

CITY OF SPRINGFIELD CLIMATE-FRIENDLY AREA STUDY

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In collaboration with City of Springfield staff



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INTRODUCTION

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to then 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 metropolitan areas.

Climate-Friendly Areas (CFAs) are defined as 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 density of housing, jobs, businesses, and services than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000, and that are also in one of the seven metropolitan areas (outside of the Portland Metro). The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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 rule also requires cities to take steps to address 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 more equitable cities by improving transportation choices and creating communities where daily needs can be met by walking, biking, or taking transit.

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

One central outcome of this rulemaking is an increased emphasis on considering equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes 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 term ‘historically marginalized community groups’ is used throughout this Technical Memo in place of “underserved populations” to more accurately capture the nuanced historical patterns of disenfranchisement that have put some community groups at an economic disadvantage today. Per the rules, historically marginalized community groups include but need not be limited to Black and African American people; Indigenous people; People of Color; immigrants; 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; youth and seniors. 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

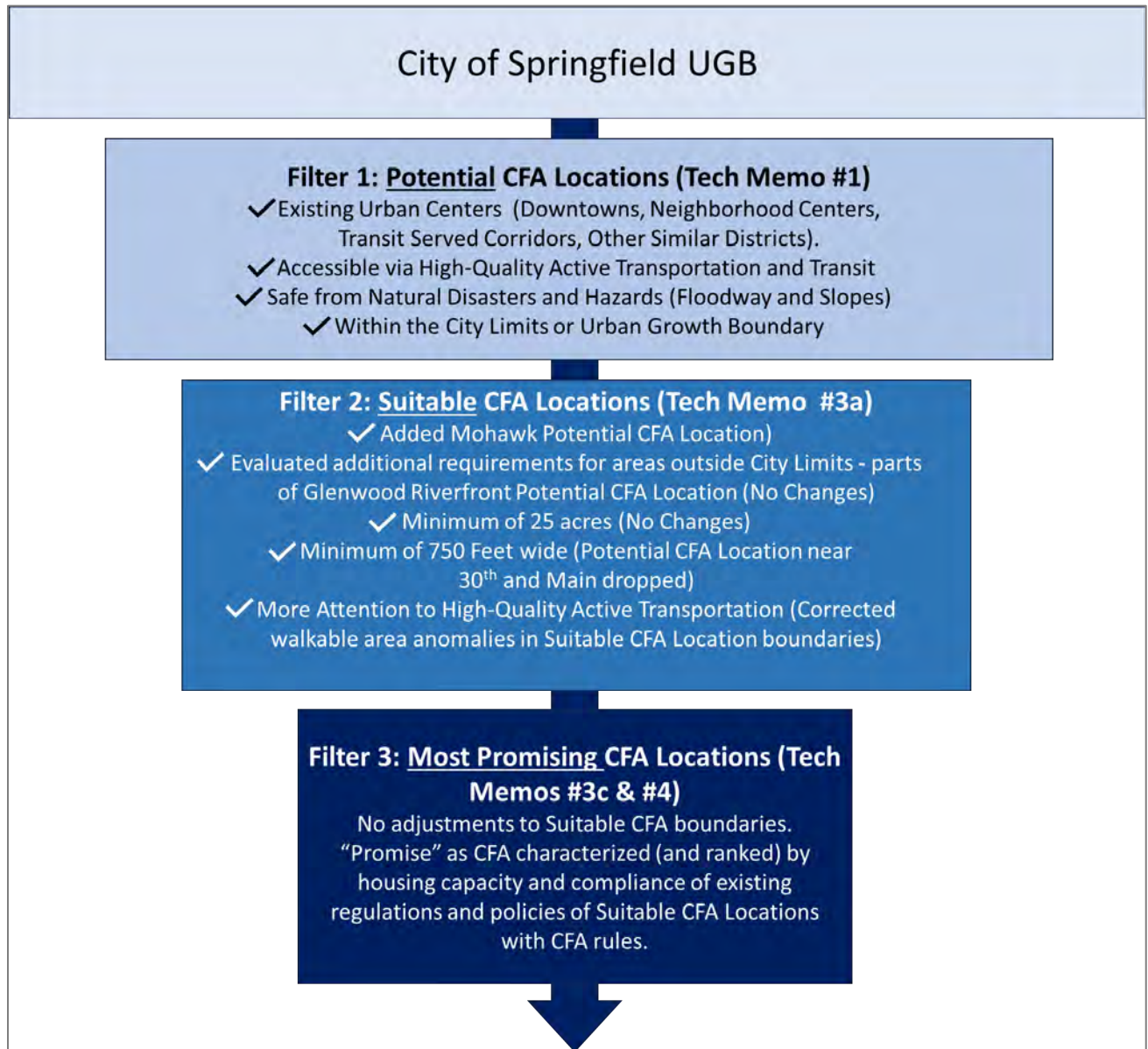
CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical 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. Analyze potential CFAs for “most promising” options	Technical Memorandum #4
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 eight technical memos. These technical memos together with this introduction and a conclusion are the CFA Study. The technical memos are summarized below for quick reference and are preceded by an even more distilled overview of the process of identification and refinement of CFA areas through the study process conducted in the Spring and Summer of 2023. Note that these memos were developed in the order presented below and some details expressed in later memos knowingly and necessarily supersede details in earlier memos.

FIGURE 1: PROCESS OVERVIEW FOR IDENTIFICATION AND REFINEMENT OF CLIMATE FRIENDLY AREAS IN STUDY



Note: As noted, an Equity Analysis is also included in the study (Tech Memos #2a and #2b). Although this analysis does not have direct CFA rule compliance implications, communities should utilize Equity Analysis findings to mitigate impacts that arise from eventual CFA Location selection.

TECHNICAL MEMORANDUM #1 – POTENTIAL CFA

Technical Memorandum #1 identifies “Potential” Climate-Friendly Areas (CFAs) in the City of Springfield and addresses locational requirements for CFAs (OAR 660-012-0310(2)), including being an urban center, being within the Urban Growth Boundary, having accessibility to high-quality transportation and transit, being safe from natural disasters and hazards, being near high density mixed uses, and meeting minimum width requirements. The memo’s analysis culminates in a map depicting numerous Potential CFA Locations.

OARs Addressed: OAR 660-012-0310(2)

TECHNICAL MEMORANDUM #2A – DISPLACEMENT RISK ANALYSIS

The purpose of Technical Memorandum #2a is to address requirements in OAR 660-012-0315(4)(f) and present equity information to decision-makers to inform future CFA designation. This memo provides a spatial analysis of historically marginalized community groups and an anti-displacement analysis.

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

TECHNICAL MEMORANDUM #2B – DEMOGRAPHIC ANALYSIS

The purpose of Technical Memo #2b is to address requirements in OAR 660-012-0315(4)(f), present equity information to decision-makers 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. This memo provides a citywide demographic profile of historically marginalized community groups and an inventory of fair and equitable housing policies that the City of Springfield currently has.

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

TECHNICAL MEMORANDUM #3A – SUITABILITY ANALYSIS

Technical Memorandum #3a identifies “suitable” CFAs in the City of Springfield and revisits the locational requirements for CFAs (OAR 660-012-0310(2)).

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

TECHNICAL MEMORANDUM #3B – POLICY/CODE EVALUATION

Technical Memorandum #3b provides an initial evaluation of the policy and regulatory context for the “Potential Climate-Friendly Areas” established through the preceding analyses (Technical Memorandums #1, 2a, 2b, and 3a). The purpose of this memo is to continue the process of refinement in the identification of 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 of relative compatibility will inform CFA recommendations related to policy and code adjustments Springfield would need to incorporate as part of adoption of CFAs.

OARs Addressed: OAR 660-012-0315(4)(e); OAR 660-012-0320

TECHNICAL MEMORANDUM #3C – CAPACITY ANALYSIS

This memo provides an analysis of residential capacity, which is a core part of the Springfield CFA Study (OAR 660-012-0315(1), (2), (3), and (4)(b)). This is one of three technical memos for analysis Step A3 of the study. It takes in data from GIS analysis which uses data from previous analysis in Technical Memorandum #3a: Suitability (TM3a), and earlier CFA Study memos, as well as zoning data from the City of Springfield (City). It also takes in development regulation (zoning) evaluation information from Technical Memorandum #3b: Policy Analysis (TM3b).

OARs Addressed: OAR 660-012-0315(1), (2), (3), and (4)(b)

TECHNICAL MEMORANDUM #2.1 – ANTI-DISPLACEMENT ANALYSIS

Technical Memorandum #2.1 begins with a summary of the results of the displacement risk analysis (see Technical Memorandum #2a) and augments that analysis with a review of 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 additional equity information to decision-makers to inform future CFA designation.

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

TECHNICAL MEMORANDUM #4 – MOST PROMISING CFA

Technical Memorandum #4 provides a cumulative evaluation of the factors contributing to an analysis of “Potential” and then “Suitable” CFAs to the “Most Promising” CFAs. The purpose of this memo is to organize these factors by Suitable CFA Locations and provide an assessment of each Suitable CFA Location relative to the others. 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)

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #1

POTENTIAL CFA

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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 identifies potential Climate-Friendly Areas (CFAs) in the City of Springfield and addresses locational requirements for CFAs (OAR 660-012-0310(2)). 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 660-012-0315(4)(a).

BACKGROUND

In September 2020, the Land Conservation and Development Commission (DLCD) launched the Climate-Friendly and Equitable Communities rulemaking in response to then 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 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 defined as 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 density of housing, jobs, businesses, and services than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000 in the seven metropolitan areas outside of Portland Metro. The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses the first step in the study phase: identification of potential CFAs in the City of Springfield.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
⇒ Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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
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Step A4. Analyze potential CFAs for “most promising” options	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),¹ is to map all “potential” CFA options. The way the rules are written, jurisdictions have some flexibility in the way they approach the study phase. LCOG has 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 rules 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 rules. The City of Springfield has chosen the “narrowing” approach.

REQUIREMENTS BASED ON POPULATION

There are different requirements in the rules based on jurisdiction population. Given a 2022 official population estimate² of 62,189,³ the City of Springfield is subject to requirements for cities greater than 10,000, including designating one or more CFA 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 a subsequent memo.

Additionally, because Springfield’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). Every jurisdiction of this population size is

¹ See <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293018>.

² City population is as determined by the most recently certified Portland State University Population Research Center population estimate, per OAR 660-012-0310(4).

³ Portland State University Population Research Center, *2022 Certified Population Estimates, July 1, 2022*. Retrieved from <https://www.pdx.edu/population-research/population-estimate-reports> on 12/21/2022.

required to have at least one “primary” CFA area of this size in acres. For these larger local governments, additional (“secondary”) CFAs may be designated with less intensive standards as provided in the rules 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)⁴ and are also described in the *Climate-Friendly Areas Methods Guide*.⁵

Potential CFA locations are:

- **Urban Centers** – In existing or planned urban centers, such as:
 - Downtowns
 - Neighborhood Centers
 - Transit-Served Corridors⁶
 - Other Similar Districts
- **Inside the City’s Urban Growth Boundary** – Inside the urban growth boundary and either:
 - inside the city limits, or
 - outside the city limits but contiguous with them – subject to additional conditions⁷.
- **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 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.
- **A Minimum of 750 Feet Wide** – CFAs shall have a minimum width of 750 feet, including any internal rights of way that may not be zoned. Contiguous CFAs with distinct land use requirements will meet the minimum width requirements. Some exceptions to the minimum may be allowed.⁸

⁴ See <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293019>.

⁵ DLCDC. *Climate-Friendly Areas Methods Guide*, 2022, p.3. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022.

⁶ 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(3).

⁷ The additional contiguity conditions are as follows: being readily serviceable with urban water, sewer, stormwater, and transportation; having a historical precedent for timely annexation; having compatible future zoning; and having compatible plan designations; per OAR 660-012-0310(2)(e).

⁸ 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.

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*,⁹ 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.

Note that the implementation of these requirements also requires a definition of some terms not defined in the rule. Examples include “urban centers,” and “high-quality” pedestrian and bicycle services. These definitions are provided below in the methodology details.

ANALYSIS

METHODOLOGY OVERVIEW

The locational criteria described in the preceding section were assessed for all areas within the City of Springfield Urban Growth Boundary. In a few cases, locational criteria were *deferred* to a later step in the analysis.

Locational criteria were deferred if (1) it was deemed to be more efficient to analyze them later once the field of potential CFAs has been narrowed or (2) there is a mismatch with the locational analysis phase (i.e., the criterion does not 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 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 *Step A3, Suitability*.
- 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 *Step A3, Suitability*. Urban centers identified in this memo will already tend to meet these criteria.

⁹ Climate-Friendly Areas Methods Guide. DLCD. 2022. p.11. Retrieved from <https://www.oregon.gov/lcd/CL/Documents/ClimateFriendlyAreasMethodsGuide.pdf> on 12/21/2022

- 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 *Step A3, Suitability*.
- 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 assessment in *Step A3, Suitability*.
 - 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 not 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

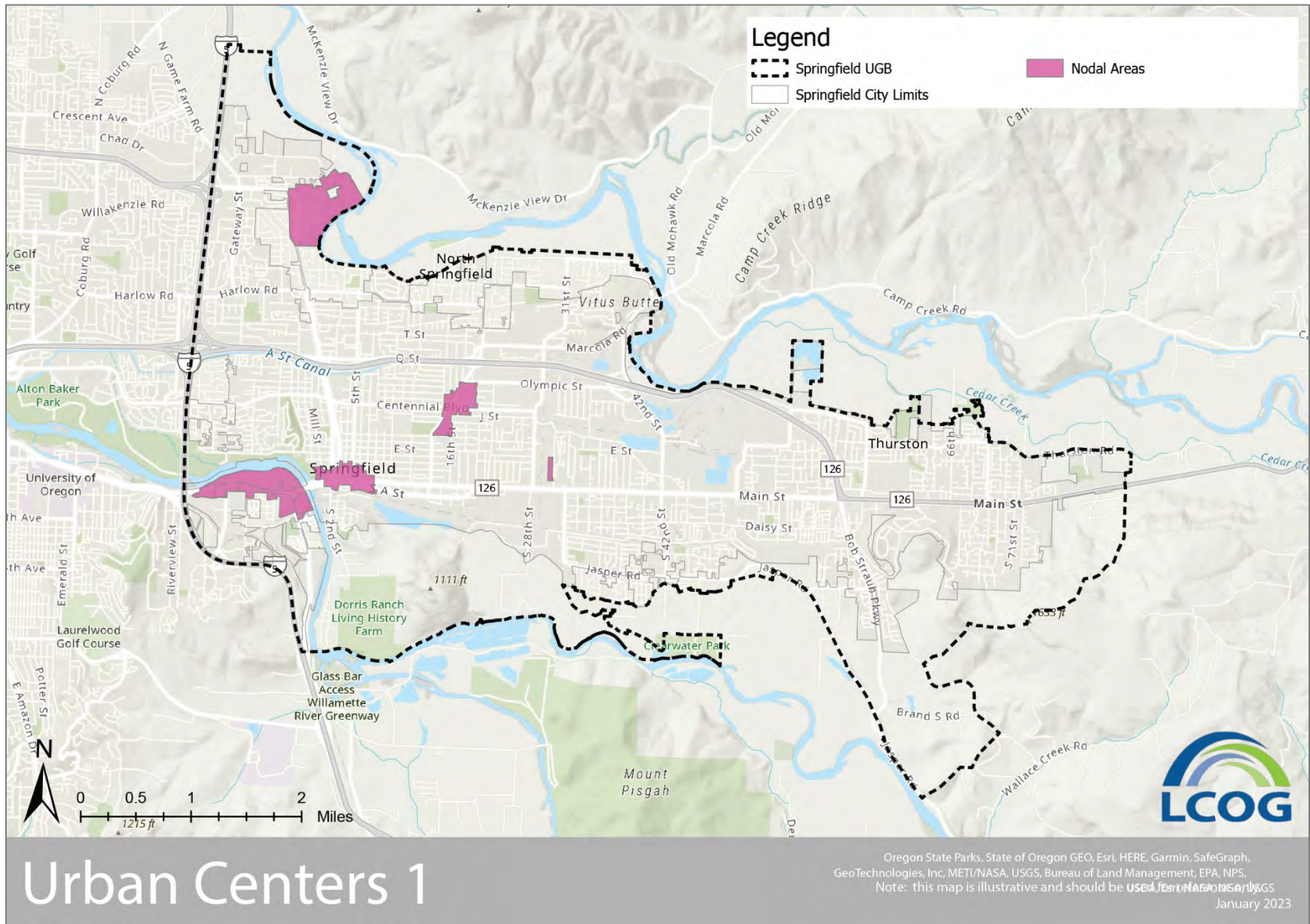
The City of Springfield does not have an official definition for “downtown” but has a number of boundaries that describe a “downtown” area for different purposes. These were used as a starting point for potential CFA locations. The CFA analysis process will determine which parts of these areas make sense to designate as a CFA.

- Downtown Nodal Area boundary
- Downtown Urban Renewal boundary
- Downtown Refinement Plan boundary
- Downtown Urban Design District boundary
- Downtown Parking Management boundary
- Downtown Vertical Housing boundary

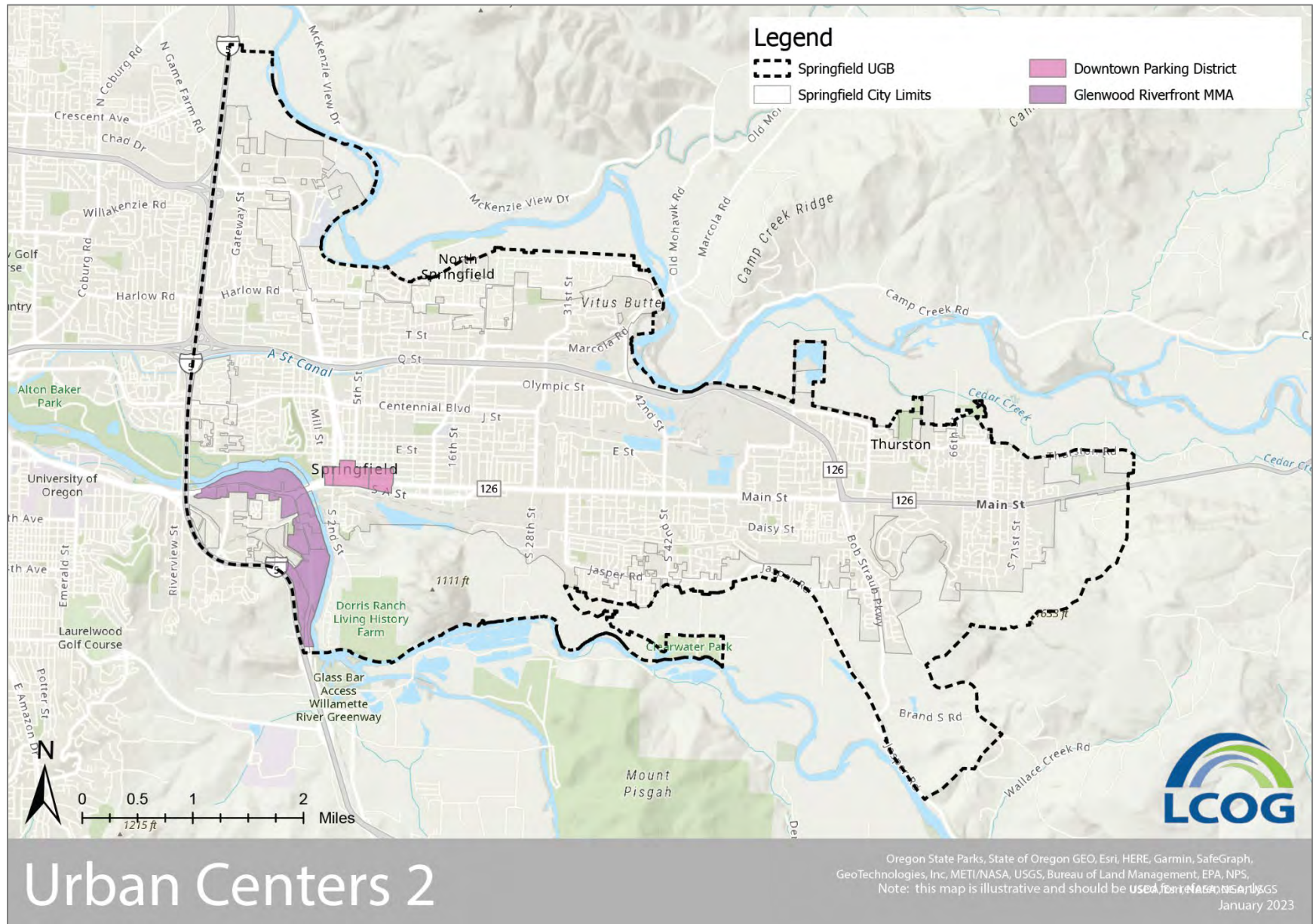
Springfield does not have an applicable, appropriate definition for “neighborhood centers.” For “neighborhood centers” and “similar districts,” the City recommended using Nodal and Multi-modal Areas (MMAs).

Map 1 through Map 5 show various candidate areas that can be considered “urban centers.” These areas were combined to create a single Urban Centers Composite layer for Downtown (Map 6). Table 2 lists the types of areas used in the analysis.

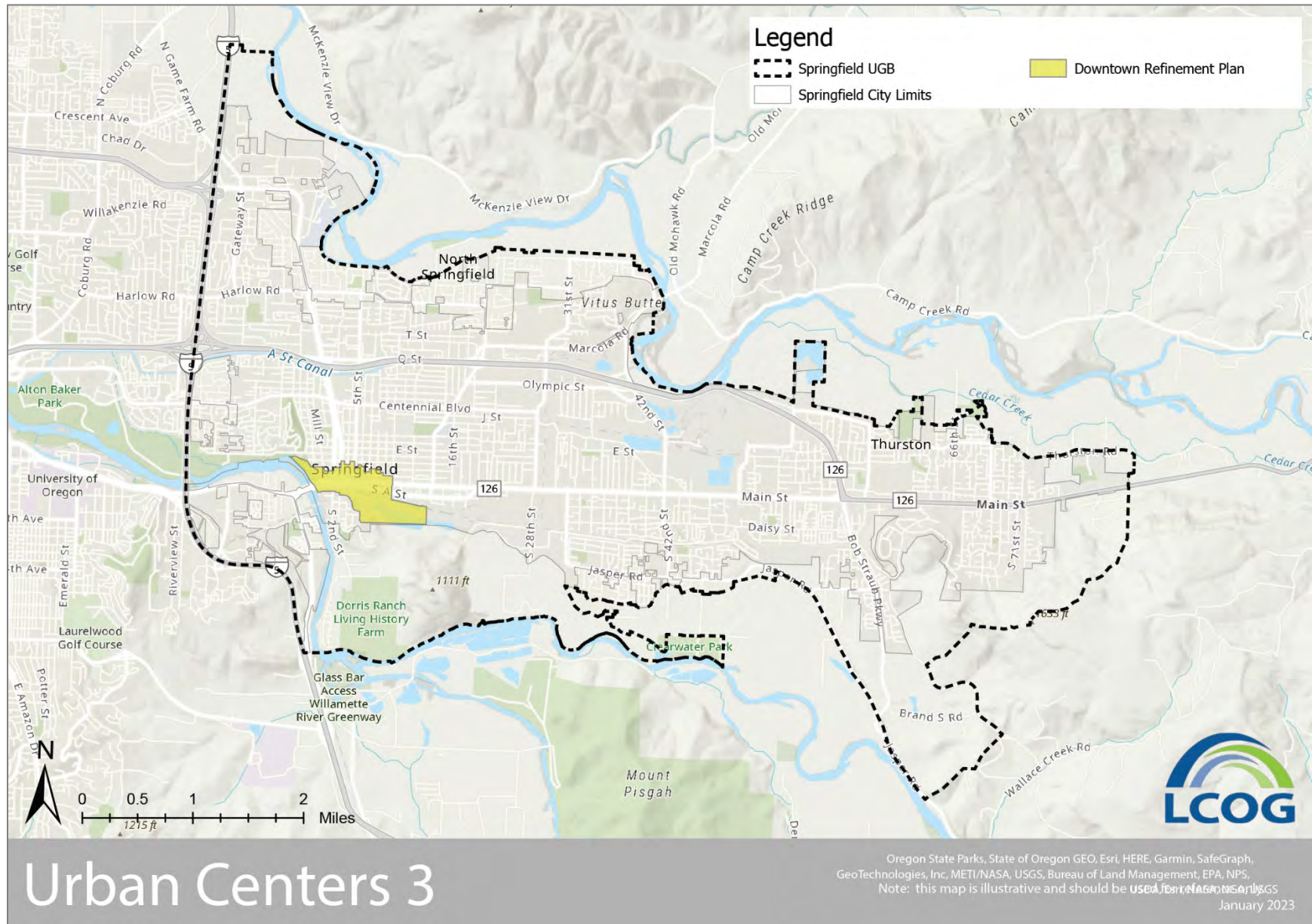
MAP 1. URBAN CENTERS – NODAL AREAS



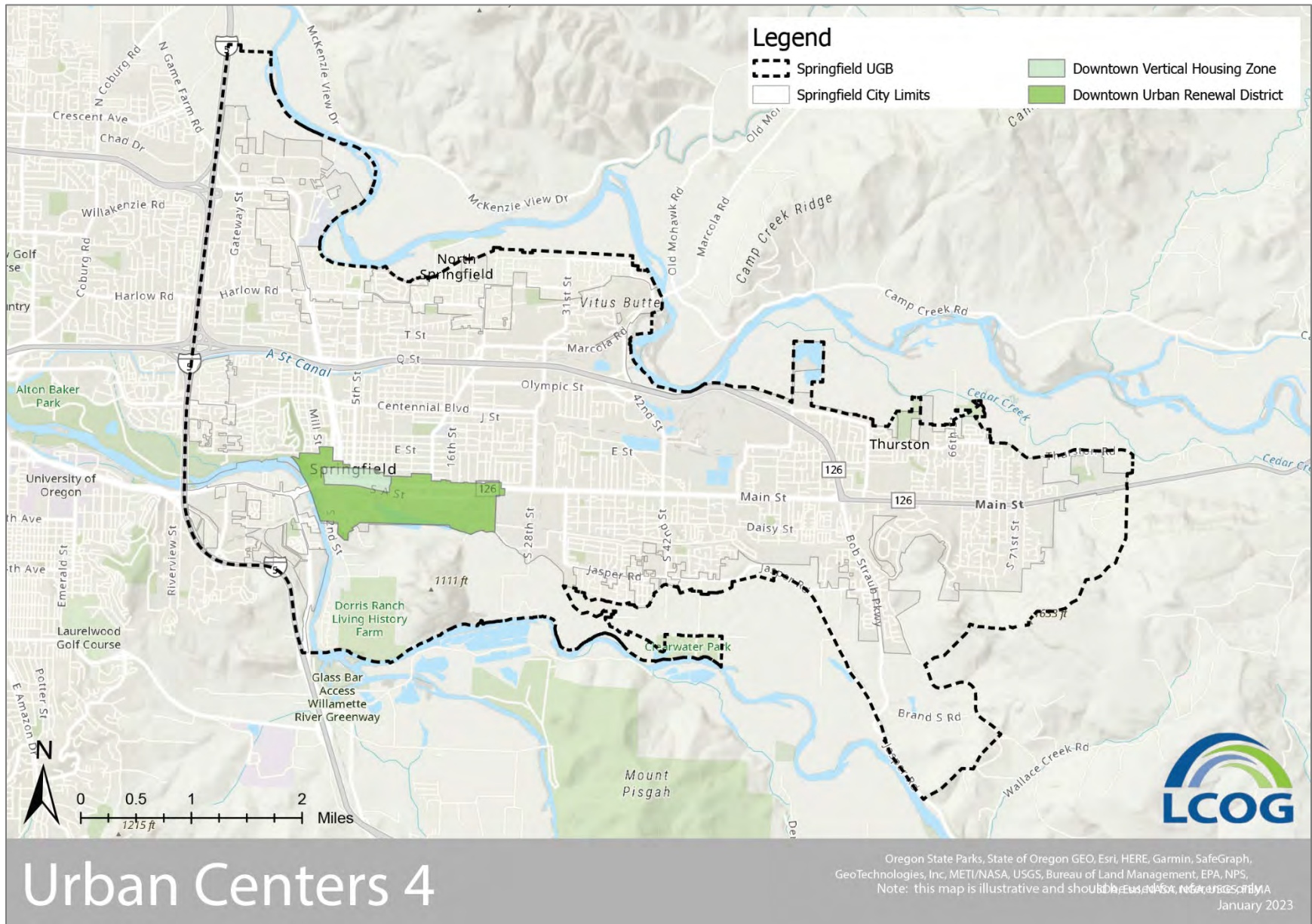
MAP 2. URBAN CENTERS – DOWNTOWN PARKING DISTRICT AND GLENWOOD RIVERFRONT MMA



MAP 3. URBAN CENTERS – DOWNTOWN REFINEMENT PLAN



MAP 4. URBAN CENTERS – DOWNTOWN URBAN RENEWAL DISTRICT



MAP 5. URBAN CENTERS – DOWNTOWN URBAN DESIGN DISTRICT



MAP 6. URBAN CENTERS – COMPOSITE

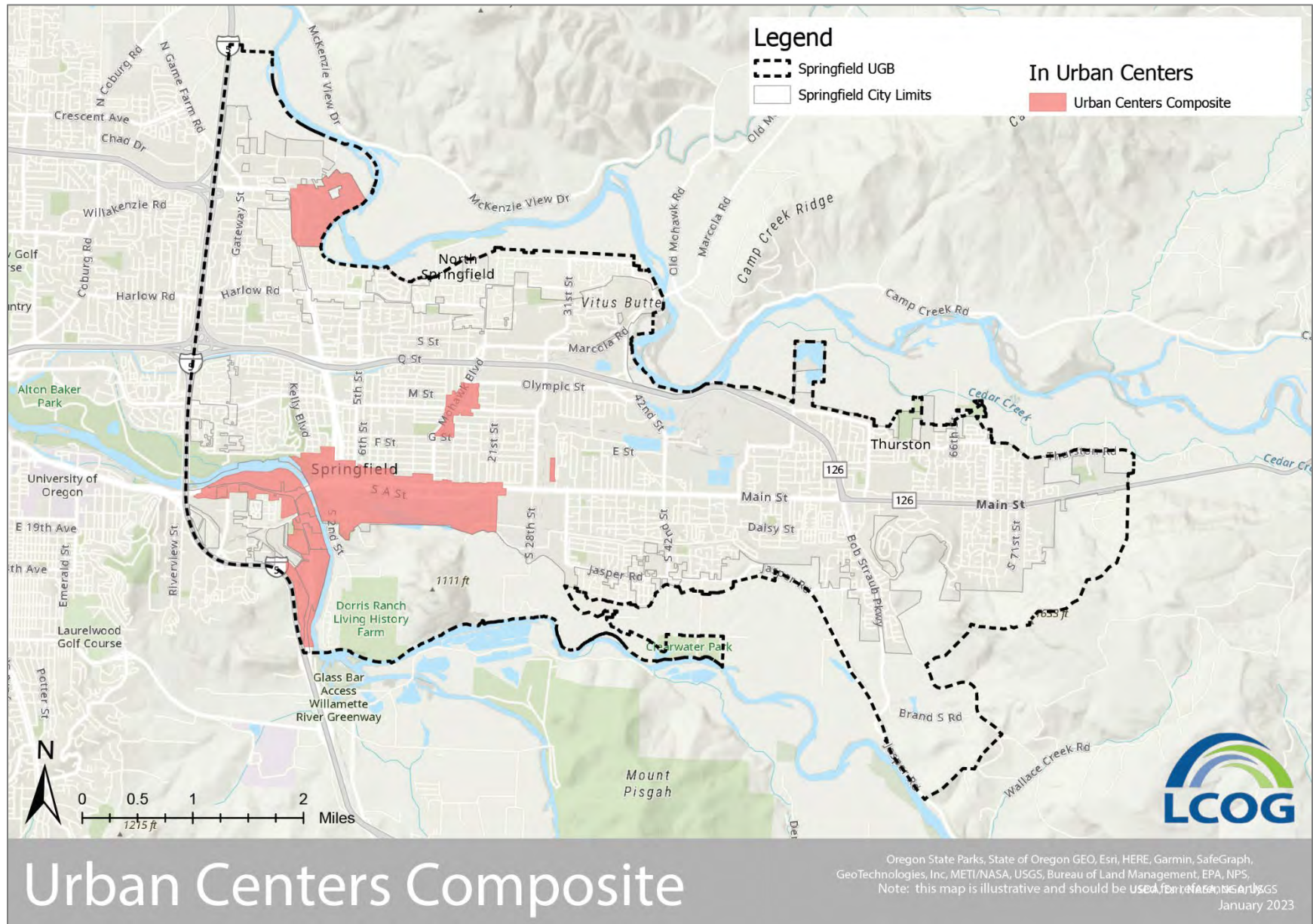


TABLE 2. URBAN CENTERS DATA SOURCES

Item	Source
Springfield Nodal Areas	Springfield ¹⁰
Downtown Parking District	Springfield ¹¹
Glenwood Riverfront MMA	Springfield ¹²
Downtown Refinement Plan	Springfield ¹³
Downtown Vertical Housing Boundary	Springfield ¹⁴
Downtown Urban Renewal District	Springfield ¹⁵
Downtown Urban Design District	Springfield ¹⁶

¹⁰ Policy sources:

- For Glenwood, source is City of Springfield, *Glenwood Refinement Plan*, Ordinances 6279, 6316, 6330 (https://www.springfield-or.gov/wp-content/uploads/2016/12/AdoptedGlenwoodRefinementPlan_amended1.pdf).
- For Downtown, source is City of Springfield, *Downtown Refinement Plan*, Ordinances 5352, 5377, 5418, 6147, 6148, 6149 (<https://www.springfield-or.gov/wp-content/uploads/2016/12/1986DowntownRefinementPlan.pdf>).
- For Mohawk, source is City of Springfield, Ordinance 6144 (November 8, 2005) as shown in Exhibit B of Ordinance.
- For Mid-Springfield (30th & Main), source is City of Springfield, Ordinances 6177, 6178, and 6179 (July 17, 2006) as shown in Exhibit A of Ordinance.
- For Gateway (Riverbend), source is City of Springfield, Ordinance 6241 (June 1, 2009) as show in Exhibit A of Ordinance.
- Note that Marcola Meadows is no longer a Nodal Development Area. City of Springfield, Ordinance 6195 (June 18, 2007) adopted it but it was removed by City of Springfield, Ordinance 6422 (November 2, 2020).

