ground floor only for MU/1)	Permitted (personal services above ground floor only in MU/1)	Permitted (above ground floor only for MU/1)	Permitted (MU), Permitted (above ground floor only in MU/2), Not Permitted (MU/1)	Permitted (MU), Permitted (above ground floor only in MU/2), Not Permitted (MU/1)	Medium
Downtown Westside Special Area (S-DW)	Single Use and Mixed use	Special Standards	Special Standards	Permitted (size limits)	Permitted (fewer uses with size limits)	Special Standards/ Conditional	Not Permitted	Not Permitted	Low

Outright Permitted

Zone	Single and Mixed-Use (Within Buildings and Development Sites)	Single-unit Attached (Town-house)	Multi-unit (5+ units)	Office Type	Non-Auto Commercial, Retail, Services	Childcare (standards for 4-16 Children/17+ Children)	Schools	Government Facilities	Aggregate Subsection 320(2&4) Compliance Rating
EC 9.3215(4)									
Fifth Avenue Special Area EC 9.2161(6) Same as C-2	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted	Permitted	Permitted	Permitted	High
Walnut Station Special Area (S-WS) EC 9.3950	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted	Special Standards/ Conditional	Permitted	Permitted	Medium
Whiteaker Special Area (S-W)	Single Use and Mixed Use	Special Standards	Special Standards	Permitted	Permitted	Special Standards/ Permitted/ Conditional (residential)	Permitted	Permitted	Medium

TABLE 4B. EVALUATION OF EUGENE LAND USE CODE FOR APPLICABLE OVERLAY ZONES AGAINST THE CFA REQUIREMENTS OF OAR 660-012-320(2)

Impact of Overlay Zones on Permitted Uses			
Transit Oriented Development (/TD) EC 9.4500	No Impact to Base/Special Area Standard		-
Nodal Development (/ND) EC 9.4250	No Impact to Base/Special Area Standard	No new retail use over 50k sq ft on the ground floor	No Impact to Base/Special Area Standard -
Planned Unit Development (/PD) EC 9.4300	PUD = Use no longer "Outright Permitted" Presence of the /PD overlay zone renders any base zone "Low" in compliance rating for OAR 660-012-0320(2).		Low
Site Review (/SR) EC 9.4400	Site Review = Use no longer "Outright Permitted" /SR is an extensive overlay zone, covering 417 acres of Eugene's Suitable CFAs, and nearly a quarter (~240 acres) of the most extensive base zone (C-2 Community Commercial). Presence of the /SR overlay zone renders any base zone "Low" in compliance rating for OAR 660-012-0320 (2).		Low
(/#) 9.4050	No Impact to Base/Special Area Zone Standard. /# adds a lower max density than the base zone and is addressed in Table 6 below.		-
(/BW) EC 9.4070	/BW has a discrete prohibited use list. None of these prohibited uses relate directly to CFA rule requirements,		
(WP) EC 9.4700, (WB) EC 9.4800, (WR) EC 9.4900,	The /WR Water Resources, /WB Wetland Buffer, /WP Waterside Protection, and /WQ Water Quality Overlays provide conservation of significant riparian areas, wetlands, wildlife, water quality and other water-related areas through development/use-restricting setbacks adjacent only to specific water resources on properties with the overlay. While Table 3 conveys significant acreage for these overlays in Suitable CFAs (particularly the /WR overlay), the actual resource boundary and applied setbacks are far less than the total acreage depicted. Setbacks are established at the time of development after		-

(WQ) EC 9.4770	necessary resource assessments occur. Generally speaking, these overlays will have only limited impact on where these uses can occur within the Suitable CFAs.	
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Other Residential Building Types

Uses not listed—or uses allowed but not required to be permitted outright by -0320 (2) and (4) — can still be allowed or permitted outright as desired by the local government, but the rule establishes no requirements for those use types therefore no additional analysis was needed for these uses. *Note: Other residential building types may be allowed, subject to compliance with applicable minimum density requirements or performance standards.*

Public and Semi-Public Uses

OAR 660-012-0320(4) requires local governments to prioritize locating government facilities that provide direct service to the public within CFAs and to prioritize locating parks, open space, plazas, and similar public amenities in or near CFAs without sufficient access to these amenities. Local governments shall amend their comprehensive plans to reflect these policies, where necessary. Eugene is not required to locate all such facilities in CFAs in the near-term. Several of Eugene’s Suitable CFAs (Downtown/Campus, Ferry Street Bridge, South Willamette, Franklin/Walnut and Chase Village) are adjacent to large parks and/or amenities, but the parks themselves are not within the Suitable CFAs, as they were removed in the suitability analysis’ removal of Natural Resource and Public Land zoning. These existing relationships are important to note and to communicate with staff responsible for the provision of parks. The term “near” is not defined in the rule. Eugene’s Park and Recreation System Plan establishes a service mile radius of one half-mile walking distance for parks. The Suitable CFAs mentioned above objectively meet that measure for “nearness.”

Table 4 characterizes use allowances related to government offices and services within Eugene’s Suitable CFAs. As the table indicates, government services are broadly allowed in the CFA relevant zones. This appears to be unaffected by additional overlay zone provisions.

Streetscape

With respect to the streetscape (street trees and landscaping) requirements of OAR 660-012-320(4), Eugene currently has comprehensive and robust requirements associated with development in EC Chapter 7 – Public Improvements and EC 9.6205 – Landscaping Standards. This includes the City’s Street Tree Program, which requires street trees for all new streets and landscaping standards that outline discrete requirements for landscaping in commercial, multi-unit and other developments.

OAR 660-012-0320 (5): BLOCK LENGTH

(5) Local governments shall establish maximum block length standards as provided below. For the purpose of this rule, a development site consists of the total site area proposed for development, absent previously dedicated rights-of-way, but including areas where additional right-of-way dedication may be required.

(a) For development sites less than 5.5 acres in size, a maximum block length of 500 feet or less. Where block length exceeds 350 feet, a public pedestrian through-block easement

shall be provided to facilitate safe and convenient pedestrian connectivity in climate-friendly areas. Substantial redevelopment of sites of two acres or more within an existing block that does not meet the standard shall provide a public pedestrian accessway allowing direct passage through the development site such that no pedestrian route will exceed 350 feet along any block face. Local governments may grant exceptions to street and accessway requirements as provided in OAR 660-012-0330(2).

(b) For development sites of 5.5 acres or more, a maximum block length of 350 feet or less. Local governments may grant exemptions to street requirements as provided in OAR 660-012-0330(2).

Analysis Implication

The City of Eugene understands OAR 660-012-0320 (5) compliance to include establishing the following requirements:

- Add a maximum block length requirement to any Climate-Friendly Areas consistent with OAR 660-012-0320 (5) - a max of 350 feet to 500 feet (depending on development size).
- Include street trees and other landscaping, where feasible

COMPARATIVE ANALYSIS OF OAR 660-012-0320 (5) AND APPLICABLE ZONES & POLICIES IN EUGENE’S SUITABLE CFAS

Block Length

Where standards in CFAs are not consistent with OAR 660-012-0320(5), Eugene will need to amend its land use code. Table 5 is a summary of Eugene’s existing block length standards at EC 9.6810 and EC 9.5500(10):

TABLE 5. EXISTING LAND USE CODE STANDARDS FOR BLOCK LENGTH (AND AREA) IN EUGENE

EC 4.2.105 (D)(4) – Street Network Standards-General Criteria	Block Area	Block Length Max
Local Streets		600 feet*
Multi-Unit Developments 8 or more acres	< 4 acres	

*Unless site conditions preclude per the exemptions at EC 9.6810(2 - 4)

Eugene’s Land Use Code does not currently regulate Block Length in the explicit terms that OAR 660-012-0320(5) requires. The City will need to add a maximum block length requirement of 350 feet to 500 feet (depending on development size of larger or smaller than 5.5 acres). The CFA rule does not specify how to define “block length.” Local governments have some discretion in defining block length as these requirements are incorporated into CFA development codes. In all cases, “block length” should be no greater than the established limits based on actual pedestrian walking distances, as measured from the inner sidewalk edge of each parallel street.

As Table 5 describes, the City does have Block Length standards in place that come close to meeting CFA expectations but, as noted, the City will need to modify its policies and code to ensure compliance with CFA standards for Block Length to meet adoption requirements.

OAR 660-012-0320 (7): TRANSPORTATION, PARKING AND BROADER LAND USE REQUIREMENTS

(7) Local governments shall adopt policies and development regulations in climate-friendly areas that implement the following:

- (a) The transportation review process in OAR 660-012-0325;*
- (b) The land use requirements as provided in OAR 660-012-0330;*
- (c) The applicable parking requirements as provided in OAR 660-012-0435; and*
- (d) The applicable bicycle parking requirements as provided in OAR 660-012-0630.*

Analysis Implication

The City of Eugene understands OAR 660-012-0320 (7) to require the following:

- **Allow and prioritize the following uses/initiatives:**
 - Compact development
 - Pedestrian and transit friendly development patterns
 - Mixed-use land uses
 - Parking facilities for shared bicycles or other small mobility devices
 - Vehicle parking benefit districts
- **Establish the following requirements:**
 - No minimum off-street vehicle parking requirements for commercial developments in CFAs or within a ¼ mile
 - No more than one-half of a parking space per dwelling unit is required for off-street parking
 - Planning (if necessary) and provisions for adequate (size, covered, secure) bicycle parking (e.g., for all major transit stations, park and rides, retail developments, multi-family, and mixed-use developments)
- **Development and adoption of:**
 - Amendments to comprehensive plans or land use regulations within CFAs that address the rules enumerated in subsection 320(7)
 - Policies and regulations to protect transportation facilities, corridors, and sites for their identified functions
 - A multi-modal transportation gap summary for CFAs as either an update to the Eugene Transportation System Plan (TSP) or in coordination with transportation service and facility providers. This should include a highway impacts summary if a CFA includes a ramp terminal intersection, state highway, interstate highway, or adopted ODOT Facility Plan.

REVIEW OF OAR 660-012-0320 (7) AND APPLICABLE ZONES & POLICIES IN EUGENE’S SUITABLE CFAS

The broad set of additional rules and requirements that OAR 660-012-0320 (7) identifies apply both generally to cities as well as in specific ways within CFAs. Eugene must consider these requirements and guidelines and incorporate them when adopting CFA policies and development regulations associated with their transportation system, vehicle and bicycle parking, and other general land use policies going forward. Table 6 summarizes the policy, plan, and regulatory implications of the rule sections outlined in OAR 660-012-0320 (7), as well providing a basic assessment of Eugene’s existing framework in comparison.

TABLE 6. SUMMARY OF OAR 660-012-0320 (7) REQUIREMENTS AND EUGENE’S SUITABLE CFAS

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements	Observed Areas for City Focus
0325 - Transportation Review	<ul style="list-style-type: none"> - Review rule when amending plans or regulations within CFAs - Create Multi-modal Transportation Gap summary (as per 0325(3)) in TSP or with transportation providers. 	<ul style="list-style-type: none"> - Reducing vehicle miles traveled (VMT) - Promoting multimodal options, including for people with disabilities - Managing impacts to highways - Proper notice for changes 	<ul style="list-style-type: none"> - None explicitly. 	<ul style="list-style-type: none"> - The City should consider how to prepare to complete a Multi-modal Transportation Gap summary. One key consideration is how proposed CFAs may impact highway intersections in numerous Suitable CFAs.
0330 - Land Use Requirements	<ul style="list-style-type: none"> - Compact development - Pedestrian and transit friendly development patterns (small block lengths, reduction of out of direction travel) - Mixed-use land uses - Slow neighborhood streets comfortable for families, efficient and sociable development 	<ul style="list-style-type: none"> - Primary pedestrian entrances oriented to pedestrian facility and open during business hours - Parking located behind or 	Eugene has zones in high proportion within Suitable CFAs which are already “in the spirit” of this CFA rule. Specific code language will need to be amended to address certain nuances, but many zones are currently aligned.	

TABLE 6. SUMMARY OF OAR 660-012-0320 (7) REQUIREMENTS AND EUGENE’S SUITABLE CFAS

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements	Observed Areas for City Focus
	<p>patterns, connectivity within the neighborhood</p> <ul style="list-style-type: none"> - Auto oriented land uses compatible with walkability - Protecting transportation facilities, corridors, and sites for their identified functions 	<p>beside buildings</p> <ul style="list-style-type: none"> - Development near transit stop/station must be oriented towards it - Ease of access to goods and services for auto-oriented uses must be equivalent to, or better than, access for people driving a motor vehicle - Allowance for no or low car districts 		
<p>0435 – Parking Requirements</p>	<p>As per OAR 660-012-0400 (3), Either</p> <ul style="list-style-type: none"> - Remove parking mandates as directed under OAR 660-012-0420 <p>Or;</p> <ul style="list-style-type: none"> - Amend their comprehensive plans and land use regulations to implement the provisions of OAR 660-012-0425 through OAR 660-012-0450: <p>OAR 660-012-0425</p> <ul style="list-style-type: none"> - Garages and carports may not be required for residential developments - Garage parking spaces shall count towards off-street parking mandates - Provision of shared parking shall be allowed to meet parking mandates - Required parking spaces may be provided off-site, within 2,000 feet pedestrian travel of a site. 			<p>The City has already removed parking mandates for almost all of the Suitable CFAs.</p>

TABLE 6. SUMMARY OF OAR 660-012-0320 (7) REQUIREMENTS AND EUGENE’S SUITABLE CFAS

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements Observed Areas for City Focus
	<ul style="list-style-type: none"> - Parking mandates shall be reduced by one off-street parking space for each three kilowatts of capacity in solar panels or wind power that will be provided in a development - Parking mandates shall be reduced by one off-street parking space for each dedicated car-sharing parking space in a development. - Parking mandates shall be reduced by two off-street parking spaces for every electric vehicle charging station provided in a development. - Parking mandates shall be reduced by one off-street parking space for every two units in a development above minimum requirements that are fully accessible to people with mobility disabilities. <p>OAR 660-012-0430</p> <ul style="list-style-type: none"> - Cities and counties may not require more than one parking space per unit in residential developments with more than one dwelling unit on a single legally established property. - Cities and counties may not require parking for certain development types <p>OAR 660-012-0435</p> <ul style="list-style-type: none"> - Remove all parking mandates within the area and on parcels in its jurisdiction that include land within one-quarter mile distance of those areas; or - Manage parking by doing <u>all</u> of the following: <ul style="list-style-type: none"> - Adopt a parking benefit district. - Require no more than one-half off-street parking space per dwelling unit in the area - No parking mandates for commercial developments <p>OAR 660-012-0440</p> <p>Cities and counties may not require parking spaces for developments on a lot or parcel that includes lands within three-quarters mile of rail transit stops.</p>		

TABLE 6. SUMMARY OF OAR 660-012-0320 (7) REQUIREMENTS AND EUGENE’S SUITABLE CFAS

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements	Observed Areas for City Focus
	<p>Cities and counties may not enforce parking mandates for developments on a lot or parcel that includes lands within one-half mile of frequent transit corridors.</p> <p>OAR 660-012-0445</p> <p>Cities and counties shall select and implement either a fair parking policy approach or a reduced regulation parking management approach.</p> <p>OAR 660-012-0450</p> <p>Cities and counties shall price at least 10 percent of on-street parking spaces, and report the percentage of on-street parking spaces that are priced as provided in OAR 660-012-0900.</p>			

TABLE 6. SUMMARY OF OAR 660-012-0320 (7) REQUIREMENTS AND EUGENE’S SUITABLE CFAS

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements	Observed Areas for City Focus
<p>0630 – Bicycle Parking</p>	<p>OAR 660-012-0630 outlines numerous additional bicycle requirements for cities and counties, <u>which do not apply solely to CFAs.</u></p> <p>Cities shall plan for and require:</p> <ul style="list-style-type: none"> - Covered, secure bicycle parking for all new multi-unit development or mixed-use development - Bicycle parking for all new retail development. <p>The following <u>apply only to CFAs:</u></p> <p>Cities shall require:</p> <ul style="list-style-type: none"> - Bicycle parking in CFAs <p>Cities shall allow:</p> <ul style="list-style-type: none"> - Parking and ancillary facilities for shared bicycles or other small-scale mobility devices in CFAs 	<p>Eugene has comprehensive bicycle parking standards. Language will need to be adjusted for full compliance, but the most significant Suitable CFA zones are “in the spirit” of this CFA rule.</p>		

OAR 660-012-0320 (6, 8 & 9): DENSITY AND HEIGHT

(6) Development regulations may not include a maximum density limitation.

...

(8) Local governments shall adopt either the following provisions into development regulations for climate-friendly areas, or the requirements in section (9). Local governments are not required to enforce the minimum residential densities below for mixed-use buildings (buildings that contain residential units, as well as office, commercial, or other non-residential uses) if the mixed-use buildings meet a minimum floor area ratio of 2.0. A floor area ratio is the ratio of the gross floor area of all buildings on a development site, excluding areas within buildings that are dedicated to vehicular parking and circulation, in proportion to the net area of the development site on which the buildings are located. A floor area ratio of 2.0 would indicate that the gross floor area of the building was twice the net area of the site. Local governments are not required to enforce the minimum residential densities below for redevelopment that renovates and adds residential units within existing buildings, but that does not add residential units outside the existing exterior of the building.

(a) Local governments with a population greater than 5,000 up to 25,000 shall adopt the following development

regulations for climate-friendly areas:

(A) A minimum residential density requirement of 15 dwelling units per net acre; and

(B) Maximum building height no less than 50 feet.

...

(c) Local governments with a population greater than 50,000 shall adopt the following development regulations for at least one climate-friendly area with a minimum area of 25 acres. Additional climate-friendly areas may comply with the following standards or the standards in subsections (a) or (b):

(A) A minimum residential density requirement of 25 dwelling units per net acre; and

(B) Maximum building height no less than 85 feet.

(9) As an alternative to adopting the development regulations in section (8), local governments may demonstrate with adopted findings and analysis that their adopted development regulations for climate-friendly areas will provide for equal or higher levels of development in climate-friendly areas than those allowed per the standards in section (8). Additional zoned building capacity of 25 percent may be included for development regulations that allow height bonuses for additional zoned building capacity above established maximums that are consistent with OAR 660-012-0315(2)(c)(B). Specifically, the local government must demonstrate that the alternative development regulations will consistently and expeditiously allow for the levels of development described in subsections (a)-(c). Alternative development regulations must require either a minimum residential density of 15 dwelling units per net acre or a minimum floor area ratio of 2.0, as described in section (8).

(a) Local governments with a population greater than 5,000 up to 25,000 shall adopt development regulations to allow a zoned building capacity, based on regulations impacting buildable site area as described in OAR 660-012-0315(2)(a and b) and allowed building heights, of at least 60,000 square feet per net acre.

...

(c) Local governments with a population greater than 50,000 shall adopt development regulations for at least one climate-friendly area of at least 25 acres to allow a zoned building capacity, based on regulations impacting buildable site area as described in OAR 660-012-0315(2)(a) and (b), and allowed building heights, of at least 120,000 square feet per net acre. Additional climate-friendly areas may comply with this standard or with the standard in subsections (a) or (b).

Analysis Implication

The City of Eugene understands OAR 660-012-0320 (8) and (9) to require the following:

Eugene, a community with over 50,000 residents, can pursue the CFA rule’s Prescriptive Standards which require at least 25 acres where the minimum residential density is 25 dwelling units per net acre (or 2.0 floor area ratio (FAR) for mixed-use buildings, as specified in subsection (8)) and a building height max of no less than 85 feet. Additional CFA acres, if needed for capacity or other reasons, would only be required to have a minimum residential density is 15 dwelling units per net acre (or 2.0 FAR for mixed-use buildings) and a building height max of no less than 50 feet.

The City can also investigate an approach focused on Outcome-oriented Standards by demonstrating, with adopted findings and analysis, that alternative development regulations for CFAs will “consistently and expeditiously allow for” at least 25 acres of zoned building capacity (based on buildable site area in –0315 (2)(a) and (b) and allowed building heights) of at least 120,000 square feet per net acre. That 25 acres must require a minimum residential density of 15 dwelling units per net acre (or 2.0 FAR for mixed-use buildings, as specified in subsection (8)). Additional CFA acres, if needed for capacity or other reasons, would only be required to have a minimum residential density is 15 dwelling units per net acre (or 2.0 FAR for mixed-use buildings) and 60,000 square feet per net acre.

Options	Minimum Residential Density	Max Building Height
		Or Zoned building capacity in square feet (sq. ft.)
Option A: Prescriptive Standards (OAR 660-012-0320(8))		
<i>25 acres, minimum (Primary)</i>	<i>25 dwelling units/net acre</i>	<i>No less than 85 feet</i>
<i>Additional acres (as needed)</i>	<i>15 dwelling units/net acre</i>	<i>No less than 50 feet</i>

Option B: Outcome-Oriented Standards (OAR 660-012-0320(9))		
<i>25 acres, minimum (Primary)</i>	<i>15 dwelling units/net acre</i>	<i>120,000 sq. ft./net acre</i>
<i>Additional acres, (as needed)</i>	<i>15 dwelling units/net acre</i>	<i>60,000 sq. ft./net acre</i>

Only the Primary CFA must meet the most stringent standards based on population. Additional CFAs may meet the less intensive standards for smaller cities and urbanized county areas. For example, a Primary CFA for a city or urbanized county area of 50,000 or more must be at least 25 acres, have a minimum residential density of 25 units per net acre, and have a maximum building height of no less than 85 feet. Additional CFAs may be designated that are less than 25 acres in size and impose minimum residential density as low as 15 dwelling units per acre and maximum building height as low as 50 feet.

Local governments are *not* required to enforce minimum residential densities for mixed-use buildings with a floor area ratio of 2.0.

Local governments are also *not* required to enforce minimum residential densities for redevelopment that renovates and adds residential units within existing buildings but does not add residential units outside the existing exterior of the building.

COMPARATIVE ANALYSIS OF OAR 660-12-0320 (6 & 8) AND APPLICABLE ZONES & POLICIES IN EUGENE’S SUITABLE CFAS

An evaluation of existing density requirements is helpful in evaluating Eugene’s two alternatives for meeting the requirements of OAR 660-012-320 (8), an objective “Prescriptive” approach or an “Outcome Oriented” approach. If Eugene pursues the prescriptive option, they will need to adopt a minimum residential density of **25 dwelling units/per net acre and maximum building height of no less than 85 feet** throughout at least one primary CFA.

The rules do not require cities to enforce the minimum residential density for mixed-use buildings (residential units with other non-residential uses) **if the mixed-use buildings meet a minimum floor area ratio (FAR) of 2.0**. A floor area ratio is the ratio of the gross floor area of all buildings on a development site, excluding areas within buildings that are dedicated to vehicular parking and circulation, in proportion to the net area of the development site on which the buildings are located. FAR is evaluated in this memo. Eugene will also not be required to enforce the minimum residential densities for redevelopment that adds residential units within existing buildings (no units added outside the existing building).

Tables 7, 8, and 9 organize CFA relevant zones in Eugene into regulatory distinctions associated with density, FAR, and building height. Zones are rated High (Higher Compliance with CFA rule subsections 320 (6 & 8)), Medium (Medium Compliance), or Low (Lower Compliance).

TABLE 7. COMPLIANCE WITH CFA CRITERIA IN EXISTING DENSITY MAXIMUMS AND MINIMUMS IN CFA RELEVANT ZONES IN EUGENE

Zones	Max. Density	Min. Density	320(6) No density max	320(8) Primary Density min of 25 du/acre	320(8) Second Density min of 15 du/acre
High-Density Residential (R-4)	112	20	Low	Low	High
High Density Residential/Nodal Overlay (R-4/ND)	112	30	Low	High	High
Limited High-Density Residential (R-3)	56	20	Low	Low	High
Limited High Density Residential/Nodal Overlay (R-3/ND)	56	25	Low	High	High
Neighborhood Commercial (C-1)	None	None	High	Medium	Medium
Community Commercial (C-2)	None	None	High	Medium	Medium
General Office (GO)	None	None	High	Medium	Medium
Major Commercial (C-3)*	None	None	High	Medium	Medium
Chambers Special Area (S-C/C-2)	None	None	High	Medium	Medium
Chase Node Special Area (S-CN/C-2)	112	20**	Low	Low	High
Chase Node Special Area (S-CN/HDR/MU)	112	20	Low	Low	High
Chase Node Special Area (S-CN/HDR)	112	20	Low	Low	High
Chase Node Special Area (S-CN/PL/PRO)	None	None	High	Low	Low
Downtown Riverfront Special Area (S-DR)	None	None	High	Medium	Medium
Downtown Westside Special Area (S-DW)	None	None	High	Medium	Medium
Fifth Avenue Special Area (S-F)	None	None	High	Medium	Medium
Whiteaker Special Area (S-W)	112	None	Low	Medium	Medium
Walnut Station Special Area (S-WS)	None	None	High	Medium	Medium

*EC 9.2161 (7) - Two dwellings or less are only allowed in a building if 80% of the ground floor of the structure is used for commercial or non-residential purposes

**EC 9.3125 – If all residential is in a single building

TABLE 8. COMPLIANCE WITH CFA CRITERIA IN EXISTING EXPLICIT FAR REQUIREMENTS IN CFA RELEVANT ZONES IN EUGENE

Zones/Overlay Zones	FAR Minimum (No Maximums)
Transit Oriented Development (/TD)	2.0
Community Commercial/TD and /ND Overlays (C-2/ND/TD)	1.0
Major Commercial/ TD and /ND Overlays (C-3/ND/TD)	1.0
General Office/TD and /ND Overlays (GO/ND/TD)	1.0
Neighborhood Commercial/ TD and /ND Overlays (C-1/ND/TD)	1.0

TABLE 8. COMPLIANCE WITH CFA CRITERIA EXISTING MAXIMUM BUILDING HEIGHT ALLOWANCE IN CFA RELEVANT ZONES IN EUGENE

Zone	Height	320(8) Primary Height over 85' allowed	320(8) Secondary Height over 50' allowed
High-Density Residential (R-4)*	120 feet	High	High
Limited High Density Residential (R-3)*	50 feet	Low	High
Neighborhood Commercial (C-1)	35 feet	Low	Low
Community Commercial (C-2)	120 feet	High	High
General Office (GO)	50 feet	Low	High
Major Commercial (C-3)	150 feet	High	High
Chambers Special Area (S-C/C-2)	120 feet	High	High
Chase Node Special Area (S-CN/C) **	50 feet commercial, 120 feet residential	High	High
Chase Node Special Area (S-CN/HDR) **	120 feet	High	High
Chase Node Special Area (S-CN/HDR/MU) **	120 feet	High	High
Chase Node Special Area (S-CN/PL)	None	High	High
Chase Node Special Area (S-CN/PRO)	30 feet	Low	Low
Downtown Riverfront Special Area (S-DR)***			
<i>Sub Area A</i>	70 feet	Low	High
<i>Sub Area B</i>	80 feet	Low	High
<i>Sub Area C</i>	120 feet	High	High
<i>Sub Area D</i>	45 feet	Low	Low
<i>Sub Area E</i>	30 feet	Low	Low
<i>Sub Area F</i>	75 feet	Low	High

Sub Area G	60 feet	Low	High
Downtown Westside Special Area (S-DW)	120 feet	High	High
Fifth Avenue Special Area (S-F)	120 feet	High	High
Whiteaker Special Area (S-W)	45 feet	Low	Low
Walnut Station Special Area (S-WS) **	60 feet	Low	High

**Some height restrictions exist in R-3 and R-4 zones; height is limited to 30 feet for buildings located within 50 feet of the abutting boundary of R-1 zoned lands (9.2751(3)(a)), in specified areas of the City both R-3 and R-4 are limited to 35, 50 and 65 feet (9.2751(3)(b) and (c)).*

***Most zones (base and special area) have a provision for transition between uses wherein a building height must be no greater than that permitted in abutting (typically residential) districts for a distance of 50 feet. In the Chase Node Special Area, height is limited to 35 feet or 2 stories within 50 feet of Garden Way. Most of the Walnut Station Special Area has height limitations of 90 feet, though due to various height standards based on street frontage, the lowest height standard is conservatively assumed. The capacity analysis (Tech Memo 3c) assumes that transitions are not allowed and thus are not considered in capacity estimates.*

****The Downtown Riverfront Special Area has some height limitations based on sea level. The figures in this table for Sub Area A and G are extrapolated from the sea level surface where the zone occur.*

CONCLUSION

RELATIVE COMPATIBILITY OF ZONES AND SUITABLE CFAS

This memo has outlined and evaluated Eugene's compatibility with CFA code and policy requirements outlined in OAR 660-012-0320. Table 9 provides an aggregated summary of the relative compliance of each applicable Eugene zone with applicable rule subsections.

This information provides necessary inputs for Technical Memo #3c, an evaluation of the capacity of Suitable CFAs in Eugene to accommodate CFA compatible development (e.g., height and density). Characterizing compliance with OAR 660-012-0320 also adds an additional lens of suitability review for Eugene's Suitable CFAs. Zones with predominantly "High" or "Medium" ratings are already more compliant with the CFA requirements and will require fewer adjustments in the City's eventual CFA designation, while zones with more "Low" compliance ratings present the need for more significant change.

The Eugene base zones with the highest existing compliance with OAR 660-012-0320 include the Community Commercial (C-2) and Major Commercial (C-3) zones which only had medium and high ratings for all rule subsections. These areas are very close to compliance with the CFA rules and generally "in the spirit" of CFAs presently. Although these two zones collectively make up over 60% (56% being C-2) of all Suitable CFAs areas, about 22% of C-2 (254 acres) is within the /SR overlay zone which requires Site Review. This distinction impacts Outright Permitted Use ratings (subsections 2&4) and adds more "Low" ratings where this occurs. Special Area Zones that rate relatively high in compliance include the Chambers, Chase Node, Downtown Riverfront (Area C), Downtown Westside, and Fifth Avenue Special Areas. Even if the existing zoning already complies, it may also be an option to change the zoning to increase allowed densities so that the 30% of needed capacity threshold in OAR 660-012-0315(1) can be met.

The Eugene zones with the lowest existing compliance with OAR 660-012-0320 include the Limited High Density (R-3), and Neighborhood Commercial (C-1). These are zones which rate "Low" in three or more areas (and have multiple "Mediums"). Any areas with the /PD and /SR overlay are also among the lowest rated areas (50% of R-4, 100% of Whiteaker Special Area). These areas would require more adjustment to come into compliance with the CFA rules and could be generalized as not "in the spirit" of CFAs presently. These areas collectively represent 27% of total Suitable CFA area.

CFA adjacency to Low Density Residential (R-1) areas is something that potentially deserves unique consideration in the identification of "most promising CFAs" in Eugene. This analysis assumes no allowance for stepbacks or transitions for areas adjacent to R-1. This is because the rule does not explicitly allow such adjustments. If CFA adoption truly does not allow stepbacks and transitions, it could reduce the viability of several of Eugene's Suitable CFAs (any surrounded by R-1).

TABLE 9. SUMMARY OF EXISTING COMPLIANCE WITH OAR 660-012-0320 FOR CFA RELEVANT ZONES IN EUGENE

<p>High = Higher Compliance, Medium = Medium Compliance, Low = Lower Compliance with Associated OAR 660-012-0320 subsections</p> <p>Where the Nodal Development Overlay District (ND) results in a changed rating for a base zone, it is added as a separate line.</p>										
		320 (2)	320 (4)	320 (5)	320 (6)	320 (7)	320 (8)	320 (8)	320(8)	320(8)
	% of Total CFA	Single and mixed uses permitted	Gov. facilities	Block length	no density max		Primary Density min of 25 du/acre	Secondary Density min of 15 du/acre	Primary Height Over 85' allowed	Secondary Height Over 50' allowed
High-Density Residential (R-4)	8.1%	Low	High	Medium	Medium	Medium	Medium	High	High	High
High-Density Residential (R-4/SR)		Low	Low	Medium	Medium	Medium	Medium	High	High	High
Limited High-Density Residential (R-3)	12.1%	Low	High	Medium	Medium	Medium	Medium	High	Low	High
Limited High-Density Residential (R-3/SR)		Low	Low	Medium	Medium	Medium	Medium	High	Low	High
Neighborhood Commercial (C-1)	0.7%	Medium	High	Medium	Medium	Medium	Medium	Medium	Low	Low
Neighborhood Commercial (C-1/SR)		Low	Low	Medium	Medium	Medium	Medium	Medium	Low	Low
Community Commercial (C-2)	55.9%	High	High	Medium	High	Medium	Medium	Medium	High	High

Community Commercial (C-2/SR or /PUD)		Low	Low	Medium	High	Medium	Medium	Medium	High	High
		320 (2)	320 (4)	320 (5)	320 (6)	320 (7)	320 (8)	320 (8)	320(8)	320(8)
		Single and mixed uses permitted	Gov. facilities	Block length	no density max		Primary Density	Secondary Density	Primary Height	Secondary Height
		% of Total CFA					min of 25 du/acre	min of 15 du/acre	Over 85' allowed	Over 50' allowed
General Office (GO)	3.1%	Medium	High	Medium	Medium	Medium	Medium	Medium	Low	High
General Office (GO/SR or /PUD)		Low	Low	Medium	Medium	Medium	Medium	Medium	Low	High
Major Commercial (C-3)	6.0%	High	High	Medium	High	Medium	Medium	Medium	High	High
Chambers Special Area (S-C/C-2)	2.7%	High	High	Medium	Medium	Medium	Medium	Medium	High	High
Chase Node Special Area (S-CN/C)	1.5%	Medium	High	Medium	Low	Medium	Low	High	High	High
Chase Node Special Area (S-CN/HDR/MU)		Medium	High	Medium	Low	Medium	Low	High	High	High
Chase Node Special Area (S-CN/HDR)		Medium	High	Medium	Low	Medium	Low	High	High	High

Chase Node Special Area (S-CN/PL)		Low	High	Medium	High	Medium	Low	Low	High	High
Chase Node Special Area (S-CN/PRO)		Low	Low	Medium	High	Medium	Low	Low	Low	Low
		320 (2)					320 (8)		320(8)	
		Single and mixed uses permitted	320 (4) Gov. facilities	320 (5) Block length	320 (6) no density max	320 (7)	Primary Density min of 25 du/acre	320 (8) Secondary Density min of 15 du/acre	Primary Height Over 85' allowed	Secondary Height Over 50' allowed
Downtown Riverfront Special Area (S-DR)(C)		Medium	High	Medium	Medium	Medium	Medium	Medium	High	High
Downtown Riverfront Special Area (S-DR) (A, B, F, G)	0.8%	Medium	High	Medium	Medium	Medium	Medium	Medium	Low	High
Downtown Riverfront Special Area (S-DR) (D,E)		Medium	High	Medium	Medium	Medium	Medium	Medium	Low	Low
Downtown Westside Special Area (S-DW)	1.3%	Medium	Low	Medium	High	Medium	High	High	High	High
Fifth Avenue Special Area (S-F)	0.4%	High	High	Medium	Medium	Medium	Medium	Medium	High	High
Walnut Station Special Area (S-WS)	3.8%	High	High	Medium	Medium	Medium	Medium	Medium	Low	High

		320 (2)	320 (4)	320 (5)	320 (6)	320 (7)	320 (8)	320 (8)	320(8)	320(8)
	% of Total CFA	Single and mixed uses permitted	Gov. facilities	Block length	no density max		Primary Density	Secondary Density	Primary Height	Secondary Height
							min of 25 du/acre	min of 15 du/acre	Over 85' allowed	Over 50' allowed
Whiteaker Special Area (S-W)	3.5%	Medium	High	Medium	Medium	Medium	Medium	Medium	Low	Low
Whiteaker Special Area (S-W/SR)		Low	Low	Medium	Medium	Medium	Medium	Medium	Low	Low

320 (2): High = no permitted uses issues, Low = 3 or more permitted use issues, Medium = one or two permitted use issues

320 (4): High = Government facilities allowed, Low = Government facilities not allowed, Medium = Nuance

320 (5): High = Block length is objectively conducive, Low = Block length is not conducive, Medium = Nuance

320 (6): High = Density Maximum does not exist, Low = Density maximum does exist, Medium = Density maximums exist, but allowed densities are consistent with “the spirit of” CFAs

320 (7): High = Consistent minor adjustments necessary, Medium = Some adjustments necessary, Low = Major adjustments necessary

320 (8) Density (Primary/Secondary): High = At or over 25/15 dwelling units/acre, Low = under 25/15 dwelling units/acre, Medium = minimum density does not meet the 25 du/acre requirement, but at least double that density is allowed or no density max exists.

320 (8) Height (Primary/Secondary): High = 85/50 or more feet allowed, Low = 85/50 ft not allowed, Medium = Nuance

TECHNICAL MEMORANDUM #3C – CAPACITY

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3C: CAPACITY ANALYSIS

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: June 21, 2023

CONTENTS

PURPOSE	148
BACKGROUND.....	148
REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS	150
ANALYSIS.....	151
<i>Methodology Overview</i>	151
<i>Determining Needed Housing Units</i>	151
Rule Requirements.....	151
Methodology	152
Results.....	152
<i>Calculate Dwelling Unit Capacity</i>	152
Rule Requirements.....	152
Methodology	154
Results.....	156
CONCLUSIONS.....	168
NEXT STEPS.....	168

PURPOSE

This memo provides a description of a tool which is a core part of the Eugene Climate-Friendly Areas (CFA) Study. This is one of three technical memos for analysis Step A3 of the study. It takes in data from a GIS analysis which uses data from the previous suitability analysis in Technical Memo #3a: Suitability (TM3a), as well as zoning data from the City. The capacity analysis also integrates development regulation (zoning) evaluation information from Technical Memo #3b: Policy Analysis (TM3b).

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown's *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon's climate pollution reduction targets 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 Oregon's eight most populated areas.

CFAs are areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.⁹²

The rules require cities (and some urbanized county areas) 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 defined CFAs within their Urban Growth Boundary (UGB). CFAs will be sized to accommodate a portion of the community's housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may currently allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, requiring either adoption of the set of prescriptive development standards set out in the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete the CFA study. Kearns & West are providing public

⁹² OAR 660-012-0005(10). <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292987>

involvement assistance with a focus on developing a community engagement plan and eliciting equity and displacement concerns from the community.

The following table provides an overview of steps for LCOG’s technical analysis.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
⇒ Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CLIMATE-FRIENDLY AREAS

Within the sections of the OAR 660 Division 12 rules describing the requirements of the CFA study, the following sections provide direction for the calculation of zoned residential building capacity and resultant residential dwelling unit capacity within potential CFA configurations.

(4) Cities and counties must submit a study of potential climate-friendly areas to the department as provided in this rule. The study of potential climate-friendly areas shall include the following information:

...

(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).⁹³

This memo provides the preliminary calculations of zoned residential building and dwelling unit capacity.

The suitable CFA locations analyzed in this memo were identified in previous analysis in Technical Memo #3a and were further refined from potential CFA locations identified in Technical Memo #1. Those earlier analyses addressed how each potential climate-friendly area complies, or may be brought into compliance, with the location and suitability requirements of OAR 660-012-0310(2).

Technical Memo #3b provided a preliminary evaluation of existing development standards (zoning) within suitable CFA locations and a general description of any changes needed to comply with the requirements of OAR 660-012-0320.

Those previous analyses provided the following inputs for this Technical Memo #3c:

- Identification of suitable CFA Locations.
- Inventory of zoning development regulations represented by base and overlays zones in the suitable CFA locations.
- Assessment of the development regulations and identification of changes to those regulations needed for compliance with the CFA rules.

⁹³ OAR 660-012-0315(4)(b)

The analysis in this memo uses the preceding inputs as well as methods and assumptions provided in the CFA rules to do the following:

- Determine the number of housing units necessary to meet all current and future housing needs, the capacity for 30% of which must be available in adopted CFAs.
- Calculate the housing unit capacity within CFA.

ANALYSIS

METHODOLOGY OVERVIEW

Specific instructions of how to calculate capacity are provided in the CFA rules:

- Determine the number of housing units necessary to meet all current and future housing needs, the capacity for 30% of which must be available in adopted CFAs.
- Calculate the housing unit capacity within CFA.

The first of these is calculated in this memo. The second is calculated in a related Capacity Calculator interactive tool and is summarized in the Calculate Dwelling Unit Capacity section below.

DETERMINING NEEDED HOUSING UNITS

Rule Requirements

The CFA rules explain how to determine the number of housing units necessary to meet all current and future housing needs, the capacity for 30% of which must be available in adopted CFAs, as follows.

The total number of housing units necessary to meet all current and future housing needs shall be determined from the local government's most recently adopted and acknowledged analysis of housing capacity and needed housing consistent with ORS 197.296 at the time it was adopted, by adding the total number of existing dwelling units identified in the buildable land inventory to the anticipated number of future needed housing units over the planning period of the housing capacity analysis.⁹⁴

This analysis uses the Envision Eugene Housing Needs Analysis (HNA) for this purpose.⁹⁵

⁹⁴ OAR 660-012-315(1)(b)

⁹⁵ The HNA is Part 2 of the Residential Land Supply Study (Appendix C of Envision Eugene Comprehensive Plan, covering 2012 - 2032), adopted in 2017. See https://www.eugene-or.gov/DocumentCenter/View/35479/3_Ordinance-Ex-A-2-Residential-Land-Supply-Study---Env-Eug-Residential.

Methodology

The calculation of needed housing from the HNA is as follows.

Existing units + anticipated future needed units = total units needed

CFA must be sized to accommodate 30% of total current & future units needed

Results

70,352 Existing dwelling units in Eugene city limits in 2011
HNA table 5 pg. 25; includes single-unit detached, single-unit attached, 2-4 units (middle housing), and 5+ units (multi-unit). Does not include Group Quarters. Does not include areas outside city limits but within the Urban Growth Boundary (UGB).

+15,105 Future needed dwelling units in UGB, 2012-2032

85,457 Total needed dwelling units



Existing dwelling units + Future needed dwelling units

25,637 Dwelling units, target capacity

*Total needed dwelling units * 30% of need*

CALCULATE DWELLING UNIT CAPACITY

Rule Requirements

The calculation of dwelling unit capacity in CFAs is allowed, under the rules, to use one of two methods, (A) the “standard” method, as described on OAR 660-012-315(2) or (B) an alternative method, as described in OAR 660-012-0320(10).

OAR 660-012-0315(2) – THE STANDARD METHOD

(2) Cities and counties subject to section (1) shall calculate the housing unit capacity within climate-friendly areas, as follows:

(a) Regardless of existing development in a climate-friendly area, determine the potential square footage of zoned building capacity for each net developable area based on proposed development standards for the climate-friendly area, including applicable setbacks, allowed building heights, open space requirements, on-site parking requirements, and all other applicable regulations that would impact the developable site area. Within developed areas with no blocks greater than 5.5 acres, analysis of net developable areas may be conducted for each city block, without regard to property boundaries within the block. Within areas of 5.5 acres or more bounded by streets where the internal development of additional roads and

utility infrastructure is anticipated, the local government shall assume the same ratio of gross land area to net land area as that which exists in the most fully developed urban center within the city or county.

(b) Where the local government has not established a maximum building height, assumed building height shall be 85 feet. For the purpose of calculating zoned building capacity, cities and counties may assume the following number of floors within multistory buildings, based on allowed building heights:

- (A) Thirty feet allows two floors.
- (B) Forty feet allows three floors.
- (C) Fifty feet allows for four floors.
- (D) Sixty feet allows for five floors.
- (E) Seventy-five feet allows for six floors.
- (F) Eighty-five feet allows for seven floors.

(c) If a local government allows height bonuses above the maximum building heights used for calculations in subsection (b), the local government may include 25 percent of that additional zoned building capacity when the bonuses:

(A) Allow building heights above the minimums established in OAR 660-012-0320(8); and,

(B) Allow height bonuses for publicly-subsidized housing serving households with an income of 80 percent or less of add the area median household income, or height bonuses for the construction of accessible dwelling units, as defined in OAR 660-008-0050(4)(a), in excess of minimum requirements.

