



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

Fax: 503-378-5518

www.oregon.gov/LCD

March 18, 2024

Mark Trinidad
Planning Manager
City of Grants Pass



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

Dear Mr. Trinidad,

Thank you for submitting your climate-friendly area (CFA) study in compliance with Oregon Administrative Rule (OAR) 660-012-0315(4) and (5). The department published the study on our website for public comment on January 19, 2024. No public comments were received on the Grants Pass CFA Study. This comment letter from DLCD and any subsequent public comments should be considered in the next step in the CFA process, which is to determine which climate-friendly area or areas the city will designate and to adopt zoning and development standards, as needed, to implement the CFA requirements.

OAR 660-012-0315(4) lists the required elements of a CFA study, which include the following:

- a) Maps showing the location and size of all potential climate-friendly areas.
- b) Preliminary calculations of zoned residential building capacity.
- c) A community engagement plan for the designation of climate-friendly areas.
- d) Analysis of how each potential climate-friendly area complies, or may be brought into compliance, with the requirements of OAR 660-012-0310(2).
- e) A preliminary evaluation of existing development standards within potential climate-friendly areas and changes to the standards necessary to comply with CFA requirements.
- f) Plans for achieving fair and equitable housing outcomes in climate-friendly areas, including analysis of whether zone changes for CFAs might displace residents who are members of state and federal protected classes.

Your submitted materials meet the requirements in OAR 660-012-0315(4). We appreciate the work you have done thus far and your timely submittal!

The following comments are intended to inform your community's next step, which is to designate sufficient climate-friendly areas with a zoned residential capacity to accommodate at least 30 percent of the community's total housing needs. As part of that process, we are happy to provide support for an urban design code audit and climate-friendly area market study. We are hopeful that the market study will help you to "right-size" your CFA development regulations to support neighborhood compatibility and to optimize market feasibility within Grants Pass.

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

2023 Population Estimate (PSU):	40,102	Total Housing Need:	20,106 dwelling units through 2041
Methodology:	Prescriptive (0320(8))	30% of Housing =	6,032 dwelling units
Primary CFA Requirements:	20 DU/acre 60 foot allowed bldg. height		

CFA Study Area:

Downtown plus High Density Residential Area:

62.56 net acres. Estimated capacity as primary CFA: 6,039 dwelling units.

Two other potential areas were identified, but not studied:

- Three Rivers Medical Center, and
- Redwood Hwy./Rogue Community College

Your preferred climate-friendly area includes portions of the Central Business District and an adjacent High Density Residential Area, which is a great candidate for walkable mixed-use development, as it already contains a variety of existing uses in close proximity to one another. With an estimated capacity of 6,039 dwelling units, this area would theoretically provide for only seven more units than are required to accommodate 30% of total housing needed. However, other areas may be designated as CFAs at a lower intensity of development, if needed.

As you begin the community process of determining the appropriate scale and location for walkable mixed-use areas in Grants Pass, we would like you to know that recent amendments to Rule 0320 now allow cities to designate CFAs at a much lower scale than allowed building heights under the “prescriptive path.” Specifically, OAR 660-012-0320(9) now allows an alternative approach for cities with a population of 25,001 to 50,000 to designate a CFA with either a minimum residential density of 15 units per acre or a minimum floor area ratio of 1.0, if the development code allows for a zoned building capacity of at least 90,000 square feet per net acre. Depending upon setbacks and other requirements in your existing development code, it may be possible to meet these standards with allowed building heights of three stories. Less intensive standards are also allowed for “non-primary” CFAs if there is a need for additional mixed-use locations. Demonstrating that an existing zone provides adequate zoned capacity per the amended rule can be as simple as providing examples of recent development under the current zoning standards that have met or surpassed the 90,000 square feet per net acre threshold. The tradeoff is that you would need to recalculate residential capacity based on the lower building heights.

We note that portions of the proposed CFA fall within the “Affordable and Vulnerable” category, using the methodology provided on the DLCD Anti-Displacement Map. This suggests that some current residents of the area could be vulnerable to displacement. We have also reviewed your list of potential housing production strategies and note that there are a variety of good options for policies and actions that would help to mitigate against that potential displacement. The extent to which displacement may actually occur is dependent upon many factors and should be

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carefully considered by decision-makers as you select and amend development standards for your CFAs. However, the rules require identification of all “ongoing and newly-added” measures to mitigate against displacement, if there is good reason to expect that displacement would otherwise occur (OAR 660-012-0315(6)(d)(B)).

Thanks again for your submitted study. We appreciate the good work you have done and look forward to supporting the CFA designation process yet to come. Please feel free to contact me, at (503) 602-0238, or at kevin.young@dlcd.oregon.gov if you have any questions or need further assistance.

Sincerely,

Kevin Young

Kevin Young, DLCD Senior Urban Planner

Cc: Brenda Ortigoza Bateman, DLCD Director

Kirstin Greene, DLCD Deputy Director

Bradley Clark, AICP, Director of Community Development, City of Grants Pass

Matt Crall, DLCD Planning Services Division Manager

Evan Manvel, DLCD Climate Mitigation Planner

Josh LeBombard, DLCD Southern Oregon Regional Representative