Data received from Springfield GIS on 2/22/2023.

¹¹ Policy source is City of Springfield. *Downtown Parking Management Plan*, Resolution 10-58 (<http://www.springfield-or.gov/wp-content/uploads/2016/12/DowntownParkingManagement.pdf>). Data received from Springfield GIS on 2/22/2023.

¹² Policy sources are City of Springfield, *Glenwood Refinement Plan*, Ordinances 6279, 6316, 6330 (https://www.springfield-or.gov/wp-content/uploads/2016/12/AdoptedGlenwoodRefinementPlan_amended1.pdf). Data received from Springfield GIS on 2/22/2023.

¹³ Policy sources are City of Springfield, *Downtown Refinement Plan*, Ordinances 5352, 5377, 5418, 6147, 6148, 6149 (<https://www.springfield-or.gov/wp-content/uploads/2016/12/1986DowntownRefinementPlan.pdf>). Data received from Springfield GIS on 2/22/2023.

¹⁴ Policy source is City of Springfield, Resolution 04-36. Data received from Springfield GIS on 2/22/2023.

¹⁵ Policy source is City of Springfield, *Downtown Urban Renewal Plan*, Ordinance 6210 (<http://www.springfield-or.gov/wp-content/uploads/2016/12/DowntownUrbanRenewalPlan.pdf>). Data received from Springfield GIS on 2/22/2023.

¹⁶ Policy source is City of Springfield, *Downtown Urban Design Plan & Implementation Strategy*, Resolution 10-57 (<http://www.springfield-or.gov/wp-content/uploads/2016/12/DowntownDistrictPlan.pdf>). Data received from Springfield GIS on 2/22/2023.

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 Springfield has worked with LCOG to develop the following definition of high-quality transit services and service areas:

- **High-Quality Transit Service** -- Existing and proposed/planned frequent transit network¹⁷.
- **High-Quality Transit Service Areas** – Areas within a half-mile walkable distance to high-quality transit.

Map 7 shows high-quality transit services. Frequent transit corridors provided by Lane Transit District (LTD) were used as the high-frequency transit corridors. A half-mile walking distance from high-frequency transit stops following the existing street network is shown on the map.

¹⁷ In this first analysis of the “frequent transit network,” routes that were not in Springfield’s TSP were not included. In later analysis (Tech Memo 3a) this was reversed to include the planned route that serves the Mohawk CFA location.

MAP 7. HIGH-QUALITY TRANSIT SERVICES

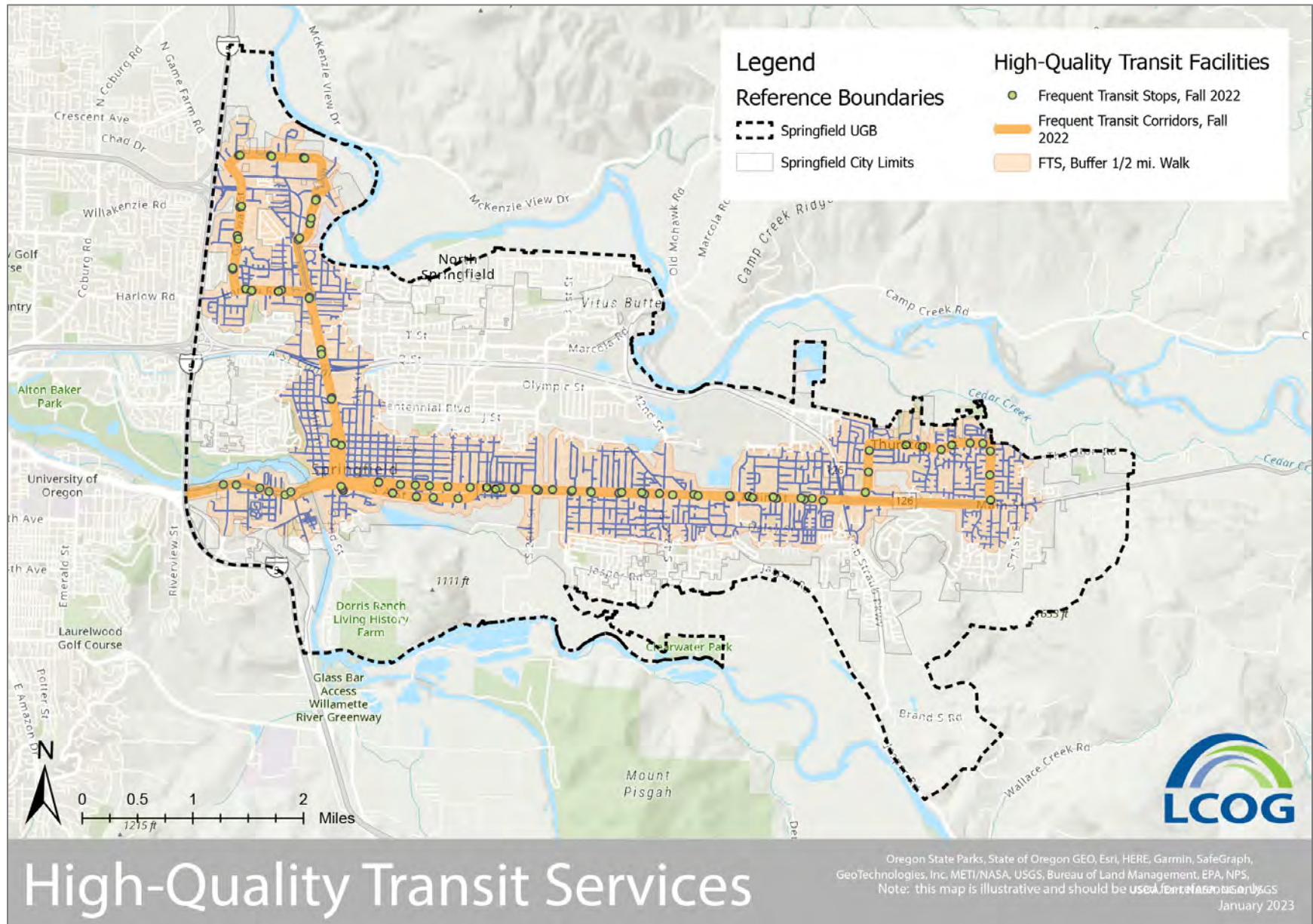


TABLE 3. HIGH-QUALITY TRANSIT DATA SOURCES

Item	Source
2022 Frequent Transit Corridors and Stops	Lane Transit District ¹⁸
Half-Mile Walking Distance Buffer	LCOG ¹⁹

HIGH-QUALITY PEDESTRIAN AND BICYCLE SERVICES

The CFA rules do not explicitly define “high-quality” pedestrian or bicycle services, but the Transportation Planning Rules (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) requires cities to plan for **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.” All ages and abilities are defined to include: (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.
- 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.

LCOG developed²⁰ the following definitions of high-quality pedestrian and bicycle services and service areas:

- **High-Quality Pedestrian Services** -- Complete and connected, direct and convenient, well-designed,²¹ and well-illuminated, accessible pedestrian services (sidewalks and paths) that provide a safe, low-stress, and comfortable experience for people of all ages and abilities.²²
- **High-Quality Pedestrian Service Areas** – Areas adequately served by high-quality pedestrian services.

¹⁸ Retrieved from Regional GIS data archive on 1/25/2023. Source: Lane Transit District, 2022.

¹⁹ Retrieved from LCOG project folder on 1/25/2023. Source: LCOG, 2022.

²⁰ Based on the above rule subsections and discussions with ODOT, CLMPO, DLCD and City of Eugene and City of Springfield staff.

²¹ Meets minimum construction standards for dedicated space to walk (sidewalks, mixed-use paths) with safe crossing locations and convenient connections to other modal facilities, such as transit stops.

²² Although the rule does not specify the “all ages and abilities” requirement for pedestrian services, it seems reasonable to expect it as baseline for equity and accessibility and apply the same standards to pedestrian facilities in this regard as are applied to bicycle facilities and multi-use paths.

- **High-Quality Bicycle Services** – Complete and connected, direct and convenient, well-designed,²³ and well-illuminated, accessible bicycle services (paths and corridors) that provide a safe, low-stress, and comfortable experience for people of all ages and abilities.
- **High-Quality Bicycle Service Areas** – Areas adequately served by high-quality bicycle services.

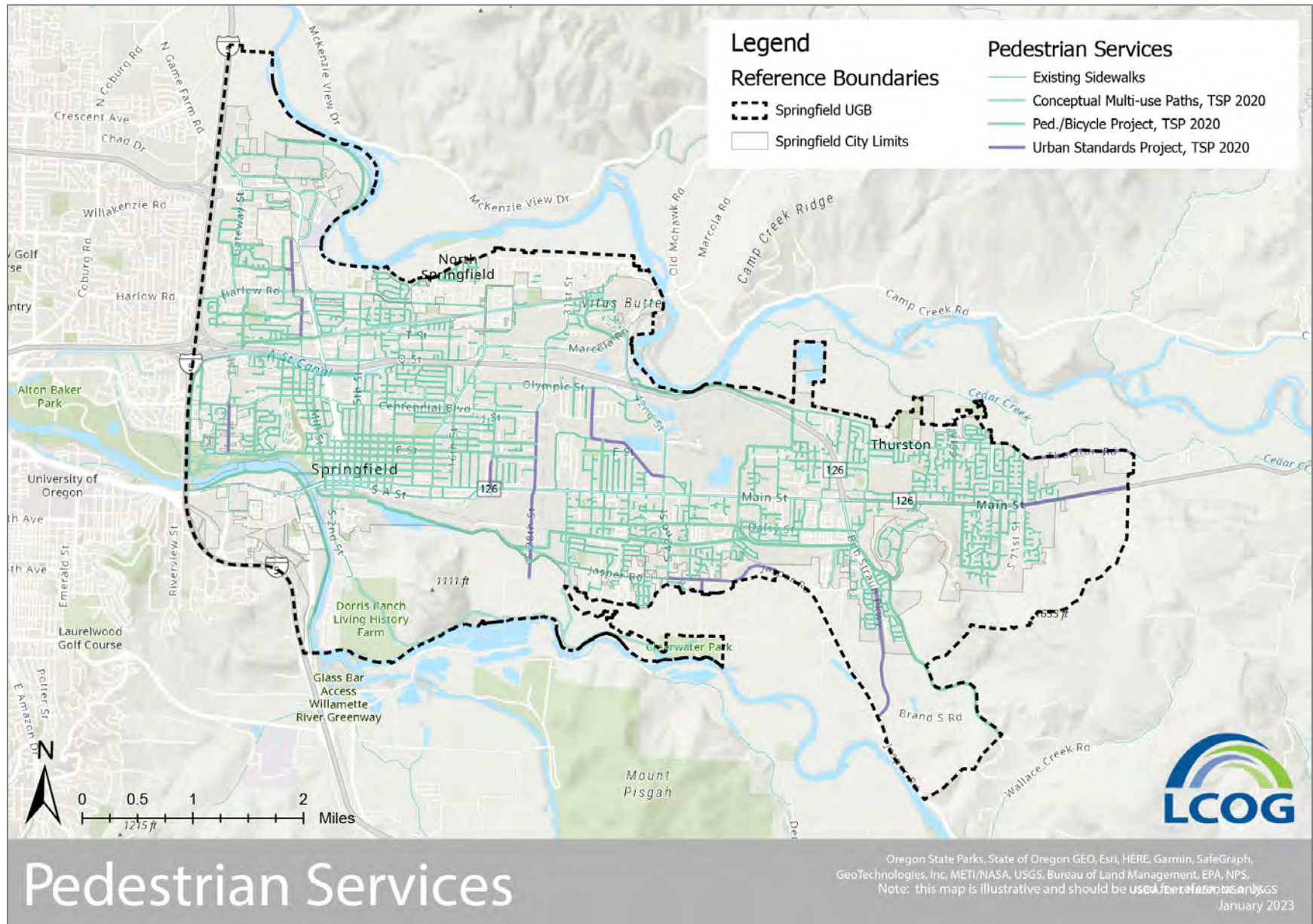
The intent of this analysis is to demonstrate a baseline of existing and planned facilities – shared use paths, sidewalk paths, protected bike lanes, accessways, and neighborhood greenways – that are appropriate for all ages and abilities.

Map 8 and Map 9 show high-quality pedestrian services and high-quality bicycle services, respectively. The City does not currently have area-based GIS layers that reflect these definitions. However, the City has identified several available layers that represent aspects of high-quality pedestrian services (network presence/absence, crossing safety and accessibility, street and park lighting) and high-quality bicycle services (network presence/absence, street and park lighting).

Since service area data are not available yet for high-quality pedestrian and bike services, only the high-quality 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 purposes of this analysis, the areas of higher line density suggest where high-quality services are most available (e.g., downtown). ADA ramps and traffic lights 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.

²³ Meets minimum construction standards for dedicated space to bicycle (bicycle lanes, mixed-use paths, signage, and striping).

MAP 8. HIGH-QUALITY PEDESTRIAN SERVICES



Pedestrian Services

MAP 9. HIGH-QUALITY BICYCLE SERVICES

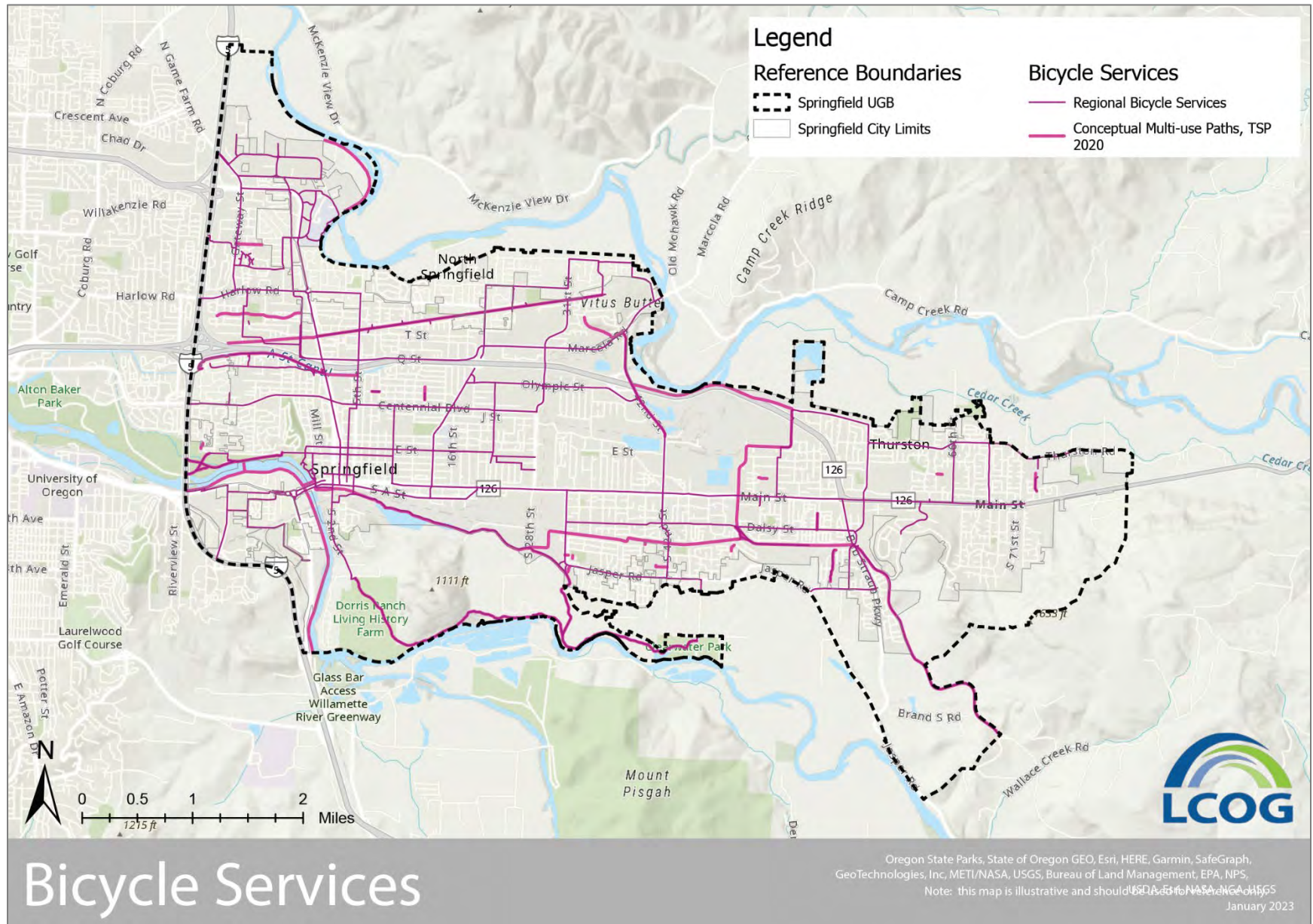


TABLE 4. HIGH-QUALITY PEDESTRIAN SERVICES DATA SOURCES

Item	Pedestrian Services Source
Existing sidewalks	Springfield ²⁴
Planned pedestrian improvements	Springfield ²⁵
Streetlights and park lights	Springfield, ²⁶ Willamalane
ADA ramps	Springfield ²⁷
Traffic signals	Springfield ²⁸

TABLE 5. HIGH-QUALITY BICYCLE NETWORK DATA SOURCES

Item	Bicycle Services Source
Planned bicycle improvements	Springfield ²⁹
Regional existing bicycle network	LCOG ³⁰
Streetlights and park lights	Springfield, ³¹ Willamalane

HIGH-QUALITY ACTIVE TRANSPORTATION AND TRANSIT COMPOSITE

Area-based data on high-quality active transportation in the Eugene-Springfield area are not available, and a more complete analysis is not possible given the current scope and budget. Because locations with high-quality active transportation largely intersect with areas with high-quality transit (with a few exceptions) and because bicycle and pedestrian infrastructure tends to cluster in urban centers that are likely to be selected as potential CFAs anyway, LCOG recommends deferring this analysis until *Step A3, Suitability*. 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

²⁴ Existing network data from the Springfield BPAC’s Pedestrian Network Inventory online map (<https://sporgis.maps.arcgis.com/apps/webappviewer/index.html?id=f01c0bc2fdc341e9b4601b7829f896d5>). Data received from Springfield GIS on 2/22/2023.

²⁵ Planned network data can be found in Transportation System Plan (https://www.springfield-or.gov/wp-content/uploads/2020/05/Springfield2035TSP-ExecutiveSummary-4_22_20-clean.pdf) Figure 11 (Recommended Pedestrian and Bicycle Projects) and also in the Urban Standards Projects that add sidewalk facilities. Data received from Springfield GIS on 3/23/2023.

²⁶ Data received from Springfield GIS on 3/23/2023.

²⁷ Ibid.

²⁸ Ibid.

²⁹ Planned network data can be found in Transportation System Plan (https://www.springfield-or.gov/wp-content/uploads/2020/05/Springfield2035TSP-ExecutiveSummary-4_22_20-clean.pdf) Figure 11 (Recommended Pedestrian and Bicycle Projects) and also in the Urban Standards Projects that add sidewalk facilities. Data received from Springfield GIS on 3/23/2023. Data received from Springfield GIS on 3/23/2023.

³⁰ Existing network data are intended to reflect the multi-use paths (purple) and bike lanes (blue) from the Springfield Bike Map (https://springfield-or.gov/wp-content/uploads/2022/07/Springfield_2022.WEB.pdf). Data retrieved from RLIDGeo regional geodatabase on 2/22/2023.

³¹ Data received from Springfield GIS on 2/22/2023.

time, high-quality active transportation can be used 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).

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 earthquake or wildfire risk were either mitigated by current land use regulations and building codes or did not apply. Coastal erosion and tsunamis do not apply due to the location of the city in the county. The only applicable hazards remaining for this analysis were riverine flooding and vulnerability to landslides due to steep slopes. The FEMA Floodway was used to represent flooding hazard and the Hillside District Overlay zone was used for steep slopes.

Map 10 shows the remaining land in Springfield's UGB that is not in the FEMA Floodway, is outside the Hillside District Overlay, 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.

MAP 10. SAFE FROM NATURAL DISASTERS AND HAZARDS (DEVELOPABLE)

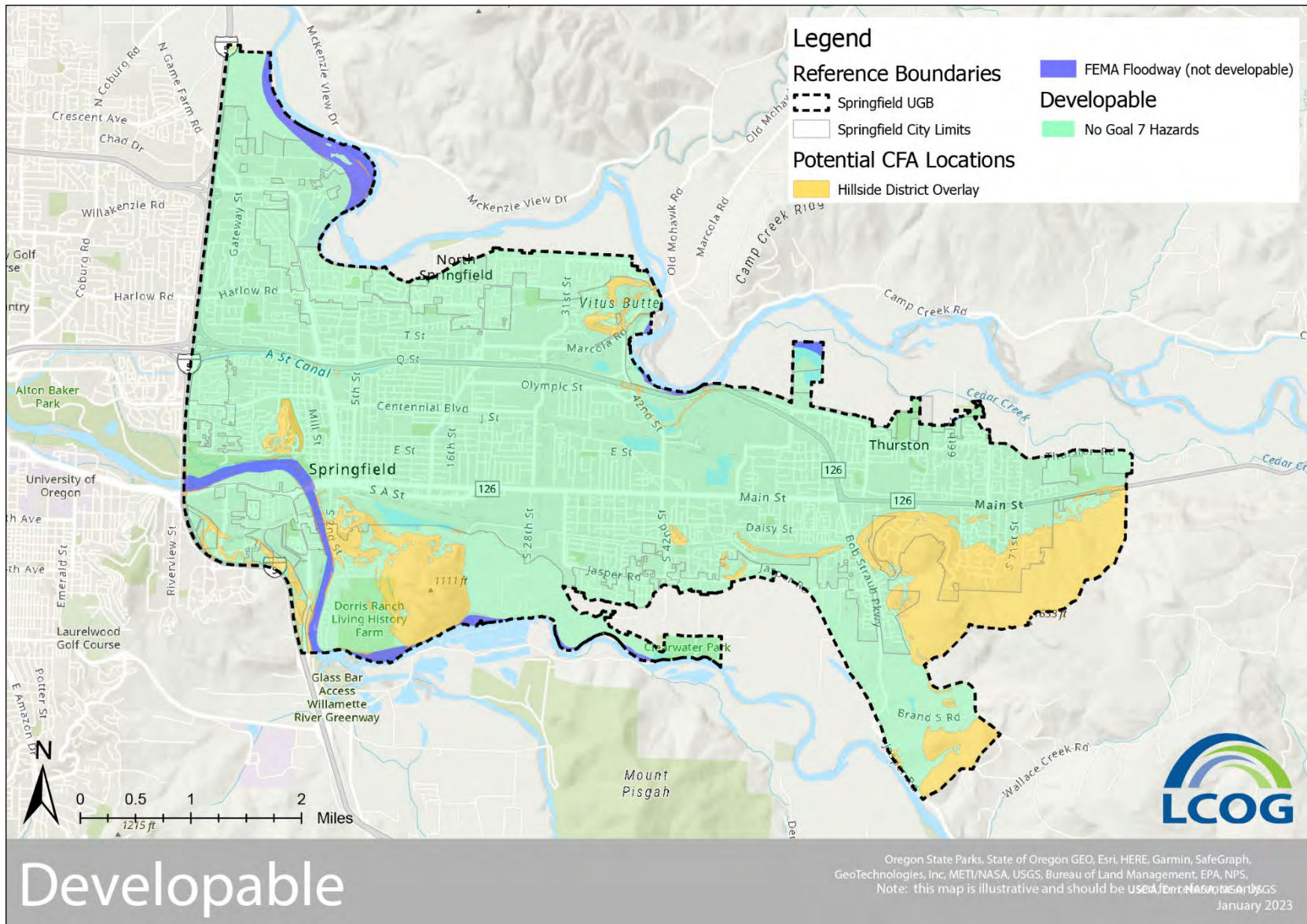


TABLE 6. SAFE FROM NATURAL DISASTERS AND HAZARDS (DEVELOPABLE) DATA SOURCES

Item	Source
Flood Prone Areas (FEMA Floodway)	FEMA ³²
Hillside District Overlay	Springfield ³³

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, DLCDC is reviewing this section of the rules and plans to clarify it soon. 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 Springfield CFAs

COMBINING THE LOCATIONAL CRITERIA

The three locational criteria considered relevant in this step of the analysis were combined to visualize where they co-occur (see Map 11):

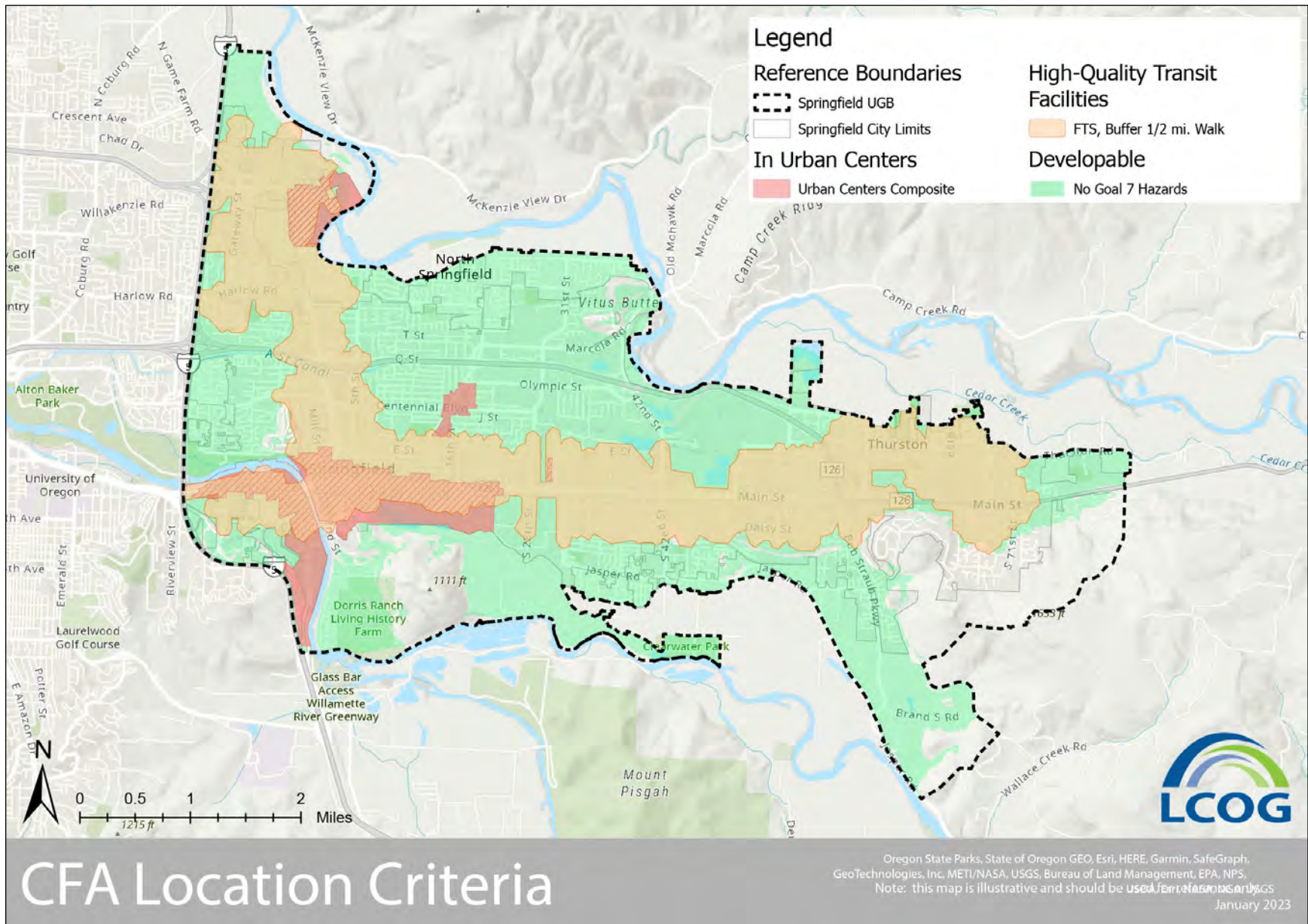
- Urban Centers
- High-Quality Transit Corridors
- Developable Lands

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.