(d) Local governments shall assume that residential dwellings will occupy 30 percent of the zoned building capacity calculated in subsections (a), (b), and (c) within climate-friendly areas. Public parks and open space areas within climate-friendly areas that are precluded from development shall not be included in calculations of zoned building capacity but may be counted towards minimum area and dimensional requirements for climate-friendly areas. Zoning and development standards for public parks and open space areas are exempted from compliance with the land use requirements in OAR 660-012-0320 if the existing zoning standards do not allow residential, commercial, or office uses.

(e) Local governments shall assume an average dwelling unit size of 900 square feet. Local governments shall use the average dwelling unit size to

convert the square footage of zoned residential building capacity calculated in subsection (d) into an estimate of the number of dwelling units that may be accommodated in the climate-friendly area.

OAR 660-012-0320(10) – THE ALTERNATIVE METHOD

(10) A local government may provide an alternative methodology for zoned residential building capacity calculations that differs from OAR 660-012-0315(2). The methodology must clearly describe all assumptions and calculation steps, and must demonstrate that the methodology provides an equal or better system for determining the zoned residential building capacity sufficient to accommodate at least 30 percent of the total identified number of housing units necessary to meet all current and future housing needs within climate-friendly areas. The alternative methodology shall be supported by studies of development activity in the region, market studies, or similar research and analysis.

Methodology

CALCULATION METHOD

This analysis uses the standard capacity calculation method, but also discusses places where an alternative calculation method could be useful (see boxed text below).

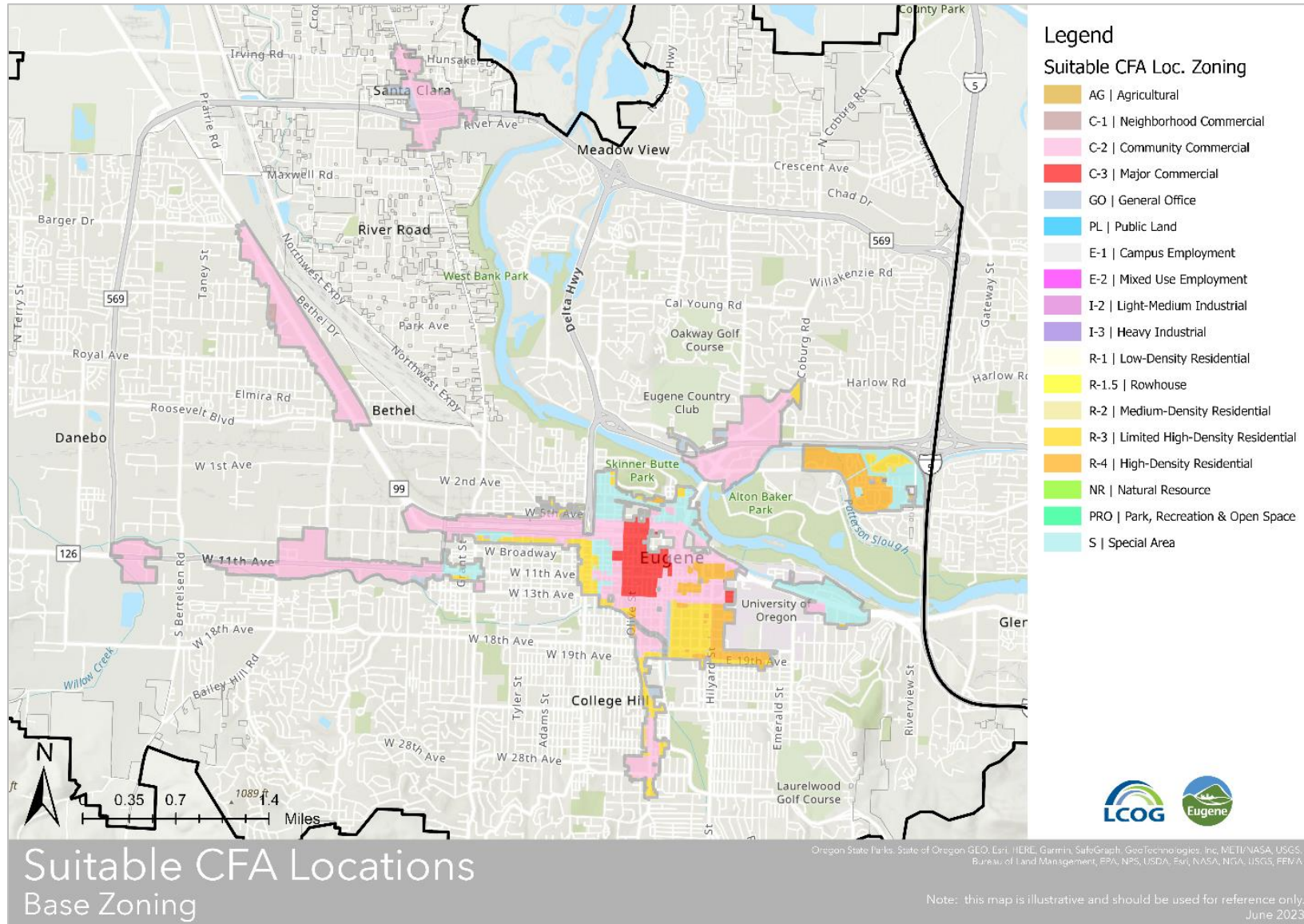
The City has several reasons to use the standard calculation method:

- The standard method does not require the development of additional analysis methods, as it is described in detail in the rules.
- The standard method does not require the additional development trend or market activity research and justification that is required for the alternative calculation method.
- Based on basic preliminary estimates by LCOG and the City, it appeared that well above the needed capacity requirement of 30% of needed housing would be available in available potential CFA locations using the standard method, making the extra effort of the alternative method unnecessary.

GIS ANALYSIS

As part of the analysis for Technical Memo #3b, a GIS overlay analysis was performed to extract base and overlay zoning information for each suitable CFA location, included in the map on the following page.

MAP 22. BASE ZONING IN SUITABLE CFA LOCATIONS



CAPACITY CALCULATOR

To provide a flexible method to explore CFA configurations and capacities, an interactive tool was developed called the Capacity Calculator. This takes the form of an Excel workbook and makes use of Excel features like filtering and conditional and table auto-formatting to provide City planners with a tool for exploring different CFA options.

This workbook takes in data from the GIS analysis supporting this memo, which in turn uses is the data from Suitable CFA Locations from TM #3a and the zoning for Eugene, as well as earlier CFA Study memos. It also integrates an evaluation of development regulations (zoning) from Technical Memo #3b: Policy Analysis.

The capacity calculations used in this tool follow the "standard capacity calculation method" as described in OAR 660-012-0320(2). It also assumes that the path followed to comply with the CFA land use requirements is the "prescriptive path" as described in OAR 660-012-0320(8). There are worksheets and calculations that bring in parameters that implement the required calculations of a capacity analysis in keeping with the "needed housing" and "standard capacity calculation" methods described in OAR 660-012-0315(1) and (2).

The net result of this is an interactive calculator that can determine the dwelling unit capacity of a particular CFA and zoning configuration and help City staff explore and fine-tune CFA options to take into the CFA adoption phase.

Results

The Capacity Calculator has the following parts (represented by worksheets).

CAPACITY CALCULATOR CONTENTS

OVERVIEW

An Overview of the workbook, its contents, purpose, and function.

CAPACITY METHOD

An explanation of the core math involved and required by OAR 660-012-0315(1) for needed housing and -0315(2) for capacity.

CAPACITY MATRIX - STANDARD

The core calculator. This filterable table uses information about CFA areas, intersecting zones, and other assumptions to calculate, among other lesser components, the net buildable area of land, zoned building area, dwelling unit capacity, dwelling density, and percent of needed housing for the CFA configuration. The dwelling unit capacity of the CFA configuration is at the bottom right and is expressed as a percentage of needed housing units in the comprehensive plan forecast period. The target per the rule at OAR 660-012-0315(1) is 30% of needed dwelling units. The icon will be green if this is achieved.

COMPLIANCE

A zoning evaluation input to the core calculator. Zones and overlays are assigned values for CFA compliance (to the -0320(2) permitted uses in particular), consistency with CFA intent, and corresponding recommendations for use in a CFA and in the capacity calculations. These values can be used to filter the core calculator, excluding rows that are not well-suited to the CFA.

ROW SET-ASIDES

An explanation of an important input to the core calculator. The exact shape of future development cannot be known. Streets can be vacated; land can be re-platted. In order to calculate potential development capacity, certain typical urban form characteristics must be assumed. These assumptions are based on the existing form of the most fully developed urban center within the city. The typical ratio of gross land area to net land area and the corresponding right-of-way (ROW) set-aside percentage are empirically determined and used to determine the net developable area of land in each suitable CFA location.

OTHER SET-ASIDES

Another zoning evaluation input to the core calculator. Zones and overlays are assigned values for set-asides and setbacks found in their development regulations. These are used to determine the net developable area of land in the CFA.

MAX. BUILDING HEIGHTS

Another zoning evaluation input to the core calculator. Zones and overlays are assigned values for maximum building heights found in their development regulations. Where they do not comply with CFA requirements, the maximum building heights are adjusted to what would comply with the rule. These are used to determine the zoned building capacity in the CFA.

SUITABLE CFA LOCATION & ZONING

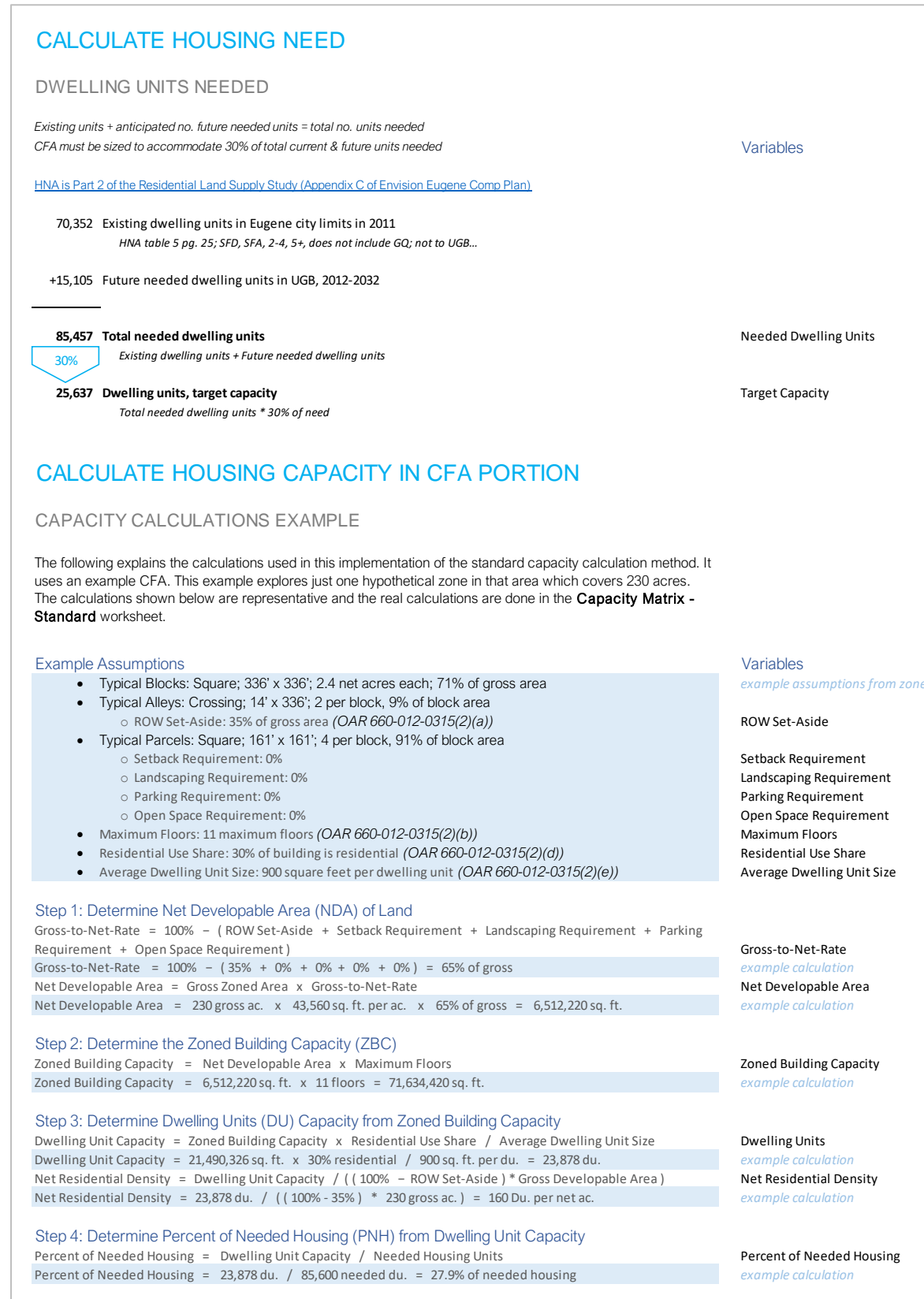
The input data from the GIS analysis, containing information about CFA areas and intersecting zones, including mainly type and area.

REFERENCE

Menus used by certain interactive features of this workbook.

Because a number of assumptions and calculations went into each sub-part of the analysis represented by these worksheets, each (except the **Overview** and **Reference** worksheets) is discussed in more length below.

FIGURE 1. CAPACITY METHOD WORKSHEET



CAPACITY METHOD WORKSHEET

The purpose of this worksheet is to give a high-level explanation of the core math involved and required by OAR 660-012-0315(1) for needed housing and OAR 660-012-0315(2) for dwelling unit capacity. The first section includes the needed housing calculations (also found in this memo) and the second section explains the dwelling unit calculations, by way of a hypothetical example.

CAPACITY MATRIX - STANDARD WORKSHEET

This worksheet is the core calculator of capacity. It takes in inputs from many of the other workbooks and uses the calculations explained on the Capacity Method worksheet to determine the capacity for each "piece" of each suitable CFA location. Each "piece" was generated in GIS and corresponds to a unique combination of CFA location, base zone, and overlay zone.


FIGURE 2. CAPACITY CALCULATOR, CAPACITY MATRIX

Area Number	Area Name	Area Acres	Zone Code	Zone Name	Subarea Code	Overlay Codes	All Codes	CFA Zone Acres	Needed Housing Units	Percent of Needed Housing
7	South Willamette	108.93	R-3	Limited High-Density Residential		SR	R-3/SR	1.34	85,457	0.08%
7	South Willamette	108.93	R-3	Limited High-Density Residential		WR	R-3/WR	0.41	85,457	0.02%
7	South Willamette	108.93	R-4	High-Density Residential			R-4	2.21	85,457	0.14%
7	South Willamette	108.93	R-4	High-Density Residential		WR	R-4/WR	0.13	85,457	0.01%
8	Franklin/Walnut	86.30	C-2	Community Commercial			C-2	7.35	85,457	0.56%
8	Franklin/Walnut	86.30	C-2	Community Commercial			C-2	0.71	85,457	0.05%
8	Franklin/Walnut	86.30	C-2	Community Commercial		WR	C-2/WR	1.55	85,457	0.12%
8	Franklin/Walnut	86.30	R-4	High-Density Residential			R-4	1.12	85,457	0.07%
8	Franklin/Walnut	86.30	S-WS	Walnut Station Special Area		FC	S-WS/FC	33.88	85,457	2.58%
8	Franklin/Walnut	86.30	S-WS	Walnut Station Special Area		WR	S-WS/FC/WR	8.76	85,457	0.67%
8	Franklin/Walnut	86.30	S-WS	Walnut Station Special Area		GA	S-WS/GA	8.47	85,457	0.64%
8	Franklin/Walnut	86.30	S-WS	Walnut Station Special Area		WR	S-WS/GA/WR	14.00	85,457	1.06%
8	Franklin/Walnut	86.30	S-WS	Walnut Station Special Area		TE-15	S-WS/TE-15	9.80	85,457	0.75%
9	Far West 11th Avenue	56.43	C-2	Community Commercial			C-2	6.83	85,457	0.52%
9	Far West 11th Avenue	56.43	C-2	Community Commercial		SR	C-2/SR	12.10	85,457	0.92%
9	Far West 11th Avenue	56.43	C-2	Community Commercial		SR, WB, WP	C-2/SR, WB, WP	21.49	85,457	1.63%
9	Far West 11th Avenue	56.43	C-2	Community Commercial		SR, WP	C-2/SR, WP	11.69	85,457	0.89%
9	Far West 11th Avenue	56.43	C-2	Community Commercial		WP	C-2/WP	1.32	85,457	0.10%
9	Far West 11th Avenue	56.43	C-2	Community Commercial		WP	C-2/WP	2.61	85,457	0.20%
								2035.22	85,457	147%

The worksheet is made up of a single table. This filterable table uses information about CFA areas, intersecting zones, and other assumptions from the rules to calculate, among other lesser components, the net buildable area of land, zoned building area, dwelling unit capacity, dwelling density, and percent of needed housing for the CFA configuration.

The dwelling unit capacity of the CFA configuration is at the bottom right of the whole table and is expressed as a percentage of needed housing units in the comprehensive plan forecast period. The target per the rule at OAR 660-012-0315(1) is 30% of needed dwelling units. The icon will be green if this is achieved.

FIGURE 3. PERCENT OF NEEDED HOUSING

85,457		0.89%
85,457		0.10%
85,457		0.20%
85,457		147%
	Percent of Needed Housing	

Each row of the table corresponds to a “piece” of the CFA, representing a unique combination of CFA location, base zone, and overlay zone. The bottom row shows totals for appropriate columns and will change depending on the filters that are applied to the columns.

The table has four groups of columns. The column groups in the table are as follows (in left-to-right order, as they appear in the table).

1. GIS Inputs – These are the columns from the GIS overlay analysis of suitable CFA locations, base zones, and overlay zones. Each of these columns are filterable and initially set to include all CFA locations and zones but to exclude zones with less than 4,000 square feet (0.09183 acres) of total area in the CFA⁹⁶ or areas with no zoning identified.⁹⁷ Other than filtering, these columns should not be changed by the user. The filter capability on these columns is useful because the user can look at, for example, just one or two suitable CFA locations or CFA and zone combinations and the total capacity at the bottom right will recalculate for just those areas.
2. Compliance Assumptions and User-Adjustable columns – Inputs from the rules or from other worksheets that are assumptions in the capacity calculations.
 - a. Primary or Secondary – [Values: Primary | Secondary] The assignment of primary or secondary CFA. This is an adjustable column for the user. It will change how much capacity is calculated because it will affect what minimum building height assumption is used.
 - b. CFA Compliance Primary/Secondary – [Values: High | Medium | Low] The overall zone compliance with the CFA rules for primary and secondary CFAs. This comes from the **Compliance** worksheet and is imported there from the results of Technical Memo #3b.
 - c. CFA Compatible Intent – [Values: True | False] The CFA compatible intent of the zone (i.e., where the intent or “spirit” of the zone is compatible with the CFA intent

⁹⁶ These appear to be minor data anomalies that are a result of imperfect GIS information and we not assessed in Technical Memo #3b or the analysis in this memo.

⁹⁷ These areas cannot be used for capacity calculations as there are no development regulations associated with them. They are typically rights-of-way.

even when compliance of current development regulations is not). This is an adjustable column for the user, but it should be changed only on the **Compliance** worksheet. It is a suggestive value to help the user sort out which zones to include in the capacity calculation.

- d. Developable – [Values: True | False] Whether the zone is developable. This is an adjustable column for the user. It can be used to exclude zones such as Parks and Open Space that can be part of a CFA but are not used for capacity calculations).
3. ROW Set-Asides and Other Development Assumptions – These columns pull in values from the **ROW Set-Aside**, **Other Set-Asides**, and **Max Building Heights** worksheets. It also includes two assumptions which come directly from the rules.
- a. ROW Set-Aside – [%] This assumption comes from the **ROW Set-Aside** worksheet. It will be discussed more below in the section on that worksheet.
 - b. Setback Requirement, Landscaping Requirement, Parking Requirement, Open Space Requirement – [%] These percentages come from the **Other Set-Asides** worksheet and are based on the prototypical building (see the discussion of the “prototypical building” later in this memo) in the particular zone. These will be discussed more below in the section on that worksheet.
 - c. Maximum Floors – [Integer] This assumption comes from the **Max Building Heights** worksheet. It will be discussed more below in the section on that worksheet.
 - d. Residential Use Share – [%] Residential dwellings are assumed, under the rules for the standard calculation method, to occupy 30 percent of the zoned building capacity for the purposes of the standard method. This is an average over all future buildings in the CFA rather than in any particular building (see the discussion of the “prototypical building” later in this memo).⁹⁸
 - e. Average Dwelling Unit Size – [Integer] 900 square feet per dwelling unit is assumed, under the rules for the standard calculation method.⁹⁹
4. Capacity Calculation columns – These columns calculate the steps in the standard capacity calculation. They include the following.
- a. Gross-to-Net-Rate – The cumulative set-aside rate for land in the CFA not available for buildings. This includes the ROW set-aside assumption for the city and the parcel level set-asides described on the **Other Set-Asides** worksheet.
 - b. Net Developable Area – The land available for buildings after the gross-to-net-rate deduction is applied.
 - c. Zoned Building Capacity – The vertical building area that can be used for residential units. It is a function of net developable area and maximum building height.
 - d. Dwelling Unit Capacity – The number of dwellings that can fit within the residential portion (30%) of the zoned building capacity.

⁹⁸ See OAR 660-012-0315(2)(d).

⁹⁹ See OAR 660-012-0315(2)(e).

- e. Net Residential Density – The net residential density achieved by the dwelling unit capacity and the portion of the gross zoned acres not in ROW set-aside.
- f. Needed Housing Units – The number of units needed as identified above under needed housing.
- g. Percent of Needed Housing – The percentage of the needed housing units met by the dwelling unit capacity in this row.

COMPLIANCE WORKSHEET

A zoning evaluation input to the core calculator. Zones and overlays are assigned values for CFA compliance (to the OAR 660-012-0320(2) permitted uses in particular), consistency with CFA intent, and corresponding recommendations for use in a CFA and in the capacity calculations. None of these values are required for the capacity calculations, but they can be used to filter the core calculator, excluding rows that are not well-suited to the CFA.

ROW SET-ASIDES WORKSHEET

This worksheet is mostly documentation and explains an important input to the core calculator.

The exact shape of future development cannot be known. Streets can be vacated; land can be replatted. In order to calculate potential development capacity, certain typical urban form characteristics must be assumed. These assumptions are based on the existing form of the most fully developed urban center within the city. The typical ratio of gross land area to net land area and the corresponding right-of-way (ROW) set-aside percentage are empirically determined and used to determine the net developable area of land in each suitable CFA location.

The densest part of Eugene's street grid can be found throughout the downtown area. The percentage of land in right-of-way in this area is 36%.

$$\text{ROW Set-Aside Percentage: } (3.74 \text{ acres} - 2.38 \text{ acres}) / 3.74 \text{ acres} = 36\%$$

Thus, areas in CFAs with blocks larger than 5.5 acres must set aside this percentage from the developable land area.

FIGURE 4. PROTOTYPICAL DOWNTOWN BLOCK



WHY A STANDARD ROW SET-ASIDE IS USED

The CFA rules ask us to analyze future capacity within a climate-friendly area "without regard to property boundaries" and "regardless of existing development." This is sensible since the exact shape of future development cannot be known. Given this uncertainty, in order to calculate potential development capacity, prototypical urban form characteristics must be assumed. All areas within CFAs are assumed to be available for replatting and so exceed the 5.5-acre threshold stated above in the rule and are required to set aside land for anticipated rights-of-way and infrastructure.

OTHER URBAN FORM CHARACTERISTICS OF THE PROTOTYPICAL BLOCK

In addition to the ratio of gross land area to net land area and the corresponding ROW set-aside percentage, other urban form characteristics can be derived from the prototypical block depicted above.

ALTERNATIVE METHODOLOGY OPTION – ROW SET-ASIDE

It is worth noting that some areas may have existing plans (e.g., neighborhood refinement plans) that indicate smaller amounts of ROW are planned for. To use those values in CFA capacity calculations, an alternative calculation method per OAR 660-012-320(10) could be used. The Capacity Calculator could easily support different ROW set-aside assumptions per suitable CFA location or per zone within the suitable CFA location by changing the values in the ROW Set-Aside column in the Capacity Matrix. However, the rule describing the alternative method asks for some supporting information on development activity or market studies that would indicate that this ROW set-aside would be likely to occur and still support the development densities the CFA capacity indicated, and development regulations require.

Typical Block Dimensions: 336 feet by 336 feet

Typical Alley ROW Width: 14 feet

Typical Maximum Parcel Dimensions: 161 feet by 161 feet

Percent of Parcel per n Feet of Front Setback:

$$P_f = 100 * ((161 \text{ feet} * n) + ((161 \text{ feet} - n) * n)) / 25,921 \text{ feet}$$

Note, per existing urban form found in the representative area, the above also assumes that blocks are divided by alleys following the pattern of the typical downtown block.

These characteristics can be used to assist in the calculations of other set-asides required by land use regulations. See the Other Set-Asides worksheet in this workbook.

Note that the CFA rules require that blocks longer than 350 feet are not allowed in CFAs (with exceptions). The prototypical block also meets this requirement.¹⁰⁰

OTHER SET-ASIDES WORKSHEET

Another zoning evaluation input to the core calculator. Zones and overlays are assigned values for set-asides and setbacks found in their development regulations. These are used to determine the net developable area of land in the CFA.

The interpretation of these standards for the purposes of this capacity calculation utilizes the concepts of the “prototypical block” and the “prototypical building.” The concept of the prototypical block was described in the preceding section on ROW Set-Asides. In the context of other set-

¹⁰⁰ OAR 660-012-0320(5)(a)-(b).

asides, it influences the lot setbacks assumed. Where development standards depend on the uses allowed in the zone, the concept of the prototypical building is used.

PROTOTYPICAL BUILDINGS

All development in rule-compliant zones is assumed to be in a prototypical building capable of yielding the maximum residential capacity under the rule. The building has the following composition:

- Mixed-use, multi-unit residential
- 30% residential space
- 70% non-residential space, either in employment use or for structured parking
- Optimal amount of the ground floor in commercial use, depending on the zone

ALTERNATIVE METHODOLOGY OPTION – RESIDENTIAL USE SHARE

It is worth noting that some areas may include zones that require more than 30% of the building be in residential use. This does not make a zone non-compliant with the land use requirements of the rules¹ but is precluded by the standard calculation method for capacity. To use those values in CFA capacity calculations, an alternative calculation method per OAR 660-012-320 (10) could be used. The Capacity Calculator could easily support different Residential Use Share assumptions per suitable CFA location or per zone within the suitable CFA location by changing the values in the Residential Use Share column in the Capacity Matrix. The rule describing the alternative method asks for some supporting information on development activity or market studies that would indicate that this residential use share would be likely to occur and still support the development densities the CFA capacity indicated, and development regulations require.

SETBACK REQUIREMENT

This assumption captures the amount of front, side, or rear lot setback required in the zone as a percentage of the land area. Development regulations for each zone express setbacks as a distance (e.g., 10 feet). With assumed dimensions of the prototypical block and lots are assumed, it is possible to calculate the percent of land for needed setback using the formula given in the preceding section on ROW Set-Asides (Percent of Parcel per n Feet of Front Setback). No side or rear setbacks are considered since the standard calculation methodology allows us to calculate "without regard to property boundaries within the block."¹⁰¹

LANDSCAPING REQUIREMENT

This column captures any landscaping required in the zone. This is typically expressed by development regulations as a percentage of the developable land area.

¹⁰¹ OAR 660-012-0315(2)(a).

PARKING REQUIREMENT

Parking is not required in CFAs that are within a half-mile of frequent transit, as all of Eugene's are.¹⁰² If parking was present, it would be assumed to be in structured parking either 1) within the building in the 70% non-residential portion assumed under the standard calculation method¹⁰³ or 2) under the building and below grade, so not counting against the maximum building height and thus not counting against the developable building area. See the Prototypical Building concept discussed above.

OPEN SPACE REQUIREMENT

This column captures not only any explicit open space requirement of a zone but also reflects the maximum lot coverage if included in the development regulations. These are not allowed to double count. For example, if a zone requires 15% of the lot to be in open space and that the lot have a maximum lot coverage by buildings of 45%, and thus 55% open space, then the open space requirement would be the larger of 15% and 55%. If that zone also required a front setback of 12% and the front setback can count towards the open space requirement, then that would reduce the open space requirement to 43% (55% - 12%).

NOTES

For each zone, the relevant city development code or relevant OAR section is referenced in the notes column.

MAX. BUILDING HEIGHTS WORKSHEET

Another zoning evaluation input to the core calculator. Base zones and overlay zones are assigned values for maximum building heights found in their development regulations. These are used to determine the zoned building capacity in the CFA.

Capacity calculations use zones that have been modified to comply per the rule requirement to look at the "proposed" development regulations, so maximum building heights that do not meet the standards for a Primary or Secondary CFA are increased to that level. Zones with no maximum building height are raised to 85 feet.

(a)...determine the potential square footage of zoned building capacity for each net developable area based on **proposed** development standards for the climate-friendly area...¹⁰⁴

(b) Where the local government has not established a maximum building height, **assumed building height shall be 85 feet.** ...¹⁰⁵

Some zones may include complex height restriction schemes for certain height regulating areas within the zone (e.g., when abutting a residential zone or when in a specifically called out area) or require building step-backs on upper floors of buildings. The step-backs have been considered non-

¹⁰² OAR 660-012-0310(2)(c) and OAR 660-012-0440(3).

¹⁰³ OAR 660-012-0315(2)(d).

¹⁰⁴ OAR 660-0315(2)(a).

¹⁰⁵ OAR 660-0315(2)(b).

compliant with the minimum height requirements of the rules for primary and secondary CFAs and have been ignored for the purposes of calculating capacity. This yields more capacity than would occur if the effect of these step-backs were estimated.

SUITABLE CFA LOCATION & ZONING WORKSHEET

This worksheet contains the input data from the GIS analysis that supported Technical Memo #3b and #3c, containing information about suitable CFA locations and intersecting zones, including mainly CFA and zone descriptions and the area in acres of the intersection of each.

CONCLUSIONS

Although the City has work ahead to determine which Suitable CFA Locations are most promising and which to adopt, including whether to include all zones in each CFA Location, we can look at the capacity generated by each CFA Location assuming all zones are used.

TABLE 11. SUITABLE CFA LOCATIONS, ALL ZONES

Suitable CFA Location	Acreage	% of Needed Capacity (As Primary)	% of Needed Capacity (As Secondary)
Chase Village	201	9%	5%
Downtown/Campus	865	● 58%	● 33%
Far West 11 th Avenue	56	4%	2%
Ferry Street Bridge	189	14%	8%
Franklin/Walnut	86	6%	4%
Highway 99	194	15%	8%
Santa Clara Station	135	10%	6%
South Willamette	109	7%	4%
West 11 th Avenue	204	15%	9%
Total	2,039	● 145%	● 83%

All locations taken together, if considered as Primary CFAs, have a theoretical zoned capacity of 145%, as shown in the table above. Together, they easily meet the rule requirement for needed housing capacity of 30%. Only the Downtown/Campus Suitable CFA Location has enough capacity to meet the capacity requirement of the rule by itself, at 60%.. There are several combinations of the smaller Suitable CFA Locations or parts thereof which would also meet the requirement. There are even more combinations of Primary and Secondary CFAs which meet the requirement.

NEXT STEPS

- City of Eugene staff will work with filterable table and map tools, as well as data from previous analyses, to explore the most promising configurations. Technical Memo #4 will explore some of these configurations, although the selection of a preferred scenario is not required to select for study.
- Some zones may need to be excluded from CFAs. The City will need to recalculate suitability (dimensional requirements) if zones are excluded that fragment the Suitable CFA location.

TECHNICAL MEMORANDUM #2.1 – EQUITY ANALYSIS

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #2.1

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: June 29, 2023

CONTENTS

PURPOSE	171
BACKGROUND.....	171
REQUIREMENTS FOR CFAS.....	172
ANALYSIS.....	174
<i>Overview of Method</i>	174
RESULTS	176
<i>Area Typologies in Potential CFAs</i>	176
<i>Housing Production Strategies</i>	180
Early Gentrification Summary.....	188
Vulnerable Summary	196
CONCLUSIONS & NEXT STEPS	197
<i>Conclusions</i>	197
<i>Next Steps</i>	Error! Bookmark not defined.
More Detailed Results	Error! Bookmark not defined.
Integrated Community Engagement Results on Equity, Gentrification, and Displacement.....	Error! Bookmark not defined.
defined.	
Mitigation of Displacement Risk	Error! Bookmark not defined.
Consideration of Equity in Selecting CFA Locations.....	Error! Bookmark not defined.

PURPOSE

The purpose of this memo is to continue addressing requirements in OAR 660-012-0315 by presenting equity information to decision-makers to inform future Climate-Friendly Area (CFA) designation. Technical Memorandum #2.1 provides a summary of the results of the anti-displacement analysis (see Technical Memorandum #2) and begins to review housing production strategies that include the potential to mitigate displacement pressures for each context.

BACKGROUND

The Climate-Friendly and Equitable Communities rules require cities to take steps to redress long-standing inequities in land use, zoning, and transportation investment (and disinvestment) decisions in the state of Oregon, a state with a long history of discrimination and racism. The rulemaking focused on reducing greenhouse gas emissions from vehicles while also building a more equitable city by improving transportation choices and creating communities where daily needs can be met by walking, biking, or taking transit.

One central outcome of this rulemaking is an increased emphasis on equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes Statement,¹⁰⁶ and it included a racial equity analysis of the rules and an analysis of how the rules could be improved to serve people with disabilities. The rules use the term “Underserved Populations,” which comes from OAR Division 12 – Transportation Planning (OAR 660-012-0125) and includes a list of populations that have historically and currently experienced marginalization. The City of Eugene has elected to use the term ‘historically marginalized community groups’ and added students and veterans to the list populations. Other historically marginalized community groups include but are not limited to Black and African American people, Indigenous people, People of Color, people with limited English proficiency, people with disabilities, low-income Oregonians, youth, seniors, and more. The rules require mapping of historically marginalized community groups, local consideration of a set of anti-displacement actions, centering the voices of these groups in decision-making, and regular reporting on efforts to engage them.

The Lane Council of Governments (LCOG) and Kearns and West (K&W) are providing technical assistance to the City of Eugene to complete Eugene’s CFA study. K&W are providing public involvement assistance with a focus on developing a community engagement plan and gathering feedback on equity issues from the community.

The following table provides an overview of steps for LCOG’s technical analysis.¹⁰⁷ This Technical Memorandum addresses Step A2(2) in the study phase: analysis of Most Promising CFAs for equity and displacement.

¹⁰⁶ <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

¹⁰⁷ LCOG is the technical lead for the CFA study, and K&W is leading public outreach that will be ongoing throughout the CFA study process.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
⇒ Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

REQUIREMENTS FOR CFAS

Per OAR 660-012-0315(4)(f), CFA studies must include:

“Plans for achieving fair and equitable housing outcomes within climate-friendly areas, as identified in OAR 660-008-0050(4)(a)-(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.”¹⁰⁸

This rule can be broken into three parts:

1. A plan to achieve certain housing outcomes within CFAs,
2. A spatial analysis to determine the likelihood of displacement, and
3. Identification of displacement mitigation actions.

The **plan for achieving specific housing outcomes** has been partially addressed in Technical Memorandum #2. Technical Memorandum #2 includes an inventory of the existing plans, policies, and tools that the City already has in place that contribute to the fair and equitable housing outcomes in different ways. Most of the plans and policies apply city-wide and do not address the CFAs directly. The fair and equitable housing outcomes are identified in OAR 660-008-0050(4)(a)-(f) and are summarized as follows:¹⁰⁹

¹⁰⁸ Source: <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062>

¹⁰⁹ The CFA study does not require a full Housing Production Strategy Report, which requires an analysis of the six equitable and fair housing factors described in OAR 660-008-0050(4)(a)-(f). However, Eugene will be required to complete this work by 2025 as part of an Urban Growth Boundary analysis with adoption by 2026. The inventory provided in this Technical Memorandum is intended to feed into the larger Housing Production Strategy Report that will be required at that time.

- **Location of Housing**—How the City is striving to meet statewide greenhouse gas emission reduction goals by creating compact, mixed-use neighborhoods available to members of state and federal protected classes.

Note: To fulfill this requirement, cities must describe actions taken by the City to:

- *Promote the production of regulated affordable units¹¹⁰*
- *Promote the production of accessible dwelling units¹¹¹*
- *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 housing for all state and federal protected classes.

Note: 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.

- **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.

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

- **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.

¹¹⁰ 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.

¹¹¹ 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. [OAR 660-008-0050(4)(a)]

“**Gentrification**” has been given various definitions but can be defined as an increase in college-educated individuals’ demand for housing in initially low-income, central city neighborhoods.¹¹²

“**Displacement**” occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.¹¹³

The mapping of areas within CFAs are that are most susceptible to displacement was also done in Technical Memorandum #2. This is equivalent to the second part of the rule requirement, a **spatial analysis to determine the likelihood of displacement**. In addition to the spatial analysis, this rule requirement was supplemented in Technical Memorandum #2 with a demographic profile that documents the existence of various state and federal protected classes within the City of Eugene.

When addressing the third part of the rule, **identifying displacement mitigation measures**, the measures selected should work to achieve the fair and equitable housing outcomes listed above. This Technical Memorandum begins to identify tools, policies, and plans that would mitigate potential displacement when a CFA is designated, under the assumption that the area will be more heavily invested in.

ANALYSIS

OVERVIEW OF METHOD

The Department of Land Conservation and Development (DLCD) created an approach to an anti-displacement analysis that is described in a guidance memo¹¹⁴ and is based on the Anti-Displacement and Gentrification Toolkit Guide for Cities (Anti-Displacement Toolkit), a toolkit which DLCD provided to local governments for Housing Production Strategies required by HB 2003.¹¹⁵ The original research for this work was performed by Portland State University (PSU).¹¹⁶

DLCD-SUGGESTED APPROACH TO ANTI-DISPLACEMENT

The suggested anti-displacement analysis approach for CFA studies presented by DLCD follows these steps:

- **Step 1. Spatial Analysis**

¹¹² 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>.

¹¹³ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

¹¹⁴ Anti-Displacement Toolkit Guide for Cities: Implementation Guidance, OAR 660-012-0315, CFA Anti-Displacement Analysis. Retrieved from https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf on 4/26/2023.

¹¹⁵ Anti-Displacement and Gentrification Toolkit Project: Guide for Cities Implementing HB 2003 Housing Production Strategies. Retrieved from <https://www.oregon.gov/lcd/UP/Documents/Anti-Displacement%20Toolkit%20Guide.pdf> on 4/26/2023.

¹¹⁶ Anti-Displacement and Gentrification Toolkit, Attachment A. Retrieved from https://www.oregon.gov/lcd/UP/Documents/AttachmentA_PSU%20Toolkit.pdf on 4/26/2023.

- Overlay Neighborhood Typologies with potential CFAs
- Identify areas of displacement risk
- **Step 2. Planning Analysis**
 - Look up Housing Production Strategies for each CFA
 - Review mitigation potential for each context
- **Step 3: Report**
 - Select strategies to best achieve goals and mitigate unintended consequences

Step 1 of the anti-displacement analysis approach above was completed in Technical Memorandum #2, which included a spatial analysis consisting of overlaying area typologies and identifying areas of displacement risk. The results from Technical Memorandum #2 will be discussed in the following section.

Step 2 of the anti-displacement analysis approach is addressed in this memo. Examples of housing production strategies are highlighted and discussed within the context of the area typology found in the most suitable CFAs (Technical Memorandum #3c) as well as which housing outcomes the strategies may contribute to.

Step 3 of the anti-displacement analysis will be performed by the City as part of CFA designation and adoption.

Overall, the methodology used to mimic the DLCD neighborhood typology was closely based on the methodology explained by PSU in the Anti-Displacement and Gentrification Toolkit, although some terminology and definitions were changed. Several other modifications to the methodology were made and are discussed in Technical Memorandum #2. These modifications include:

- The term “neighborhood” has a different familiar definition in Eugene (i.e., neighborhood association boundaries), so instead, the LCOG analysis refers to these demographic analysis areas (block groups) as just “areas.” The typology will be referred to hereafter as an “area typology.”
- Some of the indicator sets were renamed:
 - “Income Profile” became “Low-Income.”
 - “Precarious Housing” became “Older or Multi-Unit Housing.”
 - “Neighborhood Demographic Change” became “Demographic Shift.”
- Some of the indicators were renamed or redefined:
 - *Change in BIPOC* and *Change in Homeownership* were defined as relatively significant when above the citywide median, rather than below.

- Some of the area types were renamed:
 - “Affordable and vulnerable” became “Vulnerable.”

The spatial anti-displacement analysis results of Technical Memorandum #2 provide the City of Eugene with specific area types within the most suitable CFA boundaries. Once certain area types are established, tools, policies, and actions to mitigate displacement can be tailored to each area type. This memorandum discusses what considerations might go into creating a displacement mitigation strategy, as well as tools, policies, and actions that are best suited for the applicable area types according to a resource provided by DLCDC.

RESULTS

AREA TYPOLOGIES IN POTENTIAL CFAS

In Map 23 below, the potential CFAs are overlaid with their corresponding area typologies showing the risk of displacement that an area within the CFA is susceptible to. These typologies are made up of a combination of specific sets of indicators. The indicators are in turn made up of a set of demographic measures such as median income, demographic shift in an area, presence of multi-unit housing types, and more. The area typologies are a combination of the presence or absence of each indicator set, which is reflected in Table 12.

TABLE 12. AREA TYPOLOGY BY INDICATOR SET STATE

Area Typology	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	-	-	-	-	-
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A breakdown of the demographic measures and market factors that make an indicator set can be found in Technical Memorandum #2.

As shown in Map 23, the only area typologies present within potential CFAs are Vulnerable, Early Gentrification, Active Gentrification and No Risk Identified. The total amount of acres of each area type within promising CFAs can also be found in Technical Memorandum #2. Below is a brief description of the characteristics of these area types 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 lower median household income, and their residents are predominantly low-income, 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 gentrification as indicated by demographic change.

NO RISK IDENTIFIED

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 change 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 and desires. One example would be areas that don't have low-income or otherwise vulnerable people but do have mostly older or multi-unit housing.

Each of the Early Gentrification, Active Gentrification and Vulnerable area types indicate the presence of low-income households, vulnerable people (Black, Indigenous, and people of color,

people with limited English proficiency, people with disabilities, single-parent households, and people over 65 years old), and older or multi-unit housing exist in these areas at a rate generally higher than the city as a whole. The demographic groups that make up the Vulnerable People indicator set are historically marginalized communities. Precautions must be taken by the jurisdictions who are adopting CFAs to mitigate the potential displacement effects of increasing density and investment in these areas.

HOUSING PRODUCTION STRATEGIES

Step 2 of the anti-displacement analysis approach cited in the previous section is to look up Housing Production Strategies for each CFA and to review mitigation potential for each context. As a part of DLCDC’s “Anti-Displacement and Gentrification Toolkit Project,” a “Housing Production Strategy Program - List of Tools, Actions, and Policies”¹¹⁷ (HPSP) was included as Attachment B. The HPSP is a crowd-sourced, non-exhaustive list of housing production strategy tools, actions, and policies, and the strategies are sorted into the categories shown in Figure 5.

Category A		Zoning and Code Changes	These are strategies that a jurisdiction 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.
Category B		Reduce Regulatory Impediments	These strategies address known impediments to providing needed housing. These include but are not limited to zoning, permitting, and infrastructure impediments.
Category C		Financial Incentives	These are a list of financial incentives that jurisdictions can give to developers to encourage them to produce needed housing.
Category D		Financial Resources	These are a list of resources or programs at the local, state and federal level that can provide money for housing projects. The majority of these resources are intended to provide money for affordable housing projects.
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.
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.
Category Z		Custom Options	Any other Housing Production Strategy not listed in Categories A through F that the jurisdiction wishes to implement will be outlined in this section and numbered accordingly.

