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