³² FEMA.

³³ Data received from Springfield GIS on 3/22/2023.

MAP 11. COMBINED CFA LOCATIONAL CRITERIA



FINDING INTERSECTION OF THE CRITERIA

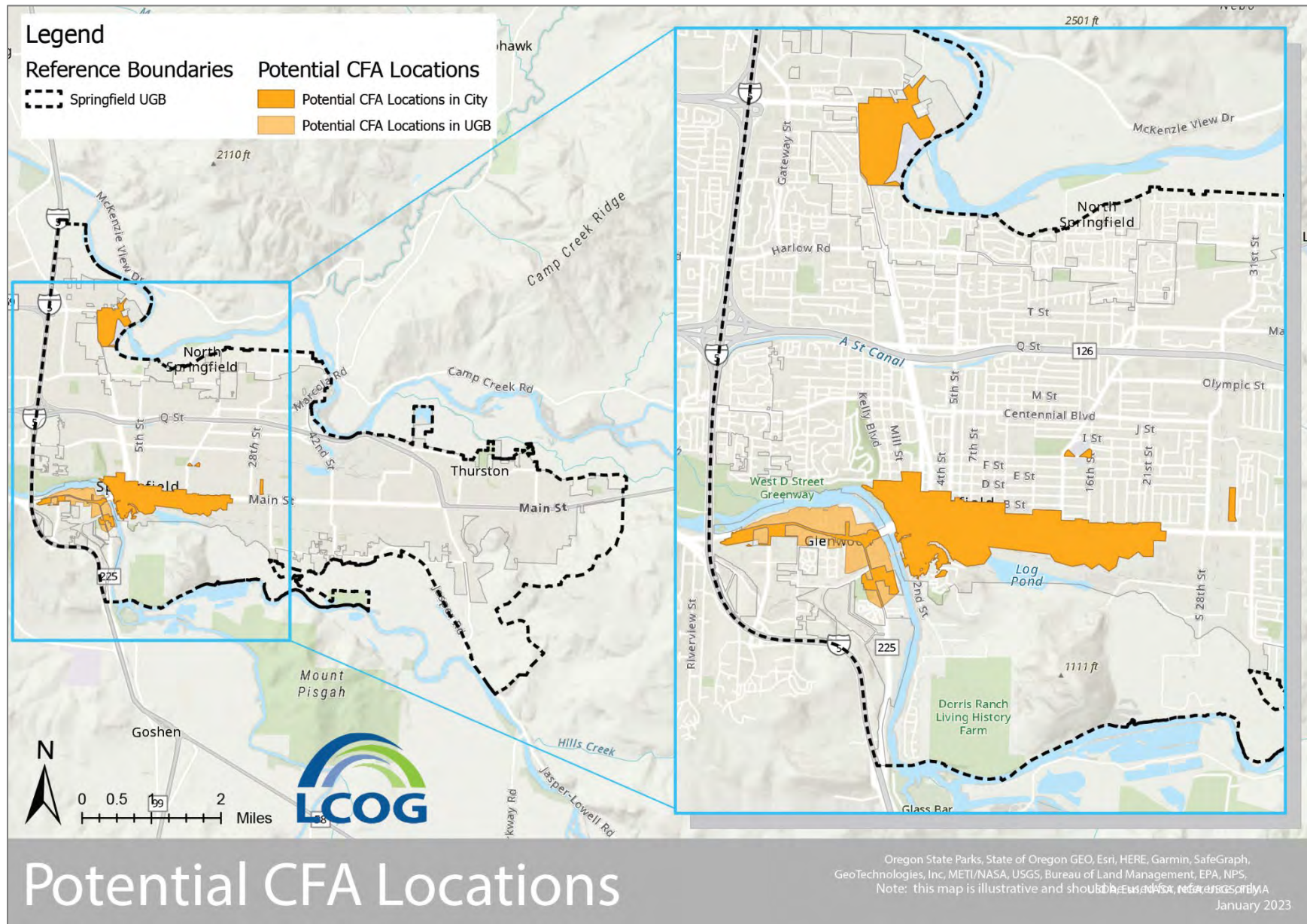
Map 12 shows potential CFA locations in the City of Springfield. The areas where urban centers, high-quality transit corridors, and developable lands are present were found by finding the intersection of the GIS layers. These intersection areas represent potential locations within Springfield's UGB where CFAs could be located based on the locational criteria provided in OAR 660-012-0310(2). Areas that are inside the city limits are differentiated from areas inside the UGB, but outside the city limits.

As noted in the previous section, there are special requirements under OAR 660-012-0310(2)(e) associated with locating CFAs outside of city limits. Several areas identified in this analysis, all in the Glenwood area, are at least partially outside the city limits. There are at least two options regarding how to proceed with these areas:

- A. Plan to annex any area prior adopting it as a CFA.
- B. Demonstrate the additional requirements in OAR 660-012-0310(2)(e) have been met.

Depending on the City's choice of how to approach this issue, the additional requirements can be evaluated at a later step of this study (*Step A3, Suitability*) and are not itemized or addressed here.

MAP 12. POTENTIAL CFA LOCATIONS



CONCLUSIONS

CONCLUSIONS

The area where all considered CFA locational criteria intersect is large. It constitutes approximately 643 acres, including rights of way and public lands, which can be included in the CFA to meet minimum area requirements. Most of these areas also appear to be large enough to meet the minimum width requirement. Whether these locations represent sufficient area to meet the capacity requirements of the rules or what proportion of these areas will be needed is to be determined. The assessment of maximum theoretical zoned housing capacity of these areas will 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:

- Further exploration of active transportation service levels, suitability of public infrastructure, and development readiness in the promising CFA locations, including additional requirements in areas outside existing city limits (*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, including annexation of otherwise suitable areas outside existing city limits (*Step A3, Policy*).
- Theoretical zoned housing capacity of suitable areas (*Step 3, Capacity*)
- Determine the most promising areas and their optimal size in acres (*Step A4*)
- Equity and displacement – review and select displacement mitigation strategies (*Step A4*)

City staff input will be needed to help define these analyses more clearly and provide needed data³⁴. These further analyses will occur in subsequent steps, as noted above.

³⁴ City staff provided input to help define these analyses more clearly and provide the data requested by LCOG. These further analyses occurred in subsequent steps, as noted in the LCOG recommendations.

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #2A

DISPLACEMENT RISK ANALYSIS

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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

The purpose of Technical Memorandum #2a is to address requirements in OAR 660-012-0315(4)(f) and present equity information to decision-makers to inform future CFA designation. This memo provides a spatial analysis of historically marginalized community groups and an anti-displacement analysis.

BACKGROUND

The Climate-Friendly and Equitable Communities rules require cities to take steps to address 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 more equitable cities 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 considering equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes Statement,¹ 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 experience marginalization. The term ‘historically marginalized community groups’ is used throughout this Technical Memo in place of “underserved populations” to more accurately capture the nuanced historical patterns of disenfranchisement that have put some community groups at an economic disadvantage today. Per the rules, historically marginalized community groups include but need not be limited to Black and African American people; Indigenous people; People of Color; immigrants; 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; youth and seniors. 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

¹ <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses the first component of the second step in the study phase: analysis of potential CFAs for equity and displacement.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
⇒ Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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

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). CFA studies must include a description of how cities will address the factors listed in OAR 660-008-0050(4)(a)-(f) such as location of housing, fair housing, housing choice, housing options for residents experiencing homelessness, affordable homeownership and rental housing and gentrification, displacement, and housing stability.²

“Gentrification” has been given various definitions but according to Oxford Languages it is defined as “the process whereby the character of a poor urban area is changed by wealthier people moving in, improving housing, and attracting new businesses, typically displacing current inhabitants in the process.”³

“Displacement” occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.⁴

² 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). However, Springfield will be required to complete this work by December 2026.

³ Retrieved from: [Oxford Languages and Google - English | Oxford Languages \(oup.com\)](https://www.oxfordlanguages.com/)

⁴ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

Technical Memorandum #2a focuses on an 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 gentrification and 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. 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 historically marginalized communities and identify actions to mitigate or avoid potential displacement. The following analysis is intended to provide geographic information on communities that are subject to varying levels of risk of displacement, which will aid in setting anti-displacement actions before CFA adoption.

ANALYSIS

OVERVIEW OF METHODS

The following analysis looks at displacement risk 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 but may help inform CFA location choices, as well as which anti-displacement actions may best suit the CFAs. The analysis will provide decision-makers information about which historically marginalized communities are present in Springfield. The information presented may be useful in community engagement efforts or for other city planning projects, such as the future Housing Production Study report.

For the purposes of fulfilling the requirements of the CFA study, the Department of Land Conservation and Development (DLCD) has placed primary emphasis on the spatial anti-displacement analysis in OAR 660-008-0050(4)(f). From DLCD's perspective (gleaned from discussions between LCOG and DLCD), 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 designating a CFA. The anti-displacement spatial analysis follows DLCD's recommended approach⁵ but utilizes a more granular dataset that will enhance the analysis and make the results more specific to the Springfield context. While the CFA study is focused on displacement pressures resulting from CFA designation, a citywide analysis could support other planning efforts that Springfield may pursue to mitigate displacement in the future.

⁵ 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>).

RESULTS

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 memo⁶ 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 2003.⁷ The original research for this work was performed by Portland State University (PSU).⁸

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.

⁶ 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.

⁷ 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.

⁸ Anti-Displacement and Gentrification Toolkit, Attachment A. Retrieved from https://www.oregon.gov/lcd/UP/Documents/AttachmentA_PSU%20Toolkit.pdf on 4/26/2023.

The subsequent steps in the DLCD methodology, which explore mitigating strategies, will be addressed in CFA Study Step A5.

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

- DLCD and Oregon Housing and Community Services (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.⁹
- City staff provided feedback that the neighborhood typology map data produced by DLCD,¹⁰ which used a census tract level, was not granular enough to pick up known areas of risk. The PSU methodology originally used tracts also. Instead, this analysis uses American Community Survey (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.¹¹ The IPUMS project is a website and database that integrates and enhances documentation for ACS data in a way that makes it easier to study change, conduct comparative research, merge information across data types and analyze individuals within a family and community context.
- The original PSU methodology was based on analysis of ACS data from two different 5-year sampling time periods, 2010-2014 and 2015-2019.¹² For the current analysis, the earlier time period (used to calculate change over time) was changed to 2008-2012 to represent the conditions at the time of the data collection for the last Housing Needs Analysis by the City (2011).¹³ 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 2019.¹⁴ This time period was selected for the Demographic Analysis as well. The anti-displacement methodology is based on the correspondence between demographic and housing market indicators. The housing market indicators shifted in 2020 and after due to the COVID-19

⁹ DLCD and OHCS collaborated on the statewide analysis based on the PSU methodology which resulted in the CFA Anti-Displacement Map. This analysis made some changes to the original PSU methodology.

¹⁰ CFA Anti-Displacement Map: Anti-Displacement Typologies 2022 Layer. Available at: <https://geo.maps.arcgis.com/apps/mapviewer/index.html?webmap=b0f58b8dcf5b493b978bffd063b2aa98>.

¹¹ IPUMS NHGIS, University of Minnesota, www.nhgis.org.

¹² 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.

¹³ Springfield Residential Land and Housing Needs Analysis (RLHNA), (2011). Available at: <https://www.springfield-or.gov/wp-content/uploads/2019/05/REDUCED-SIZE-5-Ord-6268Exhibits.pdf>

¹⁴ 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.

pandemic and have not fully recovered. Since post-pandemic data is not available at this time, it was concluded that using pre-pandemic numbers would provide a better assessment of the housing market trends.

- The DLCD methodology used the county as the geographic area for comparison. DLCD compared tract data to the county-wide measures (median values). In this analysis, block group data¹⁵ was compared to the Springfield Census Place (incorporated city limits)¹⁶ measures.

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

- Because the term “neighborhood” has a different familiar definition in Springfield, the remainder of this document will refer to these demographic analysis areas (block groups) as just “areas.” The typology will be referred to hereafter as an “area typology.”¹⁷
- Some of the indicator sets were renamed to better describe the set’s characteristics, to change the perception of a set, or just for the sake of clarity. The following 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.

¹⁵ The set of Block Groups that most closely represented the area of the UGB were used for the anti-displacement analysis. In a small number of locations, they were clipped to that boundary in order to simplify the display of information. Block Groups are statistical divisions of Census Tracts and are generally defined to contain between 600 and 3,000 people.

¹⁶ The Bureau of the Census defines a place as a concentration of population; a place may or may not have legally prescribed limits, powers, or functions. This concentration of population must have a name, be locally recognized, and not be part of any other place. A place either is legally incorporated under the laws of its respective State, or a statistical equivalent that the Census Bureau treats as a census designated place (CDP). In this case, Place is the incorporated city limits of Springfield.

¹⁷ The City of Springfield contains sub-regions that have names such as Glenwood, Gateway and Thurston that may colloquially be considered neighborhoods. This analysis uses block groups, which does not align with any official neighborhood boundary.

- 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 medians¹⁸ 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 seven 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 2 shows the components with key questions and indicators used to create the area typology.

¹⁸ Citywide median numbers were obtained from the ACS Census ‘Place’ entity, which is the incorporated area of Springfield.

TABLE 2. 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>BOTH TRUE LOW-INCOME</p>	<p><i>Where do Black, Indigenous, 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>TWO OR MORE TRUE VULNERABLE</p>	<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>EITHER TRUE PRECARIOUS</p>	<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>THREE OR MORE TRUE HOT</p>	<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>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 3.

TABLE 3. AREA TYPOLOGY BY INDICATOR SET STATE¹⁹

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	-	-	-	-	-

¹⁹ This table is a replica of [DLCD's Anti-Displacement and Gentrification Toolkit Project: Guide for Cities Implementing HB2003 Housing Production Strategies](#), including the original [PSU Study prepared for DLCD](#). City of Springfield Staff have identified ways to more effectively communicate the information and will explore doing so in developing a CFA Study Executive Summary.

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 Table 3 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 precariously housed populations with vulnerability to gentrification and displacement. 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 precarious 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 in Table 3 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 precarious 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 gentrification. Their housing market exhibits high housing prices with high appreciations, and they have a relatively low share of precarious 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 gentrification. Precarious 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 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 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 4. LOW-INCOME INDICATOR SET

Low-Income	Where do low-income people live?	
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.

VULNERABLE PEOPLE

Five measures were chosen for representative characteristics of households vulnerable to gentrification and 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 5. VULNERABLE PEOPLE INDICATOR SET

Vulnerable People	<i>Where do BIPOC and vulnerable people live?</i>	
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

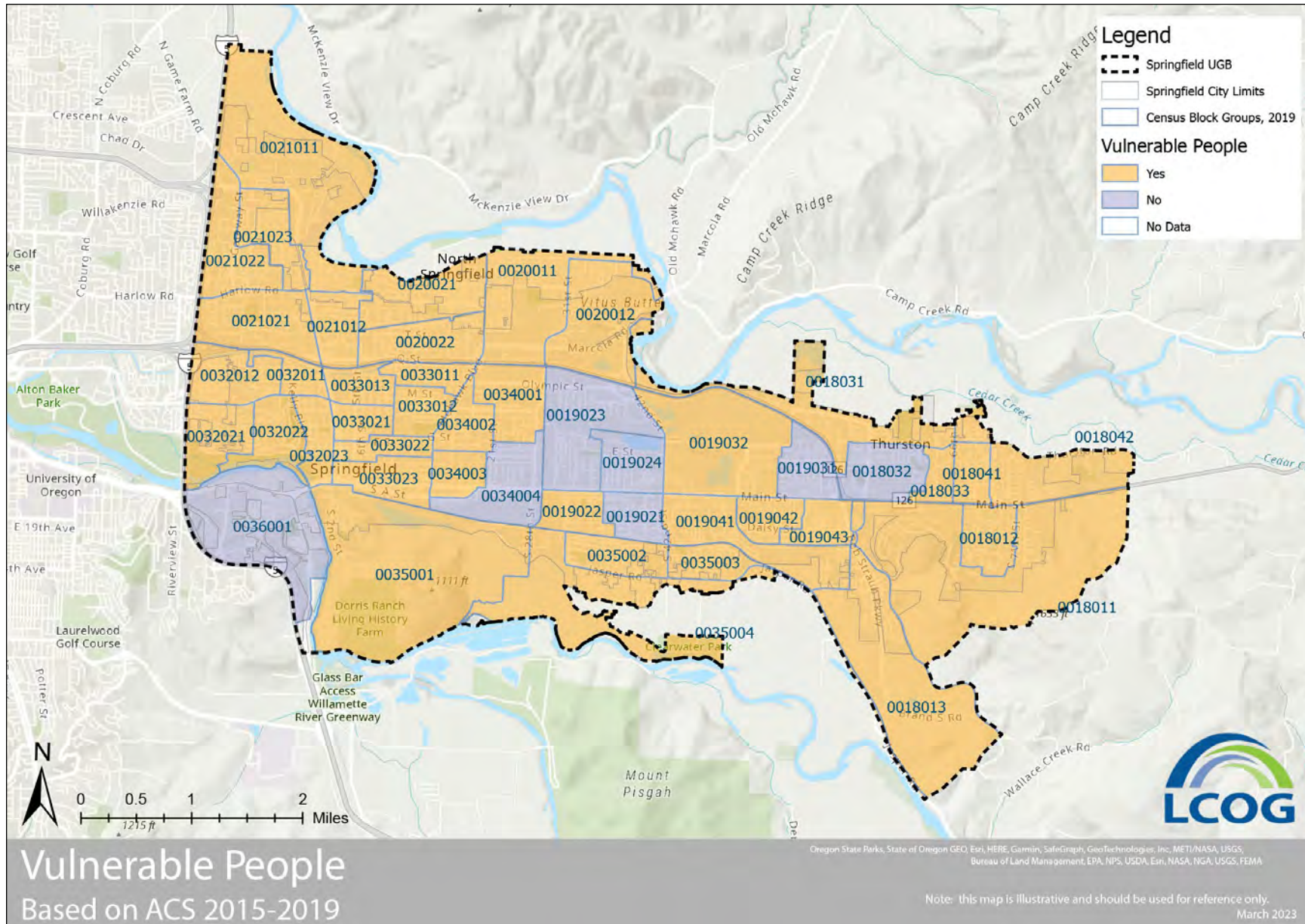
¹ BIPOC is defined as all households except for non-Hispanic whites.

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



PRECARIOUS HOUSING

Precarious housing 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 6. 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

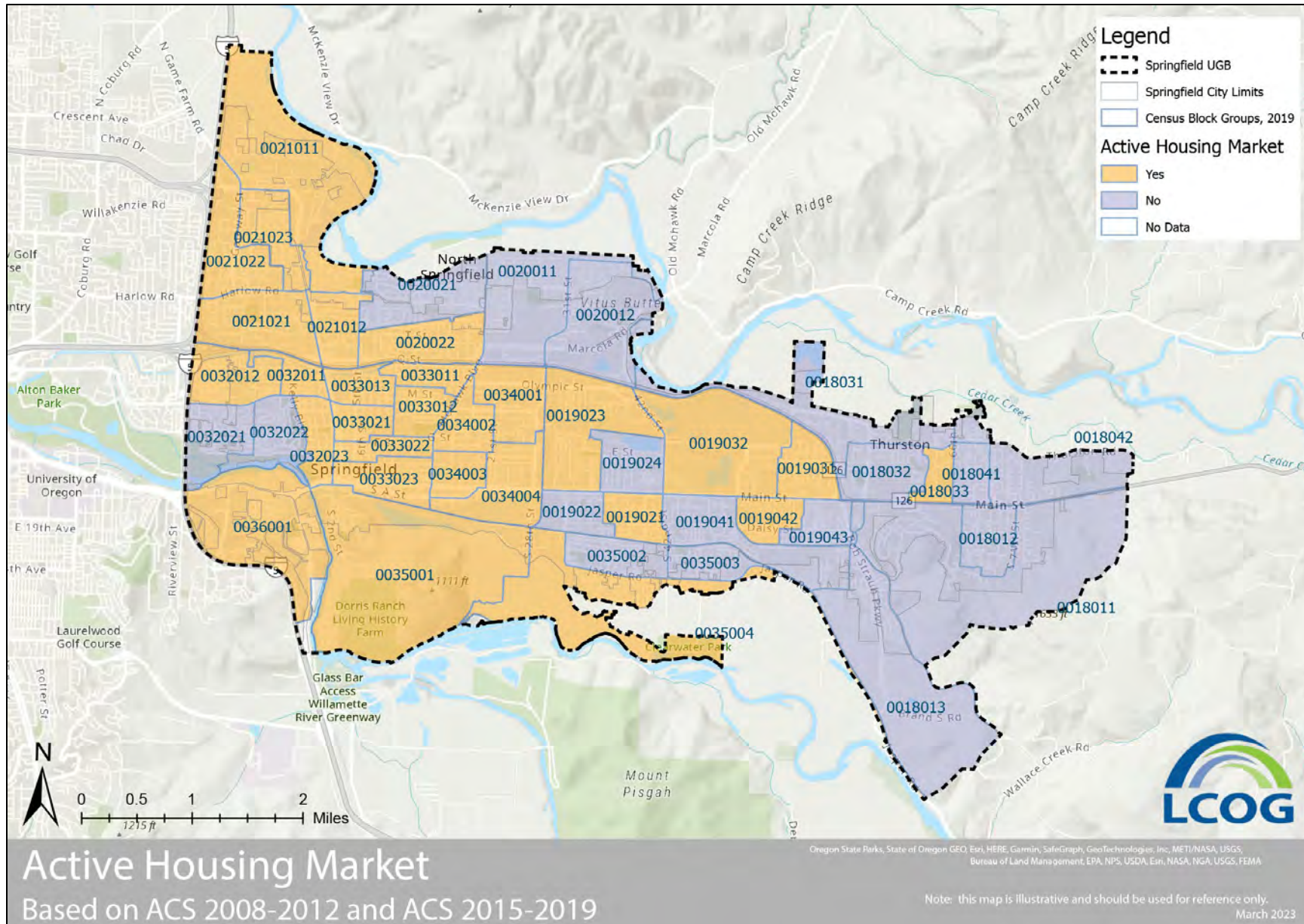
ACTIVE HOUSING MARKET

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 7. 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, 2015-2019 ACS 5-year

MAP 4. ACTIVE HOUSING MARKET INDICATOR SET



DEMOGRAPHIC SHIFT

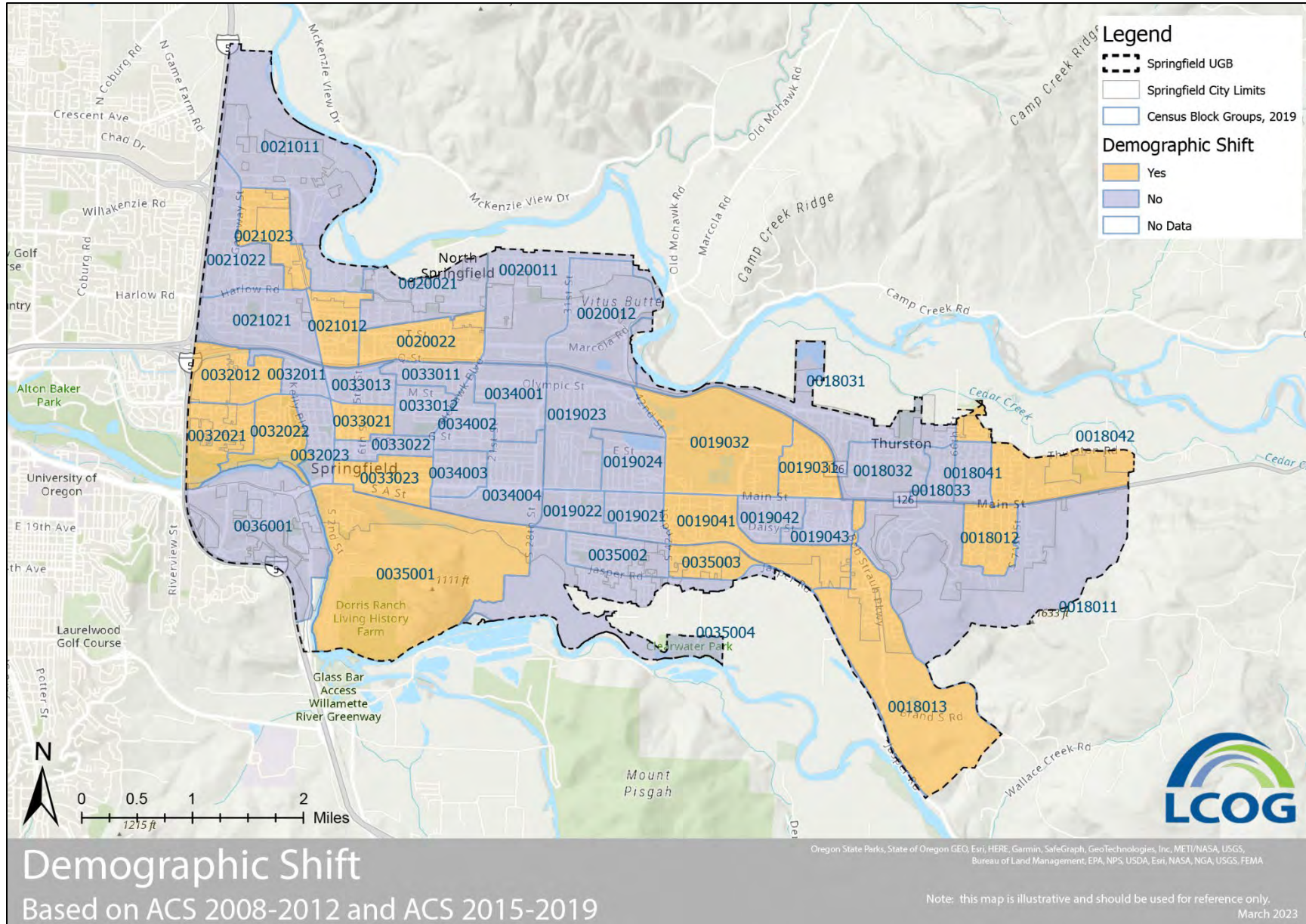
The following four measures were used to assess gentrification-related demographic change.

TABLE 8. 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



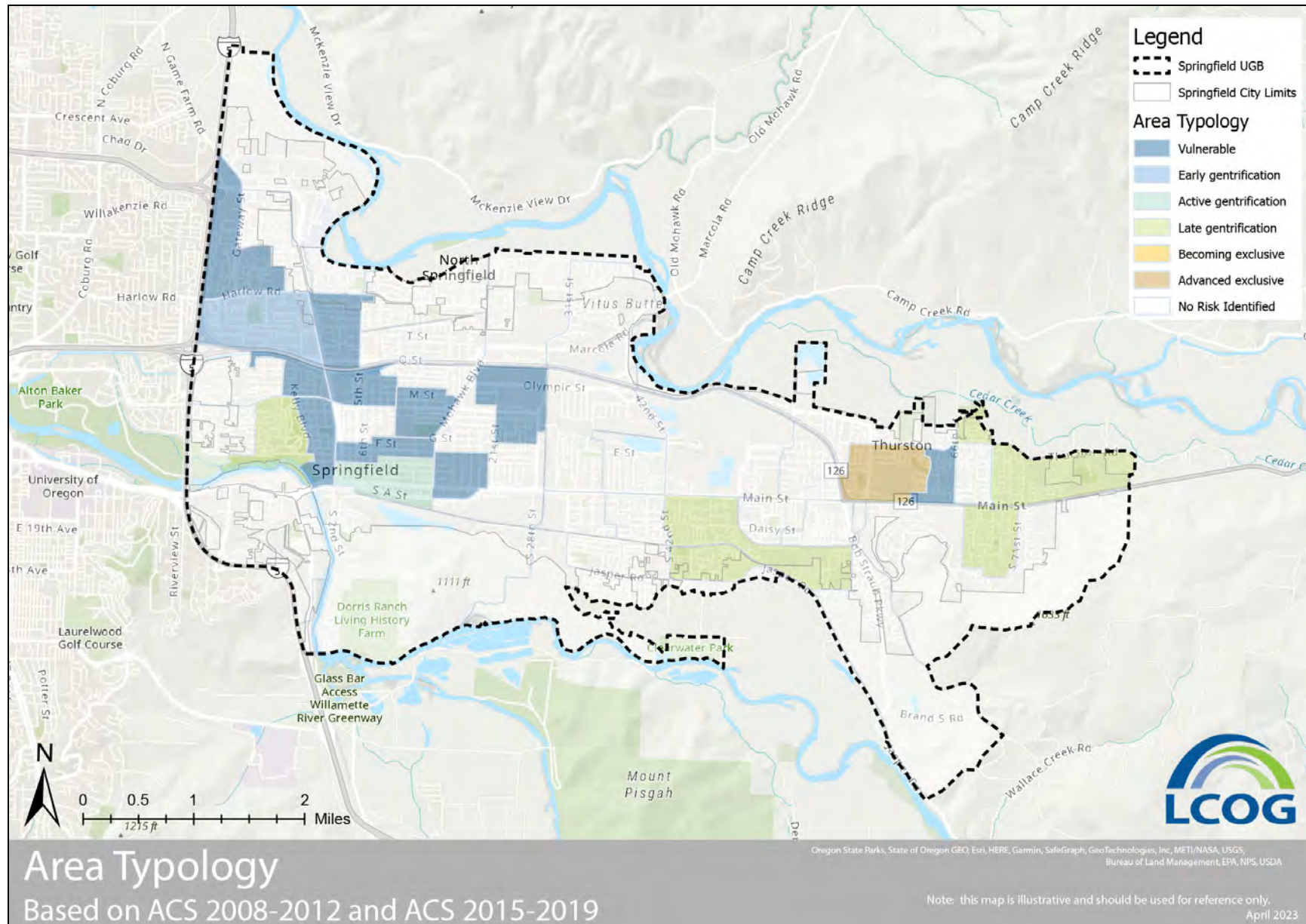
DISPLACEMENT RISK AREA TYPOLOGY MAP

The combination of the presence or absence of the indicator sets in the above section provide area types, based on rules defined for each set. Each area (block group) was analyzed assessed for the presence or absence of an indicator set, and assigned a “yes”, “no” state (see Table 3). 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 seven 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.

Map 6 was generated by combining the risk factors (indicators), based on the PSU methodology.

MAP 6. AREA TYPOLOGY



CONCLUSION

Displacement Risk Analysis

ANALYSIS OF THE APPROACH USED

When DLCD provided an analysis based on census tracts and a county-wide comparison, Springfield staff observed several inaccuracies in area typologies based on local knowledge. One goal of replacing census tracts with block groups and switching from a county-wide comparison to a city-wide comparison, was to address the inaccuracies. Defining the area type at a block group level has proved to be beneficial. Patterns of gentrification potential and displacement risk were overall more evident and better correlated with the local knowledge of City staff. Comparing citywide was more accurate and revealed more spatial differences and areas of risk than comparison with the county. However, several questions about certain area designations remained and have been subsequently answered in a separate document that breaks the pertinent block groups down in more detail (Appendix A).