FIGURE 5. ANTI-DISPLACEMENT AND GENTRIFICATION TOOLKIT CATEGORIES

The HPSP also sorts the strategies by the area typology it affects, the tenure target (for rent or for sale), and the affordability target (from Publicly-Subsidized housing to market rate housing). Cities adopting CFAs may use this resource to select the most applicable and effective tools for addressing gentrification and displacement as a result of investment in the CFAs.

Factors that should be considered when selecting tools, actions, and policies include but are not limited to:

- Tools/Actions/Policies Already in Place
 - See the Fair and Equitable Housing Policy Inventory in Technical Memorandum #2. How are these policies already contributing to Fair and Equitable Housing Outcomes? How do they effect the CFAs? What category, tenure target and affordability target do they address?
- Community Engagement Results (OAR 660-012-0315(4)(c))
 - City staff will continue to engage the community and conduct an engagement-focused equity analysis through concerted efforts to reach out to historically marginalized community groups. As of the date of this memo, Kearns and West conducted ten interviews, created handouts for several outreach events, supported a listening session on displacement, as well as research on the anti-displacement

¹¹⁷ Housing Production Strategy Program - List of Tools, Actions, and Policies OREGON ADMINISTRATIVE RULE CHAPTER 660, DIVISION 8, ATTACHMENT B (Revised February, 2022) Obtained from: https://www.oregon.gov/lcd/Commission/Documents/2022-02_Item-3_HNA_Attachment-B_Updated-Tools-Policies-Actions_HPS.pdf

engagement projects in other cities. Moving forward, engagement efforts led by the City will rely on this initial outreach and research, as well as a draft Community Engagement Plan developed by Kearns and West. Future engagement will be used to refine the most suitable CFA maps and support the selection of anti-displacement strategies alongside city-wide housing production strategies.

- How have previous efforts affected communities on the ground? What are the preferences of the communities that will be affected by newly designated CFAs and accompanying anti-displacement mitigation strategies? What could possible unintended consequences of designating CFAs?
- Fair and Equitable Housing Outcomes (OAR 660-008-0050(4)(a)-(f))
 - How will the tools selected contribute to fair and equitable housing outcomes? Is each addressed? Which outcomes are lacking a robust response?
- Ability to Implement
 - How long would it take to put the tool/policy/action into effect? What other resources are needed? What is the likelihood? What are the City's long-term and short-term priorities?
- Category Variety
 - Are the tools selected mainly in a couple of the categories above? Could additional tools be selected and implemented from other categories?
- Tenure Target Variety
 - Will the selected tools help promote fair and equitable housing outcomes for homeowners and renters?
- Affordability Target Variety
 - Will the selected tools help promote fair and equitable housing outcomes for each of the following income categories:
 - Publicly-Subsidized (< 30% AMI)
 - Affordable (30-80% AMI)
 - Workforce (80-120% AMI)
 - Market Rate (> 120% AMI)
 - Are there income categories that should be more heavily targeted in these efforts?
- Housing Equity Impact
 - The tools/policies/actions listed have a varying degree of impact on housing production specifically for desired affordability and tenure targets. Some will directly promote desired fair and equitable housing, while others may increase the amount of housing in general, which may put more pressure on displacement potential and require monitored mitigation efforts. The HSPS list sorts the tools/policies/actions impacts by DIRECT, (DIRECT), INDIRECT, (INDIRECT).
 - **DIRECT** strategies for meeting housing equity needs are focused on supply. They have strong impacts for anti-displacement that can be seen in the short-term. A **(DIRECT)** strategy is one that is specific to affordable housing and/or protected classes and vulnerable populations but does not actually create housing.
 - Strategies that allow for more housing overall are **INDIRECT**.
 - Strategies that are oriented towards smaller units or diverse housing types are **(INDIRECT)** - they are more likely to address equity needs but may also require additional tools to focus on affordability, tenure, or accessibility.

- Are enough DIRECT strategies being chosen? If the tool/strategy/policy chosen is INDIRECT are there precautions being taken to ensure other tools are focusing on affordability, tenure, and accessibility?
- Area Typology
 - Are the designated area typologies being addressed? This will be mostly Vulnerable and Early Gentrification in Eugene CFAs.
 - How well suited to the area type is the tool? The “Housing Production Strategy Program - List of Tools, Actions, and Policies” provides this distinction by color coding the area type to which the tools apply.
 - **Green:** GO use and implement, especially if a tool is useful in this area type.
 - **Yellow:** PROCEED CAUTIOUSLY and carefully. This means that a strategy needs to be monitored for impacts and possibly paired with more direct mitigating strategies in this area type.
 - **Red:** STOP AND PLAN. This strategy is highly likely to create displacement pressures and must be paired with mitigation measures in this area type.

City staff will analyze the tools, actions, and policies in the Housing Production Strategy Program to design an anti-displacement strategy. Below is an example of how to compile and compare the **green**-coded tools, actions, or policies for each area type within the potential CFAs. These green tools are the most highly recommended for the specific area types that exist in Eugene’s most promising CFAs. Meanwhile, **yellow**, and **red** coded tools have not been included because implementing them may require additional resources to monitor their impacts and additional mitigation measures in their designated area types. All the text in the table is taken directly from the “Housing Production Strategy Program - List of Tools, Actions, and Policies” list. The meaning of the categories is explained above.

Active Gentrification

Category	Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
A: Zone and Code Changes	A03: FAR Density, or Height, Bonuses for Affordable Housing	For Rent	Affordable Workforce	DIRECT	These tools work best in strong markets; have a medium impact on displacement
	Description: FAR, density, and height bonuses for affordable housing developments. Note: FAR/density bonuses do not work if there is not adequate height to make additional development feasible.				
	A06: Broaden the Definition of Housing Type	For Rent For Sale	Publicly-Subsidized Affordable Workforce Market Rate	(INDIRECT)	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering.
	Description: Broaden the definition of “housing unit” to allow for more flexibility across use types. For example, SROs are not always allowed in certain residential zones. Including them in the definition of housing unit, or broadening the set of uses allowed across all residential districts, would allow for greater flexibility of housing type.				
	A07: Allow for Single Room Occupancy in Residential Zones	For Rent	Publicly-Subsidized Affordable Workforce Market Rate	DIRECT	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering
	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.				
	A10: Inclusionary Zoning	For Rent	Publicly-Subsidized Affordable Workforce	DIRECT	These tools work best in strong markets; have a medium impact on displacement; they pair with incentives that can be customized to context for maximum overall impact

	Description: Requiring that a portion of the units within a market rate development be set aside as affordable housing. This tool will often be combined with property tax exemptions, fee waivers, or development bonuses to offset the cost of affordable housing units. Careful consideration should be employed when enacting inclusionary zoning. Note: A number of studies, including those analyzing the IZ Ordinance in Portland, have shown that IZ suppresses, rather than increases, the creation of new housing. Given that, if IZ is proposed, the financial components need to be calculated right to ensure that the inclusionary rate is not too high for the offsets provided and that overall housing production increases as a result.				
	A13: FAR & Density Transfer Provisions	For Rent	Affordable Workforce Market Rate	DIRECT	These tools work best in strong markets; have a medium impact on displacement when paired with affordability tools
	Description: Enable and encourage Transfer of Development Rights (TDR) to maximize available Floor Area Ratio (FAR) provided public benefit (e.g., historic preservation & affordable housing) are attained and covenants ensure long term benefit. This strategy assumes that there are adequate, realistic, and relatively easy receiving areas for TRDs.				
	A16: Manufactured Housing Community Preservation Zone	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	Planning and monitoring for potential displacement; may need additional incentives and programs in active gentrification for higher impact
	Description: Change the zoning of existing manufactured housing communities to be preserved to a single-use zone that only allows manufactured housing communities. Consider lifting restrictions of stick-built homes in cooperatively owned and other manufactured homes.				
D: Financial Resources	D02: Low Income Housing Tax Credit (LIHTC)	For Rent	Publicly-Subsidized Affordable	DIRECT	-
	Description: Housing Trust Funds are a flexible source of funding that can be used to support a variety of affordable housing activities. Because they are created and administered at the city, county, region, or state level, housing trust funds are not subject to the restrictions of federal subsidy programs and therefore can be designed specifically to address local priorities and needs. The entity administering the fund determines eligible activities, which can include anything from emergency rent assistance for families facing the threat of eviction or homelessness to gap financing for new construction of affordable housing to repairs for older homeowners.				

D05: Employer – Assisted Housing Programs	For Rent For Sale	Publicly-Subsidized Affordable Workforce	INDIRECT	Employer-assisted housing in areas near transit or near workplaces can support stability and equity, and contribute to a 'pro-housing agenda'
Description: Employer-assisted housing programs provide a channel through which employers can help their employees with the cost of owning or renting a home, typically in neighborhoods close to the workplace. Assistance may be provided in a variety of ways, including through down payment grants or loans that are forgiven over a period of employment, homeownership counseling and education, rental subsidies and, less commonly, direct investment in the construction of rental housing.				
D08: Demolition Taxes	For Rent For Sale	Publicly-Subsidized Affordable Workforce Market Rate	INDIRECT	Medium impacts to prevent displacement in strong market with lots of demolition and conversion, with impacts in the short term and potential to fund housing. Plan and monitor production vs. needs
Description: Cities, towns, and counties establish demolition taxes and condo conversion fees as a way to generate revenue and replace affordable housing lost to these activities. The proceeds from both demolition taxes and condo conversion fee are typically deposited in a Housing Trust Fund to support affordable housing activities. To ensure that a demolition tax on residential development does not deter needed redevelopment - this strategy should only be applied if the housing replacement is 1:1. If the proposed development is more dense than the original structure, there should not be a demolition tax.				
D14: Eviction Prevention Programs	For Rent	Publicly-Subsidized Affordable	DIRECT	Eviction prevention programs have high anti-displacement impacts, in the short term, and across all markets. They are especially useful in strong markets where there are economic incentives to evict
Description: Eviction Prevention Programs provide financial assistance to help renters facing eviction stay in their homes. These programs are generally designed for families who are being evicted due to nonpayment of rent during or following an unforeseen crisis, such as job loss or serious illness, rather than those who face more persistent affordability challenges. Jurisdictions may be interested in investing in eviction prevention to address concerns about displacement of low-income renters and also to avoid or reduce use of other more costly local services, like homeless shelters.				

	D18: Weatherization Funds through Community Action Agencies	For Rent	Publicly-Subsidized Affordable	DIRECT	Weatherization funds can address displacement by improving habitability in low-income neighborhoods; and by reducing energy costs and needs for expensive repairs that may displace owners in gentrifying neighborhoods
	Description: Use weatherization funds administered by statewide network of Community Action Agencies to preserve aging housing stock occupied by income-qualified residents.				
E: Tax Exemption and Abatement	E04: Multiple Unit Property Tax Exemption (MUPTE)	For 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.
	Description: This strategy can be used to incentivize production of multifamily housing with particular features or at particular price points by offering qualifying developments a partial property tax exemption over the course of several years.				
	E05: Multiple Unit Limited Tax Exemption (MULTE)	For 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.
	Description: Under the Multiple-Unit Limited Tax Exemption (MULTE) Program, multiple-unit projects receive a ten-year property tax exemption on structural improvements to the property as long as program requirements are met.				
	E08: Property Tax Relief for Income-Qualified Homeowners	For Rent For Sale	Publicly-Subsidized Affordable	(DIRECT)	Supporting owners to stay in place as housing markets heat up is an important preservation strategy; it does not maintain the affordability of the unit at stake.
Description: Property taxes are based on property values and so can go up regardless of the taxpayers' ability to pay. In the case of homeowners, rising property taxes can be an obstacle to housing affordability and stability. A tool used in a number of jurisdictions for mitigating these effects on those with limited incomes is by capping the amount of property tax that homeowners have to pay as a share of their income. Some jurisdictions also provide relief to lower-income renters by treating some portion of their rent as attributable to property taxes and then providing an income tax credit to offset the increase in taxes. In addition to basing the benefit on income, eligibility for caps can also be restricted to specific populations such as seniors, disabled persons, and/or veterans.					

F: Land Acquisition, Lease and Partnerships	F01: Land Banking	For Rent For Sale	Publicly-Subsidized Affordable Workforce	(DIRECT)	Planning ahead for areas of public investment with land banking can support affordable housing development without needing to purchase lots. In already developed, exclusive areas, using public land may be the only cost effective strategy for building new affordable units.
	Description: Public purchasing of vacant/under-utilized sites of land in order to save for future affordable housing development. House Bill 2003, section 15 supports land banking: SECTION 15. (1) As used in this section, “public property” means all real property of the state, counties, cities, incorporated towns or villages, school districts, irrigation districts, drainage districts, ports, water districts, service districts, metropolitan service districts, housing authorities, public universities listed in ORS 352.002 or all other public or municipal corporations in this state.				
	F05: Preserving Low-Cost Rental Housing to Mitigate Displacement	For Rent	Publicly-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. Example: The Oregon Legislature committed \$15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund. Modeled after the Greater Minnesota Housing Fund.				
	F06: Preserving Safe, Affordable Manufactured Homes	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	-
	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. In order 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). Oregon Housing and Community Services (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.				

	F08: Conversion of Underperforming or Distressed Commercial Assets	For Rent	Publicly-Subsidized Affordable Workforce Market Rate	DIRECT	Most likely to be cost effective in some neighborhood market types
Description: Acquisition of underperforming or distressed commercial assets (commercial, retail, industrial, or hotel) or partnerships with owners of the assets for conversion into needed housing.					

Active Gentrification Summary

Out of all the 10 **green** tools, policies, or actions that are geared specifically towards the Early Gentrification Area Type:

Category Types Included	A	D	E	F
Tenure Target	11 are For Rent	7 are For Rent and For Sale		
Affordability Target	14 Publicly-Subsidized (<30% AMI)	16 Affordable (30-80% AMI)	11 Workforce (80-120% AMI)	7 Market Rate (>120% AMI)
Housing Equity Impact	11 are DIRECT	2 is INDIRECT	2 (DIRECT)	3 (INDIRECT)

Early Gentrification

Category	Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
A: Zone and Code Changes	A03: FAR Density, or Height, Bonuses for Affordable Housing	For Rent	Affordable Workforce	DIRECT	These tools work best in strong markets; have a medium impact on displacement
	Description: FAR, density, and height bonuses for affordable housing developments. Note: FAR/density bonuses do not work if there is not adequate height to make additional development feasible.				
	A13: FAR & Density Transfer Provisions	For Rent	Affordable Workforce Market Rate	DIRECT	These tools work best in strong markets; have a medium impact on displacement when paired with affordability tools
	Description: Enable and encourage Transfer of Development Rights (TDR) to maximize available Floor Area Ratio (FAR) provided public benefit (e.g., historic preservation & affordable housing) are attained and covenants ensure long term benefit. This strategy assumes that there are adequate, realistic, and relatively easy receiving areas for TRDs.				
	A16: Manufactured Housing Community Preservation Zone	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	Planning and monitoring for potential displacement; may need additional incentives and programs in active gentrification for higher impact
	Description: Change the zoning of existing manufactured housing communities to be preserved to a single-use zone that only allows manufactured housing communities. Consider lifting restrictions of stick-built homes in cooperatively owned and other manufactured homes.				
D: Financial Resources	D02: Low Income Housing Tax Credit (LIHTC)	For Rent	Publicly-Subsidized Affordable	DIRECT	-

<p>Description: Housing Trust Funds are a flexible source of funding that can be used to support a variety of affordable housing activities. Because they are created and administered at the city, county, region, or state level, housing trust funds are not subject to the restrictions of federal subsidy programs and therefore can be designed specifically to address local priorities and needs. The entity administering the fund determines eligible activities, which can include anything from emergency rent assistance for families facing the threat of eviction or homelessness to gap financing for new construction of affordable housing to repairs for older homeowners.</p>				
D05: Employer – Assisted Housing Programs	For Rent For Sale	Publicly-Subsidized Affordable Workforce	INDIRECT	Employer-assisted housing in areas near transit or near workplaces can support stability and equity, and contribute to a 'pro-housing agenda'
<p>Description: Employer-assisted housing programs provide a channel through which employers can help their employees with the cost of owning or renting a home, typically in neighborhoods close to the workplace. Assistance may be provided in a variety of ways, including through down payment grants or loans that are forgiven over a period of employment, homeownership counseling and education, rental subsidies and, less commonly, direct investment in the construction of rental housing.</p>				
D14: Eviction Prevention Programs	For Rent	Publicly-Subsidized Affordable	DIRECT	Eviction prevention programs have high anti-displacement impacts, in the short term, and across all markets. They are especially useful in strong markets where there are economic incentives to evict
<p>Description: Eviction Prevention Programs provide financial assistance to help renters facing eviction stay in their homes. These programs are generally designed for families who are being evicted due to nonpayment of rent during or following an unforeseen crisis, such as job loss or serious illness, rather than those who face more persistent affordability challenges. Jurisdictions may be interested in investing in eviction prevention to address concerns about displacement of low-income renters and also to avoid or reduce use of other more costly local services, like homeless shelters.</p>				
D18: Weatherization Funds through Community Action Agencies	For Rent	Publicly-Subsidized Affordable	DIRECT	Weatherization funds can address displacement by improving habitability in low-income neighborhoods; and by reducing energy costs and needs for expensive repairs that may displace owners in gentrifying neighborhoods

	Description: Use weatherization funds administered by statewide network of Community Action Agencies to preserve aging housing stock occupied by income-qualified residents.				
F: Land Acquisition, Lease and Partnerships	F05: Preserving Low-Cost Rental Housing to Mitigate Displacement	For Rent	Publicly-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. Example: The Oregon Legislature committed \$15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund. Modeled after the Greater Minnesota Housing Fund.				
	F06: Preserving Safe, Affordable Manufactured Homes	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	-
	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. In order 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). Oregon Housing and Community Services (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.				
	F08: Conversion of Underperforming or Distressed Commercial Assets	For Rent	Publicly-Subsidized Affordable Workforce Market Rate	DIRECT	Most likely to be cost effective in some neighborhood market types
Description: Acquisition of underperforming or distressed commercial assets (commercial, retail, industrial, or hotel) or partnerships with owners of the assets for conversion into needed housing.					

Early Gentrification Summary

Out of all the 10 **green** tools, policies, or actions that are geared specifically towards the Early Gentrification Area Type:

Category Types Included	A	D	F	
Tenure Target	7 are For Rent	3 are For Rent and For Sale		
Affordability Target	8 Publicly-Subsidized (<30% AMI)	10 Affordable (30-80% AMI)	4 Workforce (80-120% AMI)	2 Market Rate (>120% AMI)
Housing Equity Impact	9 are DIRECT	1 is INDIRECT	0 (DIRECT)	0 (INDIRECT)

Vulnerable

Vulnerable					
Category	Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
A: Zone and Code Changes	A16: Manufactured Housing Community Preservation Zone	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	Planning and monitoring for potential displacement; may need additional incentives and programs in active gentrification for higher impact
	Description: Change the zoning of existing manufactured housing communities to be preserved to a single-use zone that only allows manufactured housing communities. Consider lifting restrictions of stick-built homes in cooperatively owned and other manufactured homes.				
	A18: Increase Density Near Transit Stations and Regional Multi-Use Trails	For Rent	Publicly-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
	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.				
D: Financial Resources	D01: Community Development Block Grant (CDBG)	For Rent	Publicly-Subsidized Affordable	DIRECT	-
	Description: CDBG Grants are federal funds set aside in the form of grants to be used to meet national objectives: direct benefit for low- and moderate-income households; benefit to predominantly low-income areas; elimination of slums and blight. Eligible activities include public works infrastructure, community facilities, new housing development, housing rehabilitation, and public services (counselling, social services & microenterprise training, including short-term emergency rent assistance). Eligibility is based upon the levels of low- and moderate-income families that may benefit from services provided by the eligible projects. While Cities can choose not to apply for CDBG, control of whether or not they receive CDBG is ultimately at the Federal level and like the State of Oregon, these funds can be used for things				

	that have little to do with housing, so may have limited impact. A better gauge may be HOW cities use their CDBG; for housing benefit or other.				
	D14: Eviction Prevention Programs	For Rent	Publicly-Subsidized Affordable	DIRECT	Eviction prevention programs have high anti-displacement impacts, in the short term, and across all markets. They are especially useful in strong markets where there are economic incentives to evict
	Description: Eviction Prevention Programs provide financial assistance to help renters facing eviction stay in their homes. These programs are generally designed for families who are being evicted due to nonpayment of rent during or following an unforeseen crisis, such as job loss or serious illness, rather than those who face more persistent affordability challenges. Jurisdictions may be interested in investing in eviction prevention to address concerns about displacement of low-income renters and to avoid or reduce use of other more costly local services, like homeless shelters.				
	D18: Weatherization Funds through Community Action Agencies	For Rent	Publicly-Subsidized Affordable	DIRECT	Weatherization funds can address displacement by improving habitability in low-income neighborhoods; and by reducing energy costs and needs for expensive repairs that may displace owners in gentrifying neighborhoods
	Description: Use weatherization funds administered by statewide network of Community Action Agencies to preserve aging housing stock occupied by income-qualified residents.				
E: Tax Exemption and Abatement	E01: Nonprofit Low-Income Rental Housing Exemption	For Rent	Publicly-Subsidized Affordable	DIRECT	-
	Description: This tool can provide a simplified way for affordable housing owned and operated by a nonprofit (as well as land held by a nonprofit for future affordable housing development) or Community Land Trusts (at least in land value) to qualify for a property tax exemption. Work should be done to make it easier for projects/land to qualify; minimizing the number of taxing authorities needed to grant an approval.				
	E06: Homebuyer Opportunity Limited	For Sale	Affordable 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

	Tax Exemption Program (HOLTE)				
	Description: Under the HOLTE Program, single-unit homes receive a ten-year property tax exemption on structural improvements to the home as long as the property and owner remain eligible per program requirements.				
	E07: Homestead Tax	For Rent	Publicly-Subsidized Affordable	(DIRECT)	-
	Description: Consider allowing Homestead Tax on second homes to support development of affordable housing.				
F: Land Acquisition, Lease and Partnerships	F06: Preserving Safe, Affordable Manufactured Homes	For Rent For Sale	Publicly-Subsidized Affordable	DIRECT	-
	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. In order 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). Oregon Housing and Community Services (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.				
	F08: Conversion of Underperforming or Distressed Commercial Assets	For Rent	Publicly-Subsidized Affordable Workforce Market Rate	DIRECT	Most likely to be cost effective in some neighborhood market types
	Description: Acquisition of underperforming or distressed commercial assets (commercial, retail, industrial, or hotel) or partnerships with owners of the assets for conversion into needed housing.				
	F15: Ordinances That Address Zombie Housing	For Rent For Sale	Publicly-Subsidized Affordable	INDIRECT	-

			Workforce Market Rate		
Description: More assertive tax foreclosures to enable zombie housing to be rehabbed into occupied housing.					

Vulnerable Summary

Out of all the 11 **green** tools, policies, or actions that are geared specifically towards the Early Vulnerable Area Type:

Category Types Included	A	D	E	F
Tenure Target	7 are For Rent	1 is For Sale	3 are For Rent and For Sale	
Affordability Target	9 Publicly-Subsidized (<30% AMI)	10 Affordable (30-80% AMI)	4 Workforce (80-120% AMI)	4 Market Rate (>120% AMI)
Housing Equity Impact	7 are DIRECT	1 is INDIRECT	1 (DIRECT)	2 (INDIRECT)

CONCLUSIONS & NEXT STEPS

CONCLUSIONS

This memorandum has provided some context and examples of how to approach Step 2 of the of the DLCDC anti-displacement analysis; “look up Housing Production Strategies.” The “Housing Production Strategy Program - List of Tools, Actions, and Policies” contains approximately 110 items across six categories, plus the option for jurisdictions to create custom actions. While some of the items pertain to a particular Area Type, most apply to all Area Types. There are a variety of factors to consider when creating a plan to identify mitigation actions and achieve fair and equitable housing outcomes within CFAs, as required by the CFA rules.

NEXT STEPS

With continued community engagement, further narrowing of the most promising CFA locations, and a deeper analysis of the components of each Area Type, the City can address the remaining steps of the DLCDC approach. Step 2 also includes “review mitigation potential for each context.” The “Housing Production Strategy Program – List of Tools, Actions, and Policies” includes a note on Mitigation Measures for some of the items it contains. The mitigation measures listed in DLCDC’s guidance document should be compared to existing measures that the City already has in place. The final step in DLCDC’s suggested anti-displacement analysis approach is “Step 3 Report: select strategies to best achieve goals and mitigate unintended consequences.”

The City has convened an internal working group to review and narrow the list of tools, policies, and actions and their mitigation potential. Staff are completing this review city-wide, as these items will be integrated in the city-wide Housing Production Strategy Report. Staff will indicate whether each item is already in effect, a short-term priority, or a long-term possibility. Staff will also consider whether the item is appropriate in a mixed-use, higher density context, such as CFAs, city-wide, or another geography. For example, the list includes strategies to encourage more Accessory Dwelling Units. This may be an appropriate housing production strategy in lower density residential areas across the city but would not make sense in a CFA.

This internal working group will produce a list of refined, narrowed strategies to best achieve the fair and equitable housing outcomes in CFAs, as well as increase housing production city-wide. This refined list will be used for community engagement during the CFA selection process.

Fair and Equitable Housing Outcomes

- a) Location of Housing
- b) Fair Housing
- c) Housing Choice
- d) Housing Options for Residents

Experiencing Homelessness

- e) Affordable Homeownership and Affordable Rental Housing
 - f) Gentrification, Displacement, and Housing Stability
-

TECHNICAL MEMORANDUM #4 – MOST PROMISING

City of Eugene
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #4

MOST PROMISING CFA

To: Eugene CFA Study Project Team
From: Lane Council of Governments
Date: June 30, 2023

CONTENTS

PURPOSE 200

BACKGROUND..... 200

ANALYSIS..... 201

Methodology Overview..... 201

 A Narrowing Process.....201

 Determine the Most Promising CFA Locations202

 Downtown/Campus Variations.....204

 Criteria Met by All Areas204

 Evaluation Criteria205

Location Summaries..... 206

 Location 1: Chase Village209

 Location 2: Downtown/Campus215

 Location 3: Far West 11th Avenue.....223

 Location 4: Ferry Street Bridge228

 Location 5: Franklin/Walnut234

 Location 6: Highway 99.....239

 Location 7: Santa Clara Station244

 Location 8: South Willamette250

 Location 9: West 11th Avenue.....255

Configuration Variations 259

 Location 10: Downtown/Campus, Variation A.....262

 Location 11: Downtown/Campus Variation B.....269

 Location 12: Downtown/Campus Variation C.....275

CONCLUSIONS AND CONSIDERATIONS 279

Conclusions 279

 Most Promising Suitable CFA Locations by Criterion279

Considerations for CFA Selection 281

PURPOSE

Technical Memorandum #4 (TM#4) provides a cumulative evaluation of the factors contributing to a narrowing of “Potential” and then “Suitable” Climate-Friendly Areas (CFA) to the “Most Promising” Climate Friendly Areas. The purpose of this memo is to organize these factors by Suitable CFA areas and provide a relative assessment of each area. This memo specifically addresses the requirements outlined in OAR 660-012-0315(4). This evaluation will inform the next steps Eugene will need to take as part of CFA adoption.

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to Governor Brown’s *Executive Order 20-04* directing state agencies to take urgent action to meet Oregon’s climate pollution reduction targets 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 Oregon’s eight most populated areas.

CFAs are intended to be areas where residents, workers, and visitors can meet most of their daily needs without having to drive. They are urban mixed-use areas that contain, or are planned to contain, a greater mix and supply of housing, jobs, businesses, and services. These areas are served, or planned to be served, by high-quality pedestrian, bicycle, and transit infrastructure to provide frequent, comfortable, and convenient connections to key destinations within the city and region.¹¹⁸

The rules require cities (and some urbanized county areas) 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 defined CFAs within urban growth boundaries. CFAs will be sized to accommodate a portion of the community’s housing, jobs, and services. Local governments will determine where these areas will be located, but many of these areas will likely be established in existing downtowns that may already allow for mixed uses and higher densities. Associated requirements will ensure high-quality pedestrian, bicycle, and transit infrastructure are available within these areas to provide convenient transportation options.

The rules provide a two phased process for local governments to first study the potential designation of CFAs, then in a second phase to adopt development standards for the areas selected to be designated as CFAs. The rules include some minimum requirements for CFAs and their zoning, including either adoption of the set of prescriptive development standards set out in

¹¹⁸ OAR 660-012-0005(10). <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292987>

the rules or allowing for an alternative process for local governments to craft their own standards that enable meeting minimum density outcomes.

The Lane Council of Governments (LCOG) and Kearns & West are providing technical assistance to the City of Eugene (City) to complete the CFA study. Kearns & West are providing public involvement assistance with a focus on developing a community engagement plan and eliciting equity concerns from the community.

The following table provides an overview of steps for LCOG’s technical analysis. This Technical Memorandum addresses Step A4, Determine Most Promising CFAs.

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2. Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical Memorandum #3a
Policy (Code) Evaluation of Suitable CFAs	Technical Memorandum #3b
Capacity Analysis of Suitable CFAs	Technical Memorandum #3c
Step A2(2). Analysis of Suitable CFAs (anti-displacement)	Technical Memorandum #2.1
⇒ Step A4. Determine Most Promising CFAs	Technical Memorandum #4
Step A5. Create draft CFA study	Draft CFA study
Step A6. Create final CFA study	Final CFA study

ANALYSIS

METHODOLOGY OVERVIEW

A Narrowing Process

Technical Memoranda (TM) #1 and #3c have narrowed down CFA locations of all lands within Eugene, first to “Potential CFA Locations,” meeting basic locational factors in TM #1, and then down to “Suitable CFA Locations,” after applying additional dimensional and other suitability criteria in TM #3a. Together, these “Suitable CFA Locations” met the requirements of OAR 660-012-310(2). In TM #3b and #3c, those “Suitable CFA Locations” were evaluated for rule compliance, needed changes to land use regulations and the estimated dwelling unit capacity for any needed change in regulations.

TM1	→	Potential CFAs
TM3a	→	Suitable CFAs
TM4	→	Most Promising CFAs

Determine the Most Promising CFA Locations

This memo will take this refinement process one step further towards determining the “Most Promising CFAs.”

“...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.”¹¹⁹

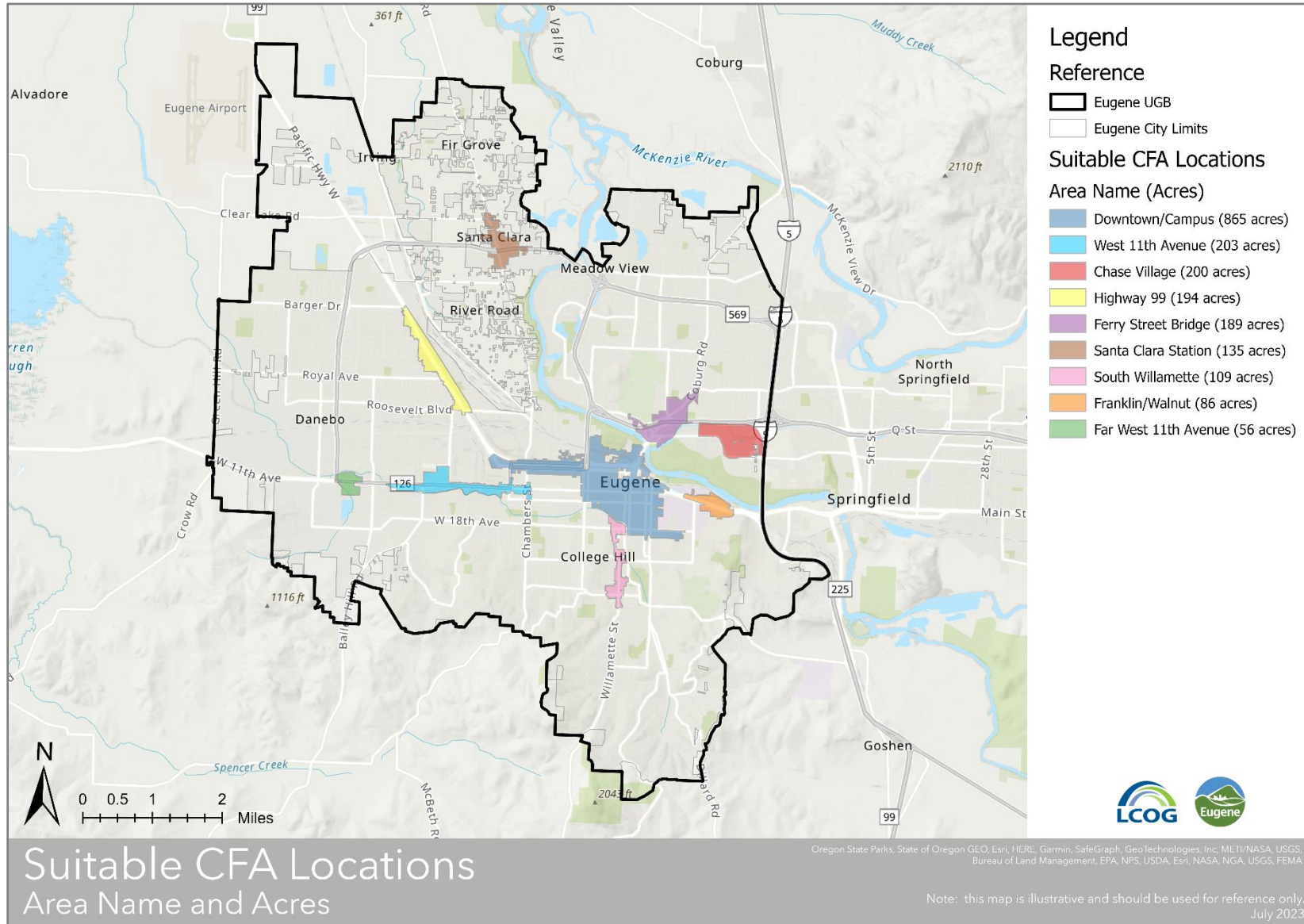
The following table and map provide tabular and visual representation of the City of Eugene’s Suitable CFA Locations, which are evaluated in this analysis.

TABLE 13. SUITABLE CFA LOCATIONS

Location	Acreage	% of Total Acreage
Chase Village	201	9.8%
Downtown/Campus	865	42.4%
Far West 11 th Avenue	56	2.8%
Ferry Street Bridge	189	9.3%
Franklin/Walnut	86	4.2%
Highway 99	194	9.5%
Santa Clara Station	135	6.6%
South Willamette	109	5.3%
West 11 th Avenue	204	10.0%
Total	2,039	100%

¹¹⁹ OAR 660-012-0315(4)(a), retrieved from <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062>.

MAP 24. SUITABLE CFA LOCATIONS



Downtown/Campus Variations

In addition to the nine Suitable CFA Locations identified and named earlier for ease of reference, three variations of the Downtown/Campus CFA Location will be evaluated.

- A. Exclude 6th/7th Avenue corridor, west of Jefferson Street
- B. Exclude zones with lower level of rule compliance (C-1, R-3, R-4, and S-W)
- C. Exclude both of the above

Criteria Met by All Areas

Each of these locations have previously been determined to meet **Locational** and **Dimensional** criteria and thus identified as Suitable CFA Locations. These absolute criteria will not be evaluated against these areas again.

- **Locational (TM #1 and TM #3a)**
 1. In an Urban Center¹²⁰
 2. Within the UGB
 - *Within the City Limits or Subject to Additional Conditions*¹²¹
 3. Served by High-Quality Transit¹²²
 4. Safe From Natural Disasters and Hazards (Goal 7)¹²³
- **Dimensional (TM #3a)**
 1. A Minimum of 25 Acres¹²⁴
 2. A Minimum of 750 Feet Wide¹²⁵

¹²⁰ “The locations shall be in existing or planned urban centers, including downtowns, neighborhood centers, transit-served corridors, or similar districts.” OAR 660-012-310(2)(b)

¹²¹ “Cities may designate climate-friendly areas within the urban growth boundary, but outside the city limits boundary, if the following requirements are met...” OAR 660-012-310(2)(e)

¹²² “The locations shall be in areas that are served, or planned for service, by high quality pedestrian, bicycle, and transit services.” OAR 660-012-310(2)(c)

¹²³ “The locations shall not be in areas where development is limited or disallowed by provisions adopted pursuant to Statewide Planning Goal 7. Climate-friendly areas may be designated in such areas if the local government has adopted requirements for development that will mitigate potential hazards to life and property, in compliance with Statewide Planning Goal 7.” OAR 660-012-310(2)(d)

¹²⁴ “Local governments with a population greater than 50,000 shall adopt the following development regulations for at least one climate-friendly area with a minimum area of 25 acres...” OAR 660-012-320(8)(c) or OAR 660-012-320(9)(c)

¹²⁵ “Climate-friendly areas shall have a minimum width of 750 feet, including any internal rights of way that may be unzoned. Contiguous climate-friendly areas with distinct land use requirements may be considered cumulatively to demonstrate compliance with the minimum width requirement. Exceptions to these minimum dimensional requirements are allowed due to natural barriers, such as rivers; or due to long-term barriers in the built environment, such as freeways. Exceptions are also allowed if potential climate-friendly areas are constrained by adjacent areas planned and zoned to meet industrial land needs.” OAR 660-012-0310(2)(f)

Evaluation Criteria

Each location and variation will be evaluated on the following relative criteria.

- **Development Regulation Compliance (TM3b)**¹²⁶
- **Dwelling Unit Capacity (TM3c)**¹²⁷
- **Supportive Adjacent Uses (TM4)**
 1. In, or Near, High-Density Mixed-Use Areas¹²⁸
 2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities¹²⁹
- **Active Transportation Facilities (TM #4)**¹³⁰
- **Adequate Infrastructure (TM #4)**¹³¹

The **Development Regulation Compliance** and **Dwelling Unit Capacity** criteria are summarized from the results of earlier analysis in previous technical memos. Each of the CFAs were reviewed for compliance with the requirements of a Primary CFA or a Secondary CFA where they are different. The **Supportive Adjacent Uses**, **Active Transportation Facilities**, and **Adequate Infrastructure** criteria were analyzed for this memo.

¹²⁶ “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...” OAR 660-012-315(4)(b)

¹²⁷ “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.” OAR 660-012-315(4)(e)

¹²⁸ “To the extent practicable, climate-friendly areas should be located within, or in close proximity to, areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities.” OAR 660-012-310(2)(b)

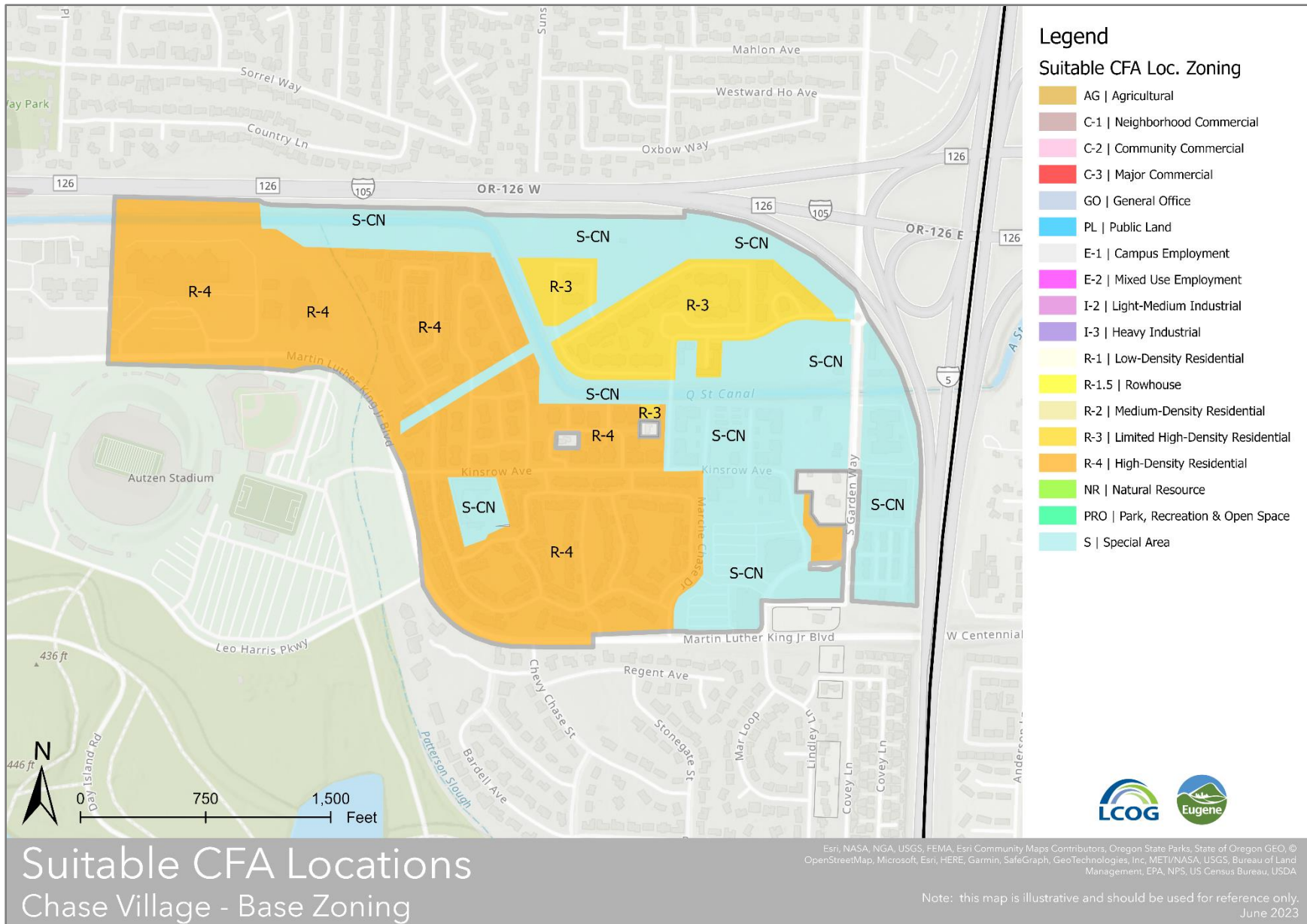
¹²⁹ “Local governments shall prioritize locating government facilities that provide direct service to the public within climate-friendly areas and shall prioritize locating parks, open space, plazas, and similar public amenities in or near climate-friendly areas that do not contain sufficient parks, open space, plazas, or similar public amenities.” OAR 660-012-320(4)

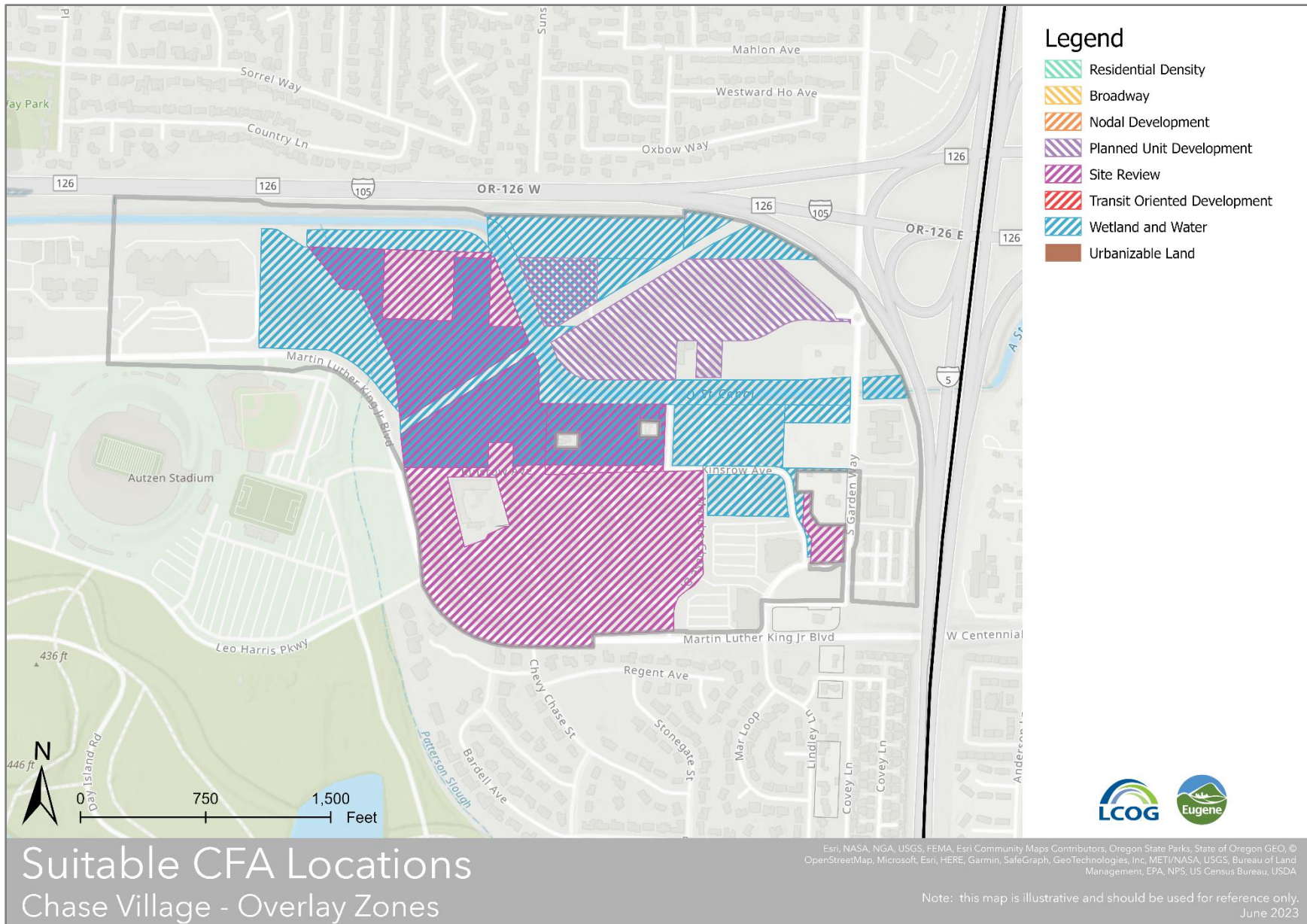
¹³⁰ “The locations shall be in areas that are served, or planned for service, by high quality pedestrian, bicycle, and transit services.” OAR 660-012-310(2)(c)

¹³¹ “Locations able to support development consistent with the land use requirements of OAR 660-012-0320.” OAR 660-012-0310(2)(a)

LOCATION SUMMARIES

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





Location 1: Chase Village

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The Chase Village Suitable CFA comprises 201 acres. It is the third largest Suitable CFA evaluated of the original nine suitable locations. The location is bounded to the north by Oregon Highway 126 and to the east by Interstate 5. It is bounded on the south and west primarily by Martin Luther King Jr. Boulevard.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Chase Village Suitable CFA is predominantly R-4 High Density Residential and R-3 Limited High Density Residential Zoning and the Chase Node Special Area (S-CN). The CFA contains all five of the Chase Node Special Area (S-CN) Zone subareas including, Commercial (/C), High Density Residential (/HDR), High Density Residential / Mixed Use (/HDR/MU), Public Land (/PL), and Park, 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 (-320(2)): All the S-CN zoned areas are at medium compliance for permitted uses. Both R-3 and R-4 have low compliance ratings for CFA required outright permitted uses.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in both R-3 and R-4 zones. The residential and commercial-oriented S-CN Subareas have low compliance for CFA required density minimums. They meet the secondary CFA requirement for density.

