



CITY MANAGER'S OFFICE

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May 2, 2022

Oregon Land Conservation and Development Commission  
635 Capitol Street NE, Suite 150  
Salem Oregon 97301-2540  
*Submitted electronically to Esther Johnson, Commission Assistant*  
[esther.johnson@dlcd.oregon.gov](mailto:esther.johnson@dlcd.oregon.gov)

**SUBJECT: Climate-Friendly and Equitable Communities Rulemaking**

Dear Chair Robin McArthur, Vice-Chair Anyeley Hallová, and Members of the Commission:

Thank you for the opportunity to comment on the Climate Friendly and Equitable Communities (CFEC) rulemaking draft rules published March 17, 2022. The City of Salem supports the Commission and the Department of Land Conservation and Development's (DLCD) policy direction to address climate change; however, **we respectfully request that the current deadline to develop a detailed Scenario Planning Work Program be extended 12 months to December 31, 2023.**

The Division 44 draft rules require cities and counties within the metropolitan planning area of the Salem-Keizer Area Transportation Study (SKATS) to prepare a land use and transportation scenario plan and adopt related local amendments. The first step in this process is to develop a detailed work program. Key required elements of the work program include developing a governance structure for regional cooperation and decision-making, and preparing a scope of work, funding estimate, and schedule. **The deadline of 7 months to complete this work program is unrealistic.**

Developing the governance structure alone will take a significant amount of work given the involvement of multiple jurisdictions (3 cities, 2 counties, a transit district, and the Metropolitan Planning Organization). Preparing the scope of work and funding estimate will rely on guidance promised by DLCD and ODOT staff in the CFEC Draft Joint Agency Implementation Work Plan (Attachment I to Agenda Item 3, March 31-April 1, 2022-LCDC Meeting). Having more information from these resources is necessary to understand the appropriate sequencing of work tasks and the level of effort necessary to inform funding estimates.

Overall, the City would like to commend the Commission and DLCD staff for all the hard work and collaboration that has occurred during the rulemaking. In order to embark on a successful regional

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collaboration to meet requirements of the rule, we request that the deadline for submitting the Scenario Planning Work Program contained in 660-044-0015(3) be extended to December 31, 2023. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KR', is positioned below the word 'Sincerely,'.

Kristin Retherford  
Interim City Manager

cc: Bill Holstrom, Transportation Planner, Department of Land Conservation and Development  
Kevin Young, Senior Urban Planner, Department of Land Conservation and Development