Displacement Risk in Potential CFAs

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.”²⁰

Indicator Set 1 through 5 show that there are concentrations of low-income households, vulnerable people, and older or multi-unit housing throughout Springfield. Indicator Set 4 and 5 also show areas where the housing market has been active and the demographics have shifted over time. The designation of CFAs will result in increased density allowances and could result in further investment in CFAs. As noted in the NCRC study quote, with investment and changes to the built environment comes rising rent, home, and property values. Displacement occurs when low-income and vulnerable households can no longer afford to live in their established communities.

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 Springfield, as shown by the presence of indicator populations in Maps 1 through 5. When the indicators are combined to make area types, it provides a glimpse into how gentrification has played out in the recent past and which areas are especially vulnerable to displacement today (Map 6).

The following area types were mapped in the City of Springfield:

- Vulnerable
- Early Gentrification
- Active Gentrification
- Late Gentrification
- Advanced Exclusive
- No Risk Identified.

The only area type missing is Becoming Exclusive. The most predominant area typologies are Vulnerable and Late Gentrification. The Vulnerable type shows where there is a combination of higher-than-city-average low-income, vulnerable, and older/multi-unit households that have yet to be part of an active housing market. The Late Gentrification type only contains the higher-than-city-average vulnerable people indicator and has been subject to an active housing market and a demographic shift over the time period included in the analysis. Although Late Gentrification does not indicate a higher-than-city-average presence of low-income or older/multi-unit households, the potential for the presence of historically marginalized community groups in these areas remains. Citywide, the Early Gentrification, Active Gentrification, and the Advanced Exclusive area types have also been mapped in the City of Springfield in this analysis for several block groups. To summarize the indicator set components of the Early Gentrification type (see Table 3), low-income,

²⁰ Mitchell, Bruce & Franco, Juan. (2019). Shifting Neighborhoods: Gentrification and cultural displacement in American cities.

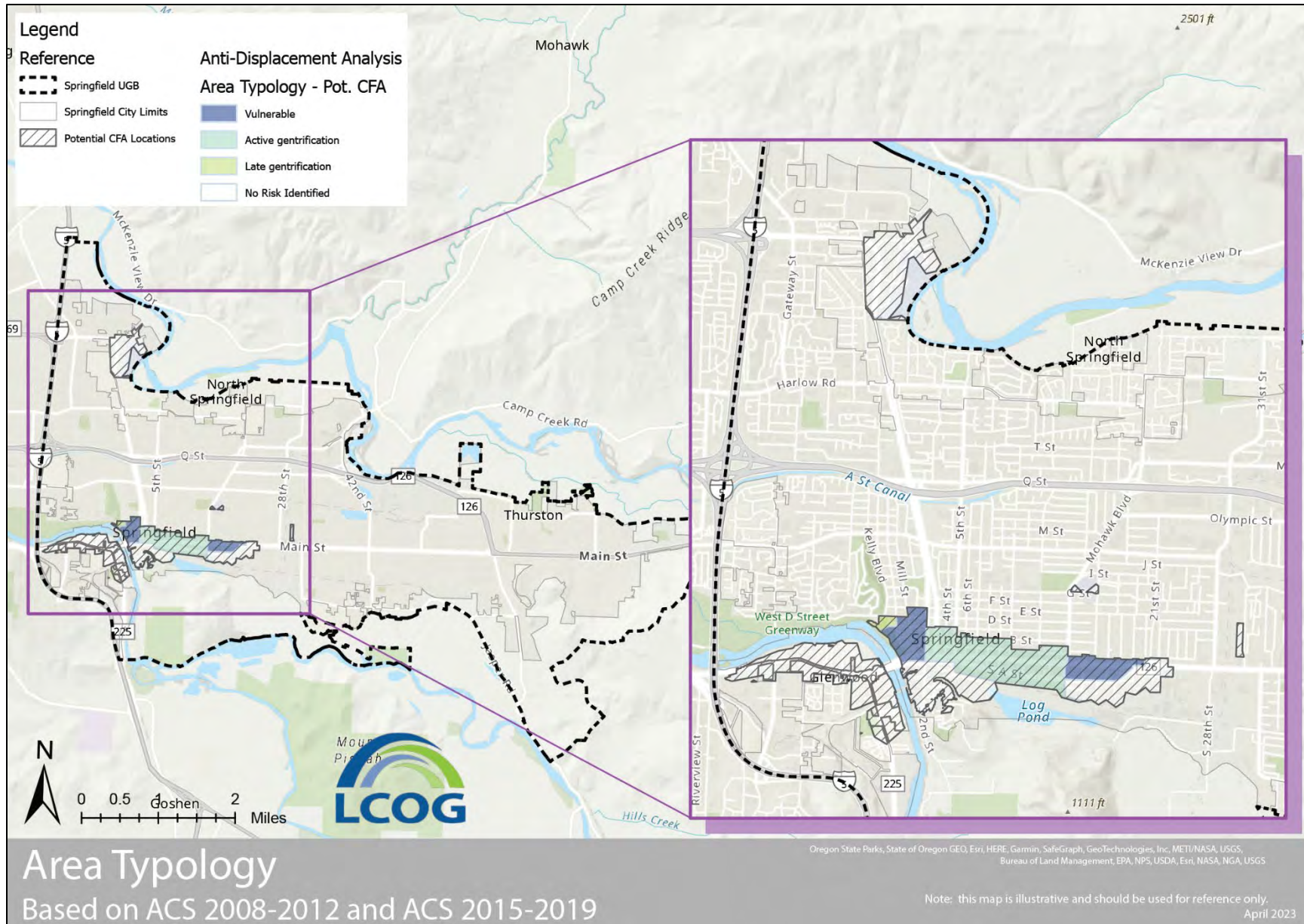
vulnerable people, older or multi-unit housing and active housing market indicators are present, and the only indicator missing is demographic shift. Active Gentrification is composed of the presence of all indicators. Lastly, Advanced Exclusive is made up of the active housing market indicator, and none of the others. The displacement risk analysis was performed citywide, which may be useful as a general planning study for various purposes, but the purpose here was to compare this analysis to the promising CFAs identified in Step A1, and eventually to the suitable CFAs identified in Step A3, which will be included in Step A5. Map 7 on the following page shows the relationship between area types and promising CFAs. The majority of potential CFAs are intersected by the No Risk Identified area type. Areas that are intersected by a risk type are intersected by the **Vulnerable, Late Gentrification and Active Gentrification** area types. This suggests that those potential CFA locations include areas with elevated risk of displacement of historically marginalized community groups, and areas where shifts in demographics and the housing market have occurred.

TABLE 9. AREA TYPES IN POTENTIAL CFA

Area Type	Acres in Potential CFAs
Vulnerable	93.8
Active Gentrification	142
Late Gentrification	6.3
No Risk Identified	528.9
Total	771

Implementation of CFAs without concurrent mitigation measures (such as investments in affordable housing and strong renter protections) is likely to exacerbate the trend towards increased risk of displacement for historically marginalized community groups. The City of Springfield is subject to the same challenges of trying to invest in a climate-friendly community without continuing the patterns of displacement of historically marginalized community groups as many other cities. As decision-makers move forward in the CFA designation process, they may look to Table 2 of this analysis to gain a better understanding of what components make up an indicator set. This would help tailor potential solutions to the needs of the existing communities within potential CFAs.

MAP 7. AREA TYPOLOGY COMPARED TO POTENTIAL CFAS



RECOMMENDATIONS

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 Affordable/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 are not required for CFA study adoption but could help inform best anti-displacement mitigation strategies before implementation of CFA regulatory changes.

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 influence gentrification and the risk of displacement for historically underserved populations. These maps could complement the area profiles and could be another appendix to the final study report.

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. According to a paper published in 2020 by the National Bureau of Economic Research (NBER)²¹ in the first two months of the COVID-19 pandemic (February to April of 2020) 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 CFA anti-displacement analysis was limited by a lack of available localized census data for analyzing business displacement. There is no comparably granular dataset for business ownership associated with other relevant demographic 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.²²

Integrated Community Engagement Results on Equity, Gentrification, and Displacement

Future integration with the results of the community engagement process should also take place and influence the most suitable displacement mitigation tools selected before CFA implementation.

²¹ “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

²² “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

City of Springfield
Climate-Friendly Areas Study

APPENDIX A – CITY CONCERNS ABOUT THE ANTI-DISPLACEMENT MAP

To: Springfield CFA Study Project Team

From: Lane Council of Governments

Date: November 21, 2023

PURPOSE & BACKGROUND

At the start of this CFA Study process (2022), City staff shared information with LCOG and DLCD regarding observed inaccuracies in the online DLCD “CFA Anti-Displacement Map”²³ for the Springfield area. After reviewing the preliminary results of the analysis described in this memo, City staff commented that the resulting map seemed to have most of the same problems and asked LCOG staff to assess this. The following explores the extent to which the modified PSU methodology and analysis performed in Technical Memo #2a addresses those inaccuracies.

ASSESSMENT OF CONCERNS

1. GLENWOOD RIVERFRONT

City staff observed the following about the DLCD map:

All of Glenwood Riverfront is classified “Advanced Exclusive” and yet that area of Springfield is higher than regional average for households in poverty and elderly population (ref. LCOG Title VI data portal²⁴ and DHS high poverty hotspots²⁵) and thus it seems odd that the neighborhood typology seems inaccurate.

²³ See <https://geo.maps.arcgis.com/apps/mapviewer/index.html?webmap=b0f58b8dcf5b493b978bffd063b2aa98>.

²⁴ [Socio-Economic Data | Lane Council of Governments Oregon \(lcog.org\)](#)

²⁵ [High Poverty Hotspots. Oregon DHS Office of Forecasting, Research, & Analysis. May 2015.](#)

The Glenwood Riverfront area is classified as “No Risk Identified” using the modified PSU methodology.

The Glenwood neighborhood is a somewhat diverse area reflecting a mix of residential, commercial, and industrial uses, with some larger partially-developed lots and open spaces near the river. The Tract used by the DLCDD map covers a larger area to the south, as well. In the current analysis, only Glenwood Riverfront is captured by one Block Group. The fact that all of Glenwood Riverfront is captured could still be a source of problems if too many diverse areas and uses are captured as the displacement risk in the subareas will not be noticeable in the data at the aggregation level of the Block Group.

The Glenwood Riverfront Block Group is "No Risk Identified" because of the following:

- **Glenwood Riverfront (No Risk Identified)**

1. Low-Income: **TRUE**
2. Vulnerable People: **FALSE**
3. Older or Multi-unit Housing: **TRUE**
4. Active Housing Market: **FALSE**
5. Demographic Shift: **TRUE**

The area type is methodologically correct as that demographic profile does not fit any of the area types that capture gentrification and displacement risk. The most obvious indicator set to wonder about is Vulnerable People: **FALSE**. This is examined more closely below.

Compared to Glenwood in Other Sources

LCOG CENTRAL LANE METROPOLITAN PLANNING ORGANIZATION (CLMPO) TITLE VI MAP

The LCOG CLMPO Title VI map describes Glenwood as having a concentration of two factors: Elderly and Poverty (based on the 2017-2021 ACS).

Elderly population is detected in the modified PSU methodology in the Vulnerable People indicator set. It is reasonable to expect that the modified PSU methodology would type this area as "Vulnerable", but not as “Active Gentrification” since there is probably not a very active housing market in the area at this time. The area is Low-Income: **TRUE**, which fits with the Title VI map finding of "Poverty". However, the Vulnerable People: **FALSE** is blocking the outcome of getting the "Vulnerable" type under the modified PSU methodology. This occurs because the Vulnerable People indicator set is defined as **TRUE** for **two or more** of the following (based on the 2015-2019 ACS) being **TRUE**. Compared to the city median:

- **Glenwood Riverfront (No Risk Identified)**

1. Vulnerable People: **FALSE** (two or more of the below = **TRUE** → **TRUE**)
 - More BIPOC persons: **FALSE (12% vs 20%)**
 - More households with low English proficiency: **FALSE (0.0% vs 1.4%)**

- More persons with disabilities: FALSE (14% vs 19%)
- More single-parent households: FALSE (0.5% vs 6.6%)
- More persons 65 years and older: TRUE (22% vs 14%)

Since only the elderly are found to be more concentrated in Glenwood Riverfront, this finding is consistent with the Title VI map. It is not considered "Vulnerable" because only one vulnerable group is present at above median levels for the city as a whole.

DHS POVERTY HOT SPOTS

The DHS Poverty Hot Spots map that was shared by City staff is consistent with the results in this memo since Glenwood is considered Low-Income under the PSU methodology.

It is not considered "Vulnerable" because the presence of low-income populations is not sufficient to classify the area as "Vulnerable" under the PSU methodology.

See the **Conclusions and Recommendations** section below for more discussion of how planners might interpret and use the results for Glenwood Riverfront.

2. ADVANCED EXCLUSIVE AREAS

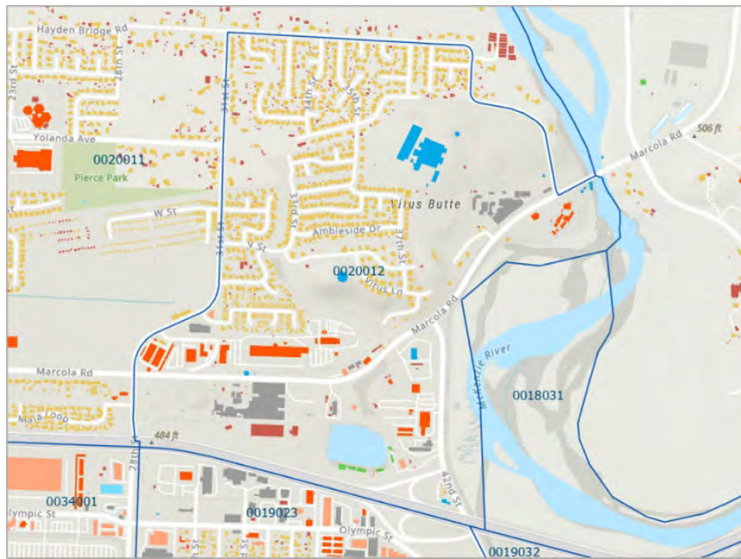
City staff observed the following:

None of the areas in Springfield that we would consider likely to be "Advanced Exclusive" (i.e. Ambleside area, Mountain Gate area, Levi Landing, and McKenzie Crest Drive) are labeled on the map as such.

One of the areas mentioned by City staff, Ambleside, is examined below.

Taking a look at the Ambleside area, it is found within Block Group 2 of Tract 20.01 (0020012). The Ambleside area is in the middle of this Block Group.

FIGURE 1. AMBLESIDE AREA OF SPRINGFIELD



The area profile is as follows.

- **Tract 20.01, Block Group 2 – incl. Ambleside (No Risk Identified)**
 1. Low-Income: FALSE
 2. Vulnerable People: TRUE
 3. Older or Multi-unit Housing: FALSE
 4. Active Housing Market: TRUE
 5. Demographic Shift: FALSE

The only obstacle to this area being typed as “Advanced Exclusive” is Vulnerable People: TRUE. The following breaks out the status values for the components of that indicator set.

- **Tract 20.01, Block Group 2 – incl. Ambleside (No Risk Identified)**
 1. Vulnerable People: TRUE (two or more of the below = TRUE → TRUE)
 - More BIPOC persons: FALSE (16% vs 20%)
 - More households with low English proficiency: TRUE (3.5% vs 1.4%)
 - More persons with disabilities: TRUE (21% vs 19%)
 - More single-parent households: TRUE (8% vs 7%)
 - More persons 65 years and older: TRUE (25% vs 14%)

This area seems solidly flagged as “Vulnerable People”. Several of the indicators are quite a bit above the median for the city as a whole. Three more of those that are TRUE would need to be FALSE to flip the area to “Advanced Exclusive”. The area is not being flagged as having gentrification because there is not a higher than median level of older or multi-unit dwellings, and

there was not a higher than median level demographic shift between 2018-2012 and 2015-2019 in this area, according to the data available.

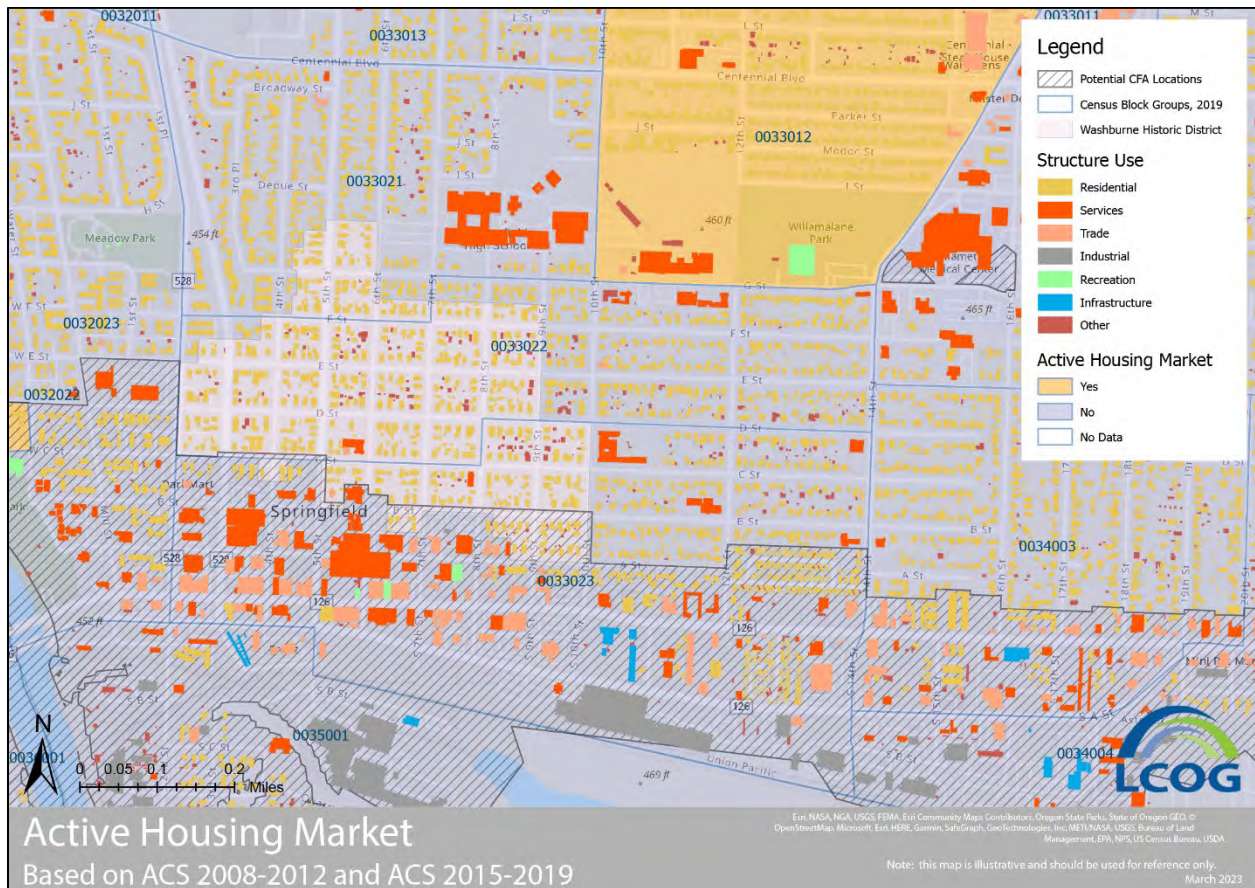
3. WASHBURNE HISTORIC DISTRICT

City staff observed the following:

Washburne Historic District is grouped together with the areas just outside the district that have the “Affordable and vulnerable” classification, which does not seem to square with on-the-ground reality of the differences between properties in the district and those outside the district.

The Washburne Historic District (Washburne) does not align with Block Groups much better than it did with the Tract in the DLCD map. Looking at the map below, the Tract number on the DLCD map that was depicted as intersecting Washburne, Tract 33.02 (003302), included its three Block Groups, 1-3 (0033021, 0033022, 0033023), and was shown intersecting the district in this map from the current analysis.

FIGURE 2. ACTIVE HOUSING MARKET INDICATOR SET MAP IN THE WASHBURNE



The Washburne is shown on the “Active Housing Market” indicator set map as “No” (FALSE) meaning it is not a more active housing market than the median for the city as a whole. The general issue this raises was mentioned previously when discussing Glenwood Riverfront.

The issue is that a demographic “signal” from a subarea of an area (one or more Tracts or Block Groups) might be lost in the “noise” of the rest of the area. For example, if the rest of the area was larger or more densely developed and had a less active housing market than the subarea. However, this is always true with any grain of demographic generalization. For example, Washburne undoubtedly has some blocks with hotter markets than others. While questions may remain about the precision of the modified PSU methodology, the question here is really only about the usefulness of its block-group-level precision for the purposes for which we are trying to put it to use. At a certain point, the size of the area of potential gentrification and displacement may be small enough that it is not considered effective for creating spatially specific mitigation strategies.

Is Washburne smaller or less dense than other areas of the Block Groups it intersects? It appears that it is smaller and has fewer housing units than all three Block Groups it intersects. This could result in the market signal getting lost in all three areas. Although, if the signal is strong enough, it could still be noticeable. If the district’s part of the market was only a little hotter and, as a result, the signal was missed, the displacement-inducing effect of the district would not be much stronger than that of the surrounding area. The problem scenario would be an active enough market in the subarea for gentrification and displacement to be occurring but not a strong enough signal to noticeably dominate the larger area.

The question is made more complex by the fact that “Active Housing Market” is only one displacement risk factors. If the district has a demographic makeup that suggests “Becoming Exclusive” or “Advanced Exclusive” (i.e., not Low-Income, not Vulnerable People) then the question of avoiding displacement may be essentially moot. On the other hand, if Washburne has a more active housing market, and the other characteristics of an “Active Gentrification” area (e.g., Low-Income, Vulnerable People), then consideration must be given to potential tradeoffs associated with excluding it from a CFA boundary or implementing displacement mitigation strategies.

Is Washburne housing market actually a lot more active than the surrounding area or the median for the city as a whole? Determining this would require the use of current, fine-grained sales data. There is parcel-level sales data in the Regional Land Information Database (RLID) that could be used for this purpose. Before doing this extra analysis, it would be worth asking if this is needed.

Roughly two blocks (6%) of the 34 blocks of Washburne (~28 residences) are within the potential CFA locations under consideration from Technical Memo #1. This is not a sufficient sample size to detect a more active housing market for those units with any accuracy. These portions of the district could be excluded from CFA designation.

While the implications of the broader granularity issue are beyond the scope of the current analysis, an analysis of parcel-level sales data and real estate market activity (including non-residential where current plan designations or zoning would allow commercial to displace residential) would be possible with available data and could supplement the results of this analysis. However, some caution would need to be exercised in interpreting the possibility of displacement since the corresponding demographic data is not available.

4. HOTSPOTS IDENTIFIED IN OTHER SOURCES

City staff observed the following:

Areas identified in the LCOG Title VI data portal and DHS high poverty hotspots that would seem to us to meet the “Affordable and vulnerable” classification are not noted as such.

Compared to Other Sources

DHS POVERTY HOT SPOTS

These hot spots were analyzed at the census Tract level using the 2008-2012 and 2009-2013 ACS 5-year survey sample data for its poverty information (and most of its other demographic information). This immediately raises the same question of precision versus accuracy.

DHS identified five hot spots in the Springfield UGB, two of which are analyzed here:

- **South Eugene (incl. Glenwood)**

The Glenwood hot spot (north end of South Eugene hot spot that heads South from Glenwood and includes all of the Russell Creek basin) has been discussed above. The Glenwood portion was shown to be a Low-Income area by the current analysis.

- **East Main Area**

The hot spot called “East Main Area” covers a few blocks south of Main Street between Main Street and the railroad tracks and from 42nd Street to South 37th Street. It is Tract 19.04 (001904) and is made up of three Block Groups. While the Tract is in poverty in the DHS analysis, in the current analysis only Block Group 3 (00019043) is found to be Low-Income. It has Percent Low-Income Households (2015-2019) of 75%, above the medians for the city as a whole of 50%, and Median Household Income (2015-2019) of \$30,223, below the median for the city as a whole of \$47,695. The other two blocks do not exceed the Percent Low-Income Households median or fall below the Median Household Income median for the city as a whole. The portrayal of the area in terms of Low-Income is more precise and is likely to be accurate since it is consistent with the Tract results.

TITLE VI MAP

The LCOG CLMPO Title VI Map was created using Block Group data from the 2017-2021 ACS 5-year survey sample data. It is very similar to the data and approach used in the current analysis. According to its documentation, “the map indicates the Block Groups in which the percentage is higher than the region-wide average for one or more of these factors”. In this case, the region is the CLMPO area, which includes Eugene, Springfield, Coburg, and some peripheral areas. This highlights one of the differences between that analysis and the current one: the modified PSU methodology uses city-wide medians rather than regional averages (means). The Title VI Map likely uses averages because the medians are not known for the region since it is not defined as an aggregation area by the Census, but the Block Groups can be averaged for the region.

Glenwood Riverfront was already explored above in this data and it was found to be consistent.

Looking at the East Main hot spot area from the DHS report as another example, the Block Groups are the same as discussed above.

- Block Group 1 factors: Disabled and Minority
- Block Group 2 factors: Disabled
- Block Group 3 factors: Disabled, Elderly, and Minority

None of these are Households in Poverty so there is some disagreement with DHS Map and the Title VI Map, as there was with the modified PSU map from this analysis. However, the factors present above are components of Vulnerable People in the current methodology, and all three of these Block Groups show as Vulnerable People: TRUE, so there appears to be significant consistency again. Block Group 3 is not flagged as being in poverty in the Title VI map but is Low-Income in the current analysis. This may be attributed to the slight differences in data period and definitions.

It is likely that the same will be seen in the other hot spot areas since similar, but more precise data was used.

5. VULNERABLE HOUSING AREAS

City staff observed the following:

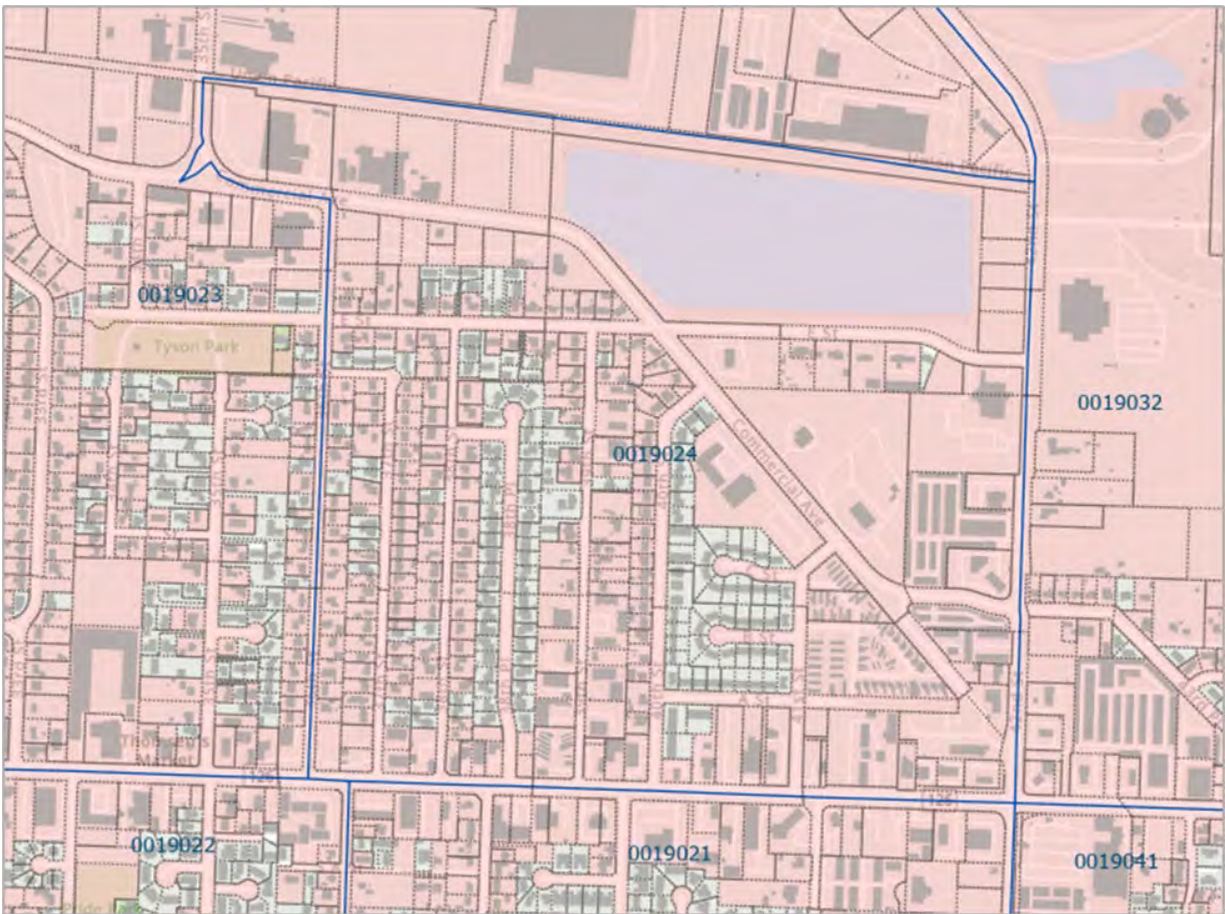
It does not seem to accurately measure which parts of town have “vulnerable housing” – defined as multi-family and/or older than 1970s. For instance, that is nearly all of middle Springfield north of Main Street and much of the areas south of Main Street, but these areas are marked “no” in vulnerable housing.

It is important to note that the indicators being measured for “Vulnerable Housing” are the Percent of Housing Built Before 1970 (as of 2015-2019) and Percent of Housing that is Multifamily Housing (2015-2019). Areas which appear as Older or Multi-Unit Housing: TRUE have *either* of these indicators as TRUE (or both). These indicators are TRUE when they exceed the median percentage for the city as a whole for the same indicator. It takes both of the two indicators to be FALSE for the Older or Multi-Unit Housing to equal FALSE. So, it is possible for an area to be comprised largely of homes built before 1970 or have many multi-unit residential buildings and still be below the median for the city as a whole, if the city has high medians for these measures.

Taking the Block Groups north of Main Street from downtown to the East Main hot spot discussed above, *each* is flagged as Older or Multi-Unit Housing: TRUE *except* 0019024. Tract 19.02, Block Group 4 is the area from 36th Street to 42nd Street north of Main Street. It is roughly 50% residential, similar to Block Group 3 to the west.

Compared to the city as a whole, where medians for percent of housing as older and multi-unit were 28% and 33%, respectively, in the 2015-2019 ACS, the percent in Block Group 3 are 11% and 28%, respectively. Neither exceed the median for the city as a whole.

FIGURE 3. VULNERABLE HOUSING IN BLOCK GROUPS NORTH OF MAIN STREET



It has two fairly large subdivisions in the midst of it (in light green in Figure 3). The one on the right is made up of duplexes and so is actually twice as large as it appears by unit count. It is likely that the proportion of newer units is simply pushed below the city median for older units (hence the 11%).

The Multi-unit percentage is much closer to the value for the city as a whole, but there appear to be relatively few larger multi-unit residential structures in this area so that would explain the slightly lower percentage.