- **Building Height (-320(8)):** Building height compliance is high for Primary and Secondary CFA criteria for R-4 but only high for Secondary CFA compliance for R-3. **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
R-3/PD	16.51	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/SR,WR	0.27	Low	Low	Medium	Medium	Medium	Medium	Low	High	High
R-4	23.35	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/SR	43.33	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/SR,WR	24.99	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/WR	9.64	Low	High	Medium	Medium	Medium	Medium	High	High	High
S-CN/C	10.31	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/HDR	5.05	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/HDR/MU	15.09	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/HDR/MU/WR	1.74	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN /HDR/WR	8.77	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/PL	8.26	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/PL/WQ	2.82	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/PL/WQ,WR	8.96	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/PL/WR	12.15	Medium	High	Medium	Low	Medium	Low	High	High	High
S-CN/PRO	4.08	Medium	High	Medium	Low	Medium	Low	High	High	High

- **Supportive Adjacent Uses (TM #4)**

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 CFA Location to the south are R-1 Low Density Residential, which may require building step-backs and height transitions, although Martin Luther King Jr. Blvd establishes a substantial separation between the areas. The Ferry Street Bridge Suitable CFA, which includes Oakway Mall and the surrounding commercial district, is nearby to the west.

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: The area west of the Chase Village Suitable CFA is zoned PL – Public Land and includes portions of Alton Baker Park, Autzen Stadium, and some Lane County public health services. Alton Baker Park is a large regional park with a full suite of recreation, parks facilities, and natural areas. Additionally, within the CFA Location 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).

- **Active Transportation Facilities (TM #4)**

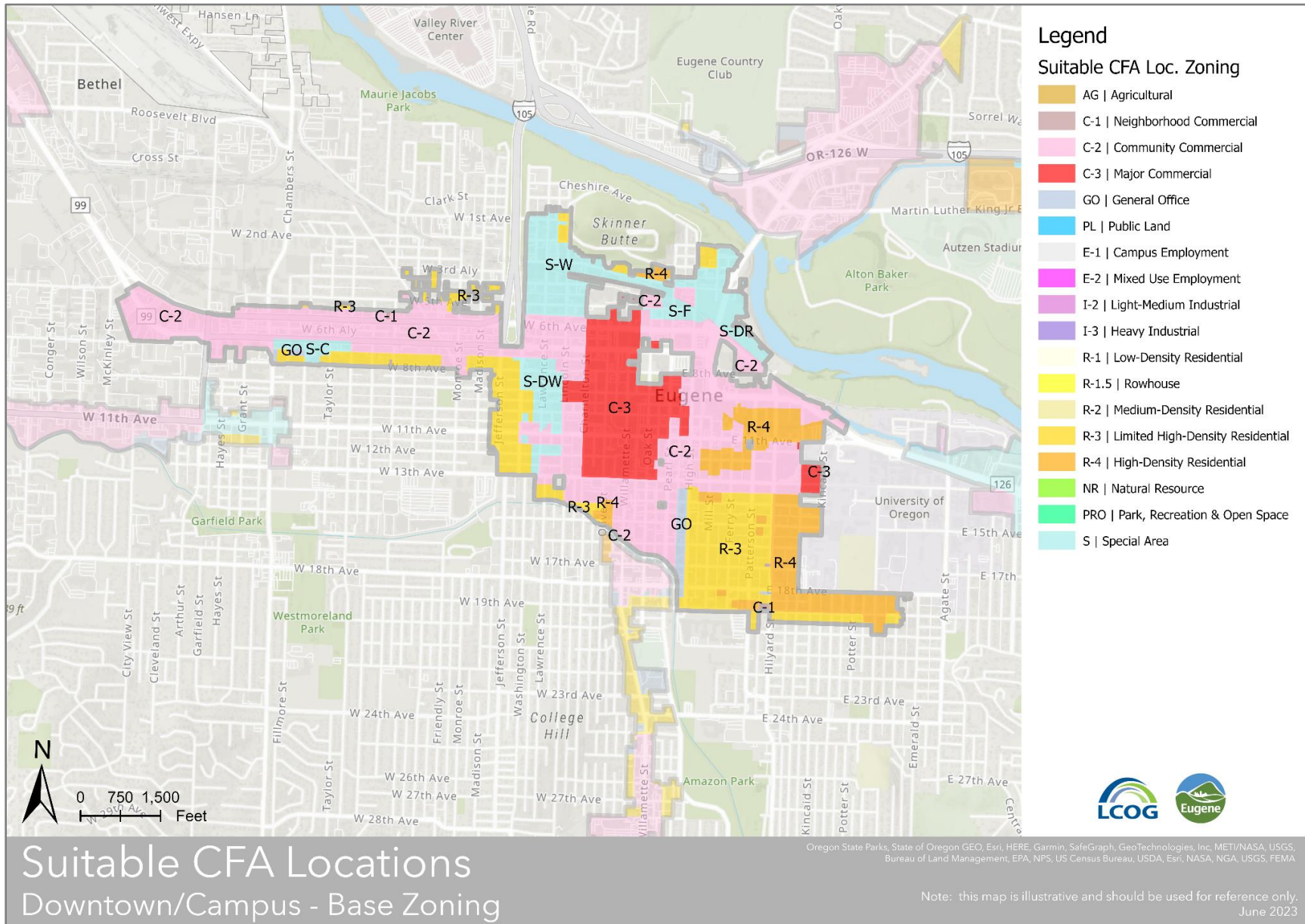
The Chase Village CFA Location is accessible from key regional destinations via high-quality walking and biking facilities. The residential area is near the Ruth Bascom Riverbank Path System, with access to the University of Oregon campus, downtown Eugene and downtown Springfield, Alton Baker Park, and other key destinations. The various housing developments within the CFA location 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 CFA Location and is classified as a minor arterial street with an extended 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 MLK Jr. Blvd. In 2023 or 2024 that will designate the outer vehicle lanes as Bus and Turn (BAT) lanes and add one new enhanced pedestrian crossing at Chevy Chase Street.

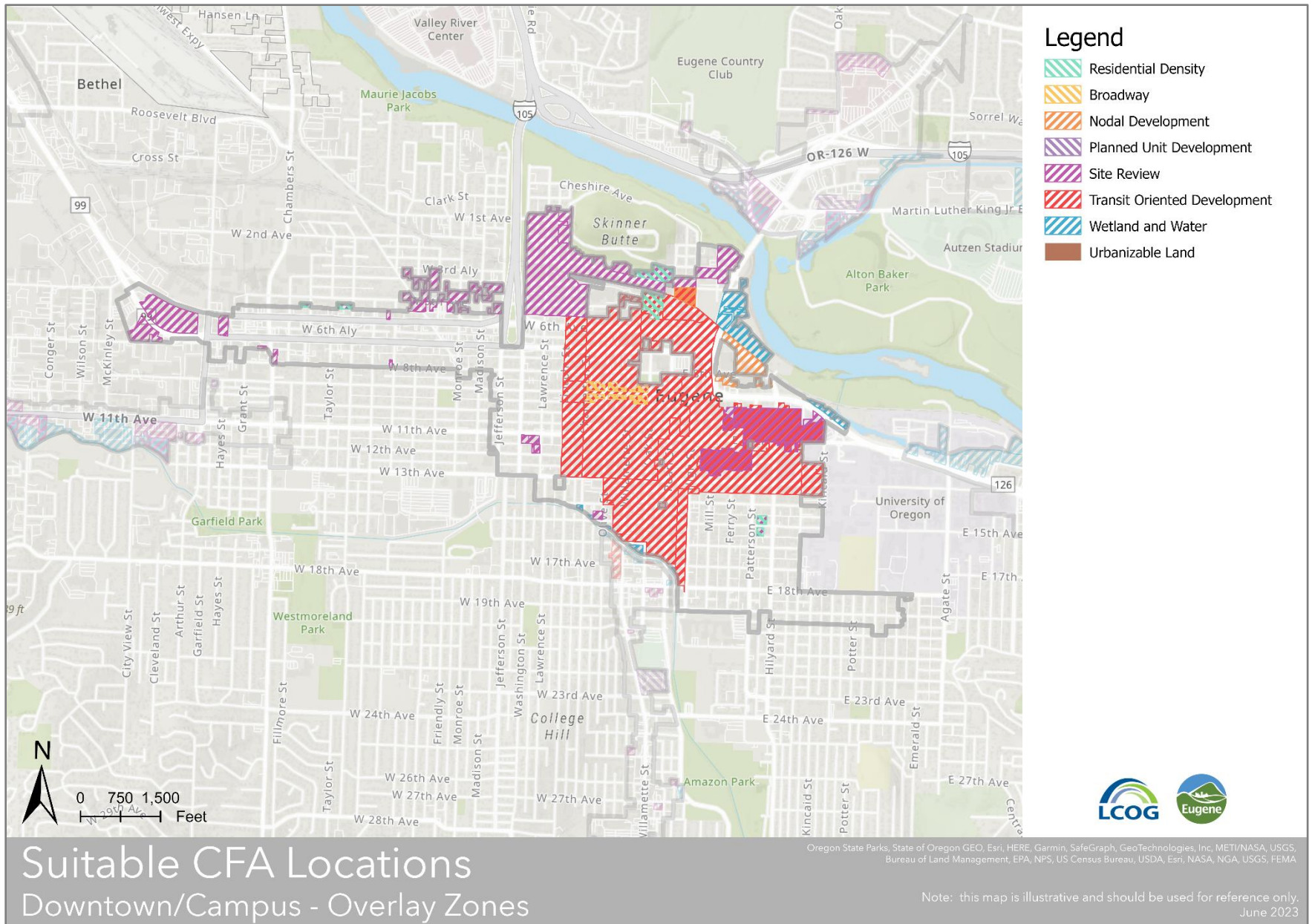
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Chase Village CFA Location 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/conveyance issues are predicted.

Water: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location.





Location 2: Downtown/Campus

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The Downtown/Campus Suitable CFA is 865 acres with meandering boundaries. It is the largest Suitable CFA evaluated of the original nine locations. The location stretches beyond the Downtown Plan Area, notably including a narrow extension about 20 blocks long running to the west along 6th and 7th Avenues and the R-3 and R-4 area to the southeast, adjacent to the University of Oregon campus, among other inclusions.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Downtown/Campus Suitable CFA contains numerous base zones and overlay zones. The most predominant zones are C-2 Community Commercial, C-3 Major Commercial, R-3 Limited High Density Residential, and R-4 High Density Residential. There are five special area zones within the location, including S-C Chambers, S-DR Downtown Riverfront, S-DW Downtown Westside, S-F Fifth Street, and S-W Whiteaker. There is also a small strip of GO General Office within the location.

Permitted Uses (-320(2)): Both R-3 and R-4 have low compliance ratings for CFA required outright permitted uses. C-2 is a highly CFA compliant zone, except where it overlaps with the /SR Site Review overlay zone, which limits outright permitted uses and renders the area medium compliant. Similarly, /SR limitations in the S-W zone, where it is applicable, reduce compliance. C-3 rates high in compliance and exists exclusively within this CFA. The two downtown special area zones (S-DW and S-DR, including applicable subareas), as well as GO areas, are medium compliant for outright permitted uses, while S-C and S-F are rated highly compliant.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in all applicable zones. Areas zoned R-3, R-4, and S-DW (unless mixed-use) meet density minimums for Secondary CFA criteria.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2, C-3, R-4, S-C, S-F, and S-DW. R-3 and GO only achieve Secondary CFA compliance for building height. The S-W and S-DR (subareas D & E) zones rate notably low in compliance due to height constraints. Related, most of the central downtown

area is covered by the /TD overlay which requires a minimum floor to area ratio of either 2.0 FAR or .65 FAR.

- **Dwelling Unit Capacity (TM #3c)**

Using all zoned areas, the Downtown/Campus Suitable CFA meets **58%** of needed housing capacity as a Primary CFA and 34% of 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% of needed housing requirement by itself.

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1	0.82	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
C-1/SR	0.43	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	170.00	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/20,TD	2.30	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND	8.12	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND,TD	2.55	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	21.03	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,TD	1.31	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/TD	150.68	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/TD,WR	0.22	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	2.45	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/BW,TD	5.13	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/TD	105.81	High	High	Medium	High	Medium	Medium	High	Medium	High
GO	1.78	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR	0.59	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High
GO/TD	7.37	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
R-3	146.74	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/40,SR	1.00	Low	Low	Medium	Medium	Medium	Medium	Low	High	High
R-3/SR	15.84	Low	Low	Medium	Medium	Medium	Medium	Low	High	High
R-3/TD	0.59	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/WR	0.30	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-4	58.90	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/ 82,92,SR	0.49	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/89,SR	3.29	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/92,SR	0.69	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/SR	0.64	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/SR,TD	31.12	Low	Low	Medium	Medium	Medium	Medium	High	High	High

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
R-4/TD	1.64	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/WR	0.05	Low	High	Medium	Medium	Medium	Medium	High	High	High
S-C/C-2	8.58	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-DR/MU	7.62	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/1/WR	0.42	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/2	0.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/2/WR	0.35	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/WR	11.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DW	23.38	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-DW/SR	1.02	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-F	0.74	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/20,TD	0.88	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/TD	6.58	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-W	1.14	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-W/SR	59.53	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	Low

- **Supportive Adjacent Uses (TM #4)**

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. The downtown area is mixed-use with high-density housing scattered throughout. The riverfront redevelopment area (S-DR) is developing with high-density and planned for mixed-use. The R-3 and R-4 zoned areas 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 Street portion is not developed with or near high-density mixed use, that portion is located near industrial zoned and developed property.

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

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: To the north and northwest, the location is bounded mostly by park 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). Within the CFA Location, there are also several other smaller parks, plazas, and similar public spaces, including the Park Blocks around 7th/8th 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 CFA Location are not within ½ mile walking distance of a playground. This gap is expected to be addressed through planned improvements to the Parks Blocks and expansion of the Downtown Riverfront Park.

To the south/southwest, the CFA Location is adjacent South Eugene High School and Amazon Park. The location is also bounded by the University of Oregon campus to the east. This CFA Location 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 Lane Transit District downtown station, City and County office buildings, courthouses/municipal court, and more.

- **Active Transportation Facilities (TM #4)**

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 Downtown Riverfront, and soon to be constructed protected

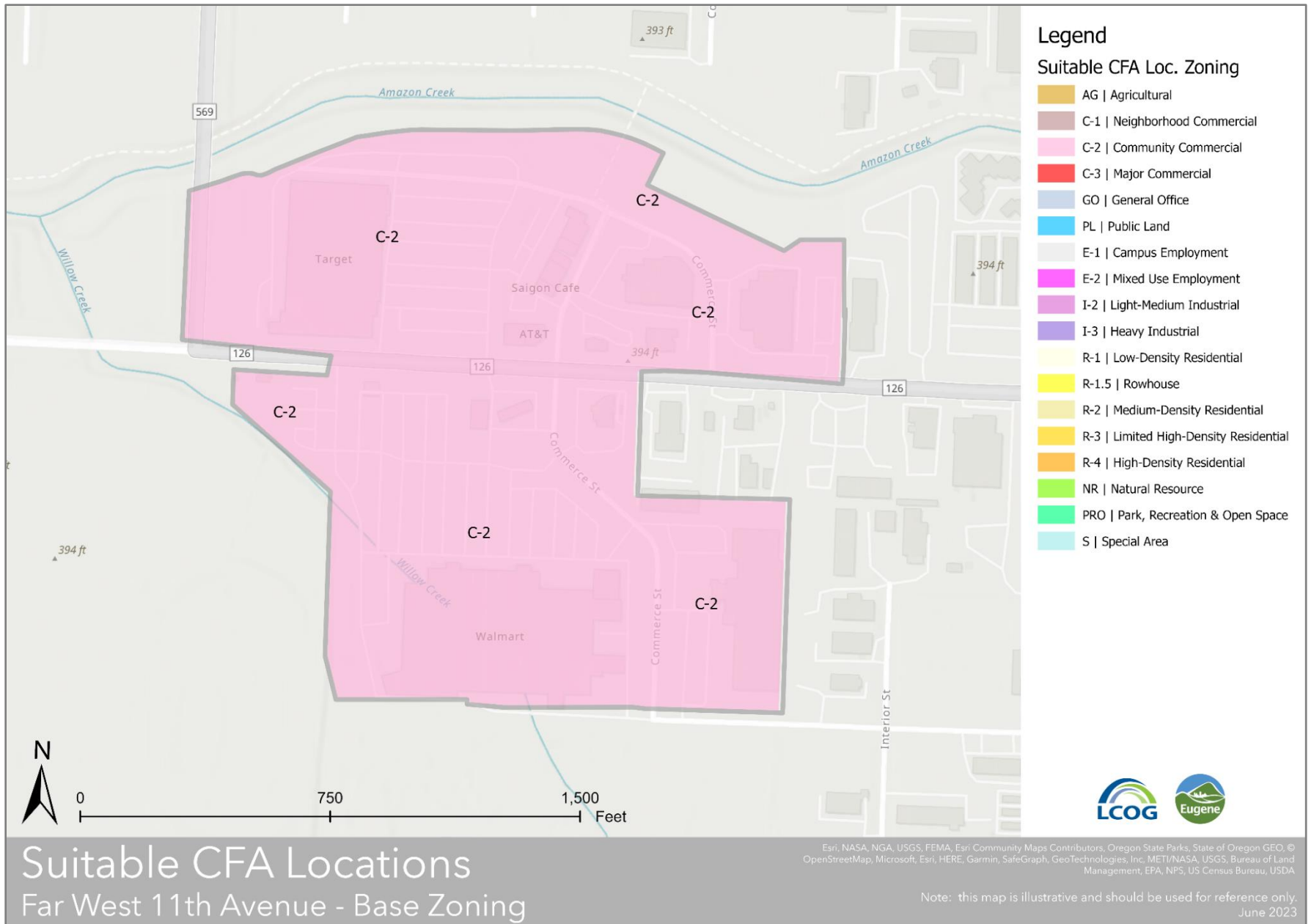
bike lanes on 8th Avenue downtown). There are several major arterials that pass through the CFA Location, including the 6th/7th Street Avenue corridor, Coburg Road (connecting downtown to the Ferry Street Bridge CFA Location), and Broadway/Franklin Blvd/OR Highway 126 (connecting downtown to the Franklin/Walnut CFA Location, downtown Springfield, and Interstate 5). Franklin Blvd. is scheduled for major improvements to support more safe and comfortable walking, biking, and transit.

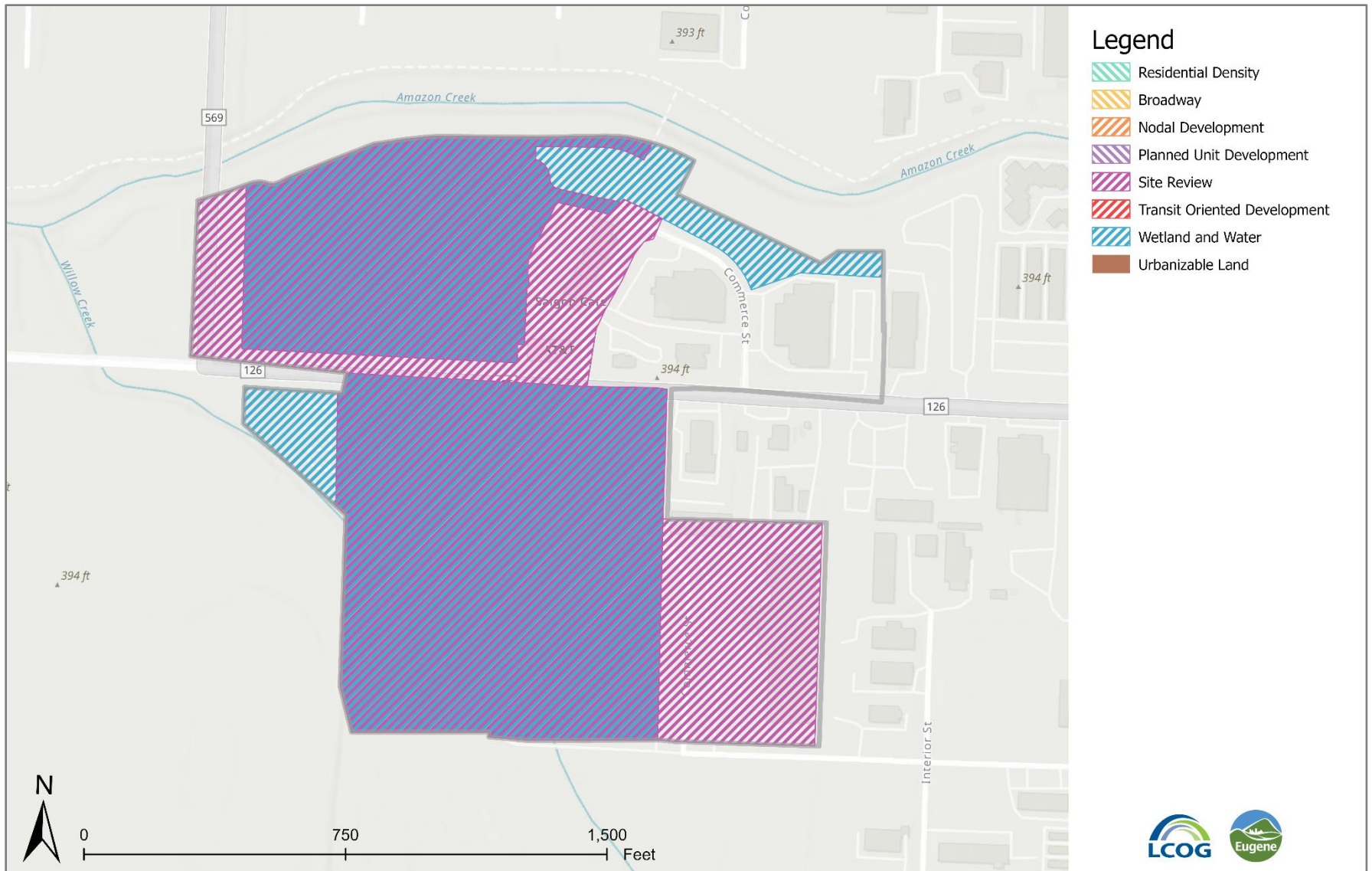
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Downtown/Campus CFA Location is Commercial and Commercial-Residential mixed-use. Some parts of the CFA Location are projected as High-density Residential (areas zoned R-3 and R-4) or Industrial & Commercial-Industrial Mixed-Use (S-DW and 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: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location





Suitable CFA Locations

Far West 11th Avenue - Overlay Zones

Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Oregon State Parks, State of Oregon GEO, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

Note: this map is illustrative and should be used for reference only.
June 2023

Location 3: Far West 11th Avenue

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

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

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Far West 11th Avenue Suitable CFA contains only one base zone (C-2 Community Commercial) and one overlay zone (/WR Water Resources).

Permitted Uses (-320(2)): C-2 is a highly CFA-compliant zone, except where it overlaps with the /PD Planned Unit Development or /SR Site Review overlay zones, which limits outright permitted uses and renders the area medium-compliant. Both /SR Site Review and /PD Planned Unit Development overlays cover a large proportion of the Far West 11th Avenue Suitable CFA.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-2.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2 areas.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-2	6.83	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	12.10	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,WB,WP	21.49	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,WP	11.69	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/WP	3.93	High	High	Medium	High	Medium	Medium	High	Medium	High

- **Supportive Adjacent Uses (TM #4)**

In, or Near, High-Density Mixed-Use Areas: The Far West 11th Avenue Location 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 Industrial. There is also a significant piece of GO General Office zoned land to the south of the 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 ½ mile walking distance of a playground.

- **Active Transportation Facilities (TM #4)**

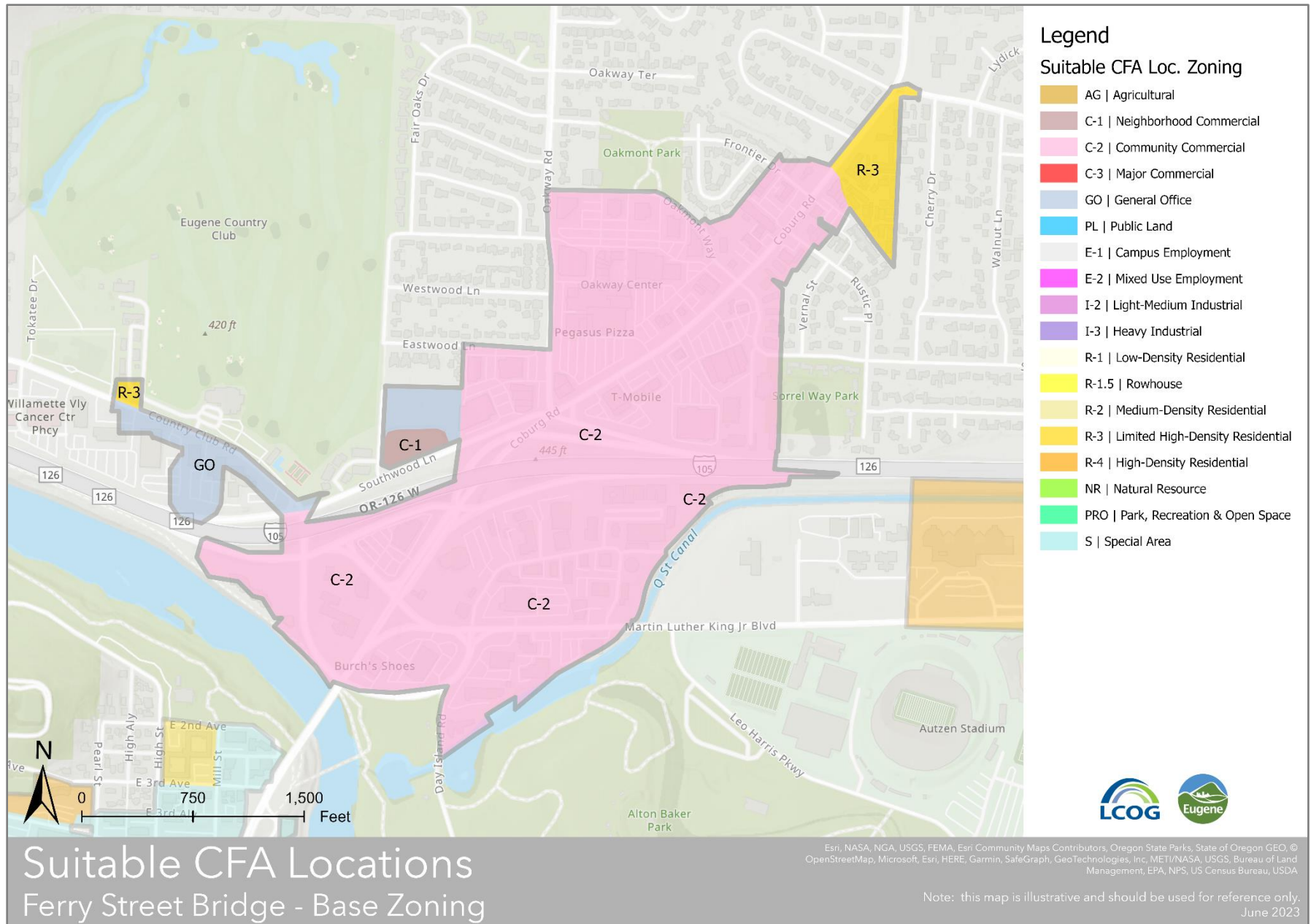
The Far West 11th Avenue CFA Location is not well-served by active transportation facilities. The exception is the Fern Ridge shared use path connecting west Eugene with the central city, which makes up the northern boundary of this CFA Location. The Fern Ridge Path connects to the CFA via a ped/bike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

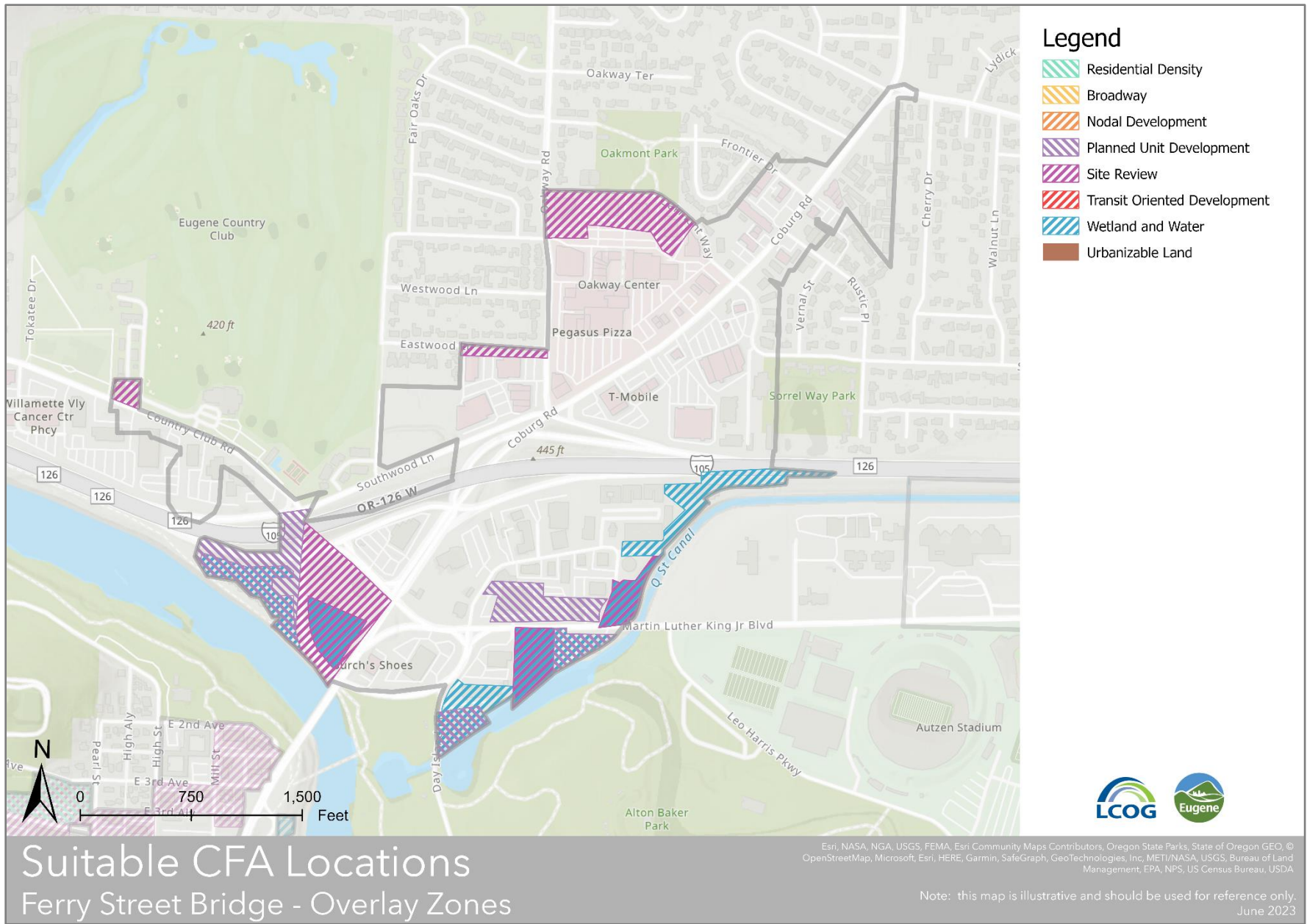
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Far West 11th Avenue CFA Location is Commercial and Commercial-Residential mixed-use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.

Water: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location.





Location 4: Ferry Street Bridge

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

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

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Ferry Street Bridge Suitable CFA Location is primarily zoned C-2 Community Commercial, with small pockets of GO General Office, C-1 Neighborhood Commercial, and R-3 Limited High Density Residential.

Permitted Uses (-320(2)): R-3 has low compliance ratings for CFA-required outright 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, which limits outright permitted uses and renders 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 for permitted uses.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-1, C-2, GO, and R-3.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2 areas. Building height compliance is high for Secondary CFA compliance in R-3 and GO areas. C-1 does not achieve the required building heights for either Primary or Secondary CFAs.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1	1.86	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	128.62	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/PD	6.96	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/PD,WR	6.21	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	13.71	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,WR	6.73	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	5.44	High	High	Medium	High	Medium	Medium	High	Medium	High
GO	11.77	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
R-3	7.41	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/SR	0.70	Low	Low	Medium	Medium	Medium	Medium	Low	High	High

- **Supportive Adjacent Uses (TM #4)**

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 Low Density Residential land. To the west, there are portions of GO General Office that were excluded from the CFA location during the walkability analysis in TM #1 (1/2 mile walking distance from a frequent transit corridor). The CFA Location could be expanded to include more of these GO areas. Areas further west of the CFA Location 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.

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: The Ferry Street Bridge Suitable CFA Location 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 (TM #4)**

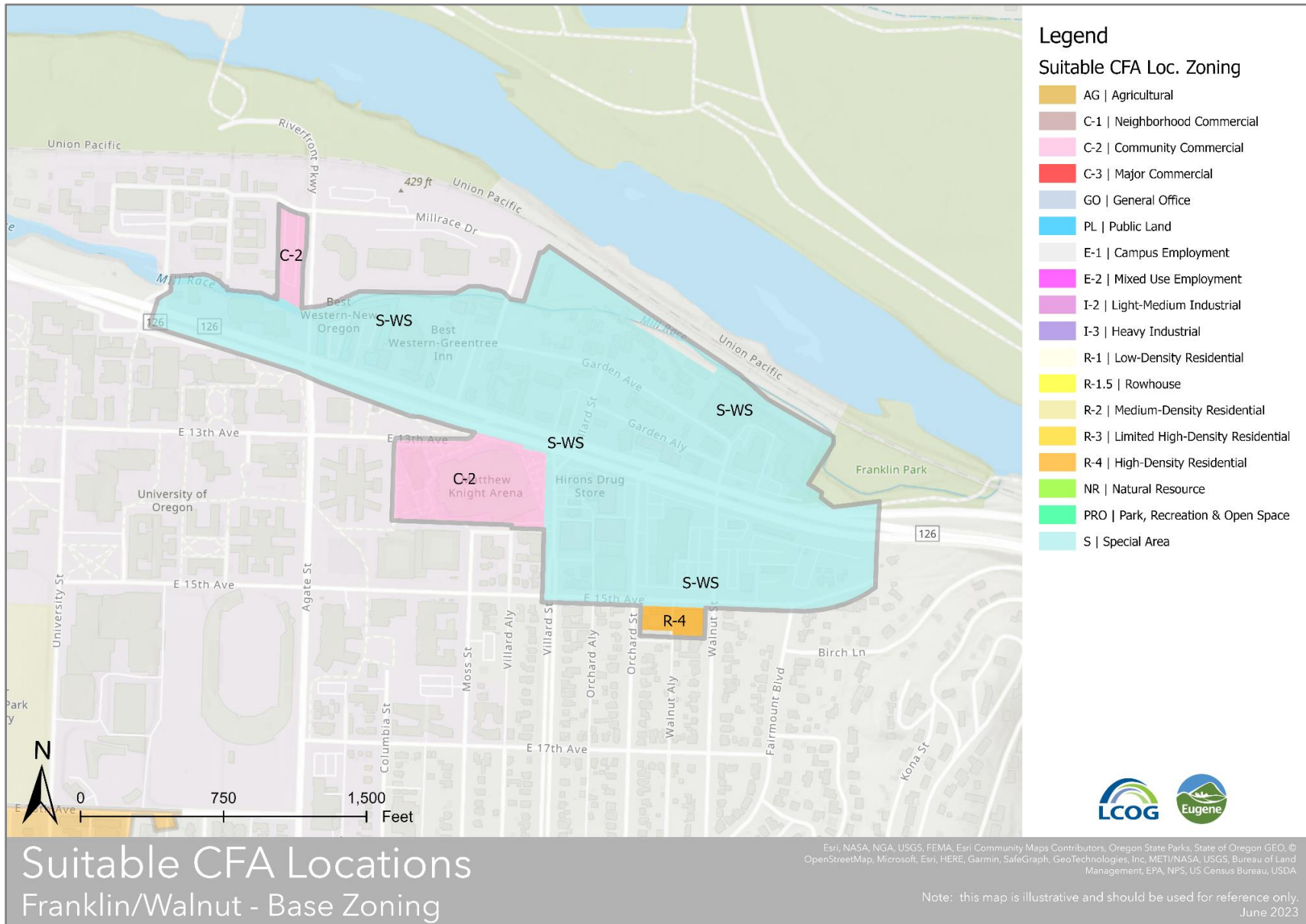
The Ferry Street Bridge CFA Location is served by active transportation facilities, but they are not adequate to make this area comfortable or safe for people walking and biking. This CFA Location sits at the intersection of several major and minor arterials, including an entrance ramp for Oregon Highway 126I-105. Coburg Road, at the center of this auto-centric commercial area, features high volumes of car vehicle traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or biking. A section of Coburg Road, as well as 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 a shared use paths on both sides of the Ferry Street Bridge crossing the Willamette River into the CFA Location continuing to I-105/Oakway Road where they transition to , and bike lanes and sidewalks on either side of Coburg Road.

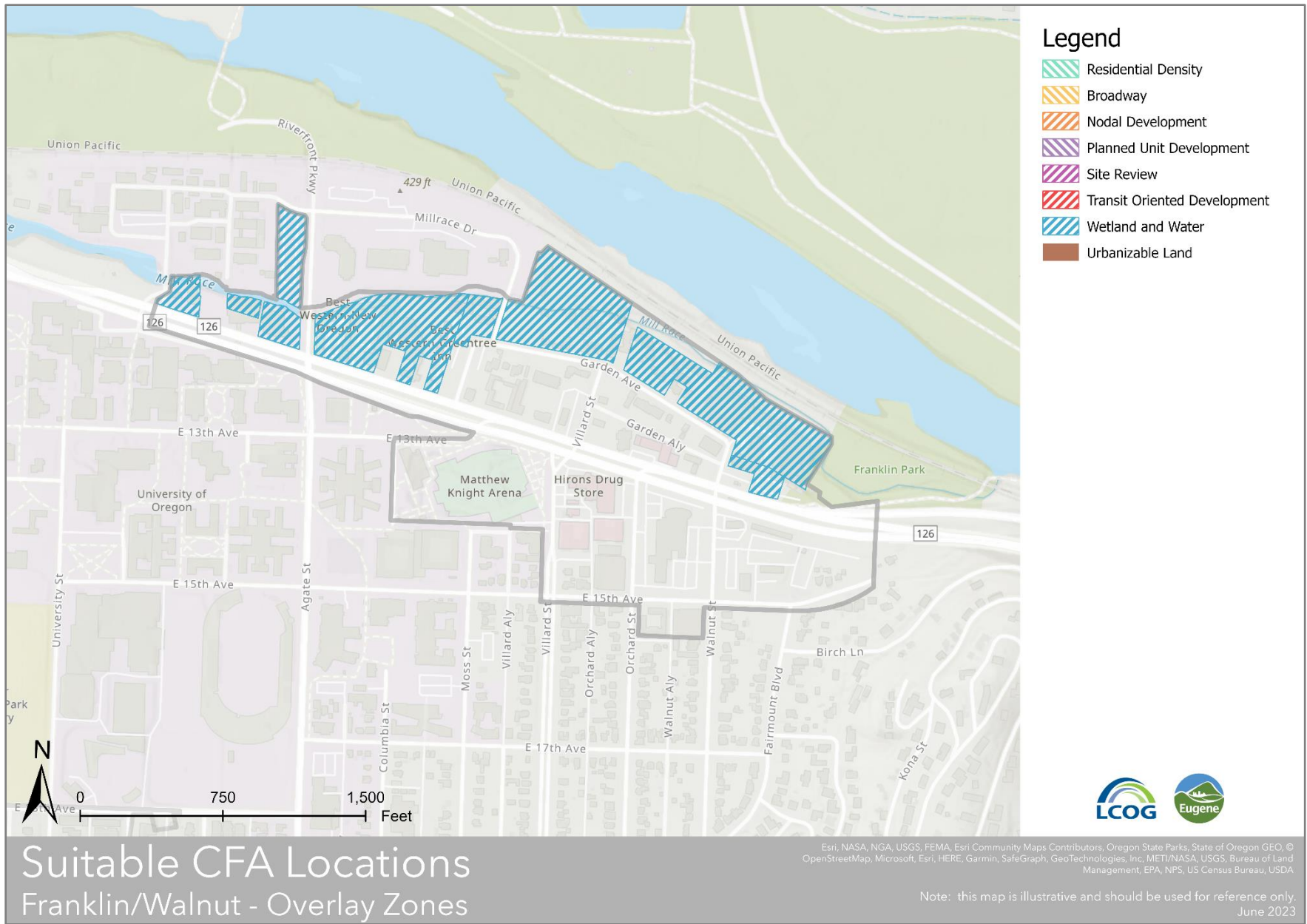
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Ferry Street Bridge CFA Location 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: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location.





