

Robin McArthur, Chair  
Land Conservation and Development Commission  
635 Capitol St. NE, Suite 150  
Salem, OR, 97301-2540

RE: Climate-Friendly and Equitable Communities (CFEC) Rulemaking

Dear Chair McArthur and Land Conservation and Development Commissioners,

As mayors that represent communities impacted by the ongoing CFEC rulemaking, we are writing to request the Department of Land Conservation and Development (DLCD) take more time to work with local government partners to provide needed clarity and plan adequate funding for implementation. We believe the state's efforts to meet Oregon's climate pollution reduction goals and create more equitable outcomes for community members on the ground is critical and an effort we as your local partners strongly support. As you're aware, local governments and other interested stakeholders have spent considerable time engaging in this rulemaking process and have worked hard to provide constructive feedback to find a path towards our shared goals. However, we continue to have concerns about the draft rules. More time is necessary to ensure we're getting it right.

While we appreciate that some clarifications have been made based on local government feedback, many of our priority concerns remain outstanding. Without workable solutions to the technical issues we've identified, the rules will be difficult to implement. In addition, jurisdictions have identified specific examples where the rules will result in less equitable outcomes for their communities and stand to perpetuate historic planning disparities. Therefore, to ensure the draft rules can be implemented as intended, we believe it is prudent to continue working together to address the outstanding list of questions and concerns.

Lastly, the implementation of these rules depends on the capacity and resources of local governments to fully incorporate the rules, which will take a significant amount of time and resources – both of which are limited as we face state and local revenue uncertainty. Local governments are also busy implementing recent legislation such as HB 2001, HB 2003, and wildfire planning, which unfortunately means competing demands on both local staff and consultants, especially in the near term. We urge you to consider the significant cost and staffing impacts to local governments as you further develop these rules.

We appreciate your consideration of these comments and look forward to our continued partnership as we work towards our common goal. Please vote to extend the rulemaking process to ensure these rules can be implemented by your local partners, to fully scope and secure the resources needed for success, and to better align our shared climate, housing, and equity goals.

Sincerely,

Mayor Alexander Johnson II, Albany  
Mayor Julie Akins, Ashland

May 18, 2022

Mayor Hank Williams, Central Point  
Mayor Ray Smith, Coburg  
Mayor Jeffrey C. Dalin, Cornelius  
Mayor Biff Traber, Corvallis  
Mayor Gery Schirado, Durham  
Mayor Lucy Vinis, Eugene  
Mayor Brian Cooper, Fairview  
Mayor Tammy Stempel, Gladstone  
Mayor Brad Studebaker, Gold Hill  
Mayor Sara Bristol, Grants Pass  
Mayor Travis Stovall, Gresham  
Mayor Tom Ellis, Happy Valley  
Mayor Steve Callaway, Hillsboro  
Mayor Donna Bowen, Jacksonville  
Mayor Cathy Clark, Keizer  
Mayor Joe Buck, Lake Oswego  
Mayor Terry Baker, Phoenix  
Mayor Scott Hill, McMinnville  
Mayor Randy Sparacino, Medford  
Mayor Teri Lenahan, North Plains  
Mayor Randy Lauer, Troutdale  
Mayor Wayne Stuart, Rogue River  
Mayor Chuck Bennett, Salem  
Mayor Keith Mays, Sherwood  
Mayor Sean VanGordon, Springfield  
Mayor Frank Bubenik, Tualatin  
Mayor T. Scott Harden, Wood Village

Cc: Land Conservation and Development Commissioners  
Brenda Bateman, DLCD Director  
Kirstin Greene, DLCD Deputy Director