It is time-consuming to look at these cases in sufficient detail to assess the accuracy of the current methodology, but it appears to be reasonably consistent with expectations and other independent datasets where it has been investigated so far.

CONCLUSIONS

SUITABILITY OF THE METHOD

The city-wide analysis is a potential useful tool for understanding demographic and housing market patterns, beyond just looking at areas where CFAs are being considered as likely. The current method seems reliable if the block group is an adequately sized unit of variation for the intended use. For the current use, a much smaller unit would start to be too inaccurate in terms of statistical margins of error and data would not be available for the demographic factors.

ADAPTING THE METHOD

There is no perfect method for identifying gentrification and displacement risk. The current method can be tuned based on local knowledge and the underlying indicators can be further investigated to lend nuance to the area type assignment. Future changes can also be anticipated based on trends and local planner knowledge.

While Glenwood Riverfront and other areas of interest may not be shown to currently be at risk for gentrification and displacement by the methodology used by DLCD or the modified PSU methodology used for the analysis in this memo, nothing in these results prevents the city from applying displacement prevention or mitigation strategies to Glenwood Riverfront if that area is chosen as a CFA.

For example, a more sensitive standard could be applied, and the area could be treated as “Vulnerable” with just one vulnerable group.

- **Glenwood Riverfront (Vulnerable)**
 1. Low-Income: TRUE
 2. Vulnerable People: FALSE TRUE
 3. Older or Multi-Unit Housing: TRUE
 4. Active Housing Market: FALSE
 5. Demographic Shift: TRUE

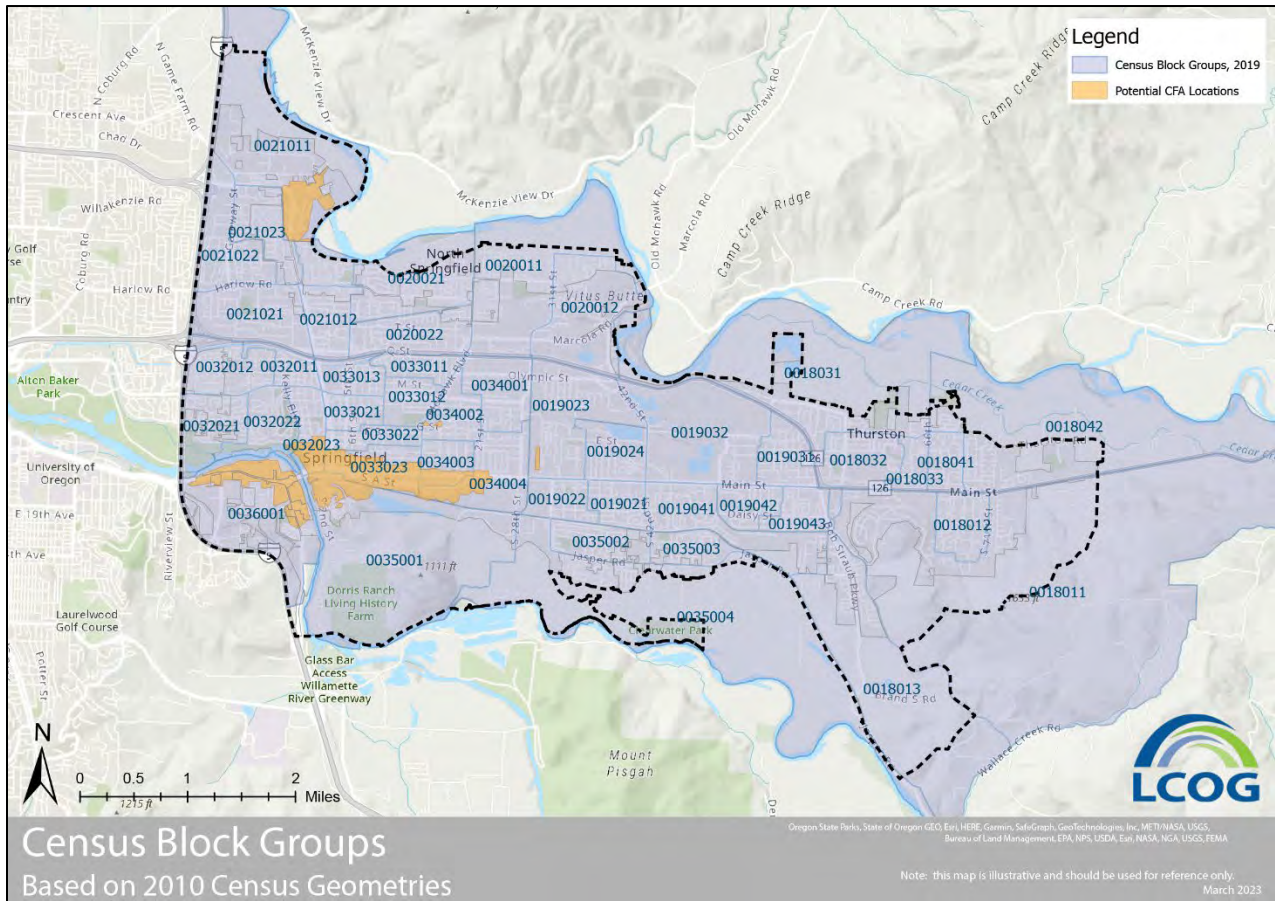
Glenwood Riverfront could be expected to transition to “Active Gentrification” in the future if the CFA stimulated an active housing market in the area. This would be based on the following adjusted demographic “fingerprint”:

- **Glenwood Riverfront (Active Gentrification)**
 1. Low-Income: TRUE
 2. Vulnerable People: FALSE TRUE
 3. Older or Multi-unit Housing: TRUE
 4. Active Housing Market: FALSE TRUE
 5. Demographic Shift: TRUE

Given the above, strategies from the DLCDC Anti-Displacement and Gentrification Toolkit⁴¹ could be used that are suitable for a Vulnerable or Active Gentrification area. For example, here are two strategies that might be selected for each of those area types (many more can be found in the toolkit):

- **Vulnerable Areas**
 - ***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.
 - ***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.
- **Active Gentrification Areas**
 - ***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.
 - ***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.

FIGURE 4. POTENTIAL CFA LOCATIONS WITHIN CENSUS BLOCK GROUPS



^[1] See <https://geo.maps.arcgis.com/apps/mapviewer/index.html?webmap=b0f58b8dcf5b493b978bffd063b2aa98>.

^[2] See [LCOG Title VI data portal](#).

^[3] See <https://www.oregon.gov/dhs/ABOUTDHS/DataDocuments/County-QuickFacts-2017.pdf> page 223.

^[4] DLCD Anti-Displacement and Gentrification Toolkit.
https://www.oregon.gov/lcd/UP/Documents/Full%20Cover%20Letter%20and%20HPS%20List_with%20links.pdf.

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #2B

DEMOGRAPHIC ANALYSIS

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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Appendix A – Inventory of City Plans, Policies and Programs by Fair and Equitable Housing Outcomes

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PURPOSE

The purpose of Technical Memo #2b is to address requirements in OAR 660-012-0315(4)(f), present equity information to decision-makers 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. This memo provides a citywide demographic profile of historically marginalized community groups and an inventory of fair and equitable housing policies that the City of Springfield currently has.

BACKGROUND

The Climate-Friendly and Equitable Communities rules require cities to take steps to address 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 cities 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 considering equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes Statement,¹ 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 term ‘historically marginalized community groups’ is used throughout this Technical Memo in place of “underserved populations” to more accurately capture the nuanced historical patterns of disenfranchisement that have put some community groups at an economic disadvantage today. Per the rules, historically marginalized community groups include but need not be limited to Black and African American people; Indigenous people; People of Color; immigrants; 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; youth and seniors. The rules require mapping of traditionally 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

¹ <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses the second component of the second step in the study phase: analysis of potential CFAs for equity and displacement.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
⇒ Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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

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). CFA studies must include a description of how cities will address each of the following Fair and Equitable Housing Outcomes.²

- a) **Location of Housing**—How the City is striving to meet statewide greenhouse gas emission reduction goals, established under Executive Order No. 20-04, by creating compact, mixed-use neighborhoods available to people who are 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 units;*³

² 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). However, Springfield will be required to complete this work by December 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.

³ 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.

- *Promote the production of accessible dwelling units;*⁴
- *Mitigate or avoid the displacement of members of protected classes; and*
- *Remove barriers and increase housing choice for protected classes within climate-friendly areas.*

b) 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.

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.

Note: 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 historically marginalized communities and identify actions to mitigate or avoid potential displacement.

“Gentrification” has been given various definitions, but Oxford Languages defines it as “the process whereby the character of a poor urban area is changed by wealthier people moving in,

⁴ 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)]

improving housing, and attracting new businesses, typically displacing current inhabitants in the process”.⁵

“Displacement” occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.⁶

The Fair and Equitable Housing Outcomes listed above (and in OAR 660-008-0050(4)) are written to inform a Housing Production Strategy Report when a city is selecting Housing Production Strategies. As of the date of this memorandum, the City of Springfield has not adopted a Housing Production Strategy Report. Prior to the creation and adoption of the Housing Production Strategy Report, this CFA study must consider how existing City of Springfield plans and policies work to meet the fair and equitable housing outcomes. The focus of Technical Memorandum #2b is inventorying the policies and plans already in place and may assist in identifying actions that may be employed to mitigate potential displacement, which is also required by OAR 660-012-0315(4)(f). It also provides a demographic profile of the historically marginalized communities in Springfield.

ANALYSIS

OVERVIEW OF METHODS

The following analysis looks at demographics 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, but rather provide context for the current practices and populations the City of Springfield contains. The information presented may be useful in public engagement efforts for the CFA requirements before implementation or for other city planning projects, such as the future Housing Production Study report.

To ensure full compliance with the rules, to work toward both equitable process and outcomes, and to gain efficiencies with future Housing Production Strategy processes, the following analysis was included in Technical Memorandum #2b:

- **A citywide demographic profile** that can provide valuable context for decision-makers. The demographic profile provides a citywide overview of the presence of historically marginalized community groups in Springfield.
- **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 Housing Production Strategy. This is attached in Appendix A.

⁵ Retrieved from: [Oxford Languages and Google - English | Oxford Languages \(oup.com\)](https://www.oxfordlanguages.com/)

⁶ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

RESULTS

Demographic Context

DEMOGRAPHIC PROFILE

The rules require recognition of the ways in which transportation and land use planning practices have historically and currently work to marginalize community groups and prioritize attempts to remedy such marginalization. The following demographic profile provides a citywide overview of the presence of historically marginalized community groups in Springfield (Table 1Table 2).⁷ The demographic profile includes a comparison to the state of Oregon where possible.

TABLE 2. DEMOGRAPHIC PROFILE

Historically Marginalized Community Group	Springfield Number	Springfield Percent	Oregon Number	Oregon Percent	Source
Springfield Total Population	62,077		4,129,803		2015-2019 ACS Table DP05
Springfield Total Households	24,580		1,611,980		2015-2019 ACS HUD CHAS
Black & African American People	1,293	2%	119,710	2.9%	2015-2019 ACS Table DP05
Indigenous People (including American Indian/Alaska Native and Hawaii Native)*	3,358	5.4%	162,787	3.9%	2015-2019 ACS Table DP05
People of Color	12,550	20.2%	1,003,961	24.3%	2015-2019 ACS Table DP05
Immigrants	3,774	6.1%	407,643	9.9%	2015-2019 ACS Table DP02
People with limited English proficiency	1,795	3.1%	220,027	5.6%	2015-2019 ACS Table DP02
People with disabilities	11,462	18.6%	587,093	14.4%	2015-2019 ACS Table DP02
People experiencing homelessness – HBNL**	1,128	1.8%	Not Available		2019 LC HSD Homeless By-Name List YTD
People experiencing homelessness – (PIT)***	2,165	0.6%	15,876	0.4%	2019 HUD Continuum of Care

⁷ OAR 660-012-0125(2) 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. The overview utilizes the Census Place entity, which is the incorporated area of Springfield.

Historically Marginalized Community Group	Springfield Number	Springfield Percent	Oregon Number	Oregon Percent	Source
Low-income households****	12,195	49.6%	691,950	42.9%	2015-2019 ACS HUD CHAS ⁸
Low-income renter households****	7,760	31.6%	377,910	23.4%	2015-2019 ACS HUD CHAS
Moderate-income renter households****	1,565	6.4%	66,715	4.1%	2015-2019 ACS HUD CHAS
Low-income homeowner households****	4,435	18%	314,040	19.4%	2015-2019 ACS HUD CHAS
Moderate-income homeowner households****	1,410	5.7%	106,000	6.6%	2015-2019 ACS HUD CHAS
Single parent households	1,611	6.6%	86,165	2%	2015-2019 ACS Table DP02
Lesbian, gay, bisexual, transgender, queer, intersex, asexual, or two-spirit community members	Not Available		Not Available		
Youth (Under 18)	13,579	21.9%	867,943	21%	2015-2019 ACS Table DP05
Seniors (65 and over)	8,758	14.1%	709,555	17.2%	2015-2019 ACS Table DP05

* OAR 660-012-0125(2)(b) includes Tribes. Tribal member data was not available and thus not included.

**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 'Springfield' jurisdiction may vary from the 'place' of Springfield 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 Springfield alone. The percentage is out of Lane County population (2015-2019 ACS Table DP05).

**** Low-income is defined as <80% of area median income Household Area Median Family Income (HAMFI) and moderate-income as 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.

⁸ 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>

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 1.8% of Springfield'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 presence of this historically marginalized group in Springfield.

The ACS data above indicates that the city of Springfield has a slightly higher percentage of indigenous people than Oregon as a whole. Another divergence is seen in low-income households, which comprise 49.6% of Springfield's population, and only 42.9% of Oregon's population. The greatest disparities in the presence of historically marginalized communities in Springfield versus Oregon seen in the demographic data above are in the renter income categories. There is a significantly larger proportion of low- and moderate- income renters in Springfield than in Oregon overall. Having high proportions of low- and moderate- income renters means that more of the population is susceptible to displacement forces.

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. With a lack of quantitative data on these community groups, qualitative data collected during the subsequent community engagement efforts may be the most effective method for learning how to best represent the missing community groups.

Fair and Equitable Housing Policy Context

OVERVIEW OF FAIR HOUSING PLANS, PROGRAMS, AND POLICIES

As required in OAR 660-012-0315(4), the CFA study must include plans to achieve fair and equitable housing outcomes within climate-friendly areas. Fair and equitable housing outcomes are identified in OAR 660-008-0050(4)(a)-(f). By the end of this study, most promising climate-friendly areas will be identified but not yet adopted. Before adopting the CFAs, the City must show how the outcome of implementing CFAs is fair and equitable. There is currently no report outlining how Springfield plans and policies will create fair and equitable outcomes for future housing projects. Discussions with DLCD have resulted in a determination that an inventory of existing plans and other city actions or policies show work towards the end of meeting fair and equitable housing outcomes during the CFA study phase. An inventory of City plans and policies, categorized by each type of fair and equitable housing outcome, is included in Appendix A.

CONCLUSIONS

Demographic Context

Data from various sources has been collected to document the presence of each of the historically marginalized communities in Springfield as listed in OAR 660-012-0125(2) (referred to as ‘underserved populations’). In particular, the presence of low- and moderate- income renters exist in Springfield at a significantly higher rate than in Oregon overall. As Springfield 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 may 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. Due to the lack of quantitative data, there is a lack of representation for these historically marginalized community groups. This may be aided by collecting qualitative data during community engagement efforts.

Fair and Equitable Housing Policy Context

The City of Springfield has a range of existing tools that could be used to aid in displacement mitigation when it comes time to designate CFAs. The guiding comprehensive plans that influence the future of Springfield (i.e. the Eugene-Springfield Metropolitan Area General Plan, the Springfield Comprehensive Plan, and several renewal/refinement plans) contain varying degrees of emphasis on stimulating production of more housing for all income levels, particularly in locations that provide access to amenities such as transportation, shopping, and parks. Certain zoning overlays have also been implemented to bolster development near multi-modal transportation infrastructure. Springfield is utilizing a variety of programs, incentives, and fee waivers to decrease barriers to building and maintaining affordable housing. Many of these policies align closely with goal of the CFA rules. For example, access to affordable housing may allow communities to remain in their preferred location if gentrification causes the cost of living to rise. When it is time to choose appropriate displacement mitigation measures for designated CFAs, it is advisable to consider the existing policy context and ensure new programs and/or tools align with established policies.

The inventory of these programs, policies and plans that already address the requirements of OAR 660-008-0050(4) will be accessible to Springfield as their Housing Production Strategy Report is due in 2026. According to OAR 660-008-0050 “A Housing Production Strategy Report must include a narrative summarizing how the selected Housing Production Strategies, in combination with other city actions, will achieve equitable outcomes” with regard to the factors listed in this memo’s analysis.

RECOMMENDATIONS

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 influence the most suitable displacement mitigation tools selected before CFA implementation.

APPENDIX A – INVENTORY OF CITY PLANS, POLICIES AND PROGRAMS BY FAIR AND EQUITABLE HOUSING OUTCOMES

Table 3 provides an inventory of City plans, policies and programs categorized by each type of fair and equitable housing outcome noted in OAR 660-008-0050(4). Table 4 includes links to more information about the City policies, plans or programs referenced in Table 3. Below is a brief explanation of what the column headers for fair and equitable housing outcomes mean:

- (a) **Location of Housing:** How the city is striving to meet statewide greenhouse gas emission reduction goals, established under Executive Order No. 20-04, by creating compact, mixed-use neighborhoods available to people who are members of state and federal protected classes. Cities subject to this rule and OAR 660-012-0310(2) shall describe actions taken by the city to: promote the production of regulated affordable units, as defined in ORS 456.586(1)(b); to promote the production of accessible dwelling units; to mitigate or avoid the displacement of members of state and federal protected classes; and to remove barriers and increase housing choice for members of state and federal protected classes within climate-friendly areas. 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.
- (b) **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.
- (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. Note: 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 historically marginalized communities and identify actions to mitigate or avoid potential displacement.

TABLE 3: INVENTORY OF CITY PLANS, POLICIES AND PROGRAMS BY FAIR AND EQUITABLE HOUSING OUTCOMES

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
Eugene-Springfield Metropolitan Area General Plan (Metro Plan) - Residential Land Use and Housing Element (Chapter III-A) The Metro Plan was created to serve as the sole official long-range comprehensive plan (public policy document) of metropolitan Lane County and the cities of Eugene and Springfield. The Metro Plan was intended to designate a sufficient amount of urbanizable land to accommodate the need for further urban expansion within the shared metropolitan UGB. As Eugene and Springfield carry out their obligations under ORS 197.304, including the establishment of separate UGBs and land supplies for their individual populations, more comprehensive planning is taking place on a city-specific basis, through city-specific plans adopted by each jurisdiction.						
<i>Residential Density</i>						

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
A.13 - Increase overall residential density in the metropolitan area by creating more opportunities for effectively designed in-fill, redevelopment, and mixed use while considering impacts of increased residential density on historic, existing and future neighborhoods.	X					
<i>Housing Type and Tenure</i>						
A.17- Provide opportunities for a full range of choice in housing type, density, size, cost, and location.			X			
<i>Existing Housing Supply and Neighborhoods</i>						
A.25 - Conserve the metropolitan area's supply of existing affordable housing and increase the stability and quality of older residential neighborhoods, through measures such as revitalization; code enforcement; appropriate zoning; rehabilitation programs; relocation of existing structures; traffic calming; parking requirements; or public safety considerations. These actions should support planned densities in these areas.						X
A.26 - Pursue strategies that encourage rehabilitation of existing housing and neighborhoods.						X
<i>Affordable, Special Need, and Fair Housing</i>						
A.27 - Seek to maintain and increase public and private assistance for low- and very low-income households that are unable to pay for shelter on the open market.					X	
A.28 - Seek to maintain and increase the supply of rental housing and increase home ownership options for low- and very low-income households by providing economic and other incentives, such as density bonuses, to developers that agree to provide needed below market and service-enhanced housing in the community.					X	
A.30 - Balance the need to provide a sufficient amount of land to accommodate affordable housing with the community's goals to maintain a compact urban form.	X					
A.31 - Consider the unique housing problems experienced by special needs populations, including the homeless, through review of local zoning and development regulations, other codes and public safety regulations to accommodate these special needs.			X	X		
A.32 - Encourage the development of affordable housing for special needs populations that may include service delivery enhancements on-site.			X	X	X	
A.33 - Consider local zoning and development regulations impact on the cost of housing.					X	
A.34 - Protect all persons from housing discrimination.		X				
<i>Coordination</i>						
A.36 - Coordinate public, private, and consumer sectors of the area's housing market, including public-private partnerships, to promote housing for low- and very low- income households and to increase housing density and types.					X	

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<p>Springfield Comprehensive Plan - Residential Land Use & Housing Element The Springfield Comprehensive Plan Residential Land Use & Housing Element addresses Statewide Planning Goal 10: Housing, “To provide for the housing needs of the citizens of the state.” This element includes goals, objectives, policies and implementation actions that are consistent with and carry out the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) Residential Land Use and Housing Element, while demonstrating the City’s ongoing commitment to increasing housing choice and residential densities.</p> <p>The policies in this element have their basis in the Residential Land Study conducted by the City 2007-2010. Several mixed-use zoning districts that implement various Metro Plan designations and Refinement Plan designations were adopted that provide for mixed-use neighborhoods.</p> <p>The residential buildable land inventory and technical analysis is contained in a Technical Supplement—the Springfield Residential Land and Housing Needs Analysis (RLHNA). The RLHNA is an analysis of land supply and housing demand prepared for the City by ECONorthwest in April 2011 that incorporates input from citizens, stakeholder groups, commissions and elected officials received throughout a multi-year citizen involvement process that included a Residential Lands advisory committee, online public surveys, community workshops, work sessions, open houses, and public hearings.</p>						
<i>Plan for Growth and Needed Housing</i>						
<i>H.5 - Develop additional incentives to encourage and facilitate development of high-density housing in areas designated for Mixed Use Nodal Development.</i>	X					
<i>Foster Housing Choice and Affordability</i>						
<i>H.8 - Continue to support and assist affordable home ownership through programs that subsidize the development of affordable homes and provide down payment assistance to income-qualified homeowners.</i>					X	
<i>H.9 - Provide a broad range of quality accessible and affordable housing options for very low-, low- and moderate-income residents. Affordable housing is defined housing for which persons or families pay 30 percent or less of their gross income for housing, including necessary and essential utilities [Oregon Revised Statute 456.055].</i>			X		X	
<i>H.10 - Through the updating and development of each neighborhood refinement plan, district plan or specific area plan, amend land use plans to increase development opportunities for quality affordable housing in locations served by existing and planned frequent transit service that provides access to employment centers, shopping, health care, civic, recreational and cultural services.</i>	X		X			
<i>Encourage Housing Diversity and Quality Neighborhoods</i>						
<i>H.11 - Continue to seek ways to update development standards to introduce a variety of housing options for all income levels in both existing neighborhoods and new residential areas that match the changing demographics and lifestyles of Springfield residents.</i>			X			

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<i>H. 12</i> - Continue to designate land to provide a mix of choices (i.e., location, accessibility, housing types, and urban and suburban neighborhood character) through the refinement plan update process and through review of developer initiated master plans.			X			
<i>H. 13</i> - Promote housing development and affordability in coordination with transit plans and in proximity to transit stations.	X					
<i>H. 14</i> - Continue to update existing neighborhood refinement plan policies and to prepare new plans that emphasize the enhancement of residential neighborhood identity, improved walkability and safety, and improved convenient access to neighborhood services, parks, schools and employment opportunities.	X					
<i>H. 15</i> - Update residential development standards to enhance the quality and affordability of neighborhood infill development (e.g., partitions, duplex developments, transitional neighborhoods, rehab housing, accessory dwelling units) and multi-family development.	X					
Downtown Refinement Plan - Land Use Element The Downtown Refinement Plan provides goals and policies through which Downtown Springfield may become a more vital and attractive place to shop, conduct business, and recreate. The Land Use Element includes policies related to the creation of mixed-use development in Downtown.						
<i>A. 1</i> - The City shall actively work to enhance the redevelopment and diversity of Downtown by promoting mixed use development within the downtown blocks, on single or aggregated tax lots, and within individual buildings. Emphasis should be directed towards expanding retail, entertainment and office opportunities and increasing residential uses above ground-floor businesses.	X					
<i>B. 1</i> - The Mixed-Use Commercial zoning district shall be applied within the nodal overlay to accommodate a mix of commercial, offices, residential, and open space uses. Design and development standards shall promote a minimum of 2-story buildings with pedestrian-friendly design and placement. The Mixed-Use Residential zoning district shall be applied within the nodal overlay area to property currently occupied exclusively by multi-family residential uses. The Public Land and Open Space zoning districts may be applied within this area to all land owned by the City of Springfield, Willamalane Park and Recreation District and the Springfield Utility Board. Commercial property in the Downtown Mixed-Use boundary, but outside the nodal overlay may be zoned Mixed-Use Commercial or Community Commercial.	X					
<i>B.2</i> - Multi-family residential shall be allowed as the sole use of a building or as one of several uses permitted within a mixed-use building or development area. Multi-family housing within 3 blocks of Springfield Station shall have a minimum density of 12 dwelling units per acre. Residential use within a mixed-use building is exempt from this density standard.	X					

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<p>Glenwood Refinement Plan (GRP) - Housing and Economic Development Chapter The GRP is one of several neighborhood-specific refinement plans that further refine and augment the Comprehensive Plan. In conformance with policies and implementation actions in the Springfield Comprehensive Plan, the GRP's Land Use Chapter directs the designation of 33.26 gross acres with a minimum density of 50 net dwelling units per acre in the Glenwood Riverfront as Residential Mixed-Use to provide housing choice for Springfield residents and ensure that Springfield's high-density housing needs can be met through annexation and redevelopment, consistent with the City's adopted housing policies.</p> <p>The Housing Section of the Housing and Economic Development Chapter contains additional policies intended to: enhance the progress of high-density residential development; facilitate the development of a neighborhood where residents from a range of economic levels, household sizes, and ages can choose to live; address the impact of redevelopment on existing manufactured home park residents; ensure existing housing meets current Building, Fire, and Health codes; and support the preservation, rehabilitation, and maintenance of existing housing over the Plan period.</p>						
<i>New Housing Development</i>						
<i>D.1.a.</i> - Provide financial incentives for the development of new high-density housing units, including affordable housing units, through the Springfield Economic Development Agency's (SEDA) tax increment-funded programs, as funding becomes available.			X			
<i>D.1.b.</i> - Provide financial incentives for the development of new high-density affordable housing units through local, state, and federally-funded housing and community development programs, as annexation occurs and funding becomes available.	X					
<i>D.1.c.</i> - Prioritize and offer opportunities for Glenwood residents who qualify for new Springfield and SEDA-assisted housing to relocate to such housing units.					X	
<i>D.1.d.</i> - Scope and plan projects to effectively develop and implement programs that provide development incentives, such as density bonuses, to developers that agree to include affordable housing in their development mix.			X			
<i>D.1.e.</i> - Evaluate and develop parking standards for inclusion in the Glenwood Riverfront Mixed Use Plan District that support Plan goals for housing that meet the needs of a range of households and support multi-modal transportation choice, maximize efficient and economical use of the residential land supply, and provide sufficient parking to meet demand, in conjunction with an access system that provides balanced travel mode options.	X					
<i>Existing Housing Stock - Manufactured Home Parks</i>						
<i>D.2.a.</i> - Allow existing residential uses in manufactured home parks to continue under the preexisting non-conforming use provisions of the Springfield Development Code.						X
<i>D.2.b.</i> - Rely on State laws and regulations, while responding with applicable referrals to available services, to address the needs of individual manufactured home park tenants.						X

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<i>D.2.c.</i> - Consider providing financial assistance for mandated expenses of relocation or displacement of residents from potentially closed manufactured home parks through SEDA's tax increment-funded programs, as funding becomes available.						X
<i>D.2.d.</i> - Explore the feasibility of partnering with a non-profit or for-profit entity to acquire land and develop a new manufactured home park in Springfield or other affordable housing opportunities for relocating potentially displaced manufactured home park residents.						X
Existing Housing Stock - Single Dwelling Units						
<i>D.3.a.</i> - Allow existing residential uses to continue under the pre-existing non-conforming use provisions of the Springfield Development Code.						X
<i>D.3.b.</i> - Continue existing programs designed to help improve the housing stock through Federal housing and community development programs and tax increment funded programs.						X
Gateway Refinement Plan - Residential Element The Gateway Refinement Plan is another neighborhood-specific refinement plan. It refines and augments the Metro Plan in the northwest portion of Springfield. The Residential Element of the plan contains several policies related to housing.						
<i>1.0</i> - The City shall, through site plan review, home and neighborhood improvement programs, and/or other related programs, actively participate in efforts to maintain and enhance existing residential neighborhoods and attract compatible multi-family developments that would enhance the Gateway Refinement Plan area.	X					
<i>2.0</i> - The City shall provide continued support for the Substantial Home, Rental Rehabilitation, and Emergency Minor Home Repair Programs, using Community Development Block Grant funds and/or other sources.						X
<i>16.0</i> - The City shall encourage and facilitate comprehensive development of a range (in type and affordability) of quality housing opportunities within the area mapped as the "McKenzie-Gateway MDR Site" by taking the following actions					X	
<i>16.1</i> - At the property owners' request, the City shall work with property owners and appropriate state, federal, and non-profit agencies, to seek financing assistance for housing developments and associated public facilities and amenities, where a minimum of 20% of the total units would provide low-moderate income housing opportunities, consistent with US Department of Housing and Urban Development (HUD) guidelines for low-moderate income.					X	
<i>16.2</i> - The City shall develop a program (amending the City Code as needed) for waiving (at the property owner's request) fees for DAP and site plan reviews for development proposals that include, at a minimum of 20% of the total number of units, low-moderate income housing opportunities (Consistent with HUD guidelines). The program shall establish clear criteria for application of the fee waiver.					X	

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
16.3 - At the property owner's request, a density transfer of up to 5 du/acre will be allowed in development areas where 20% or more of the total units provide low-moderate income housing opportunities.					X	
Downtown Urban Renewal Plan - Housing The primary goal of the Downtown Urban Renewal Plan is to assist in the revitalization of business and elimination of blight in the downtown area. SEDA acts as the Urban Renewal Agency to administer this plan. The plan's Housing goal is to "Provide for new and rehabilitated housing opportunities that collectively reflect a diversity of housing types, occupancy (rental and owner-occupied), and income levels in the City. Support housing development that is geared to support the area's goals for generating new employment." Notably, SEDA can pay SDCs for on behalf of projects meeting objectives of the urban renewal plans.						
1. Provide a wide range of housing opportunities to accommodate households at all income levels, including low-, and moderate- and upper-income rental and owner-occupied housing, which supports prospective residential markets in, adjacent to, and near the renewal area.	X					
2. Provide assistance to help maintain and assist in the rehabilitation of the stock of existing housing in the renewal area.						X
3. Assist in the development of quality housing for a range of household incomes and characteristics that are unique to the desired urban, Downtown atmosphere.	X					
Glenwood Urban Renewal Plan - Housing The primary purpose of the Glenwood Urban Renewal Plan is to assist in providing basic infrastructure for the undeveloped riverfront areas of Glenwood so it becomes ideal for high-quality, mixed-use development, and also for underused vacant and underdeveloped industrial sites in the area so they can become vital to the economic growth of Springfield and Lane County. SEDA acts as the Urban Renewal Agency to administer this plan. The housing goal of the plan is to "Provide for new and rehabilitated housing units in livable mixed income neighborhoods that collectively reflect a diversity of housing types, occupancy (rental and owner-occupied), and income levels in the City. Support housing development that is geared to support the area's goals for generating new employment."						
1. Provide a wide range of housing opportunities to accommodate households at all income levels including low-, moderate-, and upper-income rental and owner-occupied housing which support prospective residential markets in, adjacent to, and near the renewal area.	X					
2. Provide assistance to help maintain and assist in the rehabilitation of the stock of existing housing in the renewal area.						X
3. Assist in the development of quality housing for a range of household incomes that are representative of the City as a whole.	X					