Location 5: Franklin/Walnut

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The Franklin/Walnut Suitable CFA is 86 acres. It is the second smallest Suitable CFA evaluated of the original nine 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 banks for the Willamette River just on the other side of the railroad tracks.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Franklin/Walnut Suitable CFA contains only a few base zones and is dominated by the Walnut Station Special Area (S-WS) Zone which includes four subareas - /FC Franklin Corridor, /GA Garden Avenue, and TE-15 Transition Edge 15th, and /PRO Parks, Recreation, and Open Space. As no development capacity is assumed in the S-WS/PRO subarea, is not reviewed for development regulation compliance in this section. This zone, including all it's subareas (except /PRO) are generally compliant with CFA requirements, or "in the spirit" of CFA compliance. As such, compliance in this zone is summarized as a whole rather than by subarea. The location also contains some portions that are zoned C-2 Community Commercial and R-4 High-Density Residential.

Permitted Uses (-320(2)): C-2 and S-WS are highly compliant zones, while R-4 has low compliance ratings for CFA required outright permitted uses.

Building Height (-320(8)): The building height maximum in S-WS is not compliant with the Primary CFA height allowance requirements. Building height compliance is high for Primary and Secondary CFA criteria for both C-2 and R-4 areas.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-2, R-4, and S-WS.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-2	8.06	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	1.55	High	High	Medium	High	Medium	Medium	High	Medium	High
R-4	1.12	Low	High	Medium	Medium	Medium	Medium	High	High	High
S-WS/FC	33.88	High	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-WS/FC/WR	8.76	High	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-WS/GA	8.47	High	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-WS/GA/WR	14.00	High	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-WS/TE-15	9.80	High	High	Medium	Medium	Medium	Medium	Low	Medium	High

- **Supportive Adjacent Uses (TM #4)**

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 CFA Location 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 Willamette River (once 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 Higher Board of Education 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 CFA Location abuts both the Franklin Park Natural Area and Fairmount Neighborhood Park.

- **Active Transportation Facilities (TM #4)**

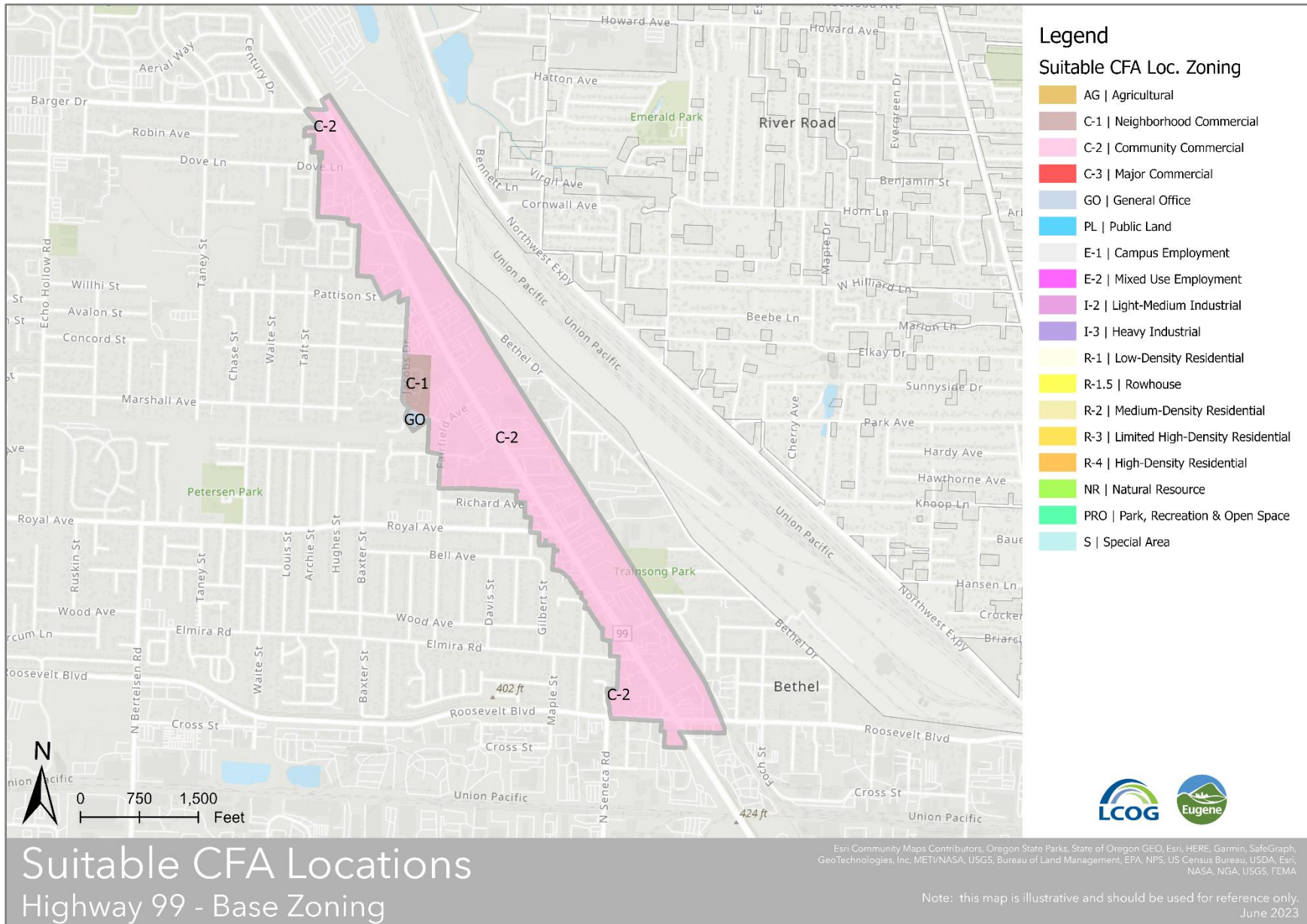
The Walnut/Franklin CFA Location is adjacent to the Ruth Bascom Riverbank Path System, connecting the location to various key destinations in Eugene and Springfield. Within the CFA, Franklin Blvd/OR Highway 126 provides a connection to the Downtown/Campus CFA, downtown Springfield, and Interstate 5.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

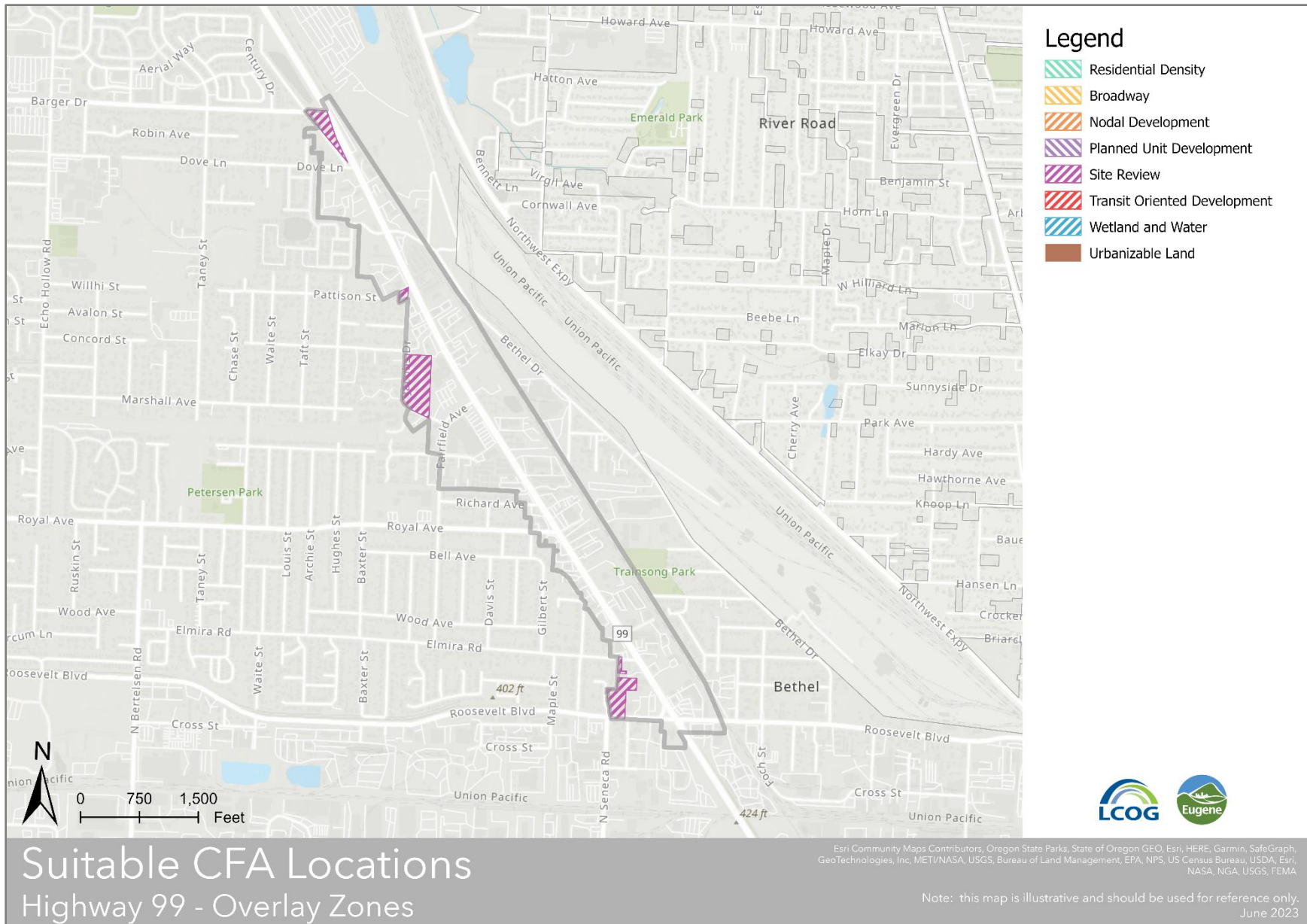
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Ferry Street Bridge CFA Location is Commercial and Commercial-Residential Mixed Use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.

Water: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location.





Location 6: Highway 99

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

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

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Highway 99 Suitable CFA is primarily zoned C-2 Community Commercial, with small pockets of GO General Office and C-1 Neighborhood Commercial.

Permitted Uses (-320(2)): C-2 is a highly compliant zone, except where it overlaps with the /SR overlay zone, which limits outright permitted uses and renders the area medium compliant. Though not extensive, there are pockets of /SR overlay in the CFA. Neither GO nor C-1 are highly compliant and, in this location, C-1 overlaps with the compliance-reducing /SR overlay.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-1, C-2, and GO areas.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2 areas. C-1 areas do not comply with either Primary or Secondary building height requirements, while GO complies with Secondary CFA height requirements.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1/SR	5.67	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	181.34	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	5.35	Low	Low	Medium	High	Medium	Medium	High	Medium	High
GO	1.11	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High

- **Supportive Adjacent Uses (TM4)**

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. This adjacency has potential implications for building step-back and other height transitions. The CFA Location 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 CFA Location. 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 CFA Location.

- **Active Transportation Facilities (TM #4)**

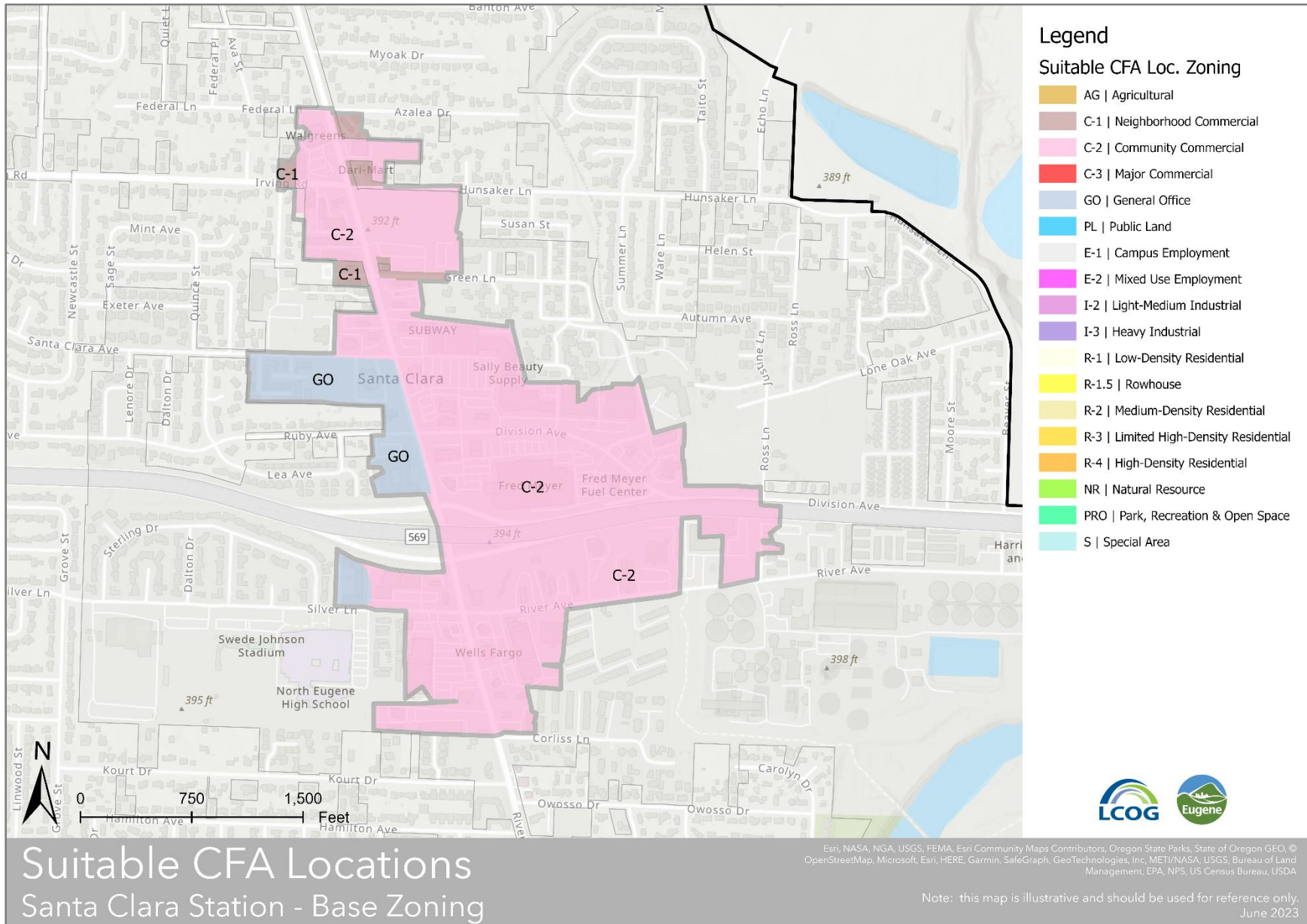
The Highway 99 Suitable CFA is not well-served by active transportation facilities. The Highway 99 corridor is characterized by auto-oriented commercial and industrial uses. While there are bike lanes and sidewalks on both sides, the major arterial and freight route features high volumes of fast-moving car traffic and many commercial driveways, increasing the potential for conflict between people driving and those walking or biking.

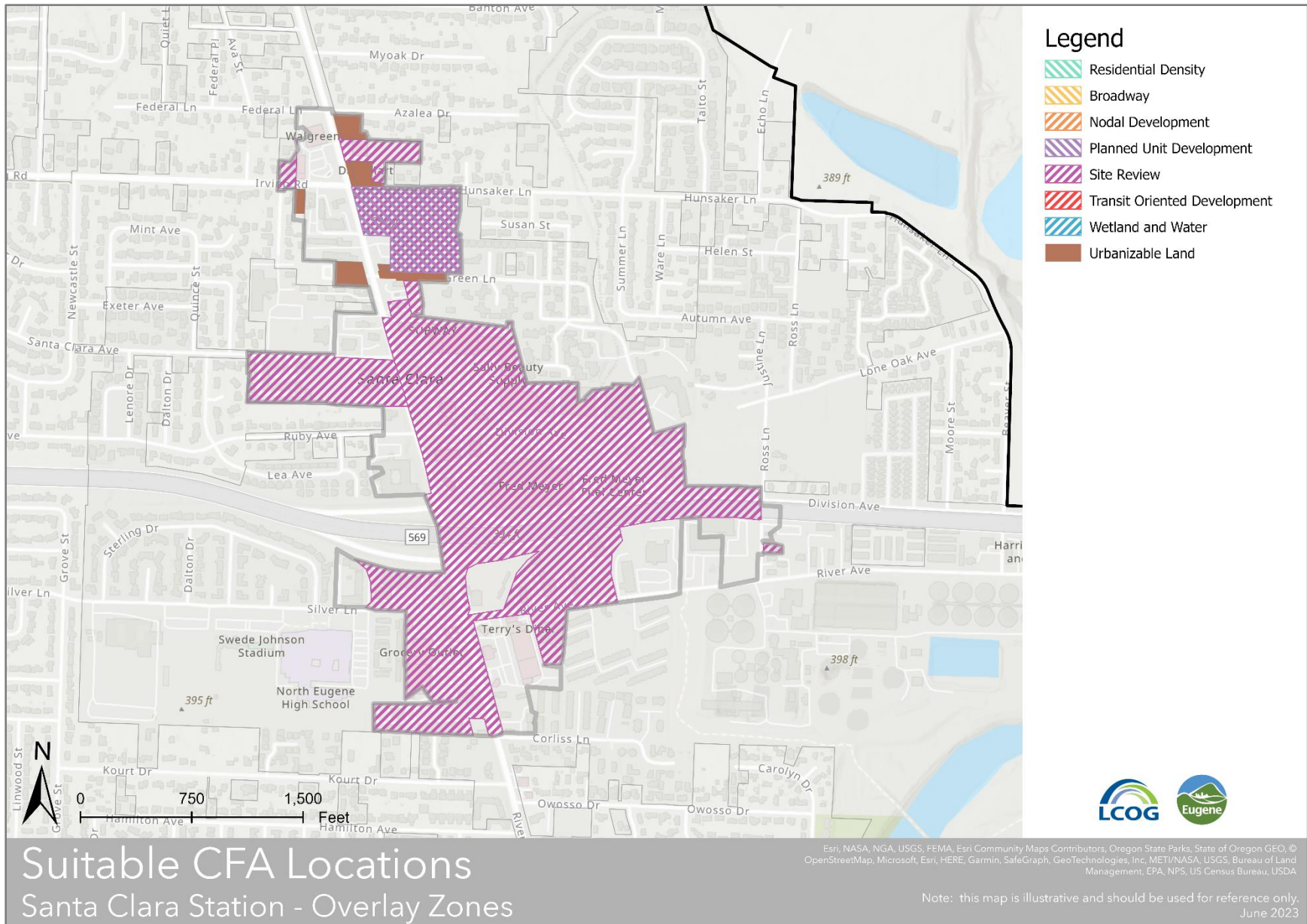
- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the Highway 99 Suitable CFA is Commercial and Commercial-Residential mixed-use. This projection aligns with a future CFA designation and would not require adjustments to current planning assumptions.

Water: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA Location.





Location 7: Santa Clara Station

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The Santa Clara Station Suitable CFA is 135 acres in size. It is the fourth smallest Suitable CFA evaluated of the original nine 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.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Santa Clara Station Suitable CFA is primarily zoned C-2 Community Commercial, with small pockets of GO General Office and C-1 Neighborhood Commercial.

Permitted Uses (-320(2)): C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review and/or /PD Planned Unit Development overlay zone, which limits outright permitted uses and renders the area medium compliant. The /SR overlay covers the majority of this CFA. Neither GO nor C-1 are highly compliant but, in this location, they also have /SR overlay, rendering these areas even less compliant.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-1, C-2, and GO areas.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2 areas. C-1 areas do not comply with either Primary or Secondary building height requirements, while GO complies with Secondary CFA height requirements.

- **Dwelling Unit Capacity (TM3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1	0.10	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
C-1/SR	0.55	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	30.25	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/PD,SR	7.92	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	79.66	Low	Low	Medium	High	Medium	Medium	High	Medium	High
GO	5.77	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR	7.72	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High

- **Supportive Adjacent Uses (TM4)**

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. There is also a significant amount of R-2 Medium Density Residential zoned land adjacent to the CFA location, providing a transition between C-2 and R-1 areas.

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: 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/recreation system. To the southwest of the CFA Location is North Eugene High School, zoned as PL Public Land. Part of the school property is planned as youth sports facilities. Abutting this Suitable CFA to the east is Lone Oak Park, an undeveloped neighborhood park. At the north end of the CFA Location, on the southeast corner of the River Road and Hunsaker Road intersection, is the Lane Transit District (LTD) Santa Clara Station. Adjacent to the transit station is surplus property that has potential for mixed-use development and possibly a neighborhood park.

- **Active Transportation Facilities (TM #4)**

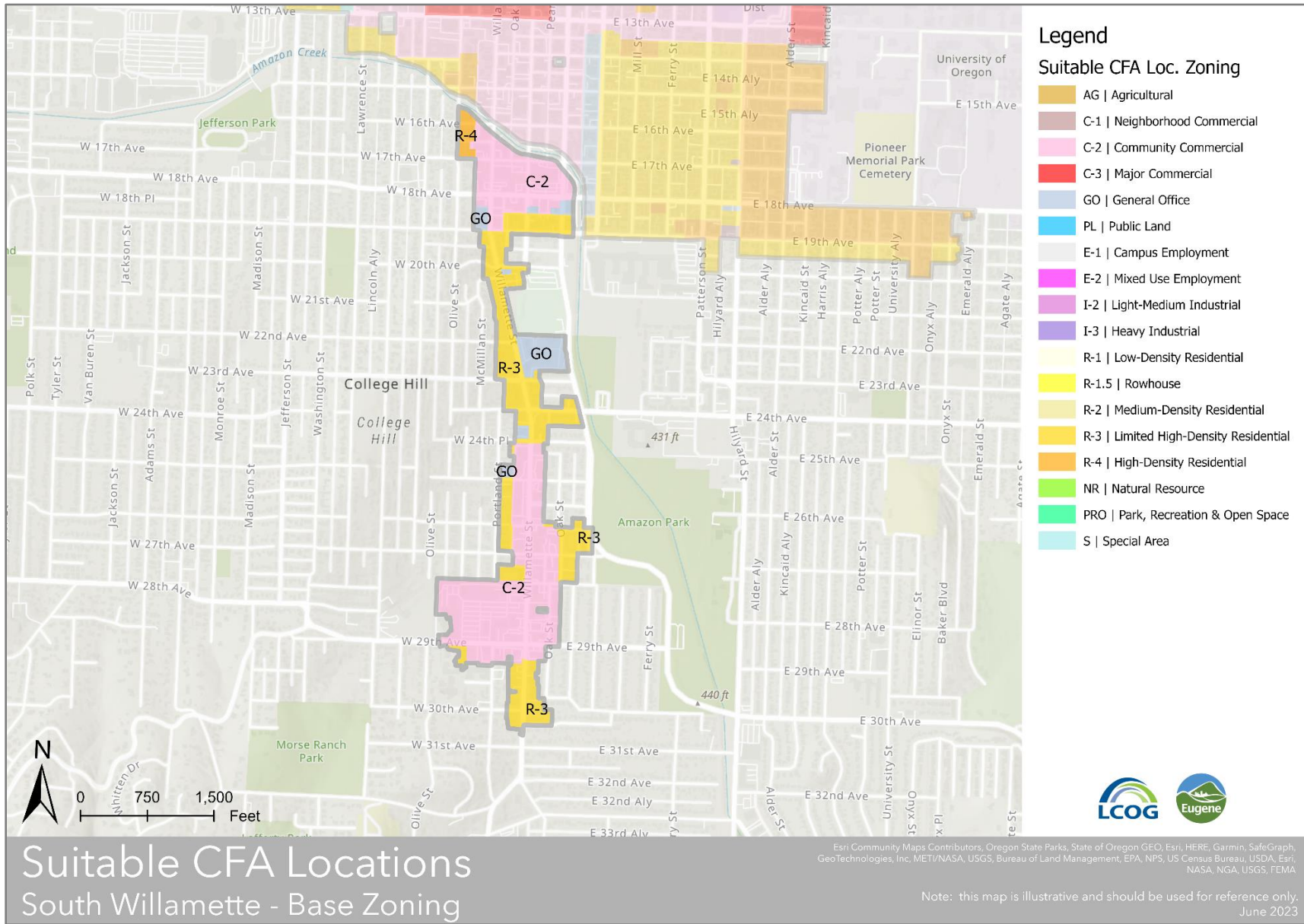
The Santa Clara Station CFA Location straddles River Road and Beltline, two major arterials, and is not currently well served by safe and comfortable active transportation facilities. The area connects to the Ruth Bascom Riverbank Path System along the Willamette, providing biking and walking access 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 CFA Location. 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. 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.

- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. 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: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA Location.



Location 8: South Willamette

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The South Willamette Suitable CFA is 109 acres in size. It is the third smallest Suitable CFA evaluated of the original nine locations. It is a long linear location following the frequent transit corridor generally along both sides of South Willamette Street from 16th Avenue to 30th Avenue. It encompasses two commercial cluster areas at either end of the 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.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The South Willamette Suitable CFA is primarily zoned C-2 Community Commercial, with substantial segments of R-3 Limited High Density Residential, including a stretch in the middle of the CFA along Willamette Street from 19th Avenue to 24th Place. There are also small segments of R-4 High Density Residential and GO General Office.

Permitted Uses (-320(2)): C-2 is a highly compliant zone, except where it overlaps with the /SR Site Review and/or /PD Planned Unit Development overlay zone, which limits outright permitted uses and renders the area medium compliant. However, the /SR and /PD overlay applies to very few parcels in the Location. GO is medium compliant, while both R-3 and R-4 have low compliance ratings for CFA-required outright permitted uses.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-2, R-3, R-4, and GO areas.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for R-4 and C-2 but only high for Secondary CFA compliance in R-3 and GO. This analysis assumes that no building height limitation buffer is applied. Therefore, in areas where the Suitable CFA abuts R-1, full development capacity (height) has been assumed.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-2	53.30	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/PD	0.55	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	1.73	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/TD	2.64	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/TD,WR	0.07	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	0.53	High	High	Medium	High	Medium	Medium	High	Medium	High
GO	2.53	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/PD	4.92	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/PD,WR	0.16	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR	0.64	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High
R-3	37.77	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/SR	1.34	Low	Low	Medium	Medium	Medium	Medium	Low	High	High
R-3/WR	0.41	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-4	2.21	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/WR	0.13	Low	High	Medium	Medium	Medium	Medium	High	High	High

- **Supportive Adjacent Uses (TM #4)**

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. The large amount of adjacent, lower-density residential zoning has potential implications for building step-backs and other height transitions.

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 recreation, parks facilities and natural areas. Also to the east and connecting to Amazon Park is South Eugene High School with various playing fields.

- **Active Transportation Facilities (TM #4)**

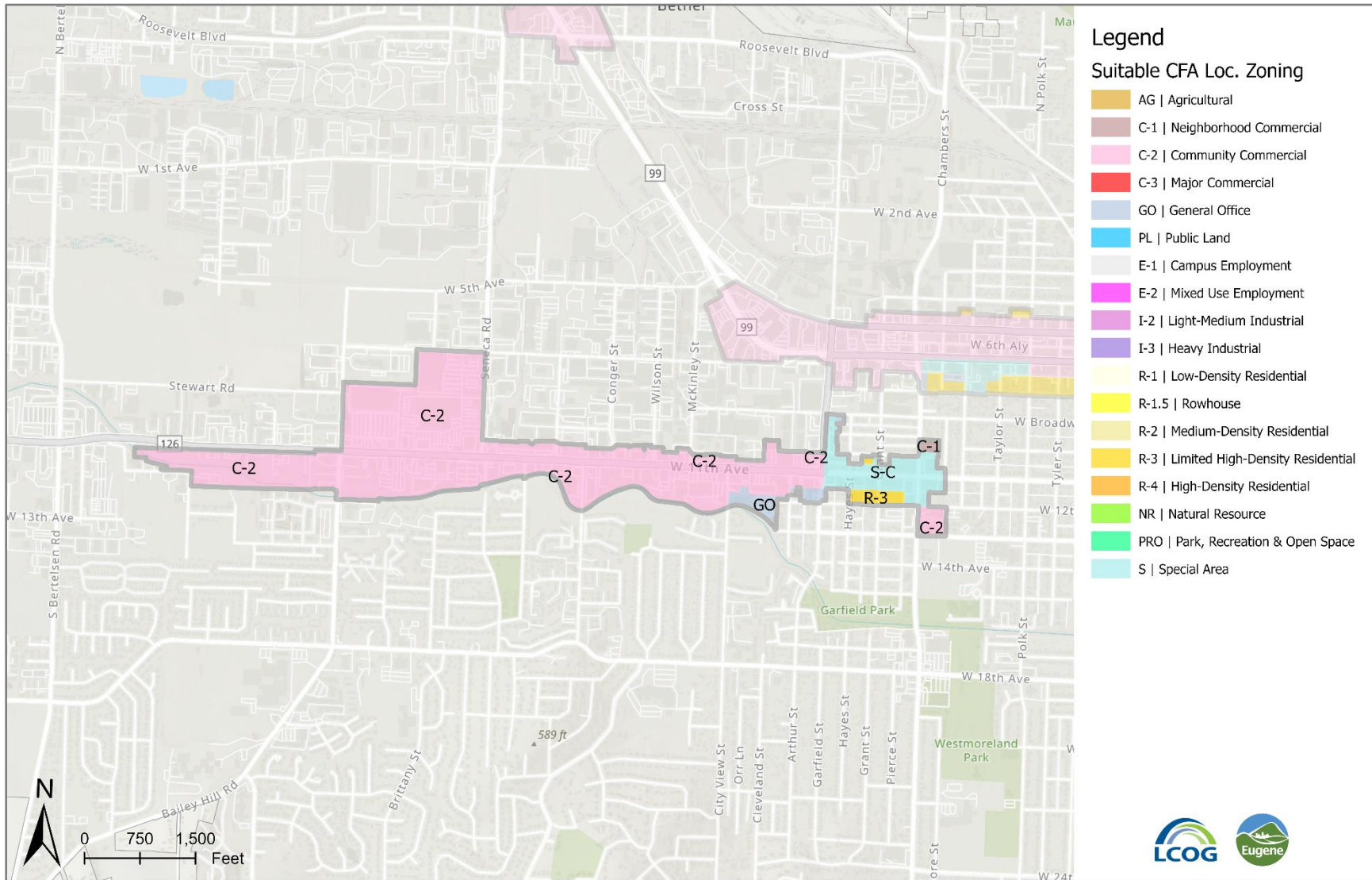
The South Willamette CFA Location is a relatively narrow, linear area following Willamette Street, a minor arterial providing a connection between downtown and the residential areas in south Eugene. Willamette Street has newly improved bike lanes and sidewalks, but many commercial driveways increase the potential for conflict between people driving and those walking or biking. 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, adjacent to the CFA Location, has a shared use path providing access to key regional destinations as well as South Willamette Eugene High School. There is also a shared use path through Civic Park that connects to South Eugene High School.

- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. The projected land use for the South Willamette Suitable CFA is a mix of Commercial and Commercial-Residential 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: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA location.

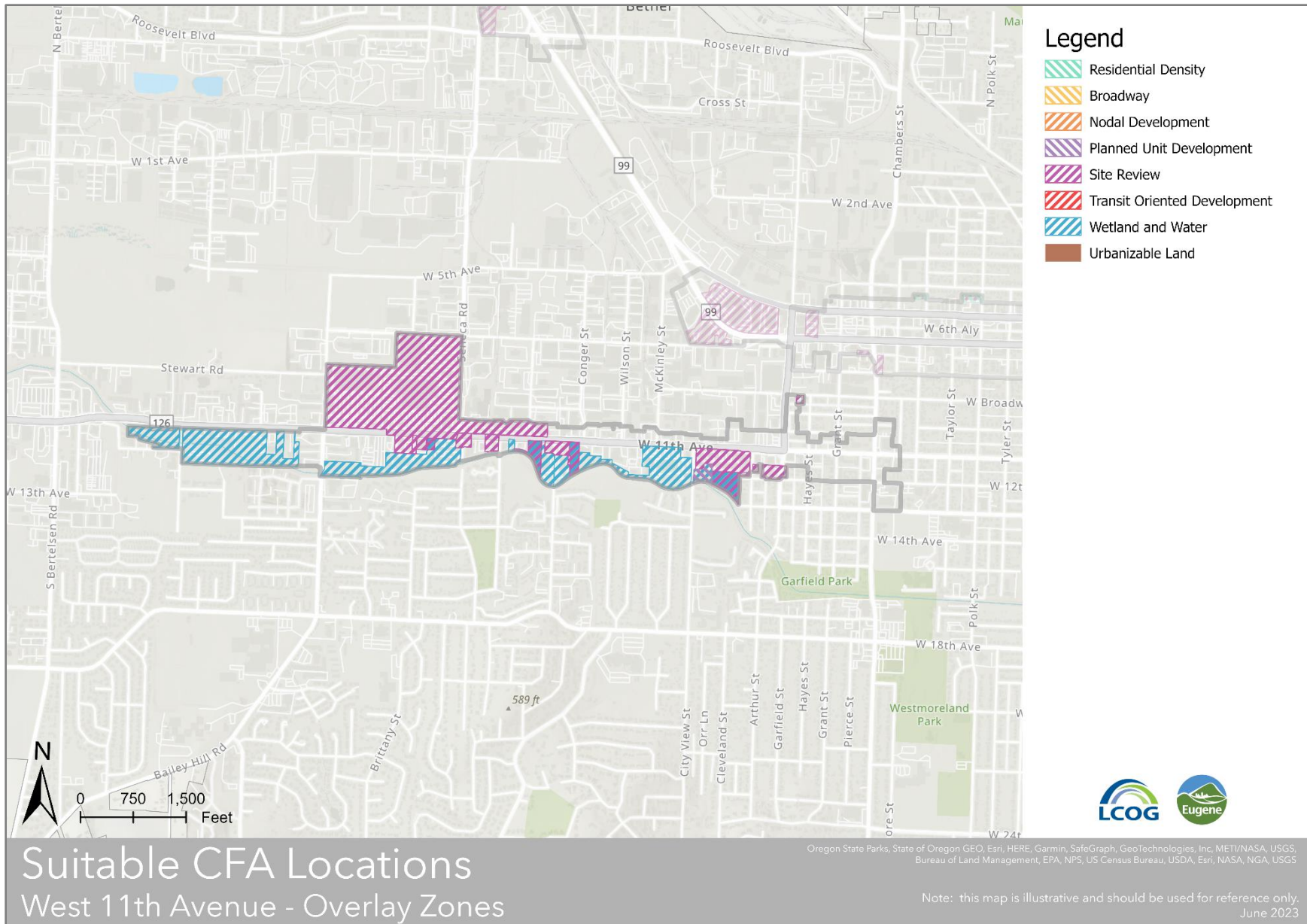


Suitable CFA Locations

West 11th Avenue - Base Zoning

Oregon State Parks, State of Oregon GEO, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, Esri, NASA, NGA, USGS

Note: this map is illustrative and should be used for reference only.
June 2023



Location 9: West 11th Avenue

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

The West 11th Suitable CFA is 204 acres in size. It is the second largest Suitable CFA evaluated of the original nine locations. The West 11th Avenue location is generally a long linear area following the frequent transit corridor along both sides of 11th Avenue/Oregon Highway 126, but it 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.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The West 11th Avenue Suitable CFA is primarily zoned C-2 Community Commercial, with small pockets of GO General Office, C-1 Neighborhood Commercial, and R-3 Limited High Density Residential. The east end of the CFA includes the S-C Chambers Special Area Zone subarea /C-2, which is generally consistent with C-2 standards.

Permitted Uses (-320(2)): C-2 and S-C/C-2 are highly compliant zones, except where C-2 overlaps with the /SR Site Review overlay zone, which limits outright permitted uses and renders the area medium compliant. The /SR overlay applies to numerous parcels in the location. Neither GO nor C-1 are highly compliant and, in this location, they also have /SR overlap, rendering these areas even less compliant. R-3 has low compliance ratings for CFA-required outright permitted uses.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in C-1, C-2, S-C/C-2, GO, and R-3 areas.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2 and S-C/C-2 areas. C-1 areas do not comply with either Primary or Secondary building height requirements, while GO and R-3 comply with Secondary CFA height requirements.

- **Dwelling Unit Capacity (TM3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1	1.00	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	55.05	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	68.40	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,WP	3.44	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/WP	45.47	High	High	Medium	High	Medium	Medium	High	Medium	High
GO/PD,WP	1.30	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR	2.13	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR,WP	2.66	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High
R-3	3.77	Low	High	Medium	Medium	Medium	Medium	Low	High	High
S-C/C-2	20.25	High	High	Medium	Medium	Medium	Medium	High	Medium	High

- **Supportive Adjacent Uses (TM #4)**

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 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 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 CFA contains a portion of, and is bounded by, the S-C Chambers Special Area, 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 of single-unit dwellings.

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 couplet, another frequent transit corridor, but this portion does not include high density or mixed-use development. Between the two transit corridors lies E-2 Mixed Use Employment areas.

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: The 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 of the CFA location is Bertelson Nature Park. The 34.5-acre natural area is co-owned and managed by the City of Eugene and Bureau of Land Management. Martin Luther King Jr. Park is a neighborhood park abutting the CFA's northern R-3 zoned area.

- **Active Transportation Facilities (TM #4)**

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 CFA is bounded to the south by Amazon Creek and the Fern Ridge Path, giving safe walking and biking access to the central city. West 11th Avenue transitions from a minor arterial to a major arterial within the CFA Location. 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 not bike lanes on West 11th Avenue, but there are several planned on the north-south connectors, including at least three within the CFA Location (Garfield, City View, and Oak Patch). Bike lanes already exist on Seneca Road and Bailey Hill Road, on the west end of the CFA. There is EmX bus rapid transit service on W. 11th from Garfield Street to the west.

- **Adequate Infrastructure (TM #4)**

Stormwater: Stormwater basin planning is based on Metro Plan Designations. 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: Eugene Water and Electric Board (EWEB) staff did not note any concerns with possible increased development in this CFA location.

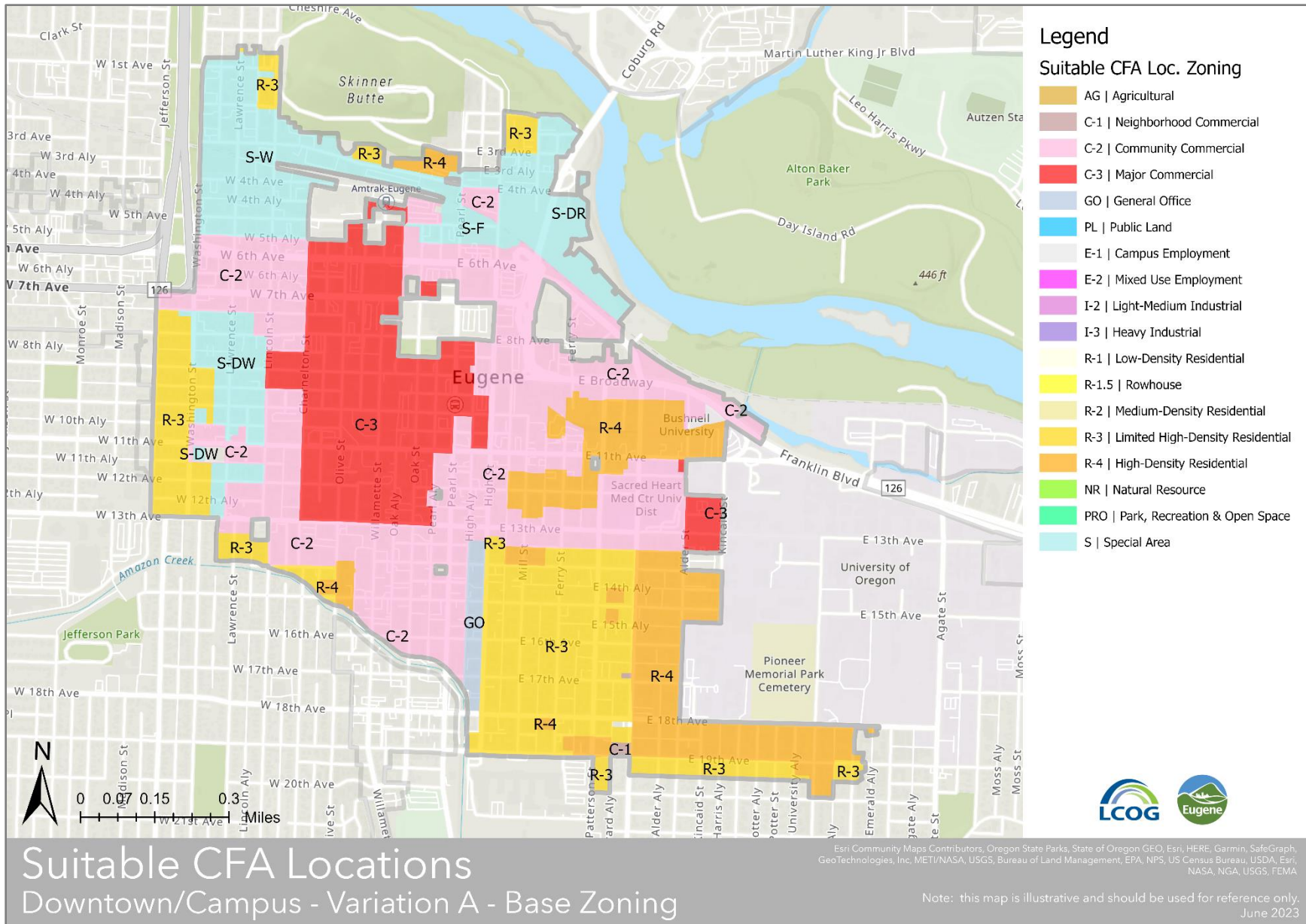
Wastewater: The City's wastewater team did not note any concerns with possible increased development in this CFA.