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<p>Eugene-Springfield Consolidated Plan As part of the Eugene-Springfield HOME Consortium, the Cities of Eugene and Springfield must complete and adopt a Consolidated Plan every five years in order to receive Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and other grants from the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan specifically directs funds towards combating rising rent prices and rising home values for cost-burdened members of the community.</p> <p>The Eugene-Springfield 2020 Consolidated Plan presents a strategic vision for housing and community development in Springfield for July 2020-June 2025. The strategies outlined in the Plan are based on priorities identified through an analysis of community needs and community outreach process. The plan identifies Priority Needs populations associated with each strategy to guide use of federal HUD funds to serve low- and moderate-income and other vulnerable residents.</p>						
<ul style="list-style-type: none"> • Increase the supply of affordable housing 				X	X	
<ul style="list-style-type: none"> • Rehabilitate existing housing stock affordable to low-income persons 					X	
<ul style="list-style-type: none"> • Provide down payment assistance for homeownership 					X	
<ul style="list-style-type: none"> • Provide rental assistance for housing stability and homelessness prevention 					X	X
<ul style="list-style-type: none"> • Remove barriers to affordable and supportive housing 		X		X	X	
<p>Analysis of Impediments to Fair Housing Conducted an Analysis of Impediments to Fair Housing Choice as part of completing the Consolidated Plan, including identification of possible strategies and actions to address impediments.</p>		X				
<p>Fair Housing Resources Page Springfield's Fair Housing webpage provides information on fair housing and filing complaints.</p>		X				
<p>Federal CDBG and HOME Funds The purpose of Community Development Block Grant (CDBG) and HOME is to advance the following statutory objectives principally for extremely low-income, low-income, and moderate-income residents:</p> <ul style="list-style-type: none"> • Provide decent, safe, and affordable housing • Create suitable living environments (CDBG) • Expand economic opportunities (CDBG) • Expand the supply of decent, safe, sanitary, and affordable housing (HOME) <p>In addition to the Consolidated Plan, Springfield must complete annual one year Action Plans for each fiscal year within the five-year period. The Action Plan describes the Cities' annual allocation process for specific uses of HOME and CDBG funds during the fiscal year. The City uses these funds for a mix of one-time projects and ongoing programs.</p>						

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
Rental Housing Development One-time HOME funds are awarded annually for the development of affordable rental housing for low and very low-income households.				X	X	
Springfield Home Ownership Program (SHOP) SHOP provides interest-free loans of up to \$25,000 from CDBG funds to first-time low-income homebuyers (under 80% AMI). Springfield partners with DevNW, a local non-profit experienced in assisting first-time homebuyers, to administer the program. It is possible to assist buyers with the purchase of a home that would not be feasible without assistance.					X	
Springfield Home Repair Program The Springfield Home Repair Program provides grants of up to \$10,000 during a five-year period from CDBG funds to very low-income homeowners to make safety and accessibility improvements to their home so they can remain in place.						X
OASIS program Springfield awards annual CDBG and general fund dollars for the operation of Catholic Community Services' Springfield service center and the Oasis Day Shelter for homeless families and children.				X		
Glenwood Place Springfield awarded one-time CDBG funds to Homes for Good to acquire land in Glenwood for construction of affordable housing to mitigate the impacts of anticipated gentrification and displacement from planned riverfront redevelopment.					X	X
Other Federal and State One-Time Funds Springfield occasionally receives other one-time Federal and State funds to support housing projects and programs.						
Homelessness outreach funds for Lane County Health and Human Services Springfield received one-time funds and allocated it to Lane County Health and Human Services Division to distribute to non-profit agencies for the purposes of supporting street outreach services for residents experiencing homelessness in Springfield. Funds were available through the end of fiscal year 2023.				X		

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
<p>Funding from House Bill 5006 for a manufactured home park Springfield advocated to the State for funding of \$3 million for the development of a new manufactured dwelling park in Springfield for the purposes of responding to displacement anticipated from redevelopment of existing manufactured home parks and resulting residential displacement. The park would include a mix of income-restricted rental and ownership houses.</p> <p>In 2021, the Oregon Legislature appropriated \$3 million in House Bill 5006 from the General Fund to the Oregon Housing and Community Services Department. This one-time appropriation is for one or more grants to nonprofit organizations for the purposes of developing or improving infrastructure for a manufactured home park in Springfield. The City will disburse the grant funding to St Vincent De Paul of Lane County (SVDP), an Oregon nonprofit corporation, and administer the grant to ensure grant funding is used for the purpose of developing or improving infrastructure for a manufactured home park in Springfield.</p>					X	X
<p>Emergency Household Assistance to Low-Income Renters Springfield received one-time ARPA funding and allocated it to the Lane County Health and Human Services Division to distribute to non-profit agencies to provide emergency household assistance to low-income renters.</p>		X				
<p>Springfield-Eugene Tenants Association (SETA) funding award Springfield received one-time ARPA funding and allocated it to SETA to fund positions supporting the tenant hotline which assists, educates, and empowers renters on housing rights issues.</p>		X				
<p>Funding for Land Banking Through an intergovernmental agreement with Lane County, Springfield received \$1.5 million one-time ARPA funding to purchase land for development as housing for low-income households. The City is searching for suitable sites and conducting due diligence.</p>					X	
<p>Development Allowances and Incentives Springfield has updated its development code and implemented programs to allow and/or encourage development of certain housing types in the city.</p>						
<p>Tax Exemption for Multiple-unit Housing The City is looking to replace the vertical housing tax exemption for an area in Downtown with the multi-unit property tax exemption allowed under ORS 307.600-637. The City also plans to expand the eligible area for a property tax exemption to include a larger portion of Downtown, areas along Main Street, areas along Q Street, and an area along Mohawk Blvd. This property tax exemption would encourage development of multiple-unit housing sited in core areas or along transit corridors.</p>	X					

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
Low-Income Rental Housing Property Tax Exemption (LIRHPTE) Springfield makes a 20-year property tax exemption available for creation of new rental units available to households at or below 60% AMI. (Springfield Municipal Code 3.508)	X				X	
Development fee waivers for affordable housing units Springfield offers development fee waivers to non-profits developing affordable housing units (60% AMI rental, 80% AMI ownership). Units must remain affordable for 5 years. This is codified in Springfield Development Code 2.1.135.	X				X	
System Development Charge (SDC) waivers for low-income housing for ownership Springfield offers SDC waivers for housing development made available for purchase by low-income buyers (80% AMI). Units must remain affordable for 5 years. The program is available through December 2025 and is based on the following objectives: <ul style="list-style-type: none"> Reduce up-front construction costs for developers who will sell homes at an affordable price to households with incomes of no more than 80% of the AMI. Encourage the creation of homes that will provide for affordable homeownership for at least five years for income-qualified households (earning no more than 80% of AMI) by providing the waiver as a grant to qualifying applicants. Facilitate housing stabilization and home equity for more income-qualified households by offering the waiver as a 5-year forgivable loan for housing units that are initially sold affordably to a qualifying buyer, subject to owners' ongoing occupancy of home. 	X				X	
Development Code Updates <i>Allowances for missing middle housing types</i> This Code update revised the Code to streamline development review and allow more types of housing to be built, including middle housing (defined as duplexes, triplexes, fourplexes, townhomes, and cottage clusters) on residentially zoned lots that allow single-unit dwellings as required by Oregon House Bill 2001 passed, in 2019. These Code amendments support housing choice by allowing the development of more housing and greater housing diversity. Permitting smaller dwelling types also allows for infill in neighborhoods with high-quality amenities. <i>Terminology Change</i> The code update also removed the term "family," which limited the number of non-related individuals that could live in a dwelling unit.		X	X			
Nodal Development Overlay District (ND) The ND District, codified in Springfield Development Code 3.3-1000, was established to work in conjunction with underlying land use districts to implement transportation-related land use policies found in the Springfield Transportation System Plan and in the Metro Plan. The ND Overlay District also supports "pedestrian-friendly, mixed-use development" as outlined in the State Transportation Planning Rule. The "Downtown", "Glenwood" and	X					

Policy, Plan, or Program	CFA Rule Requirements [OAR 660-008-0050(4)(a)-(f)]					
	(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
"Riverbend" Nodal Districts all overlap with potential CFAs and are further analyzed in the CFA Study.						
Promote Development of Accessory Dwelling Units (ADUs) Springfield has chosen to encourage development of ADUs by creating promotional materials (video, webpage, brochure), waiving SDCs for ADUs (through June 2027), and revising the development code to make building an ADU easier- including allowing ADUs to be built in conjunction with townhomes and cottage clusters.			X			
Human Services Springfield participates in regional bodies discussing homelessness and permits sheltering for residents experiencing homelessness under certain circumstances.						
Lane County Poverty and Homeless Board participation Springfield participates on the Lane County Poverty and Homeless Board (PHB) working to create a regional plan to address homelessness. The PHB is an advisory body to the Lane County Board of Commissioners.				X		
Human Service Commission participation Springfield participates on the regional, intergovernmental Human Services Commission to guide allocation of federal and state dollars to address homelessness and other social service needs.				X		
Temporary Recreational Vehicle (RV) allowances Springfield is temporarily allowing RVs to be used as temporary housing when parked on private property. The City Council resolution suspends enforcement of codes that would otherwise not allow RV occupancy as long as the property owner registers with City and property owner and RV occupants follow City guidelines.				X		
Village Fields Pallet Shelter approval Springfield approved Emergency Shelter Siting of Village Fields Pallet Shelters, owned and operated by Mainstream Housing. This site offers a safe and secure place for shelter for families and individuals who experience intellectual or developmental disability.				X		

CITY POLICIES, PLANS OR PROGRAMS LINKS

Table 4 includes links to more information about the City policies, plans or programs referenced in Table 3.

TABLE 4: CITY POLICIES, PLANS OR PROGRAMS LINKS

Policy, Plan, or Program	Link
Analysis of Impediments to Fair Housing	https://springfield-or.gov/city/development-public-works/hud-funds/
CDGB Funding to OASIS program for homeless family and children daytime services	https://springfield-or.gov/wp-content/uploads/2021/10/ATT1-FY2022-CDBG-One-Year-Action.pdf
Development Fee Waivers for Affordable Housing	https://library.qcode.us/lib/springfield_or/pub/development_code/item/chapter_2-2_1_100-2_1_135
Downtown Refinement Plan	https://www.springfield-or.gov/wp-content/uploads/2016/12/1986DowntownRefinementPlan.pdf
Downtown Urban Renewal Plan	https://www.springfield-or.gov/wp-content/uploads/2016/12/DowntownUrbanRenewalPlan.pdf/
Eugene-Springfield Consolidated Plan	https://www.eugene-or.gov/DocumentCenter/View/52889/Eugene-Springfield-Con-Plan-2020-Full-Document?bidId=
Eugene-Springfield HOME Consortium funding for low- and very low-income housing	https://www.eugene-or.gov/282/HOME-Consortium-Governing-Board
Fair Housing resources page	https://springfield-or.gov/city/development-public-works/fair-housing/
Funding from House Bill 5006 for a manufactured home park	https://springfield-or.gov/city/development-public-works/manufactured-home-parks/
Gateway Refinement Plan	https://springfield-or.gov/wp-content/uploads/2023/06/Gateway-Refinement-Plan.pdf
Glenwood Place through Homes for Good	https://homesforgood.org/about/real-estate-development/projects/glenwood-place
Glenwood Refinement Plan	https://www.springfield-or.gov/wp-content/uploads/2016/12/AdoptedGlenwoodRefinementPlan_amended1.pdf
Glenwood Urban Renewal Plan	https://www.springfield-or.gov/wp-content/uploads/2016/12/UrbanRenewalPlan.pdf
Homelessness outreach funds for Lane County Health and Human Services	https://www.lanecounty.org/government/county_departments/health_and_human_services/human_services_division
Human Service Commission participation	https://www.lanecounty.org/government/county_departments/health_and_human_services/policy_advisory_boards/human_services_commission
Lane County Poverty and Homeless Board participation	https://www.lanecounty.org/government/county_departments/health_and_human_services/human_services_division/poverty_and_homelessness_board
Low-Income Rental Housing Property Tax Exemption (LIRHPTE)	https://library.qcode.us/lib/springfield_or/pub/municipal_code/item/chapter_3-tax_exemption_for_low_income_ren
Metro Plan	https://www.lcog.org/sites/default/files/fileattachments/planning_amp_development_services/page/2585/metro_plan_2019_06_01_201906050752589173.pdf
Nodal Development Overlay District	http://springfield-or.gov/wp-content/uploads/2022/06/3.3-1000-Nodal-Development-Overlay-Districts.pdf
Promote Development of Accessory Dwelling Units (ADUs)	https://springfield-or.gov/city/development-public-works/applications-licenses-and-permits/accessory-dwelling-units/
Springfield Comprehensive Plan	https://springfield-or.gov/wp-content/uploads/2022/08/Vol.-1-Springfield-Comprehensive-Plan.pdf
Springfield Development Code Update	https://springfield-or.gov/city/development-public-works/springfield-development-code-update-project/
Springfield Home Ownership Program (SHOP)	https://springfield-or.gov/city/development-public-works/shop/
Springfield Home Repair Program	https://springfield-or.gov/city/development-public-works/home-repair-program/
Springfield Residential Lands and Housing Needs Analysis (RLHNA)	https://www.springfield-or.gov/wp-content/uploads/2019/05/REDUCED-SIZE-5-Ord-6268Exhibits.pdf
Springfield-Eugene Tenants Association (SETA) funding award	https://www.springfieldeugenetenantassociation.com/
System Development Charge Waivers for Low-Income Housing for Ownership	https://springfield-or.gov/wp-content/uploads/2022/12/Springfield_SDCWaiver_ProgramGuidelines_Dec22.pdf
Temporary Recreational Vehicle (RV) allowances	https://springfield-or.gov/city/development-public-works/rv-occupancy/
Village Fields Pallet Shelter approval	https://mainstreamhousing.org/pallet-shelters/

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3A

SUITABILITY ANALYSIS

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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 suitable Climate-Friendly Areas (CFAs) in the City of Springfield and addresses locational requirements for CFAs (OAR 660-012-0310(2)).

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 than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000, and that are also in one of the seven metropolitan areas (outside of the Portland Metro). The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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.

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

The Lane Council of Governments (LCOG) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses one component of the third step in the study phase: analysis of potential CFAs suitability, policy, and capacity.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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),² is to map all “potential” CFA options. The rules give jurisdictions some flexibility and discretion in the way they approach the study phase. Critically, it is just a study and not considered a land use decision.³ 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 rules. The “expanding” approach involves picking one or more CFA candidate areas to evaluate against the criteria in the rules then expanding iteratively as

² <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=293018>

³ “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)

necessary until the CFA(s) meet the requirements. The City of Springfield has chosen the “narrowing” approach.⁴

REQUIREMENTS BASED ON POPULATION

There are different requirements in the rules based on jurisdiction population. Given a 2022 official population estimate⁵ of 62,189,⁶ the City of Springfield 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 Requirements.

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

Potential CFA Locations are:

- **In Urban Centers** – In existing or planned urban centers, such as:
 - Downtowns
 - Neighborhood Centers
 - Transit-Served Corridors⁹
 - Other Similar Districts
- **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** – This 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.

⁴ Springfield 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.

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.

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

⁸ *Climate-Friendly Areas Methods Guide*. DLCD. 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 660-012-0440(3).

- **Within the City Limits or Urban Growth Boundary** – Inside city limits or—subject to additional conditions¹⁰—inside the urban growth area.

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*,¹¹ DLCDC 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 Springfield'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.¹²

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).

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

¹² 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.

ANALYSIS

METHODOLOGY OVERVIEW

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

Some Criteria Previously Evaluated

Some narrowing using some of the locational criteria above already occurred in Technical Memo #1: Identify Potential CFA Locations. See the Results section of Technical Memo #1 for additional notes on methodology specific to each locational requirement. The following locational criteria described in the preceding section were assessed for all areas within the Urban Growth Boundary.

- **In Urban Centers**
- **In, or Near, High-Density Mixed-Use Areas**
- **Accessible via High-Quality Active Transportation and Transit**
- **Safe from Natural Disasters and Hazards**

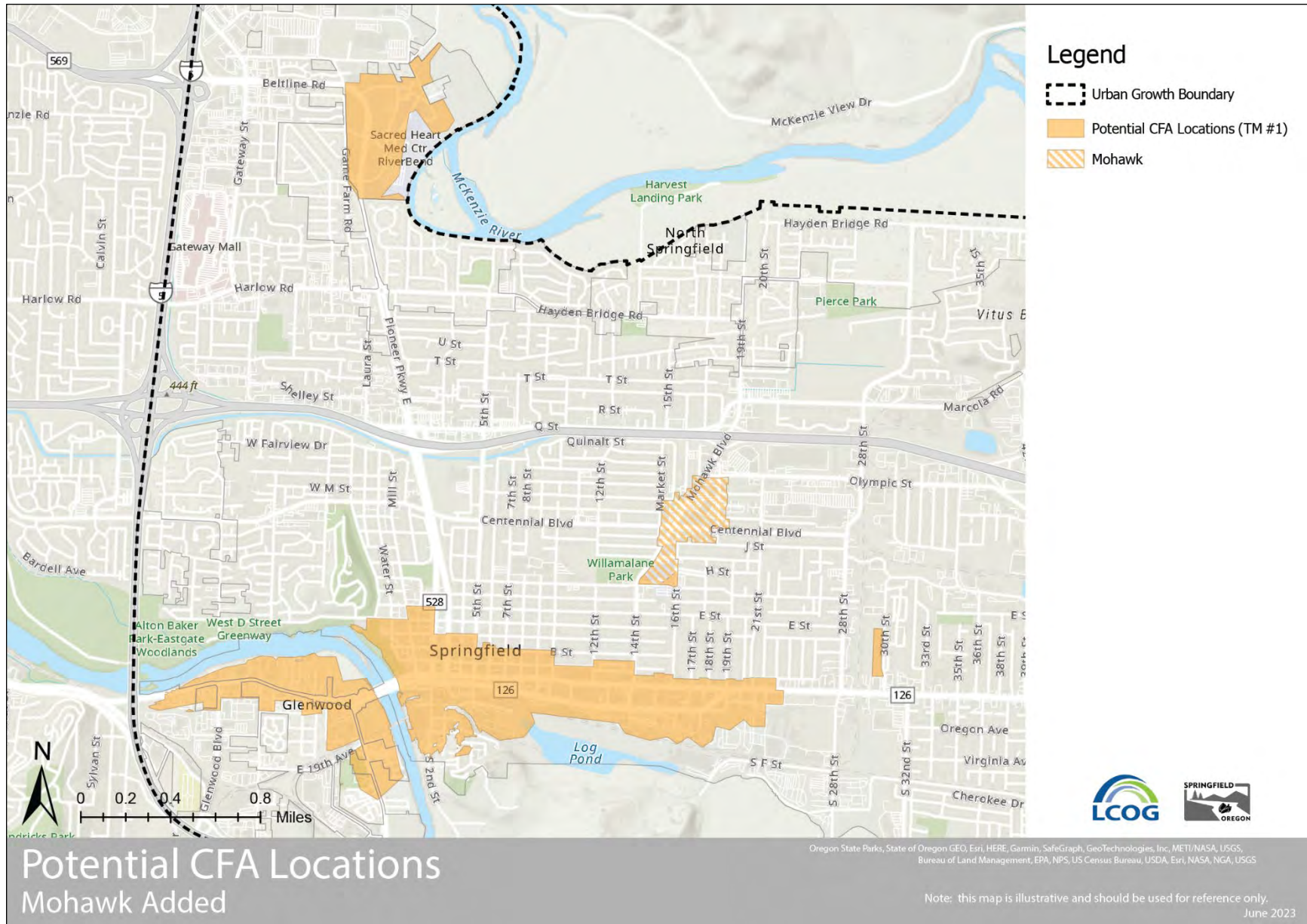
Revisiting Previously Evaluated Criteria

Some issues related to the criteria above were revisited in this memo.

- **More Locations in Urban Centers** – In the review of the results of Technical Memo #1 by the City Council of Springfield, Mohawk was reintroduced as an urban center and Potential CFA Location. This area is proposed for service by high-quality transit¹³ as reflected in Springfield's TSP and is an urban center, per the City definition used in this study, and is outside any Goal 7 hazard impacts, as determined in Technical Memo #1. That urban center was reintroduced as a Potential CFA Location in the rest of this analysis. This is shown in Map 1.

¹³ The routes proposed are for 10-minute and 15-minute frequencies. Frequent transit network is also defined in OAR 660-012-0440(3), which was the basis for the walkability definition we used for the high-quality transit service area definition. This rule defines frequent transit corridors as including routes with frequencies of at least every 15-minutes during peak service.

MAP 1. MOHAWK ADDED TO POTENTIAL CFA LOCATIONS



- **More Attention to High-Quality Active Transportation** – In Technical Memo #1, as a simplification, 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. This was a first-pass approximation and further analysis is needed to establish that high-quality active transportation services will be available to all portions of adopted CFAs. Facilities providing high-quality active transportation and transit will be examined more closely in this memo.

Criteria Deferred Until Now

In a few cases, locational criteria were *deferred* from Technical Memo #1 to a later step in the analysis. Locational criteria were *deferred* (1) if it was deemed to be more efficient to analyze them later once the field of potential CFAs has been narrowed or refined or (2) if there was a mismatch with the locational analysis phase (i.e., the criterion did not lend itself to area interpretation). The following were deferred in Technical Memo #1 and were addressed in this memo.

- **Inside the City Limits or Urban Growth Boundary** (areas outside the city limits but inside the City’s Urban Growth Boundary)

Dimensional requirements not addressed in Technical Memo #1 are addressed in this memo.

- **A Minimum of 750 Feet Wide** – 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.
- **A Minimum of 25 acres** – The 25-acre minimum requirement for at least one primary CFA was also evaluated in this memo.

Optional Criteria Not Addressed

Upon further review of the rules, the following recommended analyses were not considered required and were not deemed priorities for the study phase of the CFA designation process.

- **Served by Adequate Infrastructure**
- **Ready for Development**

These optional requirements were not addressed in this memo.

Methodology for Addressing Suitable Width

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

Minimum Width of 750 Feet: The potential CFA 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.”¹⁴

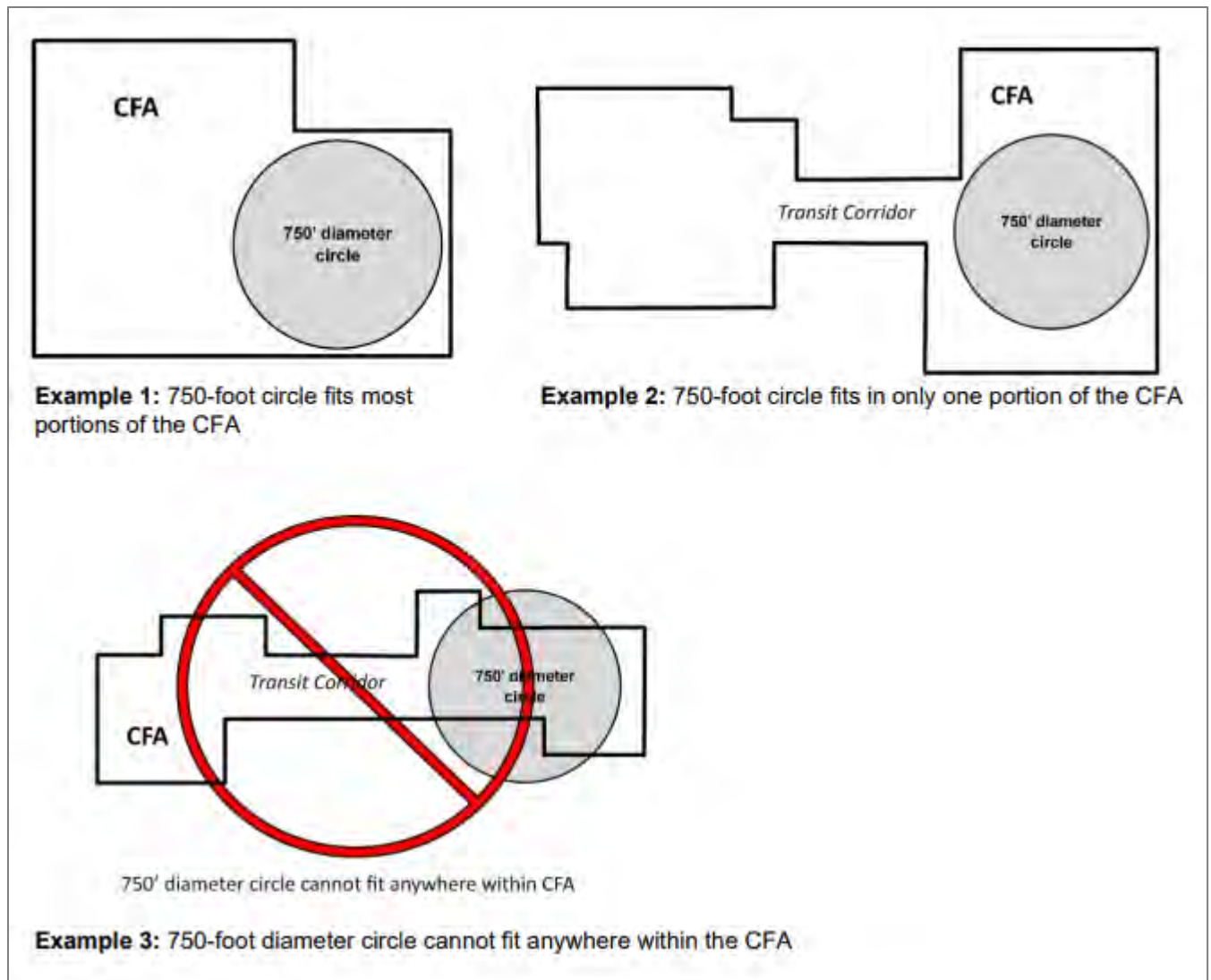
Although the above passage does not define terms like “most” or “relatively limited,” it suggests a second definition of the minimum width requirement.

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

Since CFAs 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.

¹⁴ Climate-Friendly Area Methods Guide, Updated April 3, 2023, p. 13.

FIGURE 1. MINIMUM WIDTH DETERMINATION



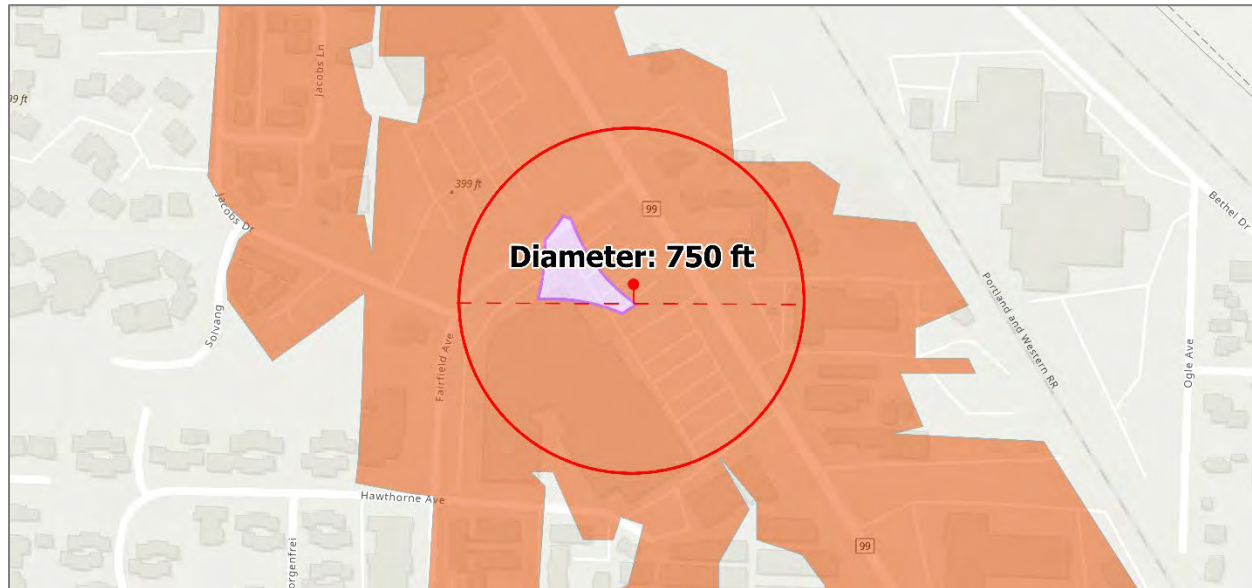
The methodology for determining which potential CFA locations meet the minimum operational definition was as follows:

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 eroded 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 2 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 from 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 reduce the eroded area considerably. These will be discussed in more detail in a later section.

MAP 2. EXAMPLE OF APPLIED MINIMUM WIDTH METHOD



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

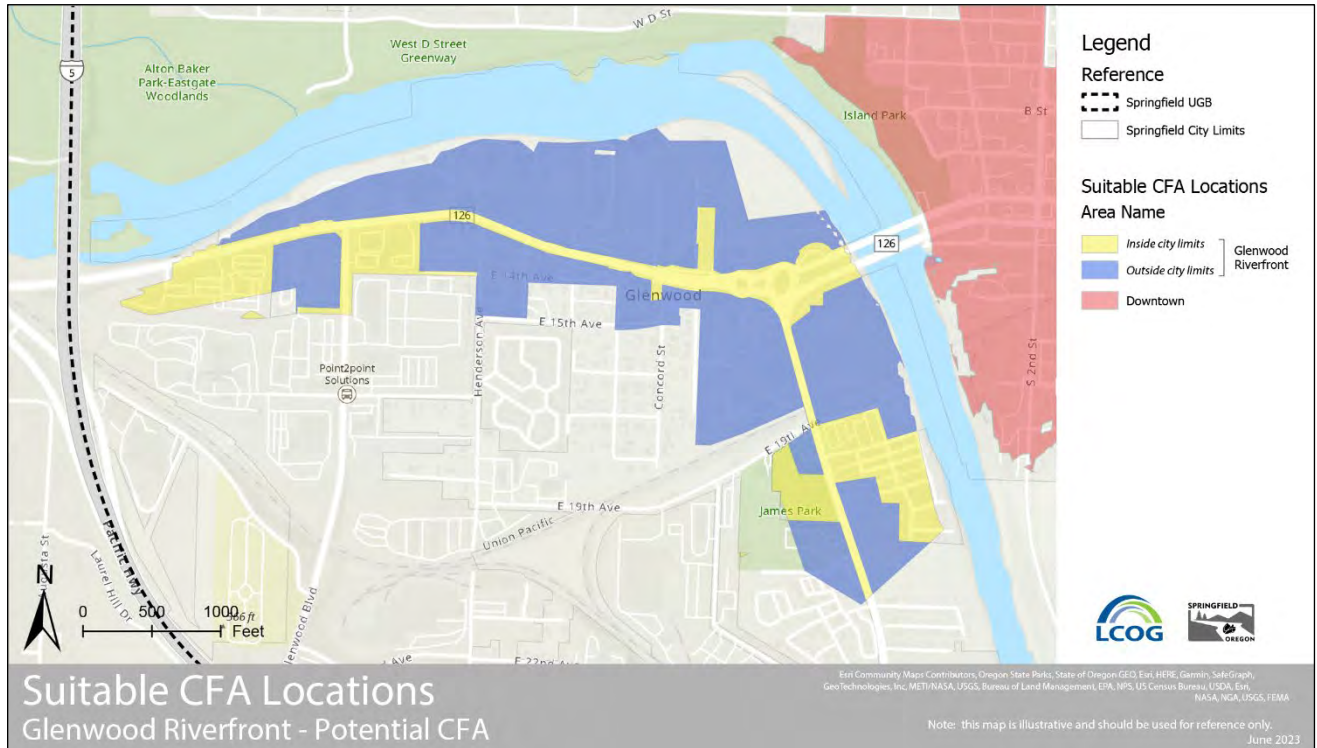
1. Buffer each spatially distinct potential CFA location polygon identified in Technical Memo #1 by negative 375 feet (the radius of a circle with a diameter of 750 feet). The negative buffer erases the outer 375 feet from all edges of the polygon, resulting in an “eroded,” reduced, interior polygon. 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*.