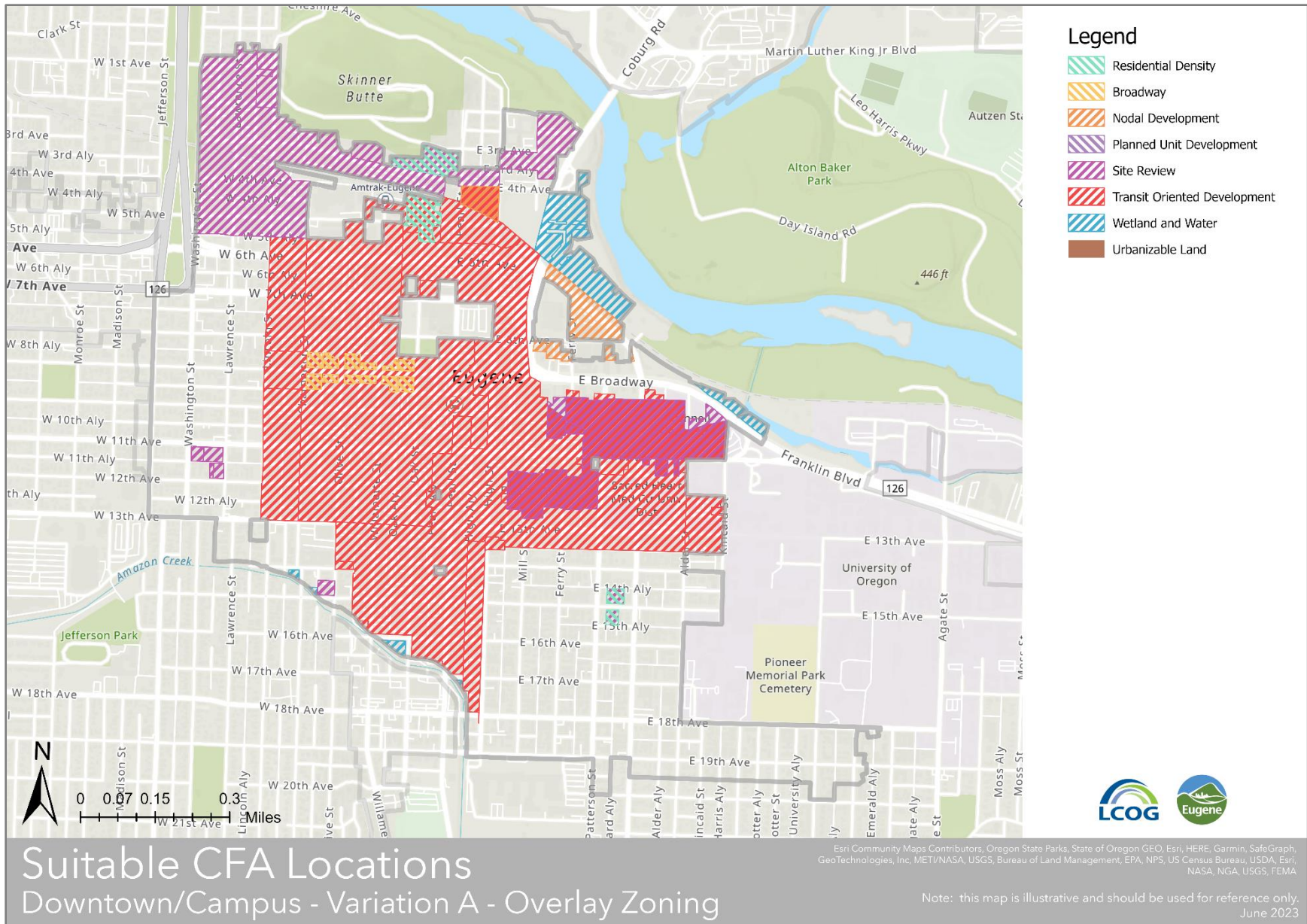
CONFIGURATION VARIATIONS

In addition to the nine Suitable CFA Locations identified and named earlier for ease of reference, three variations of the Downtown/Campus location are evaluated.

10. Downtown/Campus, Variation A - Exclude the 6th/7th Avenue corridor west of Jefferson Street
11. Downtown/Campus, Variation B – Exclude zones with lower levels of compliance (C-1, R-3, R-4, and S-W)
12. Downtown/Campus, Variation C - Exclude both of the above

Since these areas are based on the Downtown/Campus Suitable CFA, they do not have to be reassessed against the locational criteria that all other locations have already met. Each variation meets both the width and area dimensional requirements as well.





Location 10: Downtown/Campus, Variation A

REMOVE 6TH/7TH CORRIDOR

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

Variation A of the Downtown/Campus Suitable CFA removes the 6th/7th Avenue corridor west of Jefferson Street. The original location is large at 865 acres with meandering boundaries. Variation A removes 181 acres, leaving 684 acres.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Downtown/Campus, Variation A contains numerous base zones and overlay zones. The most predominant zones are C-2 Community Commercial, C-3 Major Commercial, R-3 Limited High Density Residential, and R-4 High Density Residential. There are four special area zones within the Downtown/Campus Suitable CFA that are retained in Variation A, including S-DR Downtown Riverfront, S-DW Downtown Westside, S-F Fifth Street, and S-W Whiteaker. There is also a small strip of GO General Office within the location. The areas removed from this variation are mostly zoned as C-2, with some small areas of R-3, GO, and S-C Chambers Special Area Zone.

Permitted Uses (-320(2)): Both R-3 and R-4 have low compliance ratings for CFA required outright permitted uses. C-2 is a highly CFA-compliant zone, except where it overlaps with the /SR Site Review overlay zone, which limits outright permitted uses and renders the area medium compliant. Similarly, where /SR applies in the S-W, , reduces compliance. C-3 also rates very high in compliance and exists exclusively within the Downtown/Campus Suitable CFA. The two downtown special area zones (S-DW and S-DR, including applicable subareas), as well as GO areas, are medium compliant for outright permitted uses, while S-F is rated highly compliant.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in all applicable zones. Areas zoned R-3, R-4, and S-DW (except mixed use) meet density minimums for Secondary CFA criteria.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2, C-3, R-4, S-F, and S-DW. R-3 and GO only achieve Secondary CFA compliance for building height. The S-W and S-DR (subareas D & E) zones rate notably low in compliance due to height constraints. This analysis assumes that no building height

limitation buffer is applied. Therefore, in areas where the Suitable CFA abuts R-1, full development capacity (height) has been assumed.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-1	0.82	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
C-2	57.44	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/20,TD	2.30	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND	8.12	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND,TD	2.55	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	0.63	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,TD	1.31	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/TD	150.59	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/TD,WR	0.22	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	2.45	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/BW,TD	5.13	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/TD	105.81	High	High	Medium	High	Medium	Medium	High	Medium	High
GO/TD	7.37	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
R-3	122.37	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/SR	4.62	Low	Low	Medium	Medium	Medium	Medium	Low	High	High
R-3/TD	0.59	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-3/WR	0.30	Low	High	Medium	Medium	Medium	Medium	Low	High	High
R-4	58.90	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/ 82,92,SR	0.49	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/89,SR	3.29	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/92,SR	0.69	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/SR	0.64	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/SR,TD	31.12	Low	Low	Medium	Medium	Medium	Medium	High	High	High
R-4/TD	1.64	Low	High	Medium	Medium	Medium	Medium	High	High	High
R-4/WR	7.62	Low	High	Medium	Medium	Medium	Medium	High	High	High
S-DR/MU	0.42	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/1/WR	0.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
S-DR/MU/2	0.35	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/2/WR	11.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/ MU/WR	23.38	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DW	1.02	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-DW/SR	0.74	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-F	0.88	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/20,TD	6.58	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/TD	1.14	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-W	59.53	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-W/SR	0.82	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	Low

- **Supportive Adjacent Uses (TM #4)**

In, or Near, High-Density Mixed-Use Areas: The Downtown/Campus, Variation A Suitable CFA is large with meandering boundaries and, therefore, many adjacent uses, including several areas of high-density mixed-use. Variation A is unique compared to the entire Downtown/Campus Suitable CFA in that it 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 eliminates some of the adjacent industrial zoned land on the west edge of the original CFA.

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

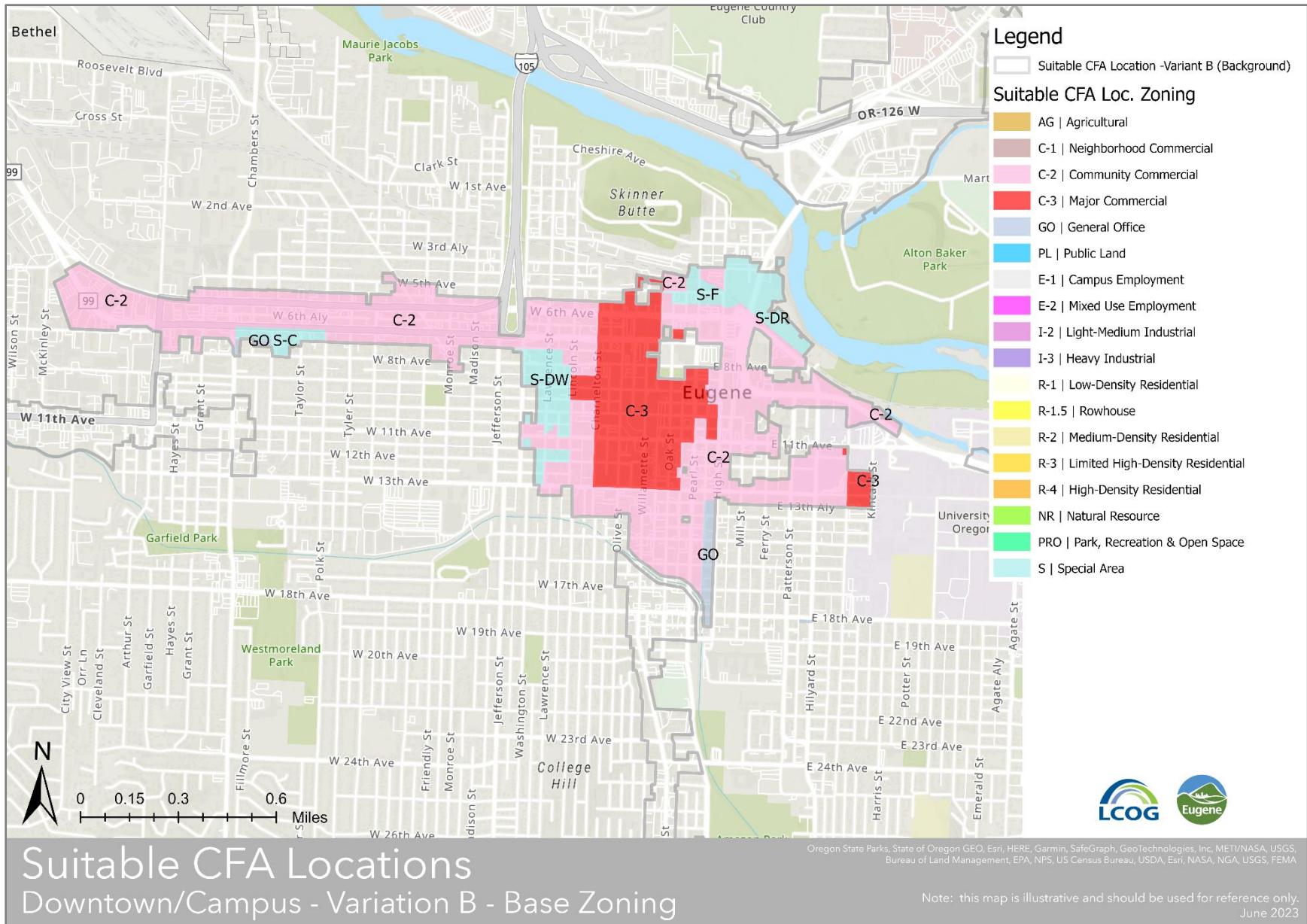
Downtown/Campus, Variation A retains all adjacent parks, open space, and public amenities included in the original CFA.

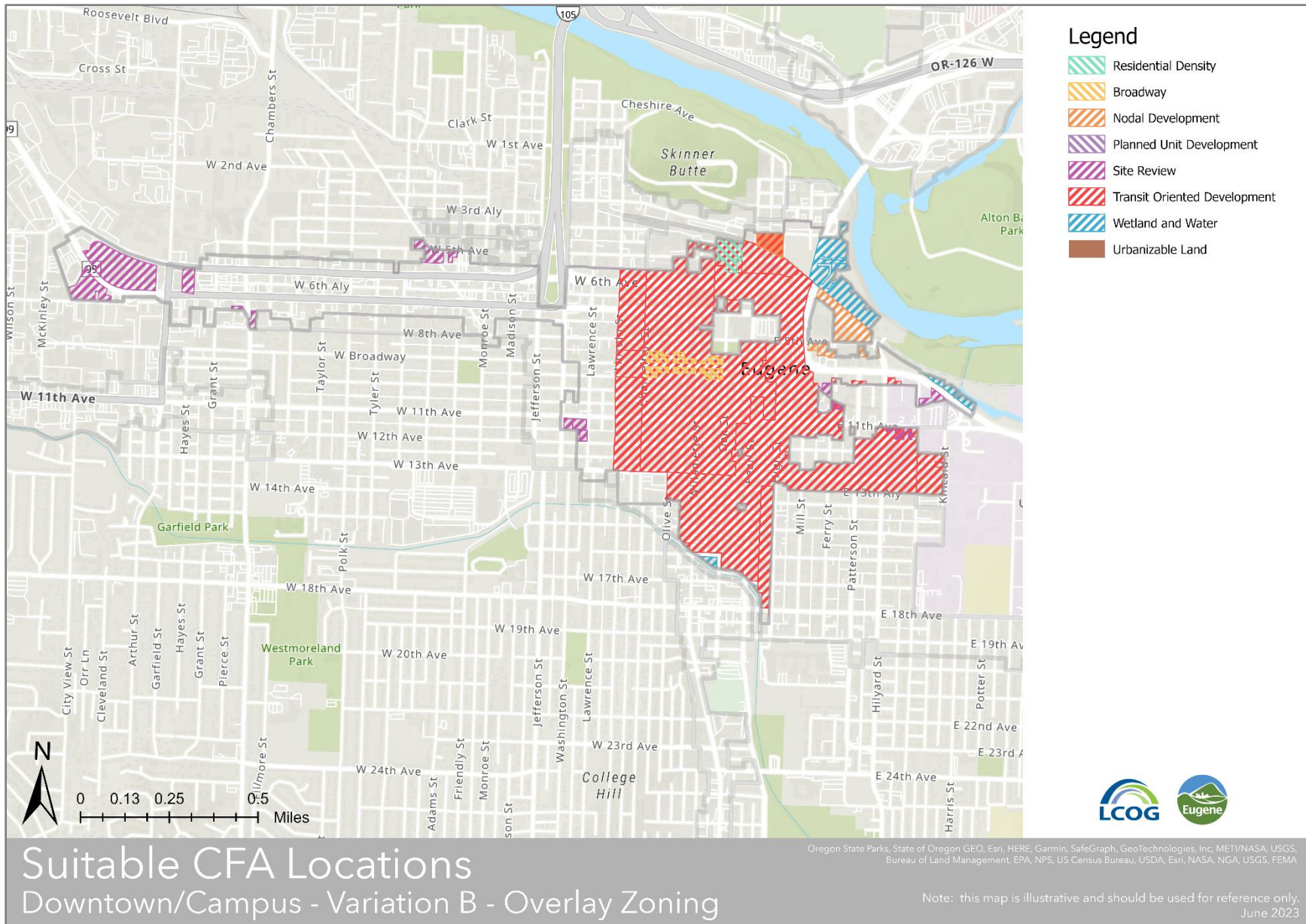
- **Active Transportation Facilities (TM #4)**

The Downtown/Campus, Variation A Suitable CFA retains all of 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 Corridor.

- **Adequate Infrastructure (TM #4)**

The Downtown/Campus, Variation A Suitable CFA does not have any unique infrastructure concerns compared to the original CFA.





Location 11: Downtown/Campus Variation B

REMOVE LESS RULE-COMPLIANT ZONES

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

Variation B of the Downtown/Campus Suitable CFA removes zones with a lower level of rule compliance (C-1, R-3, R-4, and S-W). The original location is large at 865 acres with meandering boundaries. Variation B removes 176 acres, leaving 688 acres.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Downtown/Campus, Variation B Suitable CFA contains numerous base zones and overlay zones. The most predominant zones are the C-2 Community Commercial and C-3 Major Commercial. There are four special area zones within the Downtown/Campus Suitable CFA that are retained in Variation A, including S-C Chambers, S-DR Downtown Riverfront, S-DW Downtown Westside, and S-F Fifth Street. There is also a small strip of GO General Office within the CFA. The areas removed from this variation are all segments zoned C-1, R-3, R-4, and S-W which have lower levels of compliance.

Permitted Uses (-320(2)): C-2 is a highly CFA-compliant zone, except where it overlaps with the /SR Site Review overlay zone, which limits outright permitted uses and renders the area medium compliant. Similarly, /SR limitations in GO, where it is applicable, reduce compliance from medium to low. C-3 also rates very high in compliance and exists exclusively within the Downtown/Campus Suitable CFA. The two downtown special area zones (S-DW and S-DR, including applicable subareas) are medium compliant for outright permitted uses, while S-F and S-C are rated highly compliant.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in all applicable zones. Areas zoned S-DW (except mixed-use) meet density minimums for Secondary CFA criteria.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2, C-3, S-F, and S-DW. GO only achieves Secondary CFA compliance for building height. The S-DR zone rates notably low in compliance due to height constraints in certain areas based on the S-DR Zone Height Regulating Plan.

- **Dwelling Unit Capacity (TM #3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-2	170.00	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/20,TD	2.30	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND	8.12	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND,TD	2.55	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	21.03	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,TD	1.31	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/TD	150.59	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/TD,WR	0.22	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	2.45	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/BW,TD	5.13	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/TD	105.81	High	High	Medium	High	Medium	Medium	High	Medium	High
GO	1.78	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
GO/SR	0.59	Low	Low	Medium	Medium	Medium	Medium	Low	Medium	High
GO/TD	7.37	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-C/C-2	7.62	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-DR/MU	0.42	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/ MU/1/WR	0.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/2	0.35	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/ MU/2/WR	11.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/WR	23.38	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DW	1.02	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-DW/SR	0.74	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-F	0.88	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/20,TD	6.58	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/TD	0.74	High	High	Medium	Medium	Medium	Medium	High	Medium	High

- **Supportive Adjacent Uses (TM #4)**

In, or Near, High-Density Mixed-Use Areas: The Downtown/Campus, Variation B Suitable CFA is large with meandering boundaries and, therefore, many uses within and adjacent to the CFA, including several areas of high-density mixed use. Variation B retains the adjacency to industrially zoned lands, noted in the original Downtown/Campus Suitable CFA. There is less R-1 adjacency around the University of Oregon campus, but some remains along the 6th/7th Corridor.

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

Downtown/Campus, Variation B Suitable CFA retains most of the adjacent or nearby parks, open space, and public amenities included in the entire CFA location. Less of the University of Oregon campus and South Willamette High School/Amazon Park areas are adjacent to this variation, but the general proximity is retained.

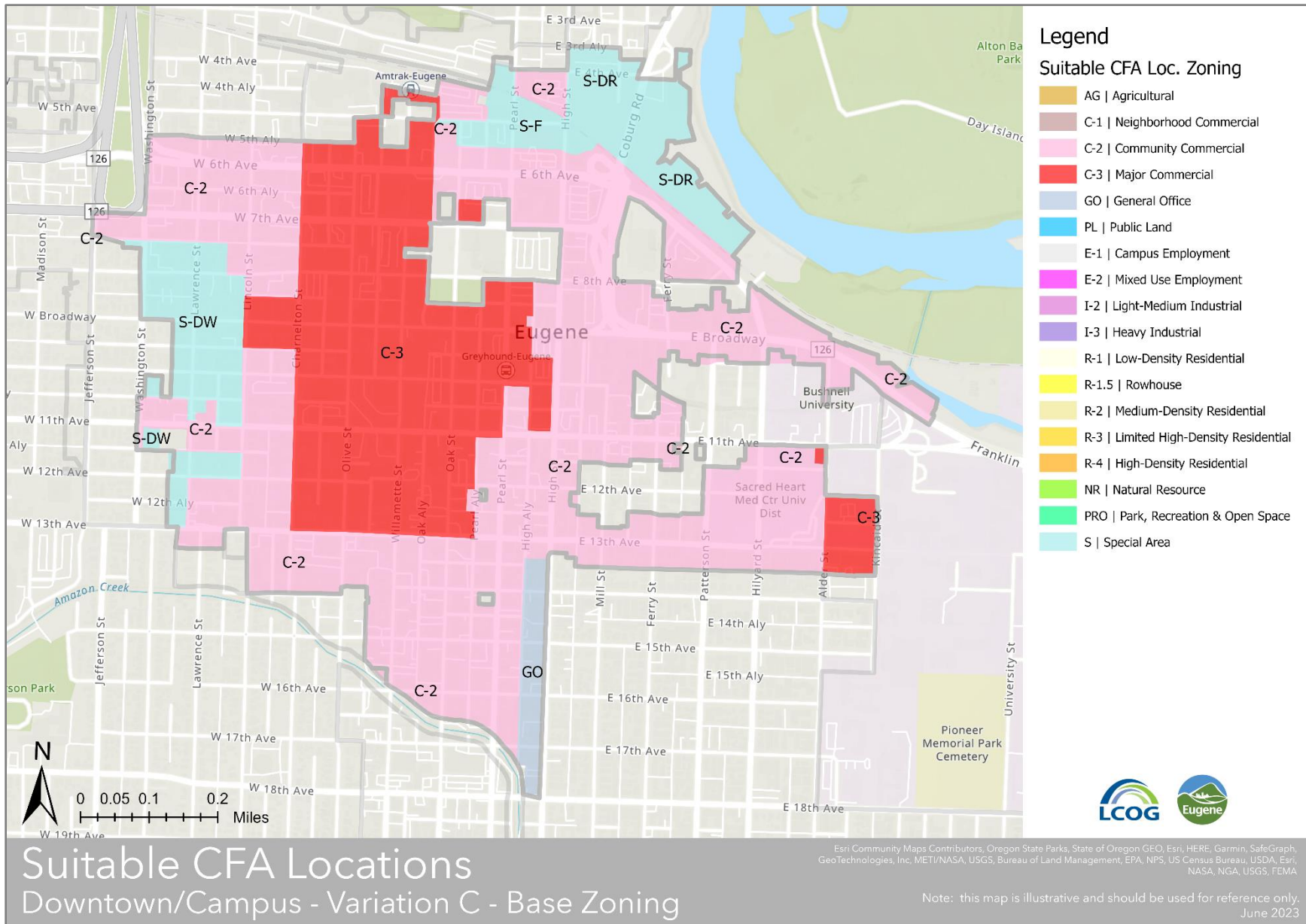
- **Active Transportation Facilities (TM #4)**

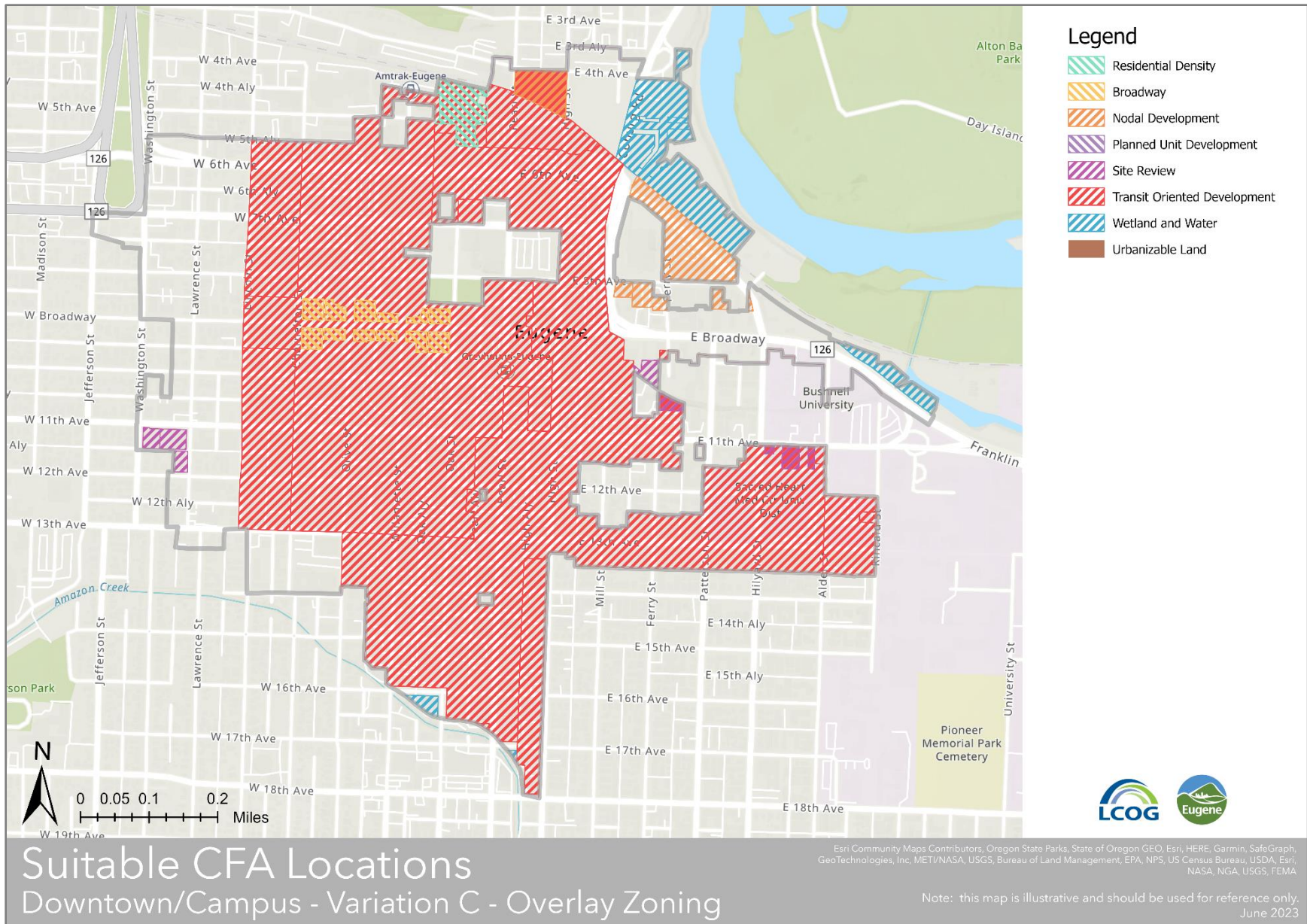
Variation B of the Downtown/Campus Suitable CFA retains most of the high-quality active transportation facilities of the original CFA. Less of the Alder Street two-way cycle track is included in the variation, although it still passes through near the entrance to the University of Oregon campus.

- **Adequate Infrastructure (TM #4)**

By removing the less compliant zones, Variation B is more aligned with current stormwater basin planning. The areas retained in this variation are all projected as Commercial and Commercial-Residential mixed use, which aligns better with CFA designation.

There are no other unique infrastructure concerns for this variation.





Location 12: Downtown/Campus Variation C

REMOVE 6TH/7TH CORRIDOR AND LESS RULE-COMPLIANT ZONES

ZONING MAPS

(See maps on the previous two pages)

DESCRIPTION

Variation C of the Downtown/Campus CFA location removes the 6th/7th Avenue corridor west of Jefferson Street as well as the zones with lower level of rule compliance (C-1, R-3, R-4, and S-W). The original location is large at 865 acres with meandering boundaries. Variation C removes 320 acres, leaving 544 acres.

CRITERIA

- **Development Regulation Compliance (TM #3b)**

(See the table on the following page)

The Downtown/Campus, Variation C Suitable CFA contains numerous base zones and overlay zones. The most predominant zones are the C-2 Community Commercial and C-3 Major Commercial. There are three special area zones within the Downtown/Campus Suitable CFA that are retained in Variation C, including S-DR Downtown Riverfront, S-DW Downtown Westside, and S-F Fifth Street. There is also a small strip of GO General Office within the location. 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 (-320(2)): C-2 is a highly CFA-compliant zone, except where it overlaps with the /SR Site Review overlay zone, which limits outright permitted uses and renders the area medium compliant (although there are very few areas for /SR). C-3 also rates very high in compliance and exists exclusively within the Downtown/Campus Suitable CFA. The two downtown special area zones (S-DW and S-DR, including applicable subareas), as well as GO areas, are medium compliant for outright permitted uses, while S-F is rated highly compliant.

Density Minimums (-320(8)): Density minimums for Primary CFA compliance are not met by current zoning and development standards, although higher densities are allowed in all applicable zones. Areas zoned S-DW (except mixed use) meet density minimums for Secondary CFA criteria.

Building Height (-320(8)): Building height compliance is high for Primary and Secondary CFA criteria for C-2, C-3, S-F, and S-DW. GO only achieves Secondary CFA compliance for building height. The S-DR (subareas D & E) zone rates notably low in compliance due to height constraints.

- **Dwelling Unit Capacity (TM3c)**

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

All Codes	CFA Area (Acres)	CFA Rule 320(2) Compliance	CFA Rule 320(4) Compliance	CFA Rule 320(5) Compliance	CFA Rule 320(6) Compliance	CFA Rule 320(7) Compliance	CFA Rule 320(8) Primary Density Compliance	CFA Rule 320(8) Primary Height Compliance	CFA Rule 320(8) Secondary Density Compliance	CFA Rule 320(8) Secondary Height Compliance
C-2	57.44	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/20,TD	2.30	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND	8.12	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/ND,TD	2.55	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/SR	0.63	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/SR,TD	1.31	Low	Low	Medium	High	Medium	Medium	High	Medium	High
C-2/TD	150.59	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/TD,WR	0.22	High	High	Medium	High	Medium	Medium	High	Medium	High
C-2/WR	2.45	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/BW,TD	5.13	High	High	Medium	High	Medium	Medium	High	Medium	High
C-3/TD	105.81	High	High	Medium	High	Medium	Medium	High	Medium	High
GO/TD	7.37	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	High
S-DR/MU	0.42	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/ MU/1/WR	0.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/2	0.35	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/ MU/2/WR	11.81	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DR/MU/WR	23.38	Medium	High	Medium	Medium	Medium	Medium	Low	Medium	Low
S-DW	1.02	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-DW/SR	0.74	Medium	Low	Medium	High	Medium	Medium	High	High	High
S-F	0.88	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/20,TD	6.58	High	High	Medium	Medium	Medium	Medium	High	Medium	High
S-F/TD	0.74	High	High	Medium	Medium	Medium	Medium	High	Medium	High

- **Supportive Adjacent Uses (TM4)**

In, or Near, High-Density Mixed-Use Areas: Variation C of the Downtown/Campus CFA Suitable CFA is large and includes many uses within and adjacent to the CFA, including several areas of high-density mixed use. Variation C retains the fewest incompatible adjacent uses of all 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 on the northeast edge of the CFA location, which is currently developed for commercial and public uses.

Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities: Variation C retains most of the adjacent or nearby parks, open space, and public amenities included in the entire CFA location. Less of the University of Oregon campus and South Willamette High School/Amazon Park areas are adjacent to this variation, but the general proximity is retained.

- **Active Transportation Facilities (TM4)**

Similar to Variation B, Variation C of the Downtown/Campus Suitable CFA 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, although it still passes through near the entrance to the University of Oregon campus. Additionally, it eliminates a large section of a major arterial passing through the original, the 6th/7th Corridor.

- **Adequate Infrastructure (TM4)**

As noted in Variation B, by removing the less compliant zones, Variation C is more aligned with current stormwater basin planning. The areas retained in this variation are all projected as Commercial and Commercial-Residential mixed use, which aligns better with CFA designation.

There are no other unique infrastructure concerns for this CFA Location variation.

CONCLUSIONS AND CONSIDERATIONS

CONCLUSIONS

All Suitable CFA Locations and variant configurations (locations 1-12) were found to already be following the absolute criteria, including:

- **Locational (TM1 and TM3a)**
 1. In an Urban Center
 2. Within the UGB
 - *Within the City Limits or Subject to Additional Conditions*
 3. Served by High-Quality Transit
 4. Safe From Natural Disasters and Hazards (Goal 7)
- **Dimensional (TM3a)**
 1. A Minimum of 25 Acres
 2. A Minimum of 750 Feet Wide

Each location was evaluated on the following additional relative criteria.

- **Development Regulation Compliance (TM3b)**
- **Dwelling Unit Capacity (TM3c)**
- **Supportive Adjacent Uses (TM4)**
 1. In, or Near, High-Density Mixed-Use Areas
 2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities
- **Active Transportation Facilities (TM4)**
- **Adequate Infrastructure (TM4)**

Most Promising Suitable CFA Locations by Criterion

This section identifies the three most promising of the Suitable CFAs under each criterion. The best variation on Downtown/Campus is selected for each criterion where a Downtown/Campus variation or the original Downtown/Campus location would be selected.

DEVELOPMENT REGULATION COMPLIANCE (TM #3B)

1. **Ferry Street Bridge.** This Suitable CFA has only a few base zones, and is dominated by the highly compliant C-2 zone. It also has few compliance reducing overlays zones.
2. **Downtown/Campus, Variation A.** These Suitable CFAs contain a range of base zones, though Variation A more than Variations B and C. They are all dominated by the highly compliant C-2 zone, though the larger Variation A has a higher proportion of C-2 than B and C, which have relatively higher proportions of the medium compliant C-3 zone.
3. **Highway 99:** This Suitable CFA almost entirely made up of highly compliant C-2 zoning. Compliance reducing overlays are also very limited in this Suitable CFA.

DWELLING UNIT CAPACITY (TM #3C)

1. **Downtown/Campus:** Using all zoned areas, this Suitable CFA meets **58%** of needed housing capacity as a Primary CFA and 34% of 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 needed housing capacity as a Primary CFA and 9% of needed housing capacity as a Secondary CFA.
3. **Highway 99:** Using all zoned areas, this Suitable CFA meets **15%** of needed housing capacity as a Primary CFA and 8% of needed housing capacity as a Secondary CFA.

SUPPORTIVE ADJACENT USES (TM #4)

In, or Near, High-Density Mixed-Use Areas

1. **Downtown/Campus, Variation C:** This Suitable CFA includes many uses within and adjacent to the CFA, including several areas of high-density mixed-use. Variation C retains the fewest incompatible adjacent uses of all the Downtown/Campus variations.
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 Willamette High School, the Park Blocks, Skinner's Butte, the University of Oregon campus, and many other, smaller amenities and public spaces.
2. **South Willamette:** This Suitable CFA is adjacent to the 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 Higher Board of Education 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 CFA Location abuts both the Franklin Park Natural Area and Fairmount Neighborhood Park.

ACTIVE TRANSPORTATION FACILITIES (TM #4)

1. **Downtown/Campus, Variation A:** This variation retains all of the high-quality active transportation facilities of the original CFA while eliminating a large section of a major arterial passing through the original Suitable CFA, the 6th/7th Corridor.
2. **Walnut/Franklin CFA:** 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 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.

CONSIDERATIONS FOR CFA SELECTION

- **Aim High:** The City should consider adopting CFAs that have a higher capacity than the minimum requirement. This will allow the City to avoid future work expanding their CFAs to meet OAR 660 Division 8 and 12 rules and Goal 10 – Housing. The City of Eugene intends to adopt CFA locations as a land use efficiency measure during their upcoming Urban Growth Boundary update.
- **Maximize Park and Open Space Access:** The City could consider a set of CFAs near the Willamette River riparian corridor and park and trail systems. Several Suitable CFAs are near large urban parks and the regional park/open space corridor of the Willamette River. These are encouraged under the rules and are also well connected by shared use paths.
- **Favor Connection:** The City could consider a set of closely connected, centrally located CFAs. Closely connected CFAs meet the transportation goals for CFAs but also magnify the benefits of each by placing each other's uses near each other. Through coordination with the City of Springfield, both cities could maximize connection between CFAs via the Willamette River corridor and shared use paths. LTD, the regional transit provider, also shared with staff that multiple CFAs (in Eugene and Springfield) along one corridor or transit line would make providing more frequent service more efficient.

NEXT STEPS

- The gentrification and displacement risk analysis in Technical Memo #2 identified that all Suitable CFA Locations pose some risk of displacement to existing, vulnerable residents. Anti-displacement strategies that can be used in the selected CFA locations are further explored in Technical Memo #2.1. The final CFA Study will include a list of preliminary strategies as recommended by City staff based on research and existing City policies and priorities.
- The complete CFA Study compilation document as provided by LCOG will include the content of all Technical Memos produced under this project. This document will serve as a ready document which could be submitted to DCLD for review and comment. The cities may choose to further supplement this document prior to submittal. This may include further analysis of considered CFA locations or consideration of additional potential CFA locations.

Appendix C. Suitable CFA Demographic Profiles

This appendix includes a summary of key demographic data used for the anti-displacement spatial analysis of Eugene's Suitable Climate-Friendly Areas. A summary of the approach, methods, and summary results is available in Section 5.2.

Indicator Set: This column describes which of the five indicator "sets" the data is used for. Each indicator set is used to answer one of five key question within the area typology. These five sets include Low-Income, Vulnerable People, Older or Multi-Unit Housing, Active Housing Market, and Demographic Shift.

Indicator: This column is the specific demographic data point, which are then combined into overall indicator sets. For example, there are two indicators for the Low Income indicator set: 1) Percentage of Low Income Households and 2) Median Household Income.

Census Block Groups: Each Suitable CFA tab includes a column for every census block group that cross through the Suitable CFA are included, as well as for Eugene as a whole. Suitable CFAs range from 1-22 associated block groups.

Period Analyzed: The first table on each tab lists indicators from the 2015-2019 American Community Survey (ACS) 5-Year Estimates. The second table lists indicators where change over time is considered, comparing 2015-2019 to 2008-2012. Change over time is only considered for certain indicators within the Active Housing Market and Demographic Shift indicators sets. Given the number of census block groups in the Downtown/Campus Suitable CFA, the block groups are separated into two tables.

***Red cells** indicate difference from the city as a whole as is relevant in the displacement analysis. For example, block groups with a higher percentage of low-income households, more multi-unit housing, or other factors that indicate vulnerability or ongoing displacement.*

***Yellow cells** indicate census block groups where data has been suppressed. Data suppression refers to the various methods or restrictions that are applied to ACS estimates to limit the disclosure of information about individual respondents and to reduce the number of estimates with unacceptable levels of statistical reliability. Suppressed indicators are removed from consideration in the spatial analysis, noted with an *asterisk* as relevant.*

Area Typology: The third and final table on each tab summarizes the results of the area typology for each census block group within the Suitable CFA. The analysis categorizes areas of the city into six different area typologies that are a combination of **yes** or **no** answers to the question posed by the indicator set. These area types describe the relative displacement risk in that part of the city, when compared to the city as a whole.

Chase Village Suitable CFA
Demographic Profile

Demographic Profile for the Chase Village Suitable CFA (2015-2019 ACS Data by Census block group)				
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups		Eugene
		410390031023	410390031024	
Low Income	Percentage of Low-Income Households	78%	58%	46%
	Median Household Income	\$ 20,457	\$ 30,928	\$ 50,962
Vulnerable People	Percent BIPOC	44%	35%	22%
	Percent LEP Households	26%	12%	2%
	Percent People with Disabilities (by tract)	12%	12%	14%
	Percent Single Parent Households	9%	9%	6%
	Percent People 65 and Older	2%	11%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	99%	80%	37%
	Percent Housing Built before 1970	1%	5%	35%
Active Housing Market	Median Gross Rent	\$ 1,076	\$ 1,155	\$ 1,031
	Median Home Value	Data suppressed	\$ 381,800	\$ 288,600
Demographic Shift	Percent Renter Occupied Units	100%	81%	52%
	Percent Bachelors or More	53%	49%	42%

Demographic Change for the Chase Village Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)				
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups		Eugene
		410390031023	410390031024	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 882	\$ 1,126	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	22%	3%	10%
	Median Home Value (in 2019 dollars)	\$ 11,134	\$ 404,318	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	Data suppressed	-6%	6%
Demographic Shift	Median Household Income	\$ 11,520	\$ 12,746	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	78%	143%	10%
	Percent BIPOC	31%	25%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	43%	39%	24%
	Percent Bachelors or More	11%	43%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	384%	14%	5%
	Percent Renter Occupied Units	97%	77%	49%
<i>Change from 2008-2012 to 2015-2019</i>	3%	5%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390031023	Active Gentrification	Yes	Yes	Yes	Yes*	Yes
410390031024	Vulnerable	Yes	Yes	Yes	No	No

* Given suppressed census data, this is based on only two available indicators

Downtown/Campus Suitable CFA
Demographic Profile

Demographic Profile for the Downtown/Campus Suitable CFA (2015-2019 ACS Data by Census block group)													
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups - Group 1											Eugene
		410390037001	410390037002 (UO Campus)	410390038001	410390038002	410390038003	410390038004	410390038005	410390039001	410390039002	410390039003	410390040001	
Income	Percentage of Low-Income Households	72%	0%	82%	100%	89%	85%	91%	72%	89%	72%	86%	46%
	Median Household Income	\$ 23,926	\$ -	\$ 20,099	\$ 35,836	\$ 29,674	\$ 10,568	\$ 12,376	\$ 25,329	\$ 22,913	\$ 20,352	\$ 11,416	\$ 50,962
Vulnerable People	Percent BIPOC	27%	31%	17%	25%	21%	29%	51%	25%	24%	4%	13%	22%
	Percent LEP Households	5%	ERROR	0%	0%	0%	0%	3%	0%	1%	0%	2%	2%
	Percent People with Disabilities (by Census Tract)	8%	8%	10%	10%	10%	10%	10%	22%	22%	22%	20%	14%
	Percent Single Parent Households	0%	ERROR	4%	0%	3%	6%	2%	2%	6%	3%	0%	6%
	Percent People 65 and Older	1%	0%	3%	5%	0%	1%	0%	11%	13%	20%	50%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	71%	ERROR	96%	98%	81%	86%	98%	95%	88%	92%	91%	37%
	Percent Housing Built before 1970	32%	ERROR	49%	25%	40%	28%	13%	47%	52%	50%	68%	35%
Active Housing Market	Median Gross Rent	\$ 999	\$ -	\$ 981	\$ 917	\$ 918	\$ 952	\$ 818	\$ 1,090	\$ 732	\$ 730	\$ 445	\$ 1,031
	Median Home Value	\$ 425,600	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	\$ 270,600	\$ 275,000	Data suppressed	\$ 288,600
Other	Percent Renter Occupied Units	89%	0%	100%	97%	100%	100%	100%	100%	97%	95%	97%	52%
	Percent Bachelors or More	77%	0%	79%	66%	30%	31%	34%	30%	28%	44%	31%	42%

Demographic Profile for the Downtown/Campus Suitable CFA (2015-2019 ACS Data by Census block group)													
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups - Group 2											Eugene
		410390042002	410390042003	410390044033	410390045011	410390045012	410390045021	410390045022	410390045023	410390046001	410390048003	410390049002	
Income	Percentage of Low-Income Households	59%	81%	70%	62%	46%	63%	70%	51%	43%	77%	57%	46%
	Median Household Income	\$ 36,046	\$ 25,720	\$ 20,347	\$ 26,501	\$ 46,102	\$ 31,633	\$ 20,553	\$ 40,251	\$ 83,426	\$ 25,556	\$ 36,694	\$ 50,962
Vulnerable People	Percent BIPOC	21%	39%	12%	15%	14%	12%	15%	17%	10%	30%	18%	22%
	Percent LEP Households	5%	5%	2%	4%	0%	0%	0%	5%	0%	13%	3%	2%
	Percent People with Disabilities (by Census Tract)	30%	30%	15%	12%	12%	13%	13%	13%	13%	5%	7%	14%
	Percent Single Parent Households	2%	10%	14%	3%	7%	2%	16%	7%	14%	9%	1%	6%
	Percent People 65 and Older	13%	4%	46%	15%	12%	20%	3%	11%	13%	1%	9%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	66%	69%	36%	75%	49%	58%	53%	45%	18%	92%	43%	37%
	Percent Housing Built before 1970	72%	66%	53%	74%	64%	45%	64%	68%	94%	32%	61%	35%
Active Housing Market	Median Gross Rent	\$ 706	\$ 688	\$ 660	\$ 764	\$ 859	\$ 639	\$ 768	\$ 804	\$ 1,111	\$ 893	\$ 994	\$ 1,031
	Median Home Value	\$ 242,400	\$ 336,300	Data suppressed	\$ 409,000	\$ 295,600	\$ 301,700	\$ 276,800	\$ 265,300	\$ 344,800	Data suppressed	\$ 460,800	\$ 288,600
Other	Percent Renter Occupied Units	86%	79%	80%	75%	74%	61%	78%	71%	47%	97%	67%	52%
	Percent Bachelors or More	19%	35%	42%	64%	62%	54%	36%	44%	51%	62%	68%	42%

Demographic Change for the Downtown/Campus Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)													
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups - Group 1											Eugene
		410390037001	410390037002 (UO Campus)	410390038001	410390038002	410390038003	410390038004	410390038005	410390039001	410390039002	410390039003	410390040001	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 919	\$ 1,171	\$ 796	\$ 872	\$ 762	\$ 719	\$ 887	\$ 1,055	\$ 562	\$ 671	\$ 376	
	Change from 2008-2012 to 2015-2019	9%	-100%	23%	5%	21%	32%	-8%	3%	30%	9%	18%	10%
	Median Home Value (in 2019 dollars)	\$ 458,881	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	\$ 260,786	\$ 253,771	\$ 272,366
Demographic Shift	Change from 2008-2012 to 2015-2019	-7%	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	Data suppressed	5%	Data suppressed	6%
	Median Household Income	\$ 11,302	Data suppressed	\$ 17,841	\$ 20,278	\$ 11,600	Data suppressed	Data suppressed	\$ 26,887	\$ 19,794	\$ 35,240	\$ 20,990	\$ 46,239
	Change from 2008-2012 to 2015-2019	112%	Data suppressed	13%	77%	156%	Data suppressed	Data suppressed	-6%	16%	-42%	-46%	10%
	Percent BIPOC	14%	22%	31%	18%	16%	13%	22%	23%	25%	7%	17%	22%
	Change from 2008-2012 to 2015-2019	90%	39%	-45%	43%	31%	115%	129%	6%	-4%	-41%	-22%	24%
	Percent Bachelors or More	83%	8%	45%	75%	56%	53%	39%	37%	39%	54%	28%	40%
	Change from 2008-2012 to 2015-2019	-7%	-100%	75%	-13%	-46%	-41%	-11%	-18%	-30%	-19%	11%	5%
Percent Renter Occupied Units	75%	100%	100%	97%	100%	98%	100%	100%	98%	90%	87%	49%	
Change from 2008-2012 to 2015-2019	19%	-100%	0%	1%	0%	2%	0%	0%	-1%	5%	12%	5%	

Demographic Change for the Downtown/Campus Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)													
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups - Group 2											Eugene
		410390042002	410390042003	410390044033	410390045011	410390045012	410390045021	410390045022	410390045023	410390046001	410390048003	410390049002	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 632	\$ 622	\$ 527	\$ 768	\$ 664	\$ 746	\$ 814	\$ 714	\$ 954	\$ 883	\$ 989	\$ 933
	Change from 2008-2012 to 2015-2019	12%	11%	25%	-1%	29%	-14%	-6%	13%	16%	1%	1%	10%
	Median Home Value (in 2019 dollars)	\$ 238,181	\$ 165,469	\$ 205,667	\$ 347,974	\$ 337,507	\$ 293,412	\$ 298,423	\$ 261,899	\$ 285,395	\$ 372,583	\$ 506,317	\$ 272,366
Change from 2008-2012 to 2015-2019	2%	103%	Data suppressed	18%	-12%	3%	-7%	1%	21%	Data suppressed	-9%	6%	

Downtown/Campus Suitable CFA
Demographic Profile

Demographic Shift	Median Household Income	\$ 11,681	\$ 24,068	\$ 17,765	\$ 42,877	\$ 24,085	\$ 11,284	\$ 33,481	\$ 28,880	\$ 44,190	Data suppressed	\$ 16,703	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	208%	7%	14%	-38%	91%	180%	-39%	39%	89%	Data suppressed	120%	10%
	Percent BIPOC	15%	31%	18%	13%	16%	40%	11%	19%	7%	26%	19%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	39%	25%	-34%	12%	-7%	-71%	46%	-8%	41%	18%	-3%	24%
	Percent Bachelors or More	28%	15%	29%	69%	76%	31%	60%	34%	52%	51%	82%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-31%	132%	47%	-8%	-19%	47%	-39%	31%	-3%	24%	-17%	5%
	Percent Renter Occupied Units	70%	86%	66%	70%	85%	81%	59%	75%	51%	98%	61%	49%
	<i>Change from 2008-2012 to 2015-2019</i>	22%	-8%	22%	8%	-12%	-24%	32%	-5%	-8%	-1%	10%	5%

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390037001	Vulnerable	Yes	Yes	Yes	No	No
410390037002	Unassigned	No	n/a	n/a	No*	No**
410390038001	Unassigned	Yes	No	Yes	Yes*	Yes
410390038002	Unassigned	Yes	No	Yes	No*	No
410390038003	Unassigned	Yes	No	Yes	Yes*	No
410390038004	Unassigned	Yes	No	Yes	Yes*	No**
410390038005	Vulnerable	Yes	Yes	Yes	No*	No**
410390039001	Early Gentrification	Yes	Yes	Yes	Yes*	No
410390039002	Vulnerable	Yes	Yes	Yes	No**	Yes
410390039003	Vulnerable	Yes	Yes	Yes	No	No
410390040001	Early Gentrification	Yes	Yes	Yes	Yes*	No
410390042002	Vulnerable	Yes	Yes	Yes	No	No
410390042003	Early Gentrification	Yes	Yes	Yes	Yes	No
410390044033	Active Gentrification	Yes	Yes	Yes	Yes*	Yes
410390045011	Unassigned	Yes	No	Yes	No	No
410390045012	Unassigned	No	No	Yes	No	Yes
410390045021	Unassigned	Yes	No	Yes	No	Yes
410390045022	Unassigned	Yes	No	Yes	No	No
410390045023	Vulnerable	Yes	Yes	Yes	No	Yes
410390046001	Unassigned	No	No	Yes	Yes	No
410390048003	Vulnerable	Yes	Yes	Yes	No*	Yes**
410390049002	Unassigned	Yes	No	Yes	No	No

* Given suppressed census data, this is based on only **two** available indicators

* Given suppressed census data, this is based on only **three** available indicators

Far West 11th Avenue Suitable CFA
Demographic Profile

Demographic Profile for the Far West 11th Ave Suitable CFA (2015-2019 ACS Data by Census block group)					
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups			Eugene
		410390010022	410390025041	410390043002	
Income	Percentage of Low-Income Households	65%	26%	57%	46%
	Median Household Income	\$ 26,734	\$ 68,160	\$ 44,937	\$ 50,962
Vulnerable People	Percent BIPOC	16%	9%	33%	22%
	Percent LEP Households	2%	0%	2%	2%
	Percent People with Disabilities (by tract)	14%	14%	23%	14%
	Percent Single Parent Households	7%	38%	4%	6%
	Percent People 65 and Older	31%	2%	7%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	57%	0%	2%	37%
	Percent Housing Built before 1970	42%	12%	40%	35%
Active Housing Market	Median Gross Rent	\$ 746	Data suppressed	\$ 1,159	\$ 1,031
	Median Home Value	\$ 462,300	\$ 235,100	\$ 151,700	\$ 288,600
Other	Percent Renter Occupied Units	61%	16%	34%	52%
	Percent Bachelors or More	31%	33%	5%	42%

Demographic Change for the Far West 11th Ave Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)					
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups			Eugene
		410390010022	410390025041	410390043002	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 762	Data suppressed	\$ 960	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	-2%	Data suppressed	21%	10%
	Median Home Value (in 2019 dollars)	\$ 356,548	\$ 286,285	\$ 135,515	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	30%	-18%	12%	6%
Demographic Shift	Median Household Income	\$ 25,755	\$ 127,469	\$ 32,918	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	4%	-47%	36%	10%
	Percent BIPOC	14%	23%	22%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	13%	-64%	46%	24%
	Percent Bachelors or More	19%	39%	11%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	62%	-14%	-55%	5%
	Percent Renter Occupied Units	64%	6%	32%	49%
<i>Change from 2008-2012 to 2015-2019</i>	-4%	177%	7%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390010022	Vulnerable	Yes	Yes	Yes	No	Yes
410390025041	Unassigned	No	No	No	No*	No
410390043002	Early Gentrification	Yes	Yes	Yes	Yes	No

* Given suppressed census data, this is based on only two available indicators

Ferry Street Bridge Suitable CFA
Demographic Profile

Demographic Profile for the Ferry Street Bridge Suitable CFA (2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups						Eugene	
		410390030002	410390030003	410390031012	410390031021	410390031022	410390031023		410390031024
Income	Percentage of Low-Income Households	54%	27%	26%	53%	13%	78%	58%	46%
	Median Household Income	\$ 43,243	\$ 89,845	\$ 61,020	\$ 42,540	\$ 78,344	\$ 20,457	\$ 30,928	\$ 50,962
Vulnerable People	Percent BIPOC	17%	5%	9%	37%	25%	44%	35%	22%
	Percent LEP Households	3%	0%	3%	0%	0%	26%	12%	2%
	Percent People with Disabilities (by Census Tract)	16%	16%	13%	12%	12%	12%	12%	14%
	Percent Single Parent Households	13%	0%	13%	0%	6%	9%	9%	6%
	Percent People 65 and Older	30%	28%	14%	27%	14%	2%	11%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	46%	8%	19%	61%	11%	99%	80%	37%
	Percent Housing Built before 1970	12%	79%	55%	41%	50%	1%	5%	35%
Active Housing Market	Median Gross Rent	\$ 1,068	\$ 1,125	\$ 1,174	\$ 946	\$ 1,315	\$ 1,076	\$ 1,155	\$ 1,031
	Median Home Value	\$ 417,000	\$ 359,900	\$ 288,200	\$ 357,700	\$ 288,200	Data suppressed	\$ 381,800	\$ 288,600
Other	Percent Renter Occupied Units	51%	16%	45%	44%	30%	100%	81%	52%
	Percent Bachelors or More	48%	61%	33%	41%	53%	53%	49%	42%

Demographic Change for the Ferry Street Bridge Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups						Eugene	
		410390030002	410390030003	410390031012	410390031021	410390031022	410390031023		410390031024
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 953	\$ 1,030	\$ 1,213	\$ 837	\$ 1,445	\$ 882	\$ 1,126	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	12%	9%	-3%	13%	-9%	22%	3%	10%
	Median Home Value (in 2019 dollars)	\$ 429,372	\$ 326,929	\$ 317,241	\$ 359,444	\$ 291,296	\$ 11,134	\$ 404,318	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	-3%	10%	-9%	0%	-1%	Data suppressed	-6%	6%
Demographic Shift	Median Household Income	\$ 67,289	\$ 70,517	\$ 56,876	\$ 104,023	\$ 67,489	\$ 11,520	\$ 12,746	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	-36%	27%	7%	-59%	16%	78%	143%	10%
	Percent BIPOC	4%	15%	40%	7%	30%	31%	25%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	294%	-69%	-77%	428%	-16%	43%	39%	24%
	Percent Bachelors or More	53%	37%	31%	56%	43%	11%	43%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-8%	64%	8%	-27%	22%	384%	14%	5%
	Percent Renter Occupied Units	61%	30%	45%	26%	31%	97%	77%	49%
<i>Change from 2008-2012 to 2015-2019</i>	-17%	-46%	-1%	69%	-4%	3%	5%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390030002	Early Gentrification	Yes	Yes	Yes	Yes	No
410390030003	Unassigned	No	Yes	Yes	Yes	Yes
410390031012	Unassigned	No	Yes	Yes	No	Yes
410390031021	Vulnerable	Yes	Yes	Yes	No	No
410390031022	Unassigned	No	Yes	Yes	No	Yes
410390031023	Active Gentrification	Yes	Yes	Yes	Yes*	Yes
410390031024	Vulnerable	Yes	Yes	Yes	No	No

* Given suppressed census data, this is based on only two available indicators

Franklin/Walnut Suitable CFA
Demographic Profile

Demographic Profile for the Franklin/Walnut Suitable CFA (2015-2019 ACS Data by Census block group)			
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Group	Eugene
		410390037001	
Income	Percentage of Low-Income Households	72%	46%
	Median Household Income	\$ 23,926	\$ 50,962
Vulnerable People	Percent BIPOC	27%	22%
	Percent LEP Households	5%	2%
	Percent People with Disabilities (by Census Tract)	8%	14%
	Percent Single Parent Households	0%	6%
	Percent People 65 and Older	1%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	71%	37%
	Percent Housing Built before 1970	32%	35%
Active Housing Market	Median Gross Rent	\$ 999	\$ 1,031
	Median Home Value	\$ 425,600	\$ 288,600
Other	Percent Renter Occupied Units	89%	52%
	Percent Bachelors or More	77%	42%

Demographic Change for the Franklin Walnut Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)			
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Group	Eugene
		410390037001	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 919	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	9%	10%
	Median Home Value (in 2019 dollars)	\$ 458,881	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	-7%	6%
Demographic Shift	Median Household Income	\$ 11,302	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	112%	10%
	Percent BIPOC	14%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	90%	24%
	Percent Bachelors or More	83%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-7%	5%
	Percent Renter Occupied Units	75%	49%
<i>Change from 2008-2012 to 2015-2019</i>	19%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390037001	Vulnerable	Yes	Yes	Yes	No	No

* Given suppressed census data, this is based on only two available indicators

Highway 99 Suitable CFA
Demographic Profile

Demographic Profile for the Highway 99 Suitable CFA (2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups				Eugene
		410390026002	410390043001	410390043002	410390043004	
Income	Percentage of Low-Income Households	59%	72%	57%	36%	46%
	Median Household Income	\$ 37,509	\$ 28,839	\$ 44,937	\$ 80,995	\$ 50,962
Vulnerable People	Percent BIPOC	30%	30%	33%	26%	22%
	Percent LEP Households	0%	1%	2%	0%	2%
	Percent People with Disabilities (by Census Tract)	19%	23%	23%	23%	14%
	Percent Single Parent Households	9%	6%	4%	16%	6%
	Percent People 65 and Older	23%	28%	7%	17%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	3%	54%	2%	0%	37%
	Percent Housing Built before 1970	28%	41%	40%	87%	35%
Active Housing Market	Median Gross Rent	\$ 1,547	\$ 762	\$ 1,159	\$ 1,098	\$ 1,031
	Median Home Value	\$ 160,900	\$ 190,400	\$ 151,700	\$ 180,900	\$ 288,600
Other	Percent Renter Occupied Units	24%	69%	34%	25%	52%
	Percent Bachelors or More	10%	17%	5%	11%	42%

Demographic Change for the Highway 99 Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups				Eugene
		410390026002	410390043001	410390043002	410390043004	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 1,126	\$ 648	\$ 960	\$ 1,095	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	37%	18%	21%	0%	10%
	Median Home Value (in 2019 dollars)	\$ 168,921	\$ 167,473	\$ 135,515	\$ 189,966	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	-5%	14%	12%	-5%	6%
Demographic Shift	Median Household Income	\$ 45,126	\$ 30,910	\$ 32,918	\$ 64,282	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	-17%	-7%	36%	26%	10%
	Percent BIPOC	11%	25%	22%	28%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	163%	17%	46%	-6%	24%
	Percent Bachelors or More	20%	15%	11%	13%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-51%	16%	-55%	-18%	5%
	Percent Renter Occupied Units	24%	59%	32%	25%	49%
<i>Change from 2008-2012 to 2015-2019</i>	-1%	16%	7%	0%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390026002	Unassigned	Yes	Yes	No	No	No
410390043001	Vulnerable	Yes	Yes	Yes	No	No
410390043002	Early Gentrification	Yes	Yes	Yes	Yes	No
410390043004	Unassigned	No	Yes	Yes	No	Yes

* Given suppressed census data, this is based on only two available indicators

Santa Clara Station Suitable CFA
Demographic Profile

Demographic Profile for the Santa Clara Station Suitable CFA (2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups						Eugene
		410390023011	410390024041	410390024042	410390027001	410390028001	410390028002	
Income	Percentage of Low-Income Households	47%	29%	38%	36%	55%	39%	46%
	Median Household Income	\$ 52,070	\$ 67,781	\$ 51,124	\$ 80,585	\$ 43,311	\$ 51,027	\$ 50,962
Vulnerable People	Percent BIPOC	17%	13%	18%	29%	26%	27%	22%
	Percent LEP Households	1%	6%	0%	0%	0%	0%	2%
	Percent People with Disabilities (by Census Tract)	17%	19%	19%	16%	15%	15%	14%
	Percent Single Parent Households	19%	9%	12%	15%	19%	7%	6%
	Percent People 65 and Older	15%	20%	20%	15%	12%	16%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	22%	5%	25%	8%	51%	19%	37%
	Percent Housing Built before 1970	38%	59%	62%	62%	42%	74%	35%
Active Housing Market	Median Gross Rent	\$ 1,031	\$ 1,473	\$ 1,093	\$ 1,284	\$ 1,191	\$ 972	\$ 1,031
	Median Home Value	\$ 268,300	\$ 258,800	\$ 226,600	\$ 214,400	\$ 220,200	\$ 239,400	\$ 288,600
Other	Percent Renter Occupied Units	44%	28%	45%	40%	67%	37%	52%
	Percent Bachelors or More	35%	33%	22%	19%	13%	28%	42%

Demographic Change for the Santa Clara Station Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)

Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups						Eugene
		410390023011	410390024041	410390024042	410390027001	410390028001	410390028002	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 972	\$ 891	\$ 1,092	\$ 1,099	\$ 852	\$ 794	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	6%	65%	0%	17%	40%	22%	10%
	Median Home Value (in 2019 dollars)	\$ 197,983	\$ 244,306	\$ 223,372	\$ 234,507	\$ 207,894	\$ 235,286	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	36%	6%	1%	-9%	6%	2%	6%
Demographic Shift	Median Household Income	\$ 30,323	\$ 60,997	\$ 62,262	\$ 53,822	\$ 35,557	\$ 51,646	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	72%	11%	-18%	50%	22%	-1%	10%
	Percent BIPOC	17%	12%	21%	19%	21%	8%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	-2%	5%	-14%	54%	23%	247%	24%
	Percent Bachelors or More	13%	18%	19%	19%	19%	28%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	176%	88%	19%	0%	-31%	1%	5%
Percent Renter Occupied Units	61%	21%	45%	38%	62%	32%	49%	
<i>Change from 2008-2012 to 2015-2019</i>	-27%	32%	-1%	6%	8%	16%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390023011	Unassigned	No	Yes	Yes	No	Yes
410390024041	Unassigned	No	Yes	Yes	No	Yes
410390024042	Unassigned	No	Yes	Yes	No	Yes
410390027001	Unassigned	No	Yes	Yes	No	No
410390028001	Vulnerable	Yes	Yes	Yes	No	No
410390028002	Unassigned	No	Yes	Yes	No	No

* Given suppressed census data, this is based on only two available indicators

South Willamette Suitable CFA
Demographic Profile

Demographic Profile for the South Willamette Suitable CFA (2015-2019 ACS Data by Census block group)									
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups							Eugene
		410390038003	410390045011	410390047001	410390047003	410390047004	410390051001	410390052001	
Income	Percentage of Low-Income Households	89%	62%	48%	35%	39%	64%	28%	46%
	Median Household Income	\$ 29,674	\$ 26,501	\$ 48,153	\$ 51,965	\$ 59,593	\$ 32,386	\$ 107,950	\$ 50,962
Vulnerable People	Percent BIPOC	21%	15%	7%	13%	13%	17%	3%	22%
	Percent LEP Households	0%	4%	0%	1%	0%	5%	0%	2%
	Percent People with Disabilities (by Census Tract)	10%	12%	13%	13%	13%	16%	12%	14%
	Percent Single Parent Households	3%	3%	0%	8%	7%	14%	0%	6%
	Percent People 65 and Older	0%	15%	10%	25%	12%	11%	30%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	81%	75%	39%	11%	39%	29%	31%	37%
	Percent Housing Built before 1970	40%	74%	64%	81%	47%	63%	55%	35%
Active Housing Market	Median Gross Rent	\$ 918	\$ 764	\$ 1,344	\$ 1,083	\$ 1,085	\$ 923	Data suppressed	\$ 1,031
	Median Home Value	Data suppressed	\$ 409,000	\$ 436,500	\$ 385,800	\$ 247,100	\$ 260,600	\$ 361,800	\$ 288,600
Other	Percent Renter Occupied Units	100%	75%	54%	42%	73%	65%	46%	52%
	Percent Bachelors or More	30%	64%	72%	57%	57%	39%	79%	42%

Demographic Change for the South Willamette Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)									
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups							Eugene
		410390038003	410390045011	410390047001	410390047003	410390047004	410390051001	410390052001	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 762	\$ 768	\$ 1,042	\$ 1,023	\$ 709	\$ 899	\$ 1,036	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	21%	-1%	29%	6%	53%	3%	Data suppressed	10%
	Median Home Value (in 2019 dollars)	Data suppressed	\$ 347,874	\$ 399,530	\$ 459,549	\$ 295,416	\$ 247,535	\$ 335,169	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	Data suppressed	18%	9%	-16%	-16%	5%	8%	6%
Demographic Shift	Median Household Income	\$ 11,600	\$ 42,877	\$ 35,371	\$ 71,149	\$ 24,532	\$ 40,306	\$ 56,129	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	156%	-38%	36%	-27%	143%	-20%	92%	10%
	Percent BIPOC	16%	13%	8%	2%	6%	5%	8%	22%
	<i>Change from 2008-2012 to 2015-2019</i>	31%	12%	-14%	472%	107%	222%	-63%	24%
	Percent Bachelors or More	56%	69%	67%	69%	51%	54%	66%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-46%	-8%	8%	-18%	11%	-28%	21%	5%
Demographic Shift	Percent Renter Occupied Units	100%	70%	71%	33%	72%	63%	53%	49%
	<i>Change from 2008-2012 to 2015-2019</i>	0%	8%	-24%	26%	1%	3%	-13%	5%

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390038003	Unassigned	Yes	No	Yes	Yes*	No
410390045011	Unassigned	Yes	No	Yes	No	No
410390047001	Unassigned	Yes	No	Yes	Yes	Yes
410390047003	Unassigned	No	Yes	Yes	No	No
410390047004	Unassigned	No	No	Yes	No	Yes
410390051001	Vulnerable	Yes	Yes	Yes	No	No
410390052001	Unassigned	No	No	Yes	Yes*	Yes

* Given suppressed census data, this is based on only two available indicators

West 11th Avenue Suitable CFA
Demographic Profile

Demographic Profile for the West 11th Suitable CFA (2015-2019 ACS Data by Census block group)						
Indicator Set	Indicator (2015-2019 ACS 5-Year Estimates)	Census Block Groups				Eugene
		410390043002	410390044011	410390044012	410390044031	
Income	Percentage of Low-Income Households	57%	52%	45%	61%	46%
	Median Household Income	\$ 44,937	\$ 55,903	\$ 56,789	\$ 30,828	\$ 50,962
Vulnerable People	Percent BIPOC	33%	35%	33%	54%	22%
	Percent LEP Households	2%	2%	0%	0%	2%
	Percent People with Disabilities (by Census Tract)	23%	19%	19%	15%	14%
	Percent Single Parent Households	4%	19%	11%	18%	6%
	Percent People 65 and Older	7%	6%	10%	4%	16%
Older or Multi-Unit Housing	Percent Multi-unit Housing	2%	64%	46%	62%	37%
	Percent Housing Built before 1970	40%	18%	2%	57%	35%
Active Housing Market	Median Gross Rent	\$ 1,159	\$ 973	\$ 1,398	\$ 841	\$ 1,031
	Median Home Value	\$ 151,700	\$ 229,600	\$ 193,200	\$ 159,600	\$ 288,600
Other	Percent Renter Occupied Units	34%	73%	63%	80%	52%
	Percent Bachelors or More	5%	30%	23%	17%	42%

Demographic Change for the West 11th Suitable CFA (2008-2012 compared to 2015-2019 ACS Data by Census block group)						
Indicator Set	Indicator (2008-2012 ACS 5-Year Estimates)	Census Block Groups				Eugene
		410390043002	410390044011	410390044012	410390044031	
Active Housing Market	Median Gross Rent (in 2019 dollars)	\$ 960	\$ 800	\$ 1,004	\$ 816	\$ 933
	<i>Change from 2008-2012 to 2015-2019</i>	21%	22%	39%	3%	10%
	Median Home Value (in 2019 dollars)	\$ 135,515	\$ 207,003	\$ 198,540	\$ 193,863	\$ 272,366
	<i>Change from 2008-2012 to 2015-2019</i>	12%	11%	-3%	-18%	6%
Demographic Shift	Median Household Income	\$ 32,918	\$ 37,173	\$ 50,746	\$ 48,118	\$ 46,239
	<i>Change from 2008-2012 to 2015-2019</i>	36%	50%	12%	-36%	10%
	Percent BIPOC	22%	23%	19%	29%	24%
	<i>Change from 2008-2012 to 2015-2019</i>	46%	50%	76%	89%	-7%
	Percent Bachelors or More	11%	38%	26%	28%	40%
	<i>Change from 2008-2012 to 2015-2019</i>	-55%	-20%	-12%	-37%	5%
	Percent Renter Occupied Units	32%	74%	63%	69%	49%
<i>Change from 2008-2012 to 2015-2019</i>	7%	0%	0%	17%	5%	

Block Group	Area Typology	Indicator Sets				
		Low Income	Vulnerable People	Older or Multi-Unit Housing	Active Housing Market	Demographic Shift
410390043002	Early Gentrification	Yes	Yes	Yes	Yes	No
410390044011	Unassigned	No	Yes	Yes	No	No
410390044012	Unassigned	No	Yes	Yes	No	No
410390044031	Vulnerable	Yes	Yes	Yes	No	No

* Given suppressed census data, this is based on only two available indicators

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 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. 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.

City of Eugene Staff Recommendation:

Existing: The City is already using this strategy. Note any considerations for displacement mitigation potential.

Existing, Investigate Further: The City is using this strategy to an extent, but staff noted opportunities to improve or expand.

Consider Later: This may be a longer term strategy for the City to consider or isn't appropriate/realistic right now, given financial, policy, or other constraints.

Consider Now: The City should consider this strategy for CFAs moving forward. Note any considerations for implementation or necessary vetting/community engagement.






Housing Production Strategy Guidance Document:

To assist cities in the creation and drafting of their Housing Production Strategy Report in compliance to HB 2003, the Department of Land Conservation and Development (DLCD) provided a guidance document of housing production strategies a jurisdiction could employ to facilitate housing production in their community. The document contains a list of strategies assigned by categories. Each strategy includes a brief overview of its intent and purpose as well as a projection of its expected impact by housing tenure and by income bracket. As the jurisdiction prepares a housing production strategy report, the jurisdiction would review the guidance document to select specific strategies that work best for their community and that address their identified Housing Needs. The jurisdiction would simply reference the strategy number when describing the adoption, implementation, and expected magnitude of impact of each strategy in their report. If the jurisdiction has a strategy that is not listed they would propose this under Category Z.

Categories of Tools, Actions, and Policies

The proposed categories contain tools, strategies, or policies that are intended to:

1. Reduce financial and regulatory impediments to develop Needed Housing;
2. Create financial and regulatory incentives for development of Needed Housing;
3. Provide access to local, state, and federal resources; and
4. Allow for local innovation.

Category A		Zoning and Code Changes	These are strategies that a jurisdiction 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.
Category B		Reduce Regulatory Impediments	These strategies address known impediments to providing needed housing. These include but are not limited to zoning, permitting, and infrastructure impediments.
Category C		Financial Incentives	These are a list of financial incentives that jurisdictions can give to developers to encourage them to produce needed housing.
Category D		Financial Resources	These are a list of resources or programs at the local, state and federal level that can provide money for housing projects. The majority of these resources are intended to provide money for affordable housing projects.
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.

<p>Category F</p>		<p>Land, Acquisition, Lease, and Partnerships</p>	<p>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.</p>
<p>Category Z</p>		<p>Custom Options</p>	<p>Any other Housing Production Strategy not listed in Categories A through F that the jurisdiction wishes to implement will be outlined in this section and numbered accordingly.</p>

Housing Equity Impact and Mitigating Measures

In the Spring of 2021 DLCD partnered with Portland State University to create an anti-displacement and gentrification toolkit. Though not mandatory to use, the toolkit was designed 1) help jurisdictions better measure the pressures of anti-displacement and gentrification in their communities, and 2) direct HPS strategies towards mitigating these pressures as more housing is produced. In the process several additional columns were created to better understand the impact of each strategy when it comes to anti-displacement work. These additional columns are defined as follows:

Housing Equity Impact: DIRECT, (DIRECT), INDIRECT, AND (INDIRECT)

DIRECT strategies for meeting housing equity needs are focused on the 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. A (DIRECT) strategy is one that is specific to affordable housing and/or protected classes and vulnerable populations, but does not actually create housing.

Strategies that allow for more housing overall are INDIRECT; strategies that are oriented towards smaller units or diverse housing types are (INDIRECT) - 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.

Neighborhood Typology:

The toolkit establishes a methodology for cities to categorize census tracts based on where gentrification and displacement pressures have already occurred or may occur in the future. These six Neighborhood Typologies (Affordable and Vulnerable, Early Gentrification, Active Gentrification, Late Gentrification, Becoming Exclusive, and Advance Exclusive) reflect the spatial distribution of housing inequity. Cities should take special consideration of these spatial inequities in the development of their Housing Production Strategies. Some Housing Production Strategies when applied flatly across an entire city result in negative or inequitable outcomes for communities members most at risk of displacement. This section is intended to highlight which strategies may have unintended negative impacts on particular neighborhood typologies. This is not to imply that all Housing Production Strategies will have negative impacts on housing equity - many strategies work without particular concern across any kind of neighborhood. However, some housing production strategies are better suited for particular neighborhood types, and some strategies need special nuance or policy refinement to add special mitigation protections against further potential displacement impacts.

Green: GO use and implement, especially if a tool is useful in this neighborhood type

Yellow: PROCEED CAUTIOUSLY and carefully. This means that a strategy needs to be monitored for impacts and possibly paired with more direct mitigating strategies in this neighborhood type.

Red: STOP AND PLAN. This strategy is highly likely to create displacement pressures and must be paired with mitigation measures in this neighborhood type.

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.

Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Existing, Investigate Further	Some of this was done through the Middle Housing Code Amendments (HB 2001, 2019) and through earlier work. There is an opportunity to do more, starting with an analysis of small, developed lots to understand the extent of the issue in Eugene.	A01	Ensure Land Zoned for Higher Density is not Developed at Lower Densities	This strategy will work on establishing minimum density standards, updating development codes to prohibit new single-family detached housing in high density zones, and allow single-family detached homes in medium density zones only if they meet minimum density or maximum lot size requirements.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Morrow County HNA, 2017	INDIRECT	All	Planning and continued monitoring with attention to displacement in gentrifying areas; add incentives for direct production of equity needs
Existing	Eugene (and Oregon) have made notable progress in reducing barriers to ADUs and other cost-effective housing types. Staff do not see the land use code as a notable barrier for this strategy.	A02	Zoning Changes to Facilitate the Use of Lower-Cost Housing Types	In many cities, towns, and counties, changes to local zoning policies can help to facilitate the development of lower-cost housing types, such as Accessory Dwelling Units (ADU's), manufactured homes, multifamily housing, micro-units, or single-room occupancy developments. Changes to local zoning policies can also help to facilitate the development of safe overnight sheltering options for unhoused residents, such as Safe Park programs, Conestoga Hut Micro-shelters, sleeping pod micro-shelters, and others. To increase the likelihood the market can produce lower-cost housing types, it is important to make them allowable as of right in all locations and neighborhoods. If not, still provide flexibility in zoning code to still issue variance or conditional use permits that allow deviations from existing regulations on a case-by-case basis.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	All	Planning and continued monitoring of production vs. needs
Existing, Investigate Further	Existing, but there is an opportunity to do more. In the past, developers have told staff that density and height allowances were not what held back their proposals. Chief obstacles were total cost of construction and process delays/appeal risks. Controlled Income and Rent (CIR) is one of our few density increasing incentives. However, it is rarely used effectively. There is an opportunity to investigate what other levers exist within the code or otherwise that could be used to create a density/height bonus.	A03	FAR, Density, or Height Bonuses for Affordable Housing	FAR, density, and height bonuses for affordable housing developments. Note: FAR/density bonuses do not work if there is not adequate height to make additional development feasible.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	Early Gentrification Active Gentrification Late Gentrification	These tools work best in strong markets; have a medium impact on displacement
Consider Later	Do not recommend at this time.	A04	Housing Rehabilitation Codes	Housing rehabilitation codes (or rehab codes) are building codes designed to reduce the costs of renovating and rehabilitating existing buildings, thereby facilitating the continued availability and habitability of older rental housing and owner-occupied homes. This is especially helpful to facilitate conversation into multiplex housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	INDIRECT	Early Gentrification Active Gentrification Late Gentrification	Where naturally occurring affordable housing is being lost to rehab; add incentives to maintain affordability to increase anti-displacement impacts
Existing	Eugene has a successful Pre-Approved ADU Program and Plan Library in place. The program minimizes costs for customers by reducing planning/design needs and plan review fees. There may be an opportunity to expand existing ADU incentives to duplexes or increase incentives for ADUs.	A05	Code Provisions for ADUs	ADUs are smaller, ancillary dwelling units located on the same lot as a primary residence. They are typically complete dwellings with their own kitchen, bathroom and sleeping area. Given that ADUs are usually built by individual homeowners with limited experience or financial resources, code provisions can have a significant influence on the feasibility of their development and enable more widespread production. For example, easing occupancy requirements, allowing more ADUs on a lot, and expanding maximum size requirements. Certain building and development code regulations can inadvertently drive up ADU construction costs. More flexibility in siting, design, construction and lower fees are also needed to achieve feasibility in many cases.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of the Dalles Housing Strategy Report (2017)	(INDIRECT)	All	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
Existing	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.	A06	Broaden the Definition of Housing Type	Broaden the definition of "housing unit" to allow for more flexibility across use types. For example, SROs are not always allowed in certain residential zones. Including them in the definition of housing unit, or broadening the set of uses allowed across all residential districts, would allow for greater flexibility of housing type.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Affordable & Vulnerable Early Gentrification Active Gentrification Late Gentrification Exclusive	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering
Consider Now	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.	A07	Allow for Single Room Occupancy in Residential Zones	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification Late Gentrification Exclusive	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering
Consider Later	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, potentially to include cottage clusters. There are some changes needed at the state level to ensure support and legally sound standing regarding common/community sewer.	A08	Promote Cottage Cluster Housing	Cottage clusters are groups of relatively small homes typically oriented around shared common grounds with 4-14 homes typically between 1,000-1200 square feet in size. By further defining cottage cluster design and development standards, housing code can effectively address a predictable process for developers, and potentially encourage greater production for this housing type. Some examples may include: allowing for a wide range of sizes and attached/detached options for housing; not specifying ownership structure so that both renters/owners can live on the same cluster; ensuring that minimum site size, setbacks and building coverage requirements do not prohibit cottage cluster development on smaller lots; draft design requirements that ensure neighborhood compatibility, and efficient use of land, but are not so specific as to restrict the ability to adapt to varying neighborhood contexts. Other ideas include: uniformed codes, form-based codes, and allowing shared underground infrastructure when practical (e.g., sewer lines from each cottage can connect to one main that runs out to street, rather than 8 parallel lines out to street).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of the Dalles Housing Strategy Report, April 2017	(INDIRECT)	All	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
Existing, Investigate Further	Existing. The City is currently monitoring the impact of new regulations and will implement additional changes as needed.	A09	Short-Term Rentals Regulations	Short-term rentals can be seen as an investment strategy for small investors, but can also remove rental housing supply from the market, in effect driving up rent from the local housing market. To avoid this effect, regulations can include definitions for various forms of short-term rentals, defining use, and occupancy standards, and even adding limits to the number of days that a short term rental can be in operation in order to mitigate their impact on the local housing market. Short Term Rental Regulation should begin with include registration requirements for all short term rentals.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Morrow County HNA, 2017	DIRECT	All	High impact on displacement especially in hot neighborhoods
Consider Later	The Intergovernmental Housing Policy Board studied this when Inclusionary Zoning was authorized by Oregon law, and found it not a good fit for Eugene at the time. This could be revisited as state laws are adjusted and other cities continue implementation.	A10	Inclusionary Zoning	Requiring that a portion of the units within a market rate development be set aside as affordable housing. This tool will often be combined with property tax exemptions, fee waivers, or development bonuses to offset the cost of affordable housing units. Careful consideration should be employed when enacting inclusionary zoning. Note: A number of studies, including those analyzing the IZ Ordinance in Portland, have shown that IZ suppresses, rather than increases, the creation of new housing. Given that, if IZ is proposed, the financial components need to be calculated right to ensure that the inclusionary rate is not too high for the offsets provided and that overall housing production increases as a result.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	Active Gentrification Late Gentrification	These tools work best in strong markets; have a medium impact on displacement; they pair with incentives that can be customized to context for maximum overall impact
Existing	No additional notes.	A11	Add Restrictive Covenants to Ensure Affordability	Adding restrictive covenants to ensure affordability over time at a certain income level for affordable housing developments. Restrictive covenants are usually placed on a property in exchange for a local or state government providing financial contribution to the project. These covenants work best over the short-term (up to 30 years); after that they become unable to accommodate changed circumstances.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	Strong tool for subsidized housing preservation in all markets
Consider Later	Staff are interested in understanding and investigating this issue further, depending on the depth of potential impacts.	A12	Align Lot Division Density with Zoning Density	Sometimes there are conflicting regulations between the density that is allowed by the zoning code versus the density that is allowed when lot division (for fee-simple lots) is considered. This can cause unintentional reductions in density, only caused by the fact that the developer would like to create for-sale housing on fee-simple lots. Ideally, the densities would be aligned, so there is not a density reduction between - condominium versus fee-simple developments.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	All	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Consider Later	Staff do not seem immediate value for this tool in Eugene.	A13	FAR & Density Transfer Provisions	Enable and encourage Transfer of Development Rights (TDR) to maximize available Floor Area Ratio (FAR) provided public benefit (e.g., historic preservation & affordable housing) are attained and covenants ensure long term benefit. This strategy assumes that there are adequate, realistic, and relatively easy receiving areas for TRDs.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	Early Gentrification Active Gentrification Late Gentrification	These tools work best in strong markets; have a medium impact on displacement when paired with affordability tools
Consider Now	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.	A14	Re-examine Requirements for Ground-floor Retail/Commercial	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 (e.g., affordable housing).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Bend	INDIRECT	All	--
Consider Later	This could be an interesting tool to implement. Further discussion and information is needed.	A15	Encourage Diverse Housing Types in High-Opportunity Neighborhoods	Enable developments that support multiple unit sizes, types, and tenure options to promote diverse housing options in high-opportunity neighborhoods. With a goal of reversing historical patterns of racial, ethnic, cultural and socio-economic exclusion. Use an analysis of "Access to Opportunity" to decide which zones or locations (via zoning overlay) to determine where this is appropriate. Goal is to promote access to opportunity (e.g., high performing schools, multiple transportation options, services, etc.) to households with a range of backgrounds and incomes. The jurisdiction could pare this strategy with a robust program of incentives (e.g., deeper financial incentives, greater range of housing types, more regulatory waivers, etc.) to be made available in these areas than in other areas of the city.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Late Gentrification Exclusive	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Consider Later	The Intergovernmental Housing Policy Board studied this option many years ago. At that time, there was concern about spot zoning and takings. It may be more impactful to look into ways to purchase parks.	A16	Manufactured Housing Community Preservation Zone	Change the zoning of existing manufactured housing communities to be preserved to a single-use zone that only allows manufactured housing communities. Consider lifting restrictions of stick-built homes in cooperatively-owned and other manufactured homes.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland Mfd Dwelling Park Amendment	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	Planning and monitoring for potential displacement; may need additional incentives and programs in active gentrification for higher impact
Consider Later	Given recent Middle Housing Code Amendments, staff were uncertain of the impacts of this change. Staff will track implementation in Bend.	A17	Small Dwelling Unit Developments	Allow a land division where small lots or parcels are created below the standard lot/parcel size for dwelling units that are limited in size. Calculate density differently for the dwelling units due to their limited size. Density example: a. Dwelling units 600 square feet or smaller: 0.25 of a dwelling unit. b. Dwelling units 601 to 1,200 square feet: 0.50 of a dwelling unit.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Bend	(INDIRECT)	All	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
Consider Now	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.	A18	Increase Density near Transit Stations and Regional Multi-use Trails	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Affordable & Vulnerable Early Gentrification Active Gentrification Late Gentrification Exclusive	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
Consider Later	Staff indicated that it is simpler to control density by plan designation and zoning. Both state funding and best practices for Affordable Housing support locating housing near services, transit, etc.	A19	High Density Requirements for to-be-Annexed Land	Requiring a certain portion of to-be-annexed land to include a percentage of high density. Be careful that this strategy is not used as a way for low density areas in high-infrastructure locations to shirk responsibility to upzone.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Newberg	INDIRECT	All	Planning and continued monitoring for housing needs; add incentives for direct production of equity needs

Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Consider Now	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.	A20	Pre-Approved Plan Sets for Middle Housing Typologies	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	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
Existing	Eugene already has a successful Pre-Approved ADU Program that includes a dozen, pre-approved plan sets created by local designers.	A21	Pre-Approved Plan Sets for ADUs	Provide a pre-approved set of plans for ADU designs (6-10 sizes/configurations) that, if chosen by a developer/owner, would lead to automatic approvals and reduced permitting schedule. Plans would reduce the need for architectural costs and reduce barriers to entry.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	ADUs have a medium impact on preventing displacement, with planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Existing, Investigate Further	Eugene already allows a mix of housing, especially with recent Middle Housing Code Amendments. There may be an opportunity to explore incentives for a mix of housing in the future.	A22	Mixed Housing Types in Planned Unit Developments	Require or incentive a mix of housing types within Residential Planned Unit Developments (PUD).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Forest Grove	INDIRECT	All	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
Consider Later	Expedited plan review for various permit types would require leadership considerations for increased personnel resources and/or re-prioritizing of project types. COE has short permitting time lines so a baseline would need to be established that reflects what does "expedited" mean.	A23	Accessible Design	Provide incentives in the development code to increase the number of units designed to meet Universal Design, Lifelong Housing Certification, and other similar standards. Examples of incentives include: expedited review and permitting processing, planning and building fee reductions, system development charge deferrals, density or building height bonuses.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	Directly addresses equitable housing need
Consider Later	From the building code and permitting process perspective, typologies listed which are registered by DMV and governed by Oregon Vehicle Code do not require building permits and are not held to building codes standards of 1/2-unit dwellings. May require electrical and plumbing permits	A24	Legalize Alternative Housing Types on Wheels and in Parks	Many smaller housing formats are built on wheels, including tiny homes on wheels (THOWs), park model homes, and recreational vehicles (RVs), providing occupants significant flexibility in where they site their homes, yet many local codes prohibit the siting of these housing types outside of manufactured home parks and RV parks. Permitting these housing types, with appropriate siting standards to ensure adequate public facilities access and life/safety, can provide additional permanent or interim housing options outside of parks. Allowing broader siting of RV parks and amending standards to allow THOWs, park model homes, and other housing types on wheels can also provide additional siting opportunities.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Tiny House on Wheels (THOWS) - City of Portland	(INDIRECT)	All	--
Consider Later	No additional notes.	A25	Legalize and Encourage Tiny Homes and Villages	The Oregon Reach Code, Part II, defines a "tiny house" as a dwelling that is 400 square feet or less in floor area, excluding lofts. While many (though not all) jurisdictions allow tiny homes to be sited as a primary or accessory dwelling, few encourage their development through regulatory incentives. Legalizing the siting of tiny homes as primary or accessory dwellings through the removal of minimum unit size requirements can enable the development of this housing type. Jurisdictions can encourage the development of tiny houses and tiny house villages by providing regulatory incentives – such as reductions in required off-street parking or open space – for units less than 400 SF in floor area	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--
Consider Now	Building Plan Review Team suggested this idea.	Z	Clarify Housing Terms in the Code	Reconcile the terms used in City of Eugene Land Use Code and the Building Code; at minimum, provide a legend for understanding/eliminate confusion.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--
Consider Now	Building Plan Review Team suggested this idea.	Z	Special Project Plan Review Process	Work with Building and Permit Services representatives to create a "special project" conditions framework for quick review times or non-traditional code compliance review such as "in-person/on-site review" with the "paperwork/plans" to follow in more of an "as-built/as-approved" condition for very specific emergency housing such as Safe-Sleep-Sites - not all housing types.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--
Consider Now	Building Plan Review Team suggested this idea.	Z	Small Home Specialty Code Revisions	Lobby the Building Codes Division to remove sprinkler requirement for the Small Home Specialty Code, established by ORS 455, requires that the 2018 International Residential Code (un-amended by Oregon), including but not limited to Appendix Q, be used for the design and construction of small homes. Statute defines a "small home" as a single-family residence that is not more than 400 square feet in size. (*will require automatic sprinkler system per R313.2 in accordance with Section P2904 or NFPA 13D)	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--

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.