RESULTS

Inside the City Limits or Urban Growth Boundary

A part of the Glenwood Riverfront area that is otherwise potentially a suitable CFA location is outside the city limits but inside the Urban Growth Boundary (UGB). See Map 3. The area in blue is outside the city limits but inside the UGB.

MAP 3. GLENWOOD RIVERFRONT AREA POTENTIAL CFA



The portions of the Glenwood Riverfront Potential CFA Location outside the city limits were analyzed for the following additional requirements (Table 2).

TABLE 2. ADDITIONAL CFA REQUIREMENTS

Requirement	Status	Justification
The area is contiguous with the city limits boundary.	TRUE	See Map 3.
The provision of urban services is contingent upon annexation into the city limits.	TRUE	City staff confirm this. ¹⁵

¹⁵ Climate-Friendly Area Methods Guide, Updated April 3, 2023, p.13.

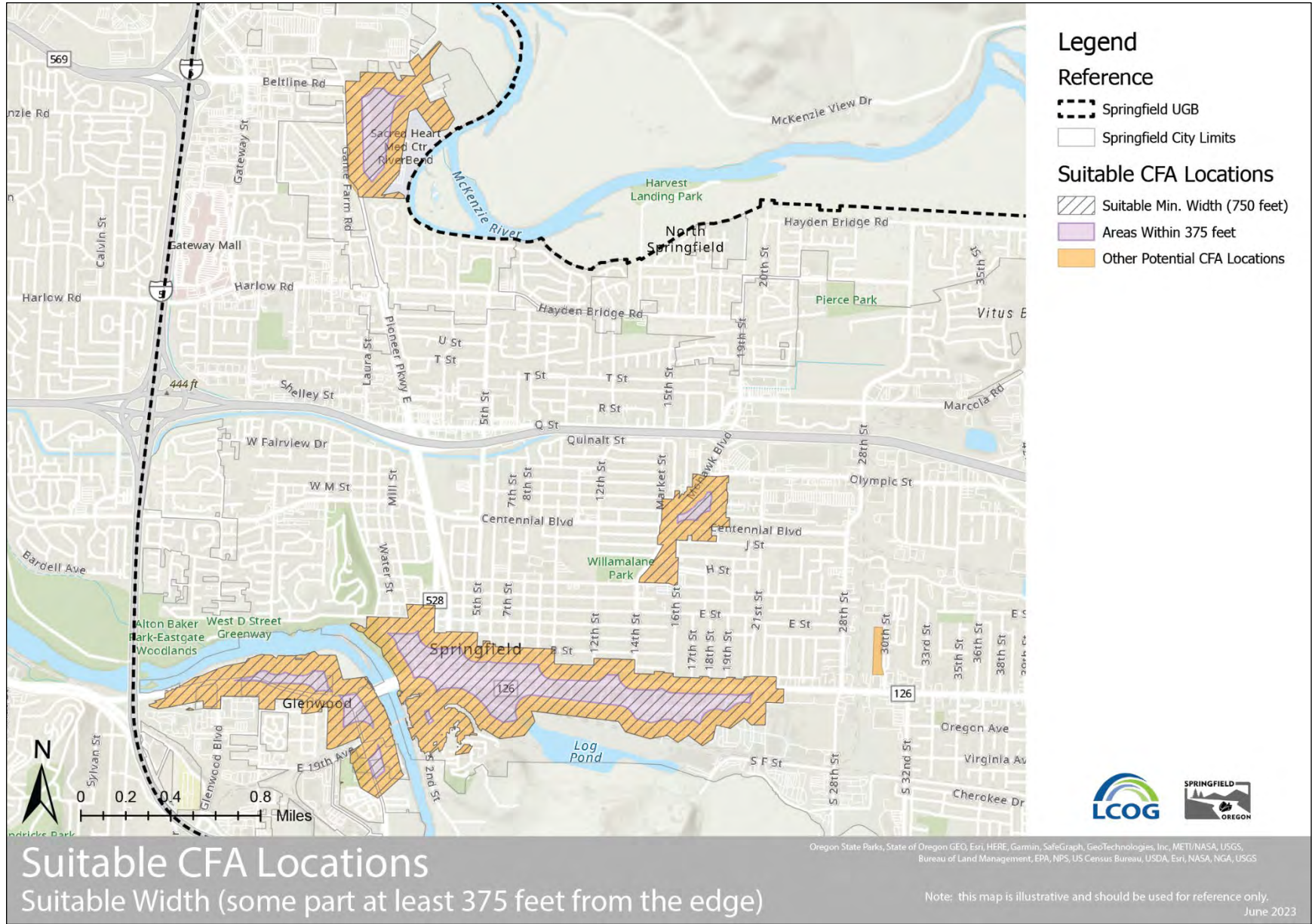
Requirement	Status	Justification
The area is readily serviceable with urban water, sewer, stormwater, and transportation. “Readily serviceable” means that urban infrastructure services are nearby and could be provided to allow construction on the site within one year of an application for a building permit.	TRUE	<p>City staff confirm the following:</p> <p>This area is already partly served by urban water, sewer, stormwater, and transportation (see below for the analysis of high-quality active transportation in this area).</p> <p>The remaining areas are near existing infrastructure services and are planned to be served in the future.</p> <p>Service can be provided to any site in the area not currently served within one year of an application for a building permit.</p>
The zoning that will be applied upon annexation, based on the City’s comprehensive plan designation for the area, is consistent with climate-friendly area requirements.	TRUE	The zoning that will be applied upon annexation in this area will comply with climate-friendly area requirements and any gaps will be corrected that are identified in Technical Memo #3b.
The county in which the subject area is located has adopted a consistent comprehensive plan designation for the area.	TRUE	The area is covered by the Metro Plan, Springfield Comprehensive Plan, and Glenwood Refinement Plan, all of which were jointly adopted by Lane County and the City of Springfield. The plan designations in this area will comply with climate-friendly area requirements and any gaps will be corrected that are identified in Technical Memo #3b.
The City can demonstrate that at least 70 percent of complete annexation applications within the last five years have been approved within one year of the date of complete annexation application.	TRUE	City staff confirm that 100% of complete annexation applications within the last five years have been approved within one year of the date of complete annexation application. ¹⁶

Suitable Width

Map 4 shows the results of both methods citywide. Areas in orange are potential CFA locations identified in Technical Memo #1; areas with diagonal lines are potential CFA locations that meet the minimum width suitability criteria. The Potential CFA location off of 30th Street was removed since, as a small and isolated area, it does not meet the minimum CFA width requirements.

¹⁶ Climate-Friendly Area Methods Guide, Updated April 3, 2023, p. 13.

MAP 4. POTENTIAL CFA LOCATIONS OF SUITABLE AND OPTIMAL MINIMUM WIDTH



Suitable Size

Because Springfield’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 here “Primary CFAs.” For these larger local governments, additional (“Secondary”) CFAs may be designated with less intensive standards as provided in this rule to achieve the required housing capacity.

Table 3 shows the potential CFA locations that were of suitable width, by size.

TABLE 3. CFA LOCATIONS OF SUITABLE WIDTH

Location Name	Acres
Downtown	367
Glenwood Riverfront	157
Inside City Limits	46
Outside City Limits	111
Riverbend	109
Mohawk	59
TOTAL	692

Note: Some of these areas are adjusted in a later section of this memo, adding some area to Glenwood Riverfront and Riverbend.

In, or Near, High-Density Mixed-Use Areas

OAR 660-012-310(2)(b) 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.” The intentions of this rule are somewhat unclear.

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 does not discern whether a CFA is required to be surrounded by dense residential and employment uses. 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 are as follows:

1. Attempt to interpret the intent of the rule and define the terms.
2. Consider this requirement as too ambiguous to evaluate.

Springfield has elected to consider this requirement as too ambiguous and thus will not be evaluated in this memo.

Suitable Locations for Springfield CFAs

COMBINING THE SUITABILITY CRITERIA

To recap, the location and suitability criteria considered relevant so far in the analysis were:

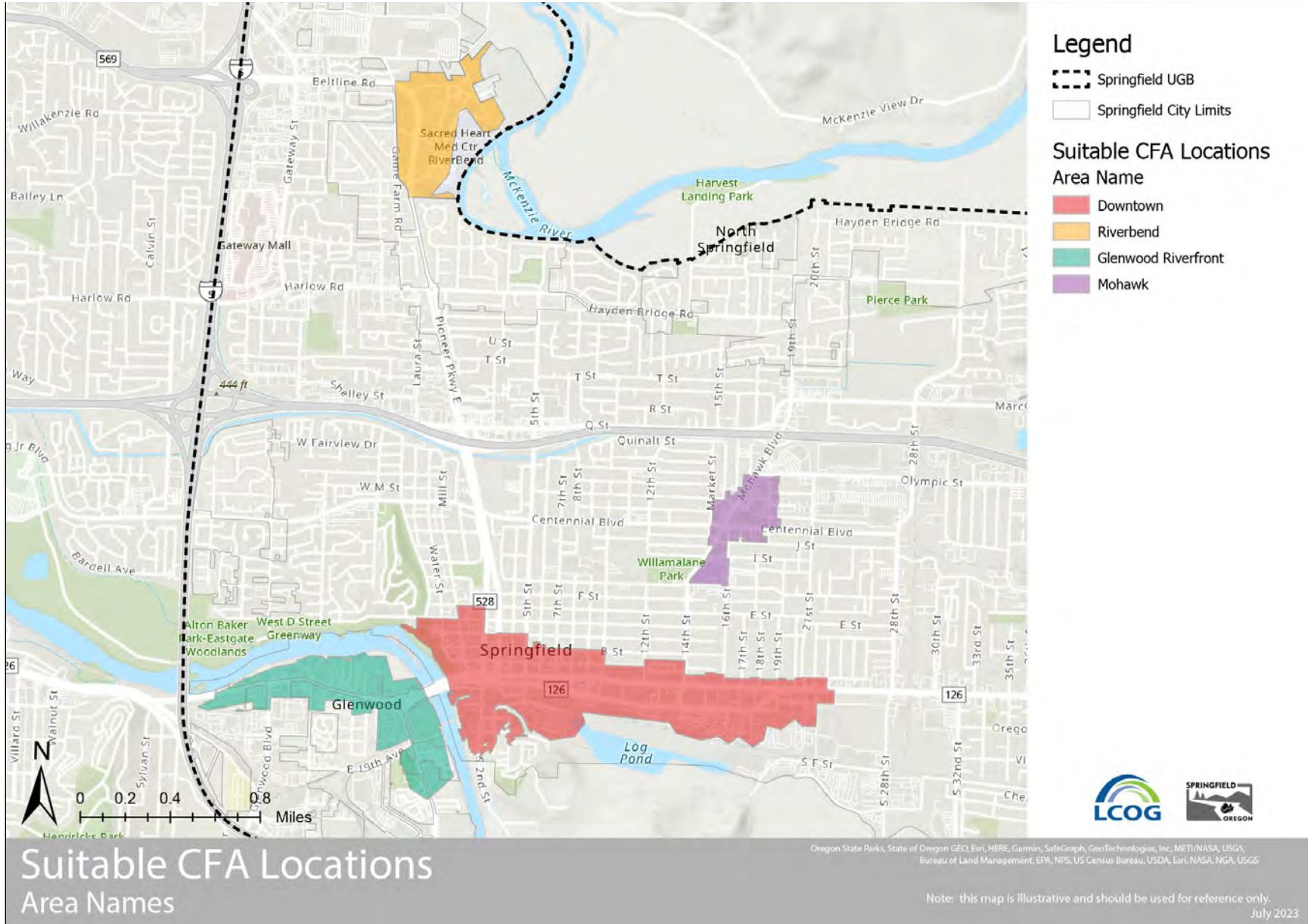
- In Urban Centers
- In, or Near, High-Density Mixed-Use Areas
- In High-Quality Transit Corridors
- In Developable Lands (Not Impacted by Goal 7 Hazards)
- Inside the City Limits
- Outside the City Limits but Inside the City's Urban Growth Boundary (additional conditions)
- Of Sufficient Minimum Width
- *For Potential "Secondary" CFA Locations*
 - No minimum size
- *For Potential "Primary" CFA locations*
 - At Least 25 Acres in Size

Each criterion presumes the passage of the previous one. Map 5 shows the resulting locations.

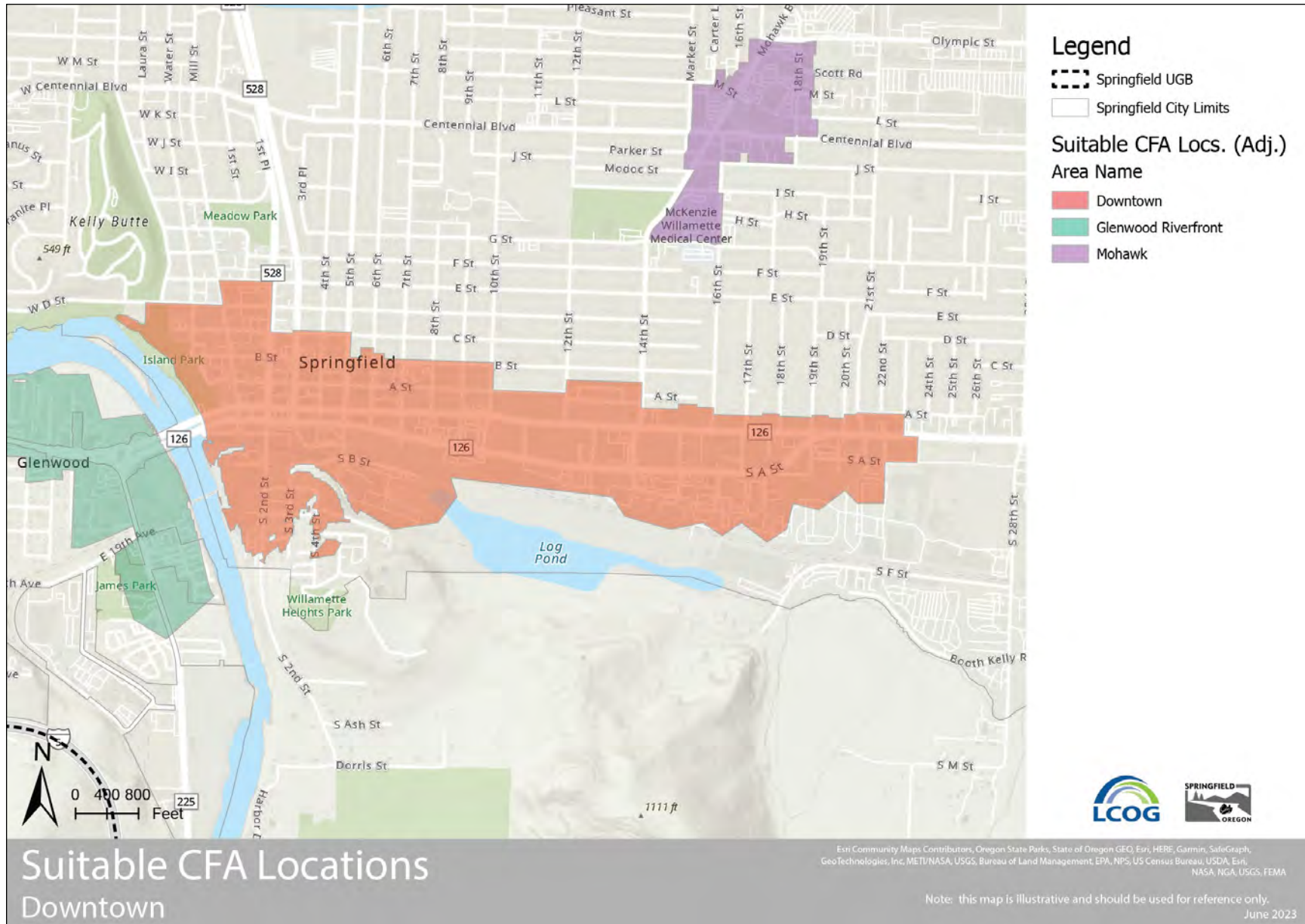
SUITABLE CFA LOCATIONS IN DETAIL – MAP SERIES

There are four distinct potential CFA locations that were found to be suitable. Map 6 through Map 9 focus on each suitable CFA location in order to better understand the areas involved.

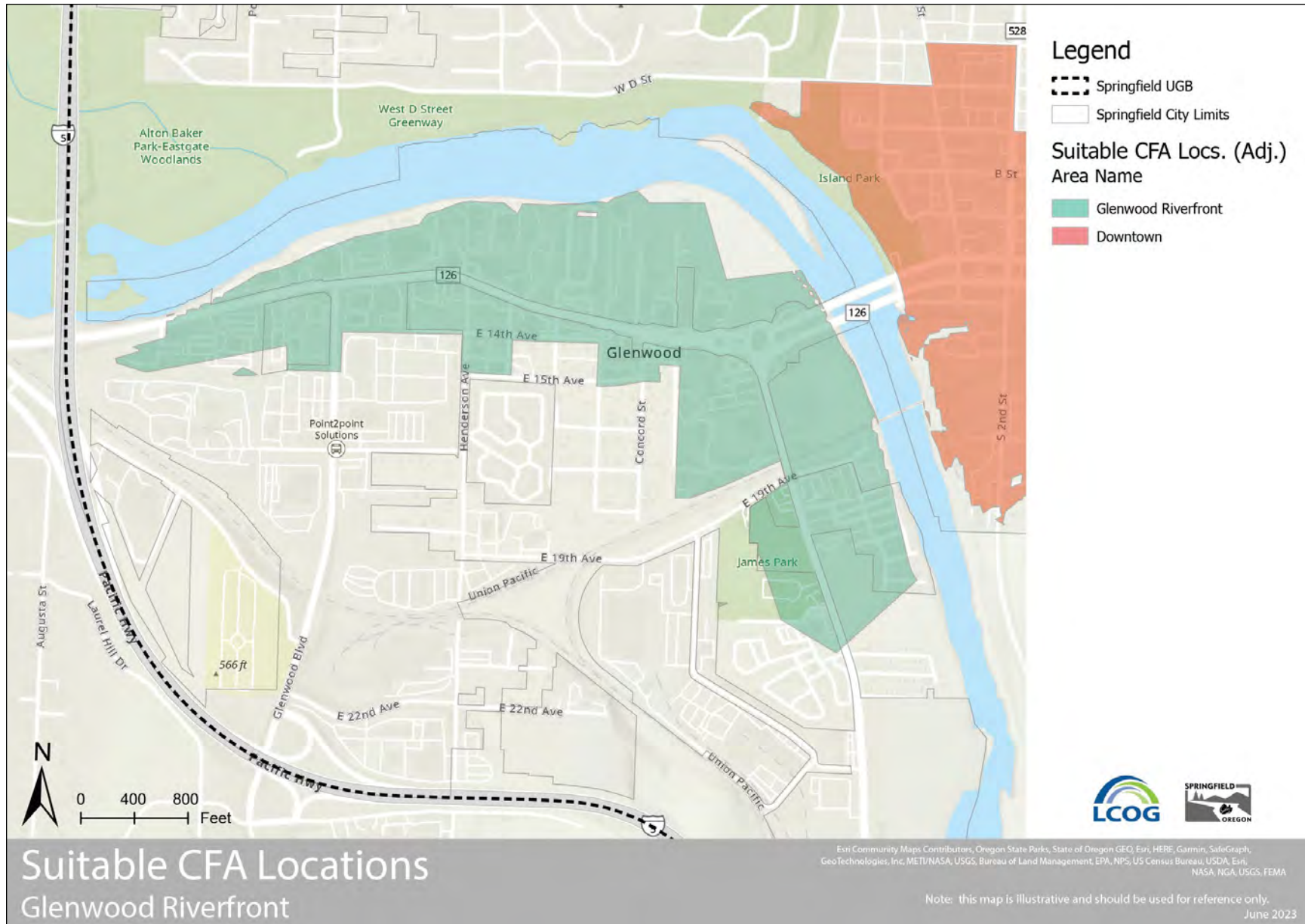
MAP 5. SUITABLE CFA LOCATIONS

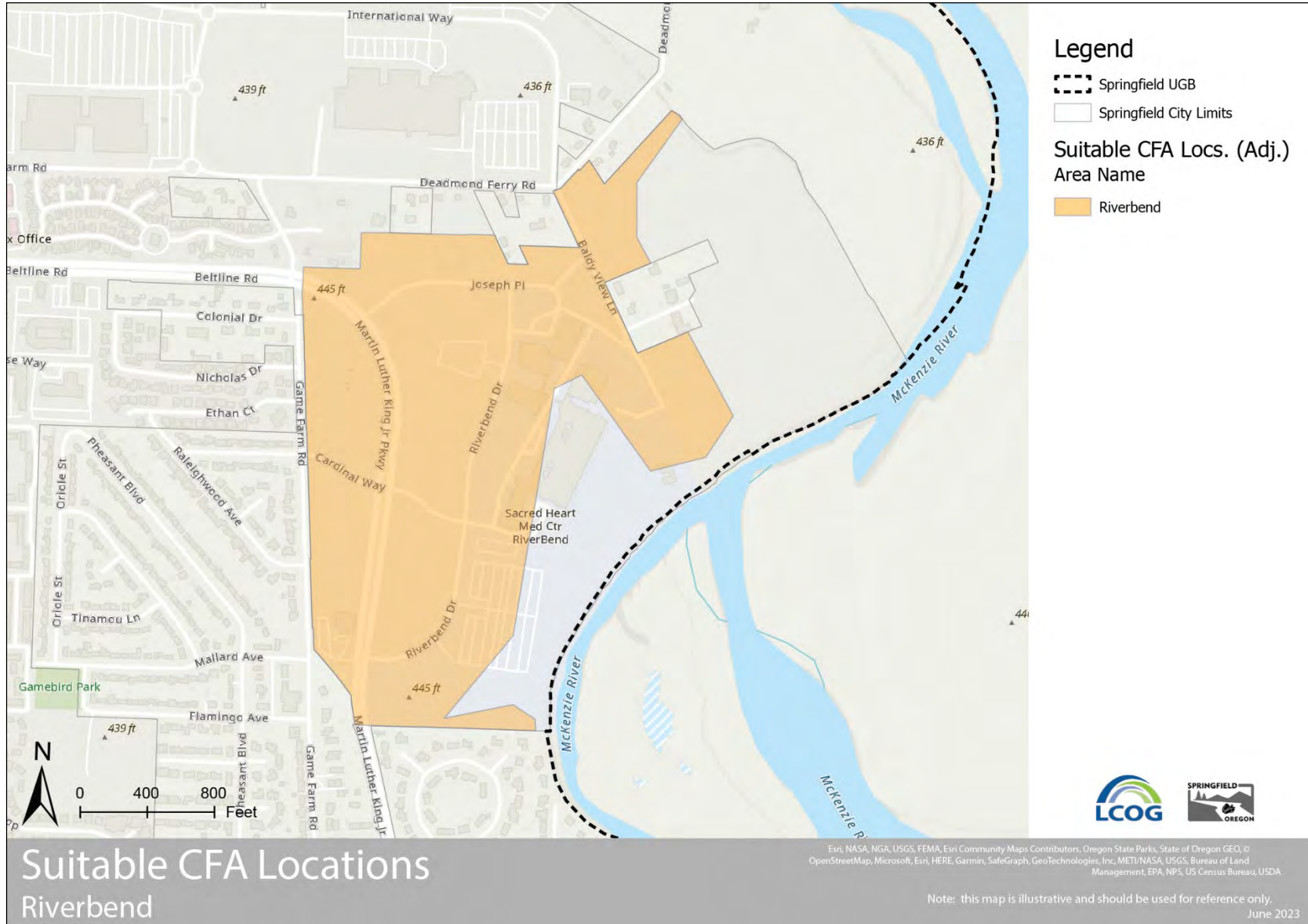


MAP 6. SUITABLE CFA LOCATIONS – DOWNTOWN

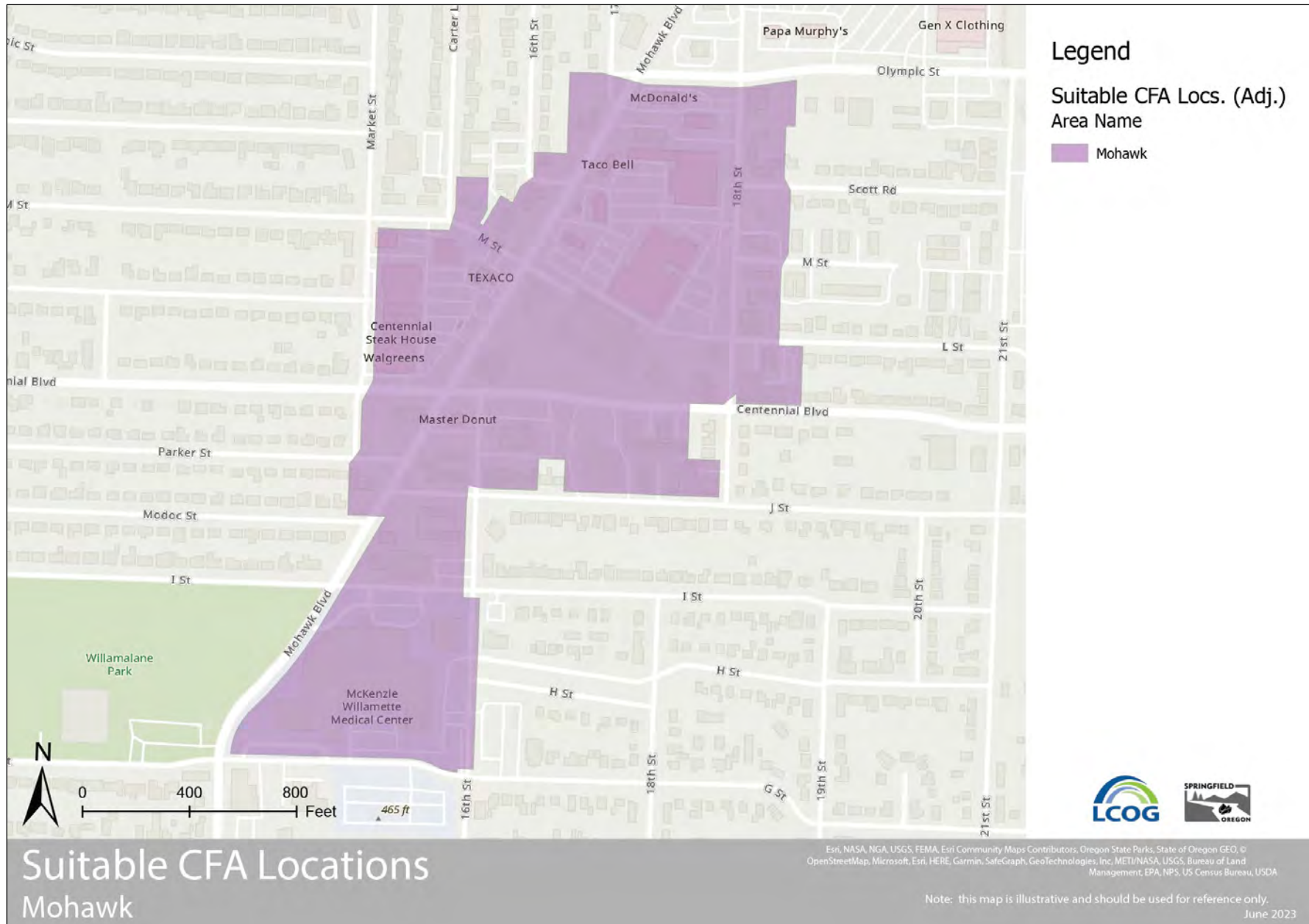


MAP 7. SUITABLE CFA LOCATIONS – GLENWOOD RIVERFRONT





MAP 9. SUITABLE CFA LOCATIONS – MOHAWK



High-Quality Pedestrian, Bicycle, and Transit Services

OAR 660-012-0310(2)(c) requires that, CFA “locations shall be in areas that are served, or planned for service, by high quality pedestrian, bicycle, and transit services.” However, the terms “high quality” and “service” used in the rules are not defined, nor do they have broadly accepted definitions.

The City provided the following definitions for services¹⁷ and service areas.

High-Quality Pedestrian Services: Meets minimum construction standards for dedicated space to walk (sidewalks, mixed-use paths) with safe crossing locations and convenient connections to other modal facilities, such as transit stops.

High-Quality Pedestrian Service Areas – Areas adequately served by high-quality pedestrian services.

High-Quality Bicycle Services: Meets minimum construction standards for dedicated space to bicycle (bicycle lanes, mixed-use paths, signage, and striping).

High-Quality Bicycle Service Areas – Areas adequately served by high-quality bicycle services.

High-Quality Transit Services: Existing and proposed/planned frequent transit¹⁸ network.

High-Quality Transit Service Areas – Areas within a half-mile walkable distance to high-quality transit.

HIGH-QUALITY TRANSIT SERVICES

High-quality transit services were already analyzed in Technical Memo #1, and potential CFAs were located where high-frequency transit was within a half-mile walking distance. However, the absence of useable pedestrian network data that could be used for routing hypothetical pedestrian trips required that the street network be used, regardless of the presence of safe pedestrian facilities. In many areas, particularly in Glenwood Riverfront, accessibility to the existing high-quality transit will depend on the application of land use regulations for new development.

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

- OAR 660-012-0710(1) requires cities and counties to plan for 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.

¹⁷ The term “services” is used here to refer to bicycle facilities and infrastructure.

¹⁸ Frequent transit corridors are defined in OAR 660-012-0440(3).