Staff Recommendation	Other Notes	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Existing	As a part of CFEC Parking Reform, the City of Eugene removed minimum off-street parking requirements city-wide, effective December 31, 2023.	B01	Remove or Reduce Minimum Parking Requirements	Removing parking requirements for residential uses provides the opportunity to reduce the amount of lot area used for pavement and provides more space for housing and open space. This strategy offers greater flexibility to site housing and reduces costs associated with providing parking. Allow developers to respond to market demands and transit access without having the burden of parking minimums. Consider removing parking requirements near transit or for affordable housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Tigard	INDIRECT	All	--
Existing, Investigate Further	This was partially addressed through the Middle Housing Code Amendments. There may be more code impediments to be addressed, but would require further analysis.	B02	Remove Development Code Impediments for Conversions	Streamlining the conversion of larger single-family homes into multi-unit dwellings (e.g., duplex or triplex). This should be aligned with reduced off-street parking requirements, so that conversion doesn't trigger the need to add additional driveways (or isn't halted by inability to add additional driveways).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Tigard	(INDIRECT)	Early Gentrification Active Gentrification	Conversions that upgrade and upscale may displace through broader neighborhood changes; conversions that create more rental and moderate cost housing may stabilize
Existing, Investigate Further	In Eugene, all housing is considered needed housing. There may be an opportunity to expedite permitting for income-qualified affordable housing. From permit processing - Expedited plan review for various permit types would require leadership considerations for increased personnel resources and/or re-prioritizing of project types. COE has short permitting time lines so a baseline would need to be established that reflects what does "expedited" mean. Eugene already assigns Project Coordinators to be a primary direct City contact for applicants and internally track permit progress.	B03	Expedite Permitting for Needed Housing Types	Expedited permitting will help to reduce costs of development of Needed Housing as identified by the City. Consider projects with direct or indirect funding from local government as essential and projects with long term affordability covenants through tax abatement or inclusionary requirements as high priority and/or only expedite housing according to the jurisdictions identified needed housing types. Local governments might also consider assigning a designating staff to shepherd projects through the construction process in order to expedite process.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland (direct funding only)	(INDIRECT)	All	--
Existing	No additional staff notes.	B04	Expedite Lot Division for Affordable Housing	Expedite lot divisions and subdivisions for affordable housing projects	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	--
Existing, Investigate Further	Eugene has made notable progress in this regard, including through the establishment of Middle Housing Land Divisions. There may be additional regulatory barriers to explore and address.	B05	Reduce Regulatory Barriers to Lot Division	Remove barriers such as minimum street frontage, driveway requirements, etc., that impact minimum lot size/density during lot division. Preferably allow by-right lot division up to max number of units allowed.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	Increased density in gentrifying neighborhoods may not serve to stabilize; add incentives and programs to target affordability and increase impact
Existing, Investigate Further	The City completed a formal review of the entire permitting process in 2015. There is likely a need to complete another holistic review.	B06	Streamline Permitting Process	In some cities, towns, and counties, the process associated with obtaining approval for new construction is so time-consuming or costly that it dampens the amount of new development and adds significantly to its costs. To help streamline the process, cities, towns and counties can initiate a comprehensive review of all steps in the development approval process to identify the factors that most significantly suppress new residential construction and redevelopment. With a clearer picture of the obstacles, local leaders can then begin to assess whether they can be reduced or eliminated to stimulate development activity. In doing the comprehensive review, it is critical that actual timeline performance be evaluated not just the planned timeline.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	INDIRECT	All	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Consider Now	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.	B07	Flexible Regulatory Concessions for Affordable Housing	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 buildings.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Morrow County HNA, 2017	(DIRECT)	All	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering
Consider Later	Staff had concerns about this approach and would need to investigate the impacts further. Waiving key infrastructure elements (especially those that impact accessibility/transportation) could cause projects to be less competitive for state or federal funding. There is some history of doing phased infrastructure for income qualified projects in Eugene.	B08	Waive Off-Site Infrastructure Requirements for Needed or Affordable Housing	Waive infrastructure build-out requirements for infill affordable or needed housing projects constructed in neighborhoods without a network of those amenities currently. Example: Waive requirements for curb, gutter and sidewalk build-out on the lot if it is located in an area without either connecting curb, gutter, and sidewalk currently or viable plans for funding infrastructure construction within the next decade. This is especially relevant in smaller, more rural locations.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Clackamas County Housing Report	(INDIRECT)	All	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Existing	Capital Improvement Planning team members are actively involved in urban growth planning and housing planning efforts.	B09	Capital Improvements Programming (CIP)	Programming work in a Capital Improvements Programming (CIP) so that projects are constructed sooner to support development of middle housing or to open up more land in an Urban Growth Boundary (UGB) for development of middle housing. Coordinate housing planning with CIP work to prioritize those projects that would support development (e.g., new water line, sewer pumping station). If the UGB is amended or the premises on which the CIP were based changed substantially, the CIP should be revised.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	All	--
Existing	No additional staff notes.	B10	Public Facility Planning	Completing water, sewer, and transportation PFPs and getting capital improvement projects (CIP) built so that costs to develop on land zoned for needed housing can be further anticipated and supported. In addition, public utilities planning also allows for more unit capacity, especially in areas that are upzoned for denser housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Tigard City of Bend	INDIRECT	All	--
Existing	There is always an opportunity to do more, but Eugene has demonstrated a pro-housing agenda through strategic planning, the Housing Implementation Pipeline, and other locally-driven efforts in recent years.	B11	Pro-Housing Agenda	Change the culture of Planning / Development Services departments to have a pro-housing agenda for both rental and homeownership. Supplement with fair housing education and education on the supply and demand impact on housing prices. The State could support jurisdictions in this effort by providing an incentive (e.g., funding set-aside) for jurisdictions that adopt aggressive pro-housing policies. In the State of California housing funds are prioritized for cities that adopt pro-housing policies. Though it may be counterintuitive, since this allows anti-housing cities to avoid housing altogether. Alternatively, the State of Oregon could consider a stick rather than carrot approach (e.g., withholding highway funds).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	All	A more focused agenda on affordable housing will address NIMBY and stigma issues with rental housing, affordable housing, and protected classes
Existing	There is always an opportunity to do more, but Eugene has demonstrated a pro-housing agenda through strategic planning, the Housing Implementation Pipeline, and other locally-driven efforts in recent years.	B12	Pro Affordable Housing Agenda	Change the culture of Planning / Development Services departments to have a pro Affordable Housing agenda for both rental and homeownership. Supplement with fair housing education and education on the supply and demand impact on housing prices. The State could support jurisdictions in this effort by providing an incentive (e.g., funding set-aside) for jurisdictions that adopt aggressive pro Affordable Housing policies. This agenda should include a plan to ensure that affordable housing is not suppressed in single-family zones or in wealthier communities. As part of this, encourage departments to look closely at how existing approaches may inadvertently favor one type of tenure over another.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	A pro-affordable housing agenda does not create housing directly; but it is an important component of planning to ensure that equity is achieved. Including Fair Housing and addressing protected classes such as race/ethnicity and national origin will further target this strategy to equitable outcomes

Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Consider Now	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.	B13	Align Bike Parking Requirements with Actual Use	Require bicycle parking requirements more in line with actual use. Example: No more than 1-1.5 bike parking stalls per unit.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	All	--
Consider Now	Development of the Housing chapter of the Envision Eugene Comprehensive Plan is included in the City's Planning Division work plan for 2024-2026.	B14	Adopt Affirmatively Furthering Fair Housing as a Housing Policy in Comprehensive Plan	Amend the comprehensive plan to explicitly make Affirmatively Furthering Fair Housing a Housing Policy. Example below, based on federal guidance on affirmatively furthering fair housing and current state protected classes. Jurisdictions may add additional protected classes, such as ancestry, ethnicity, or occupation. Additionally, a jurisdiction could create an Analysis of Impediments to Fair Housing (AI), even when not required, and conduct fair housing training for Council, Planning Commission, and other relevant policymakers. Jurisdictions would work to make known evidence and best practices in planning, to reverse discrimination and exclusion as well as concentrations of wealth, a required aspect of the comprehensive plan process. Housing Policy x: Affirmatively Furthering Fair Housing [Jurisdiction] affirmatively furthers access to decent, affordable housing with convenient access to the services and destinations Oregonians need to thrive without regard to their race, color, religion, national origin, sex, familial status, mental or physical disability, source of legally-derived income, marital status, sexual orientation or gender identity.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	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
Consider Later	Eugene has made strides in this area in recent years through Middle Housing Code Amendments and the Housing Implementation Pipeline. Education of opposed community members may not be the best use of additional resources, at this time.	B15	Reduce the Power of NIMBYism to stop, slow, change, or reduce affordable housing	Many jurisdictions give communities/neighborhoods too much veto power on both zoning policy, and particular project proposals to keep others who they don't approve of from moving in. Dedicate funds to educate citizens on poverty, exclusion, and racial dynamics. Remove policies that allow neighborhood opposition to evidence based zoning proposals and individual projects. Decisions about what kind and how much housing goes where it needs to be data-driven and focused on equitable outcomes instead of the best outcomes for those with the most money and/or privilege.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	removing policies as a stronger and more direct impact than educating communities.
Consider Later	This may be a part of upcoming urban growth planning, but requires further exploration.	B16	Holistic Planning to Distribute New Density More Equitably	Geography is often at odds with social equity; natural beauty is often in wealthy neighborhoods, as are historic buildings, allowing them to exclude new development and affordable housing. Develop a targeted plan to distribute density within the jurisdiction more equitably to areas with quality schools, access to natural resources etc.. Additionally, work to distribute transit equitably to ensure that exclusionary neighborhoods don't remain that way because they don't offer transit for higher density housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact
Existing	Eugene's land use code already includes limited requirements and provides flexibility. Staff were concerned about the impacts of further reducing requirements.	B17	Reduce on-site Common/Active Open Space Requirements	Remove or reduce requirements for on-site common/active open space. Instead, ensure that adopted Parks plans fully consider the needs of every neighborhood, and that the jurisdiction is actively working toward satisfying those needs.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	Affordable & Vulnerable Early Gentrification	Take care with neighborhoods that are seeking more holistic revitalization to balance non-housing needs with housing production
Consider Later	Eugene does not have a recent, comprehensive review of homeownership impediments, but the Housing Implementation Pipeline does include affordable home ownership unit goals and dedicated funding sources for creating income-qualified home ownership opportunities.	B18	Prioritize Home Ownership	Jurisdictions would develop a comprehensive review of the impediments to the development of homeownership opportunities and actionable steps to remove those impediments. <i>Note: An important impediment to condominium development is the risk associated with the current condominium law in Oregon. A revamp of this law is needed to increase homeownership opportunities that are smaller in size. This would require action at the state level.</i>	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	To ensure access to homeownership to under-represented groups, pair development of owner-occupied housing types with homebuyer education, financial assistance like downpayments and low-cost loans, and affirmative marketing
Consider Later	No additional staff notes.	B19	Survey Applicants on Development Program Decision-Making	Add a section to the city's development application asking developers how they decided on their development program and which public incentives were part of the consideration. This would lead to better information about how to tailor city strategies toward production. An alternative to requiring cities to collect this info, is to consider this approach as part of a production strategy. To be a strategy it needs additional action like logging and making publicly available the aggregated survey information on the city's housing/development/planning webpage or similar. The information could be collected on a form separate from the development application, so it is clear that the additional information is not part of the permit decision.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Housing Production Strategy Technical Advisory Committee	(INDIRECT)	All	--
Consider Now	Housing Policy Team suggested this idea.	Z	Update the Housing Dispersal Policy and codified map	The current 1996 Housing Dispersal Policy and codified map are outdated and do not represent the critical need for dense, affordable housing development.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--

Category C: Financial Incentives

These are a list of financial incentives that cities can offer to developers to encourage them to produce needed housing.

Staff Recommendation	Other Notes	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Consider Now	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.	C01	Reduce or Exempt SDCs for Needed Housing	Reducing, deferring, and/or financing System Development Charges (SDCs) at a low interest rate for needed housing types. This strategy reduces development costs.]	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Tigard	(INDIRECT)	All	Increase impacts by focusing SDC incentives on needed housing types from the equity housing needs analysis
Existing, Investigate Further	This tool is currently used to incentivize ADUs, but could be applied to other housing types.	C02	Modify SDC fee schedules	Updating SDC fee schedule so that is tied to dwelling size. This strategy ensures that smaller dwelling sizes in single and multi-family housing are not disproportionately burdened by fees and therefore encouraged. Consider per square foot fees rather than per dwelling.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Florence	(INDIRECT)	All	Increase impacts by focusing SDC incentives on needed housing types from the equity housing needs analysis
Existing	The City of Eugene offers a 100% reduction of SDCs for ADUs, as well as providing other compact development reductions based on transit-proximity, location, and transportation demand management.	C03	Reduce or Exempt SDCs for ADUs	Waivers/reductions of SDCs for ADU production in order to improve the feasibility of the development. Create a model ordinance for the waiver, or deferment, of SDCs. Scale SDCs based on size, resource efficiency, and access to alternative transportation.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland	(INDIRECT)	Early Gentrification Active Gentrification	In strong market, this can produce more housing units; ADUs have medium anti-displacement impact, can be increased with programs to target affordability and equity
Consider Later	No additional staff notes.	C04	Incentivize Manufactured and Modular Housing	Give Bonus Density Incentives for manufactured and factory built housing. Consider tying bonus to modular housing that demonstrates if housing meets affordability targets of below 120% AMI.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Metro King County RMHP	(DIRECT)	All	--
Existing	No additional staff notes.	C05	Waive or Finance Park Impact Fees for Affordable Housing	A policy providing for the exemption (preferred) or financing park impact fees (helpful) for affordable housing ensures a mix of affordable housing. Financing the fee while still collecting can mitigate the cost of the fee to coincide with the available cash flow of the affordable housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Tualatin Hills Park & Recreation District	(DIRECT)	All	Reduced fees have medium impacts on displacement
Consider Now	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.	C06	Publicly Funded Infrastructure Improvements	Fund off-site improvements for workforce or affordable housing; e.g., street intersection improvements triggered by development.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	Reduced fees have medium impacts on displacement
Consider Later	No additional staff notes.	C07	Reconsider Applying Park SDCs	If there are appropriate levels of parks and open space near the project, these impact fees should not be charged or should be assessed at a much lower rate. They are not general funds to be allocated without a nexus to the development.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Early Gentrification Active Gentrification	Reduced fees have medium impacts on displacement in strong markets; make more impact by targeting to affordable development
Existing, Investigate Further	Staff noted that it would be useful to understand more nuanced differences between ITE calculations for trip generation between housing types, especially as it pertains to attached/detached middle housing.	C08	Transportation SDCs Tied to Parking	Tie transportation SDCs to the number of parking spaces, as the number of parking spaces is a more accurate predictor of the number of trips that will start or end at every development. By tying transportation costs directly to vehicle storage, the system will both be assessing transportation impacts fairly and encouraging alternate modes of transportation.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Early Gentrification Active Gentrification	Reduced fees have medium impacts on displacement in strong markets; make more impact by targeting to affordable development
Consider Now	Staff team recommended this idea.	X	SDC Methodology	Expand SDC expand methodology for calculating transportation modes that are not captured in traditional calculation. Update the Transportation Demand Management and Traffic Impact Analysis processes and procedures to apply to housing in a more meaningful way.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--

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.

Staff Recommendation	Other Notes	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
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Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Existing	The City's CDBG program contributes approximately \$1.4 million in federal grants and loans annually to area nonprofit organizations and other groups to provide services, public facilities and affordable housing for low- and moderate-income residents and neighborhoods.	D01	Community Development Block Grant (CDBG)	CDBG Grants are federal funds set aside in the form of grants to be used to meet national objectives: direct benefit for low and moderate income households; benefit to predominantly low income areas, elimination of slums and blight. Eligible activities include public works infrastructure, community facilities, new housing development, housing rehabilitation, and public services (counseling, social services & microenterprise training, including short-term emergency rent assistance). Eligibility is based upon the levels of low- and moderate-income families that may benefit from services provided by the eligible projects. While Cities can choose not to apply for CDBG, control of whether or not they receive CDBG is ultimately at the Federal level and like the State of Oregon, these funds can be used for things that have little to do with housing, so may have limited impact. A better gauge may be HOW cities use their CDBG; for housing benefit or other.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Tigard City of Eugene City of Beaverton City of Hillsboro City of Gresham City of Portland City of Bend City of Redmond State of Oregon	DIRECT	Affordable & Vulnerable	--
Existing	The City of Eugene utilizes this resource, but more state and federal funding is necessary.	D02	Low Income Housing Tax Credit (LIHTC)	Federal tax provision that encourages private investment in affordable rental housing by providing qualified investors with a dollar-for-dollar reduction in federal income tax liability in exchange for investment in qualifying new construction and rehabilitation projects. LIHTCs may also be paired with Tax Exempt Revenue Bonds.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	Early Gentrification Active Gentrification Late Gentrification	In strong markets, LIHTC can be used to create mixed-income housing that provides cross-subsidy to affordable units; LIHTC can also be combined with additional programs to extend the affordability period for the housing
Existing	The City of Eugene utilizes this federal funding source allocated to states.	D03	Housing Trust Funds	Housing Trust Funds are a flexible source of funding that can be used to support a variety of affordable housing activities. Because they are created and administered at the city, county, region, or state level, housing trust funds are not subject to the restrictions of federal subsidy programs and therefore can be designed specifically to address local priorities and needs. The entity administering the fund determines eligible activities, which can include anything from emergency rent assistance for families facing the threat of eviction or homelessness to gap financing for new construction of affordable housing to repairs for older homeowners.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	All	--
Consider Later	This is an option to explore, but would require a funding source. This type of subsidy would help in long-term, lower loans for Affordable Housing developments.	D04	Operating Subsidies for Affordable Housing Developments	Operating subsidies are payments made annually (or more frequently) to owners of affordable housing developments that make the housing more affordable by covering a portion of the ongoing costs of operating the development.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	All	--
Consider Later	Most of the large employers in Eugene are public agencies. This would require more outreach to understand if employers are interested.	D05	Employer - Assisted Housing Programs	Employer-assisted housing programs provide a channel through which employers can help their employees with the cost of owning or renting a home, typically in neighborhoods close to the workplace. Assistance may be provided in a variety of ways, including through down payment grants or loans that are forgiven over a period of employment, homeownership counseling and education, rental subsidies and, less commonly, direct investment in the construction of rental housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	(INDIRECT)	Early Gentrification Active Gentrification	Employer-assisted housing in areas near transit or near workplaces can support stability and equity, and contribute to a 'pro-housing agenda'.
Existing	The City of Eugene utilizes this funding resource.	D06	HOME Program	HOME is a federal program established by Congress in 1990 that is designed to increase affordable housing for low- and very low-income families and individuals. All States and participating jurisdictions receive HOME funds from HUD each year, and may spend HOME on rental assistance, assistance to homebuyers, new construction, rehabilitation, improvements, demolition, relocation, and limited administrative costs.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Existing, Investigate Further	The City of Eugene has dedicated revenue sources for Affordable Housing including a CET which supports the Affordable Housing Trust Fund. Other revenue sources could be investigated further.	D07	Dedicated Revenue Sources for Affordable Housing	A dedicated revenue source for affordable housing provides an ongoing committed stream of revenue for affordable housing, often deposited into a Housing Trust Fund. This can be helpful in increasing the total funding available for affordable housing. The fund can receive its sources from: Transient Lodging Taxes collected from Short Term Rentals, developer fee and real estate transfer taxes (not constitutional in Oregon).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	All	--
Consider Later	The potential revenue and impact of this tax would be relatively low.	D08	Demolition Taxes	Cities, towns, and counties establish demolition taxes and condo conversion fees as a way to generate revenue and replace affordable housing lost to these activities. The proceeds from both demolition taxes and condo conversion fees are typically deposited in a Housing Trust Fund to support affordable housing activities. To ensure that a demolition tax on residential development does not deter needed redevelopment, this strategy should only be applied if the housing replacement is 1:1. If the proposed development is more dense than the original structure, there should not be a demolition tax.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	INDIRECT	Active Gentrification Late Gentrification Exclusive	Medium impacts to prevent displacement in strong market with lots of demolition and conversion, with impacts in the short term and potential to fund housing. Plan and monitor production vs. needs
Existing	The City of Eugene established a CET in 2019 to support the Affordable Housing Trust Fund.	D09	Construction Excise Tax (CET)	A Construction Excise Tax (CET) is a tax on construction projects that can be used to fund affordable housing. According to state statutes, the tax may be imposed on improvements to real property that result in a new structure or additional square footage in an existing structure.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland City of Eugene City of Sisters	DIRECT	All	Plan and monitor production vs. needs
Existing	Eugene has two urban renewal districts (Downtown and Downtown Riverfront) which support the development of housing affordable to all income levels.	D10	Tax Increment Financing (TIF) Set-Aside	Create a TIF set-aside for affordable housing development programs within designated Urban Renewal Areas (URAs). Target could be to begin setting aside funds for affordable housing projects as a medium-term action, over the next 5 years or so. For example: Portland City Council designates 45% of the gross amount of TIF for designated housing purposes (rental housing for households under 60% of Area Median Income (AMI) and homeownership for households under 80% of AMI).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	The TIF set-aside can fund housing; but it is a financing mechanism that relies on overall property values increasing to create the increment. TIF is associated with gentrification and displacement, especially for people of color. This may be exacerbated by Oregon's restriction of TIF funds to physical development; add community and economic development activities for low-income and POC to support their staying in place as neighborhoods improve
Existing	Housing Choice Vouchers are administered by Homes for Good. The City has no control on use of vouchers.	D11	Flexible Use of Housing Choice Vouchers	Public Housing Authorities have the ability to attach up to 20% of their voucher assistance to specific housing units for each low income housing project, up to 25% of any single project. Project-Based Rental Assistance (PBRA) vouchers provide rental assistance for eligible individuals and families who occupy specific housing units managed by private owners who have entered into agreements with a housing agency. The household pays an established amount to the owner each month (typically approximately 30% of monthly income) and the housing agency pays the balance of the rent due. If public housing authorities include homeownership in their administrative plan, housing vouchers may also be used to facilitate low income homeownership.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	All	--
Consider Later	Housing Choice Vouchers are administered by Homes for Good. The City has no control on use of vouchers.	D12	Targeted Vouchers	Vouchers that target renters at the 60-80% AMI who are often left out of the housing funded by bond funds and other public sources that are focused on lower income levels. Housing Authorities use affordable housing dollars and issue vouchers that are good for one year and pay any landlord the difference between what the tenant can afford and market rent. This takes the reporting burden off the landlord and essentially allows any existing unit to be affordable. Each year the tenant would have to prove to the Housing Authority if they were still income qualified and if not.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Existing	There are some existing loan programs, including the Emergency Home Repair program, Rental Rehab program operated by the City, as well as programs run by the local utility and housing authority.	D13	Low-Interest Loans / Revolving Loan Fund	Housing Repair and Weatherization Assistance for low and moderate income households may be capitalized by Tax Increment Financing (TIF), Community Development Block Grant (CDBG) Funds, or local Housing Trust Funds.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland	DIRECT	All	--
Existing	Lane County provides an eviction prevention program.	D14	Eviction Prevention Programs	Eviction Prevention Programs provide financial assistance to help renters facing eviction stay in their homes. These programs are generally designed for families who are being evicted due to nonpayment of rent during or following an unforeseen crisis, such as job loss or serious illness, rather than those who face more persistent affordability challenges. Jurisdictions may be interested in investing in eviction prevention to address concerns about displacement of low-income renters and also to avoid or reduce use of other more costly local services, like homeless shelters.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification Late Gentrification	Eviction prevention programs have high anti-displacement impacts, in the short-term, and across all markets. They are especially useful in strong markets where there are economic incentives to evict.
Consider Now	The Eugene City Council is exploring funding options, including a bond or levy, to address homelessness, which could include housing production.	D15	Bond - for Resident Support Services and Permanent Supportive Housing Services	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Oregon Metro City of Portland	DIRECT	All	--
Consider Now	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	Following the passage of Measure 102 Oregon local governments, including cities and counties, 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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Oregon Metro City of Portland	DIRECT	All	--
Consider Now	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.	D17	Use IHBG funds for Urban Native Americans	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	NAYA and CDP and Confederated Tribes of the Siletz	DIRECT	All	--
Existing	There are some existing weatherization programs, including the Emergency Home Repair program, Rental Rehab program operated by the City, as well as programs run by the local utility and housing authority.	D18	Weatherization Funds through Community Action Agencies	Use weatherization funds administered by statewide network of Community Action Agencies to preserve aging housing stock occupied by income-qualified residents.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	OHCS Weatherization Assistance	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	Weatherization funds can address displacement by improving habitability in low-income neighborhoods; and by reducing energy costs and needs for expensive repairs that may displace owners in gentrifying neighborhoods.
Consider Later	No additional staff notes.	D19	Transit-Oriented Development Grants	Provide financial incentives to developers to create transit-oriented communities. Funding can be used for site acquisition, infrastructure projects and residential/mixed-use projects.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Oregon Metro TOD Program	(INDIRECT)	All	Planning ahead for affordability in TOD is important for not displacing households who are most likely to use transit (low-mod income, renters, POC, and immigrants); making it an effective strategy for equity and to support multi-modal transportation.
Existing	Eugene participates in this program, but it is a very competitive process for limited funds.	D20	Local Innovation and Fast Track (LIFT) Program for Affordable Rental Housing Development	The Local Innovation and Fast Track (LIFT) Housing Program's objective is to build new affordable housing for low income households, especially families. Funds are available for Serving Historically Underserved Communities, Rural and Urban Set-asides, Urban Communities, Service to Communities of Color, and Rural Communities. Available for affordable homeownership units (below 80% AMI).	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	OHCS Housing Development Program	DIRECT	All	--
Existing	This resource was used locally for the Commons on MLK. There is limited funding and access.	D21	Mental Health Trust Fund Awards	Administered by the Oregon Health Authority for capital construction costs.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Existing	The City does not develop housing directly so does not typically apply for these funds; partners like Homes for Good do access these funds, typically limited (Emerald Village, The Nel, Commons)	D22	Foundations Awards	Local, regional, and national foundations provide both capital funding and program funding for a wide variety of innovative housing models and programs.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Examples: Meyer Memorial Trust and Oregon Community Foundation (OCF)	DIRECT	All	--
Consider Later	Developments in Eugene can qualify for conventional financing.	D23	State of Oregon Debt	State of Oregon to offer non-recourse low-interest debt that can be used to fund workforce or affordable housing. This could be provided through an existing relationship like Network for Oregon Affordable Housing (NOAH). This would be a valuable tool for providing housing in rural communities, where conventional debt funding may not be readily available. <i>Note: This strategy has been suggested by the housing development community, but programs are not yet in place in the State of Oregon.</i>	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--

Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Consider Later	Developments in Eugene can qualify for conventional financing.	D24	State of Oregon Debt Support	State of Oregon to provide some form of collateralization to support private debt placement for a workforce or affordable housing project. For example, the State could provide Letters of Credit and/or Guarantee on behalf of the developer to the private lender. This would be a valuable tool for providing housing in rural communities, where conventional debt funding may be hesitant to invest without substantial backing that the State could provide. <i>Note: This strategy has been suggested by the housing development community, but programs are not yet in place in the State of Oregon.</i>	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Consider Later	Dependent on state legislation. Staff are unsure how much revenue this would produce in Eugene.	D25	Luxury Tax for Equitable Housing	Oregon State sales tax on luxury items, 2nd homes, etc., dedicated to providing funds for affordable housing funds. <i>Note: This strategy has been suggested by the housing development community, but programs are not yet in place in the State of Oregon.</i>	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Consider Now	This strategy would require considerable coordination with health and public safety providers and would depend on the amount available.	D26	Reallocate Health and Public Safety Resources to Housing	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	--
Consider Later	No additional staff notes.	D27	Georgist Land Tax	Generate tax revenue for affordable housing by reducing the gains accrued from public investments that are capitalized into private value.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	A land tax promotes equity among homeowners, if properly calibrated and incentives more development of housing supply. This requires state law changes. https://www.pdx.edu/news/psu-study-portland-land-value-tax-would-improve-equity-homeowners-incentivize-development

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.

Staff Recommendation	Other Notes	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Consider Later	The City used to have LITE program (shorter than LIRHPTE which provides same benefit to non-profit owners for longer period of time (20 yrs)). LITE has to be renewed every year.	E01	Nonprofit Low-Income Rental Housing Exemption	This tool can provide a simplified way for affordable housing owned and operated by a nonprofit (as well as land held by a nonprofit for future affordable housing development) or Community Land Trusts (at least in land value) to qualify for a property tax exemption. Work should be done to make it easier for projects/land to qualify; minimizing the number of taxing authorities needed to grant an approval.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	See Oregon Revised Statute Chapter 307.540	DIRECT	Affordable & Vulnerable	--
Existing	Existing for rentals. In Eugene, only for-profit ownership of older (pre-1990) housing is excluded from LIRHPTE. Staff noted it would be good to allow incomes to increase (don't penalize development if they do).	E02	Property Tax Exemption for Affordable Housing Tied to Level of Affordability	Create a Property Tax Exemption for affordable housing that is tied to level of affordability instead of the ownership structure. For example, grant a property tax exemption for affordable housing that serves households making less than 60% of AMI at initial lease up. Don't tie the property tax exemption to ownership (LLC, non-profit, housing authority) and only require income verification at the beginning of a residents tenancy. The property should still get the exemption even if the household increases income after their initial lease up so they can build assets in place.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	Early Gentrification Active Gentrification	Take care to include homebuyer and post-purchase financial education to avoid loss of assets in gentrifying neighborhoods, where owners can be pressured to sell or to take out refinance loans.
Consider Later	No additional staff notes.	E03	Vertical Housing Development Zone Tax Abatement	Partial property tax exemption program on improvements for new mixed use development. To qualify, a project must have improved, leasable, non-residential development on the ground floor and residential development on the floors above. A partial abatement on land value is allowed for each equalized floor of affordable housing. This abatement could be made better by an adjustment to the floor equalization formula - right now, there is a 20% abatement per equalized floor, but if the project ends up being 3.8 equalized floors it only gets 3 floors worth of the abatement rather than an apportioned abatement.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Authorized by Oregon Revised Statute, 307.841. City of Hillsboro City of Beaverton City of Milwaukie Oregon City	DIRECT	Active Gentrification Late Gentrification	Calibrate incentives to needed housing types, e.g., affordability levels. Incentives for inclusion of affordable units work best in strong markets.
Consider Now	The City of Eugene already has a MUPT 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 MUPT, as a part of the Downtown Priorities and Projects work.	E04	Multiple Unit Property Tax Exemption (MUPT)	This strategy can be used to incentivize production of multifamily housing with particular features or at particular price points by offering qualifying developments a partial property tax exemption over the course of several years.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	See Oregon Revised Statute, Chapter 307.600	(INDIRECT)	Active Gentrification Late Gentrification	Calibrate incentives to needed housing types, e.g., affordability levels. Incentives for inclusion of affordable units work best in strong markets.
Consider Later	No additional staff notes.	E05	Multiple Unit Limited Tax Exemption (MULTE)	Under the Multiple-Unit Limited Tax Exemption (MULTE) Program, multiple-unit projects receive a ten-year property tax exemption on structural improvements to the property as long as program requirements are met.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Authorized by Oregon Revised Statute, Chapter 307.600	(INDIRECT)	Active Gentrification Late Gentrification	Calibrate incentives to needed housing types, e.g., affordability levels. Incentives for inclusion of affordable units work best in strong markets.
Consider Later	This is not a high priority in Eugene. There is an annual renewal process required.	E06	Homebuyer Opportunity Limited Tax Exemption Program (HOLTE)	Under the HOLTE Program, single-unit homes receive a ten-year property tax exemption on structural improvements to the home as long as the property and owner remain eligible per program requirements.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Authorized by Oregon Revised Statute, 307.651.	(INDIRECT)	Affordable & Vulnerable	Calibrate incentives to needed housing types, e.g., affordability levels. Incentives for inclusion of affordable units work best in strong markets.
Consider Later	Staff noted questions about applicability of this tax (in City limits? What about rentals?)	E07	Homestead Tax	Consider allowing Homestead Tax on second homes to support development of affordable housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	Affordable & Vulnerable	--
Consider Later	Staff noted the high administrative burden to this type of tax relief.	E08	Property Tax Relief for Income-Qualified Homeowners	Property taxes are based on property values and so can go up regardless of the taxpayers' ability to pay. In the case of homeowners, rising property taxes can be an obstacle to housing affordability and stability. A tool used in a number of jurisdictions for mitigating these effects on those with limited incomes is by capping the amount of property tax that homeowners have to pay as a share of their income. Some jurisdictions also provide relief to lower-income renters by treating some portion of their rent as attributable to property taxes and then providing an income tax credit to offset the increase in taxes. In addition to basing the benefit on income, eligibility for caps can also be restricted to specific populations such as seniors, disabled persons, and/or veterans.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Local Housing Solutions	(DIRECT)	Active Gentrification Late Gentrification Exclusive	Supporting owners to stay in place as housing markets heat up is an important preservation strategy; it does not maintain the affordability of the unit at stake.
Existing	Three census tracts in Eugene have been designated as Opportunity Zones.	E09	Investing into Federal Opportunity Zones (OZ)	Qualified Opportunity Zones (QOZ) were created by the 2017 Tax Cuts and Jobs Act. These zones are designed to spur economic development and job creation in distressed communities throughout the country and U.S. possessions by providing tax benefits to investors who invest eligible capital into these communities. Taxpayers may defer tax on eligible capital gains by making an appropriate investment in a Qualified Opportunity Fund and meeting other requirements.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Opportunity Zones FAQ (IRS)	INDIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	The OZ program has been found to be generally poorly targeted and monitored; as with any investment incentive it is important to include strong anti-displacement protections for vulnerable residents and ensure their inclusion in economic opportunities.
Consider Later	No additional staff notes.	E10	Delayed Tax Exemptions	Allow housing to be built and operated at market rate while allowing developers to choose a path that maintains or reduces rents over time. Once the property falls below 80%AMI (but maintains HUD quality standards), tax exemptions would kick in. This could be an alternative to upfront incentive dollars, SDC reductions, etc. for providing affordable housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	--

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.

Staff Recommendation	Other Notes	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Existing	Eugene currently uses this strategy, but there are some limitations. Land costs are high, locally competitive market, challenging to find available properties, limited resources.	F01	Land Banking	Public purchasing of vacant/under-utilized sites of land in order to save for future affordable housing development. House Bill 2003, section 15 supports land banking.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Metro TOD Program	(DIRECT)	Active Gentrification Late Gentrification Exclusive	Planning ahead for areas of public investment with land banking can support affordable housing development without needing to purchase lots. In already developed, exclusive areas, using public land may be the only cost effective strategy for building new affordable units.
Consider Now	This strategy would require coordination with Lane Transit District.	F02	Joint Development Agreements	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	All	Important foundation with focus on housing for transit dependent people (Low income, renters, POC and immigrants)
Existing	No additional notes.	F03	Community Land Trusts	Land acquired by nonprofits or community-based organizations that maintain permanent ownership of land. Prospective homeowners are able to enter long-term (i.e., 99-year), renewable leases at an affordable rate. Upon selling, homeowners only earn a portion of the increased property value, while the trust keeps the remainder, thereby preserving affordability for future low- to moderate-income families	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	All	Land trusts are a very strong anti-displacement measure in all neighborhood types, with immediate and long-term impacts.
Existing	No additional notes.	F04	Public/Private Partnerships (P3)	Partnerships between government and the private sector and/or nonprofits have the capacity to bring resources to the table that would otherwise not be available if each institution were able to help communities provide housing on its own. This can come in the form of coalitions, affordable housing task forces, and collaboratives.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(INDIRECT)	Affordable & Vulnerable Early Gentrification Active Gentrification Late Gentrification Exclusive	Setting clear public goals; including monitoring of provision of public benefits; and including financial penalties for not meeting goals are important for strengthening community benefits agreements in public-private partnerships.
Consider Now	This strategy would require a new funding source.	F05	Preserving Low-Cost Rental Housing to Mitigate Displacement	Preventing displacement and preserving "naturally occurring" affordable housing through acquisition, low-interest loans/revolving loan fund for preservation, and/or code enforcement. Example: The Oregon Legislature committed \$15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund. Modeled after the Greater Minnesota Housing Fund.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	NOAH Impact Fund	DIRECT	Early Gentrification Active Gentrification Late Gentrification	Preservation is cost-effective compared to new construction and can prevent displacement in the immediate term for households in place.
Consider Now	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.	F06	Preserving Safe, Affordable Manufactured Homes	Manufactured home parks often provide a form of affordable housing stock, but are particularly vulnerable to redevelopment pressures since lots are temporarily leased out. In order 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). Oregon Housing and Community Services (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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Portland	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	--

Staff Recommendation	Local Considerations & Staff Comments	#	Strategy	Description	Affordability Target	Tenure Target	Source (if available)	Housing Equity Impact	Neighborhood Typology	Mitigating Measures
Existing	This work was started in 2021-2022, but additional staff resources, land, and funding for development pose challenges.	F07	Providing Information and Education to Small Developers	Providing information to small, local developers that will help them understand land use permitting processes and give them a sense of clarity and certainty about requirements so they can better provide smaller scale housing at an affordable level.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	All	--
Existing	Eugene is pursuing this strategy with two properties currently.	F08	Conversion of Underperforming or Distressed Commercial Assets	Acquisition of underperforming or distressed commercial assets (commercial, retail, industrial, or hotel) or partnerships with owners of the assets for conversion into needed housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	DIRECT	Affordable & Vulnerable Early Gentrification Active Gentrification	Most likely to be cost effective in some neighborhood market types.
Existing, Investigate Further	There is some existing precedent for this in Eugene. Its unclear how much land is available that would be well suited for Affordable Housing.	F09	Enhanced Use Lease of Federal Land	The US Department of Veterans Affairs (VA) may lease land for up to 85 years to developers of projects which provide the VA with compensation. Such enhanced use leases have been used to provide land for permanent affordable housing for people experiencing homelessness including veterans in Oregon, Minnesota and Washington States.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Housing Authority of Douglas County	(DIRECT)	All	--
Existing	This is an existing goal in the City's Housing Implementation Pipeline, but the amount of appropriate land available is limited.	F10	Prioritize Housing on City/County Owned Land	Surplus property suitable for housing is offered up for affordable development.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Eugene	(DIRECT)	All	--
Existing	There is precedent for this type of model in Eugene, including Peace Village. Land is limited.	F11	Combine Community Land Trust with Limited Equity Cooperative Model	Combine a Community Land Trust (CLT) with a Limited Equity Cooperative for a lower barrier entry to homeownership of a share of a permanent small/tiny home community.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	SquareOne Villages	DIRECT	All	--
Existing	There is precedent for this type of model in Eugene, but land is limited.	F12	Surplus Land for Affordable Housing	Sell land at the State or City's cost (below market) to developers of affordable housing. Long-term lease at very minimal cost to developers for land the City is not yet ready to surplus. County surplus of foreclosed land to affordable housing developers and/or housing authority.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Bend	(DIRECT)	All	--
Existing	No additional notes.	F13	McKinney-Vento Federal Surplus	Cities may partner with the Federal Government to surplus Federal land for homeless housing or services under McKinney Vento.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Bend	(DIRECT)	All	--
Consider Now	No additional notes.	F14	Right of First Refusal for Land Purchase	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	CASA of Oregon - Mfd Housing Co-Op Dev	(DIRECT)	All	--
Consider Later	Staff are unsure that this issue is pervasive enough in Eugene to warrant a priority focus.	F15	Ordinances that Address Zombie Housing	More assertive tax foreclosures to enable zombie housing to be rehabbed into occupied housing.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	INDIRECT	Affordable & Vulnerable	--
Existing	No additional notes.	F16	Regulatory Agreement	Regulatory Agreement, between the jurisdiction and developer, in place with the land sale that keeps the units affordable for 20 years in exchange for SDC waivers. This is straightforward without going through a difficult or costly process.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	City of Beaverton	(DIRECT)	Active Gentrification Late Gentrification	Prepare for agreement expiration with preservation plans
Consider Later	High administration requirements with a low number of sites.	F17	Designated Affordable Housing Sites	A jurisdiction would establish designated sites with a completely different set of regulations than apply to the balance of the public and private building sites. The sites would be overseen by an Affordable Housing Commission, that is empowered to prioritize, fast track, and approve affordable housing projects (with designated and required affordability objectives) and bypass the majority of the city's fees and regulations. The Commission would have its own set of requirements (structural approval, zoning allowance, etc.), but they would be streamlined, and tailored to facilitate a quicker and much less expensive process.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	--
Consider Now	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.	F18	Utilize Surplus Land Owned by Faith-Based Organizations for Affordable Housing	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.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	Expanding Opportunities for Affordable Housing, Metro and City of Portland	(DIRECT)	All	--
Existing	The City partnered with the University of Oregon for a study of naturally occurring affordable housing. The findings of this study will likely be available by end of 2023.	F19	Affordable Housing Preservation Inventory	Prepare an inventory of subsidized and naturally occurring affordable housing to support proactive policies intended to preserve the affordable housing stock. This strategy is intended to help offset some of the need for costly new construction.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	The Center for Housing Policy, Washington DC Opportunity Zone Toolkit, US Department of Housing and Urban Development	(DIRECT)	All	--
Existing	No additional notes.	F20	Fair Housing Education, Referral, and Other Services	Provide residents, property owners, property managers, realtors, lenders and others involved with real estate transactions with access to Fair Housing information and referrals. Ensure that city staff know how to identify potential Fair Housing violations and make referrals to the Fair Housing Council of Oregon and state and local enforcement agencies. Partner with and fund Fair Housing Council of Oregon to provide periodic Fair Housing Audit Testing, customized outreach and education and other specialized services.	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	--
Consider Later	Need more information.	F21	Public or Mission-Driven REITs and Turn-Key Delivery	Most public subsidies and tax incentive programs are complex due to the need for regulation and corruption prevention, imposing many impediments to developing affordable housing. Jurisdictions would participate in a public REIT that buys turn-key projects for set costs. This would motivate mission-minded developers to drive down cost knowing that risk is minimal by having a buyer at the end. If the developer doesn't deliver the required specs, quality, and competitive construction cost, then they have to sell or rent on the open market or find other incentives in current, standard fashion. The jurisdiction could invest state pension funds in these REITs. <i>Note: Though this strategy has been suggested by the housing development community, it is not clear if this program is currently available to jurisdictions in the State of Oregon</i>	Publicly-Subsidized (< 30% AMI) Affordable (30-80% AMI) Workforce (80-120% AMI) Market Rate (> 120% AMI)	For Rent For Sale	--	(DIRECT)	All	--