In Technical Memo #1, as a simplification, access to high-quality transit (defined as within half-mile walking distance of a frequent transit corridor) was assessed and used as a proxy for the presence of high-quality active transportation (pedestrian and bicycle, as well as other active modes not identified in the rules) services.

However, there are two limitations of this approach.

1. While there is often considerable overlap between high-quality active transportation services and high-quality transit service (which is defined in this study as transit one can walk to) the network used to calculate walkability to transit was the street network and does not reflect the presence or absence of high-quality pedestrian facilities or services. Similarly, the presence of a street network that can be traversed up to a half a mile from high-frequency transit stops does not address the presence of high-quality bicycle facilities or services.¹⁹
2. This approach only analyzes the existing walkability of the existing and planned transit network. Future routes pedestrians could take were not represented since the network used was the existing street network. Future development to high urban standards is likely to provide high-quality pedestrian and bicycle facilities and services.

For the above reasons, facilities and service levels of high-quality active transportation will be examined more closely in this memo.

HIGH-QUALITY PEDESTRIAN SERVICES

To mitigate the shortcomings of the analysis mentioned in the prior section, the presence of high-quality pedestrian services in each area can be evaluated since accessibility to transit is part of the definition of that service provided above.

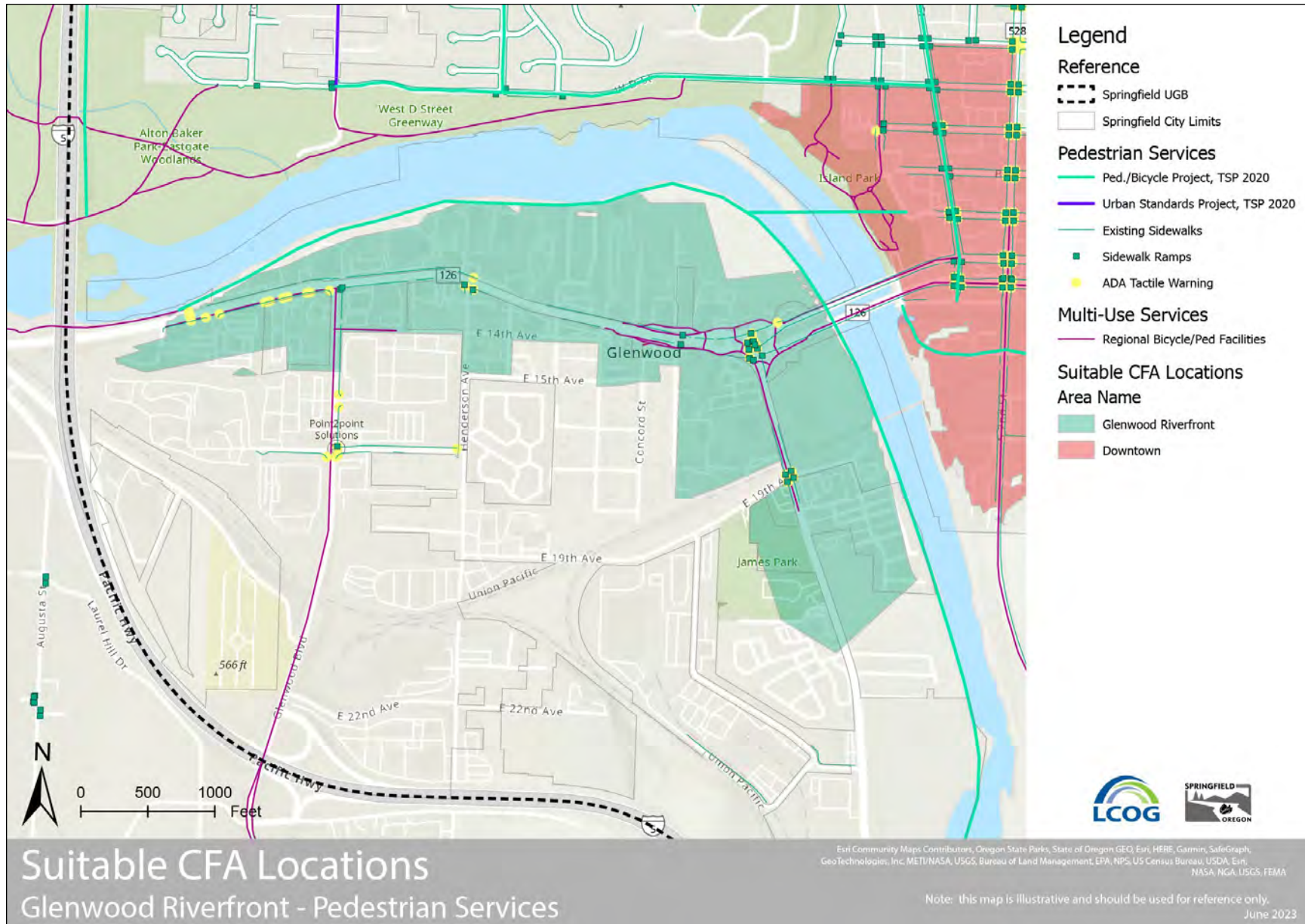
Note that the City cannot ensure transit services to any area. LTD is able to change service provisions as they see fit. However, as the regional transit authority, they are bound to provide service wherever there is significant anticipated demand. The potential CFA locations would meet that requirement since they are defined as "...an urban mixed-use area containing, or planned to contain, a mixture of higher-density housing, jobs, businesses, and services."²⁰

HIGH-QUALITY PEDESTRIAN SERVICES IN DETAIL – MAP SERIES

For each suitable CFA location identified, the presence of existing and planned high-quality pedestrian services was evaluated by visual inspection of maps of each area. The following map series depicts these services in each location.

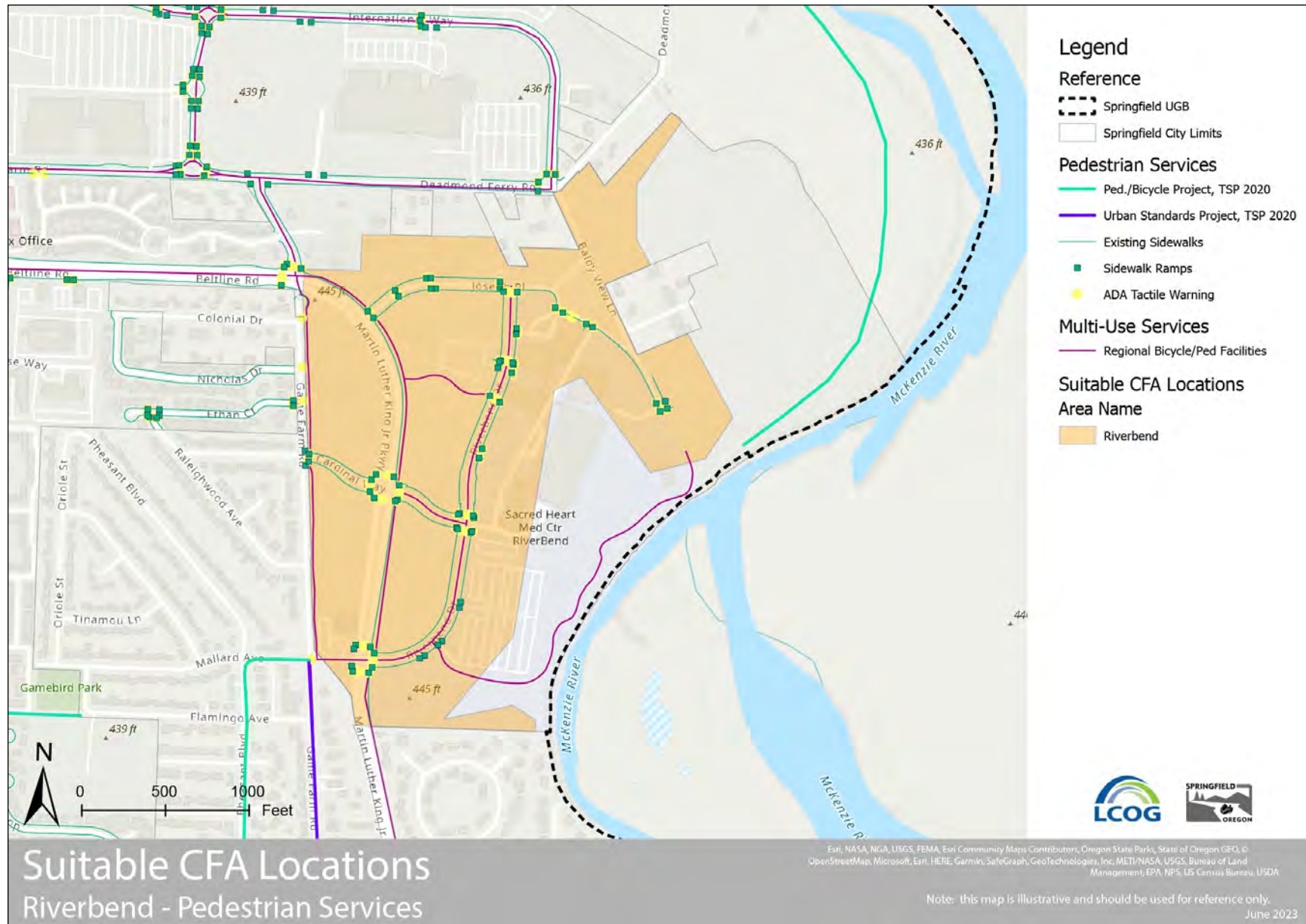
¹⁹ Unfortunately, an accurate pedestrian network dataset that can be used for this type of analysis is unavailable at this time, although it is under development by the Central Lane MPO. This work will also integrate off-street paths and bicycle routes for a multi-modal active transportation network that can be used to accurately model accessibility at the human-powered scale. ODOT is also undertaking a project to fund data collection efforts designed to improve active transportation facility inventories statewide. These efforts will not be available in the timeframe necessary for this study, however.

²⁰ OAR 660-012-0005(10)

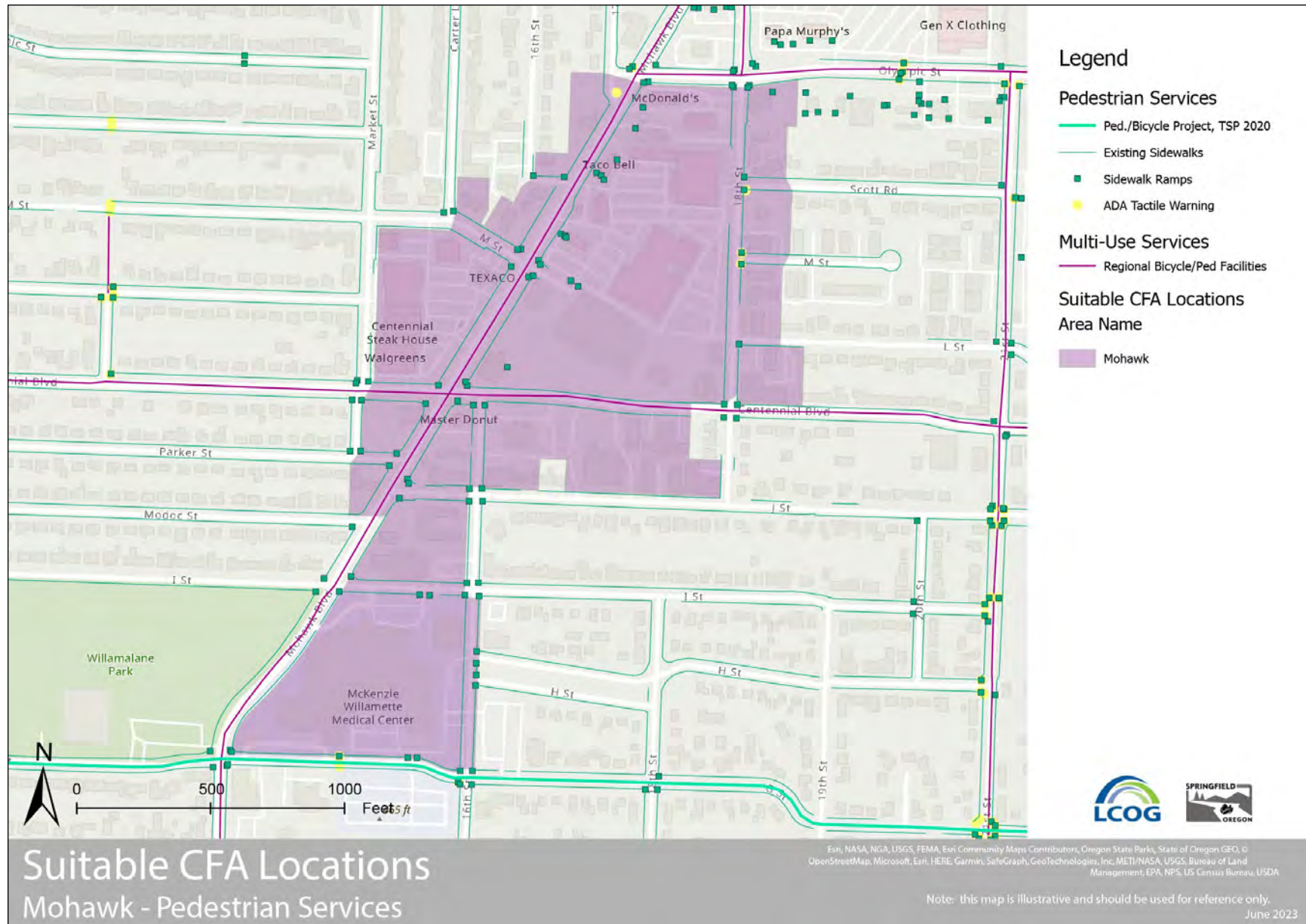


Suitable CFA Locations
Glenwood Riverfront - Pedestrian Services

MAP 12. HIGH-QUALITY PEDESTRIAN SERVICES IN SUITABLE CFA LOCATIONS - RIVERBEND



MAP 13. HIGH-QUALITY PEDESTRIAN SERVICES IN SUITABLE CFA LOCATIONS - MOHAWK

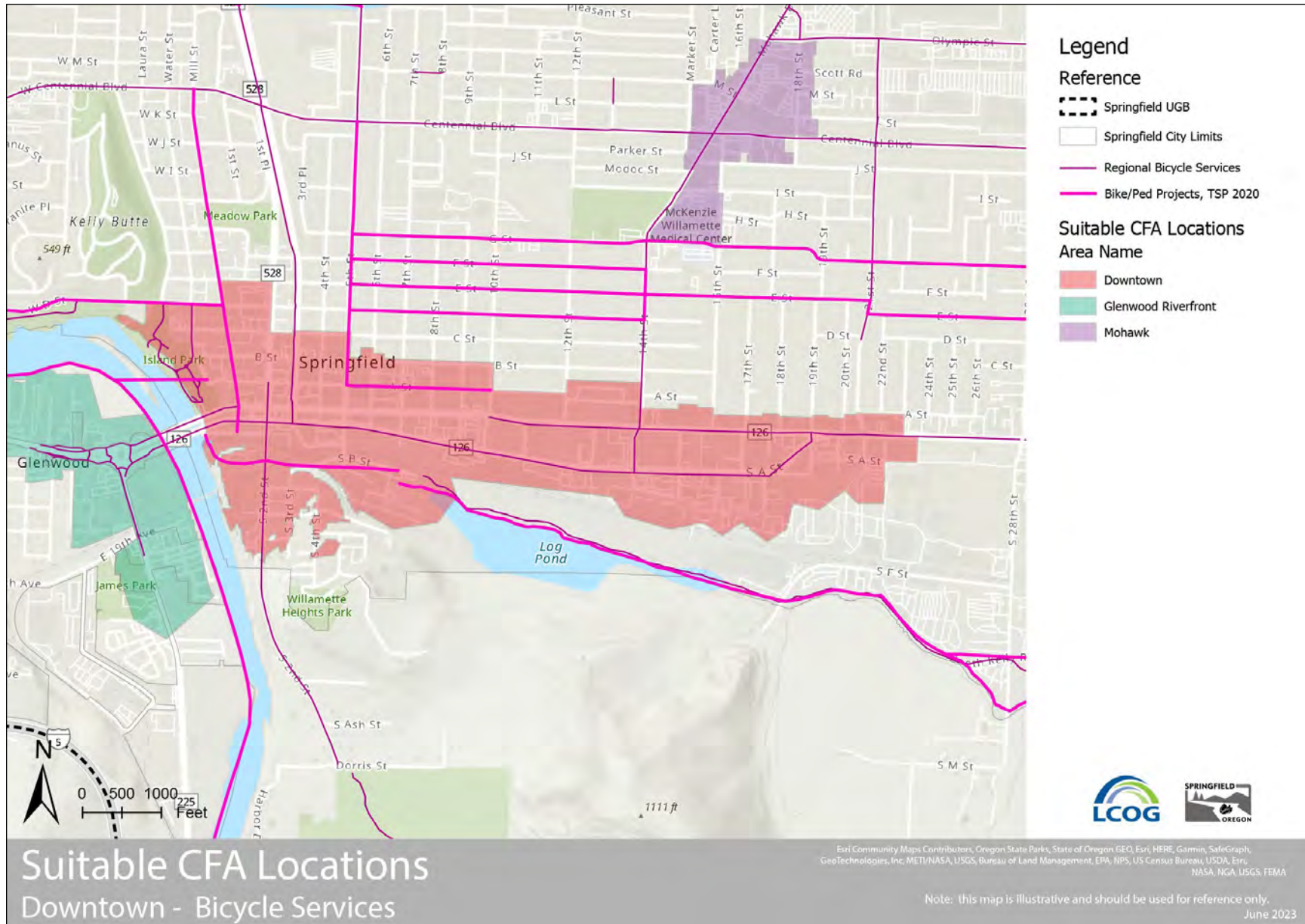


The above maps show existing and planned pedestrian services. In some areas there are significant gaps in the coverage of these services. This can be misleading however, since high-quality transportation service levels will be required of land use regulations that comply with the rules and will apply to future development in CFA zoned locations. These gaps and needed adjustments are addressed in Technical Memo #3b. In the following section of this memo, several suitable CFA locations are adjusted to increase their size and include areas that are expected to be served by high-quality pedestrian services when developed.

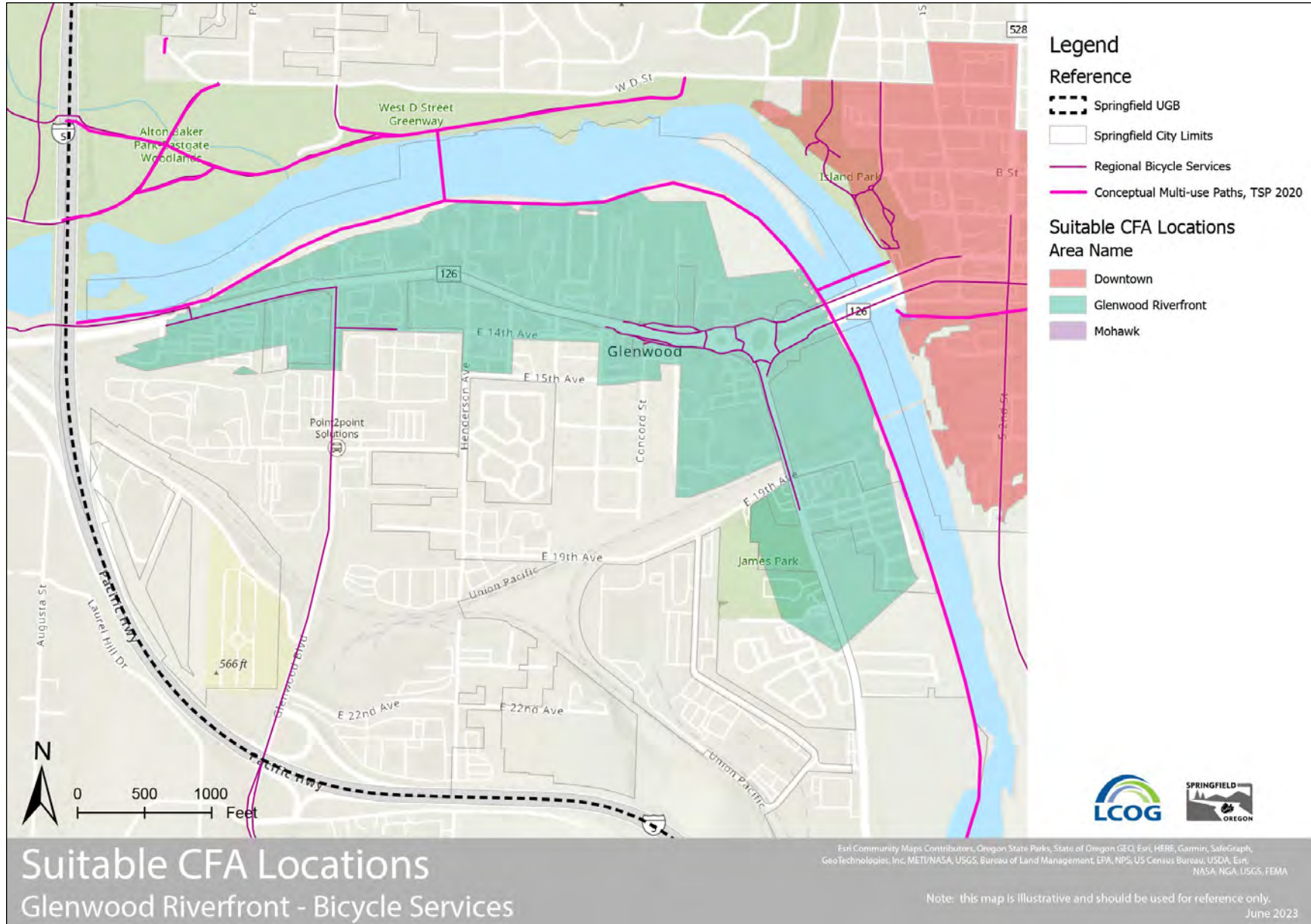
HIGH-QUALITY BICYCLE SERVICES IN DETAIL – MAP SERIES

For each suitable CFA location identified, the presence of high-quality bicycle services was evaluated by visual inspection of maps of each area. The following map series depicts these services in each location.

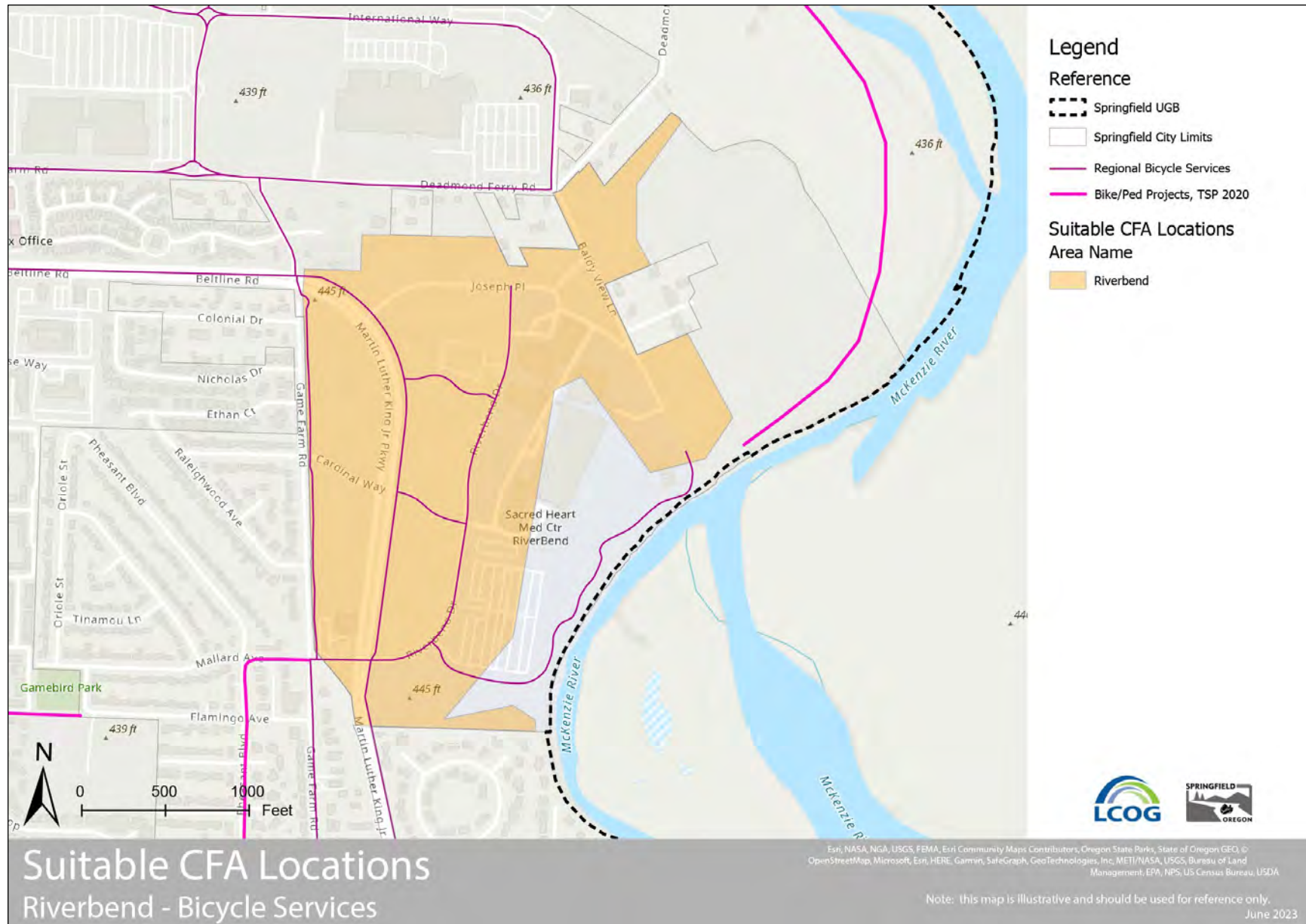
MAP 14. HIGH-QUALITY BICYCLE SERVICES IN SUITABLE CFA LOCATIONS - DOWNTOWN



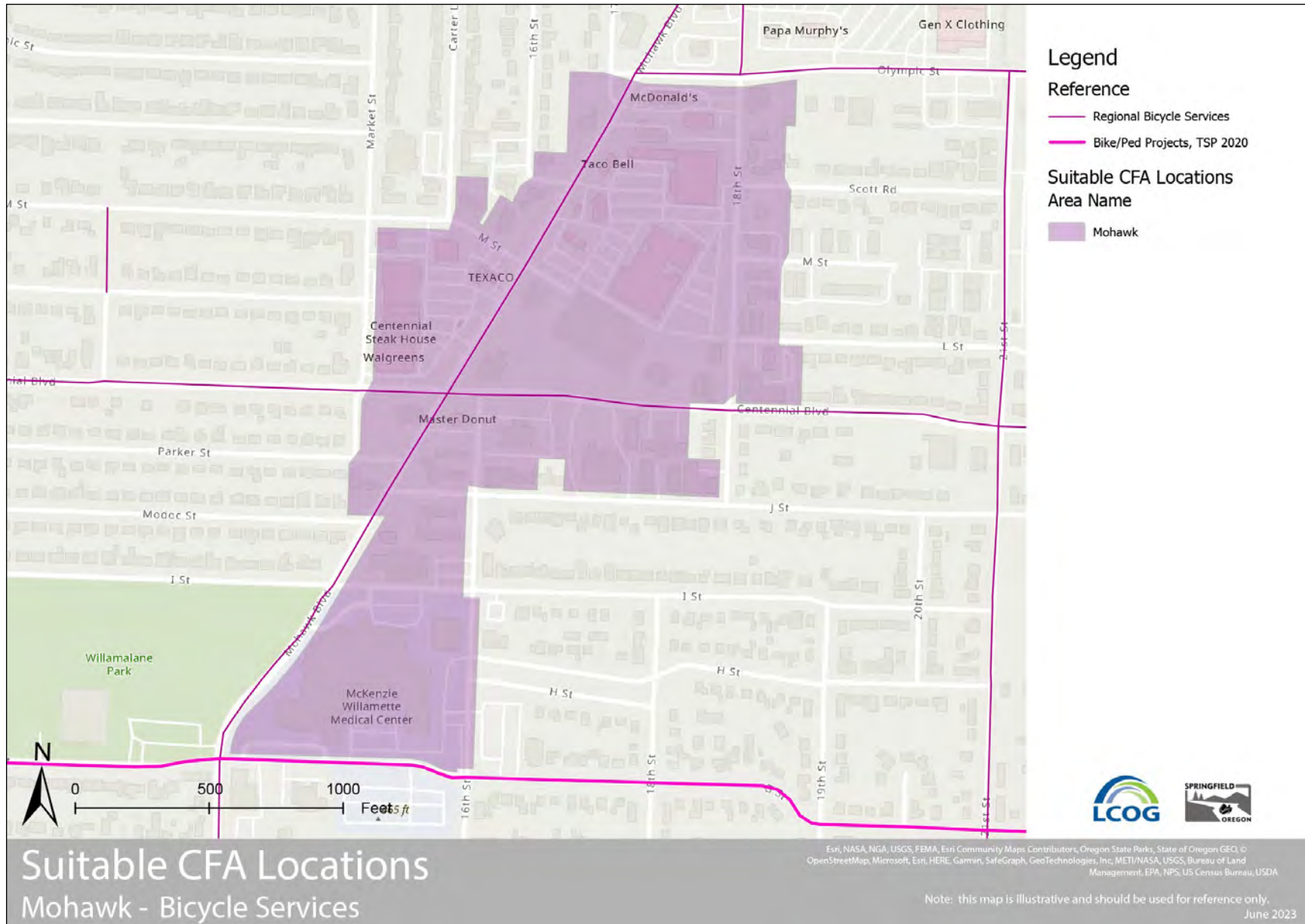
MAP 15. HIGH-QUALITY BICYCLE SERVICES IN SUITABLE CFA LOCATIONS – GLENWOOD RIVERFRONT



MAP 16. HIGH-QUALITY BICYCLE SERVICES IN SUITABLE CFA LOCATIONS - RIVERBEND



MAP 17. HIGH-QUALITY BICYCLE SERVICES IN SUITABLE CFA LOCATIONS - MOHAWK



As with the pedestrian maps, the above maps show existing and planned bicycle services. As before, in some areas there are significant gaps in the coverage of these services. This can be misleading however, since high-quality transportation service levels will be required of land use regulations that comply with the rules and will apply to future development in CFA zoned locations. These gaps and needed adjustments are addressed in Technical Memo #3b. In the following section of this memo, several suitable CFA locations are adjusted to increase their size and include areas that are expected to be served by high-quality bicycle services when developed.

HIGH-QUALITY TRANSIT SERVICES

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

- OAR 660-012-0710(1) requires cities and counties to plan for 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 Springfield has worked with LCOG to develop the following definition of high-quality transit services and service areas:

- **High-Quality Transit Service** -- Existing and proposed/planned frequent transit network.
- **High-Quality Transit Service Areas** – Areas within a half-mile walkable distance to high-quality transit.

High-quality transit services were already analyzed in Technical Memo #1, and potential CFAs were located where high-frequency transit was within a half-mile walking distance. However, the absence of usable pedestrian network data that could be used for routing hypothetical pedestrian trips required that the street network be used, regardless of the presence of safe pedestrian facilities. In many areas, particularly in Glenwood Riverfront, accessibility to existing high-quality transit will depend on the application of land use regulations for new development.

Adjustments to Suitable CFA Locations

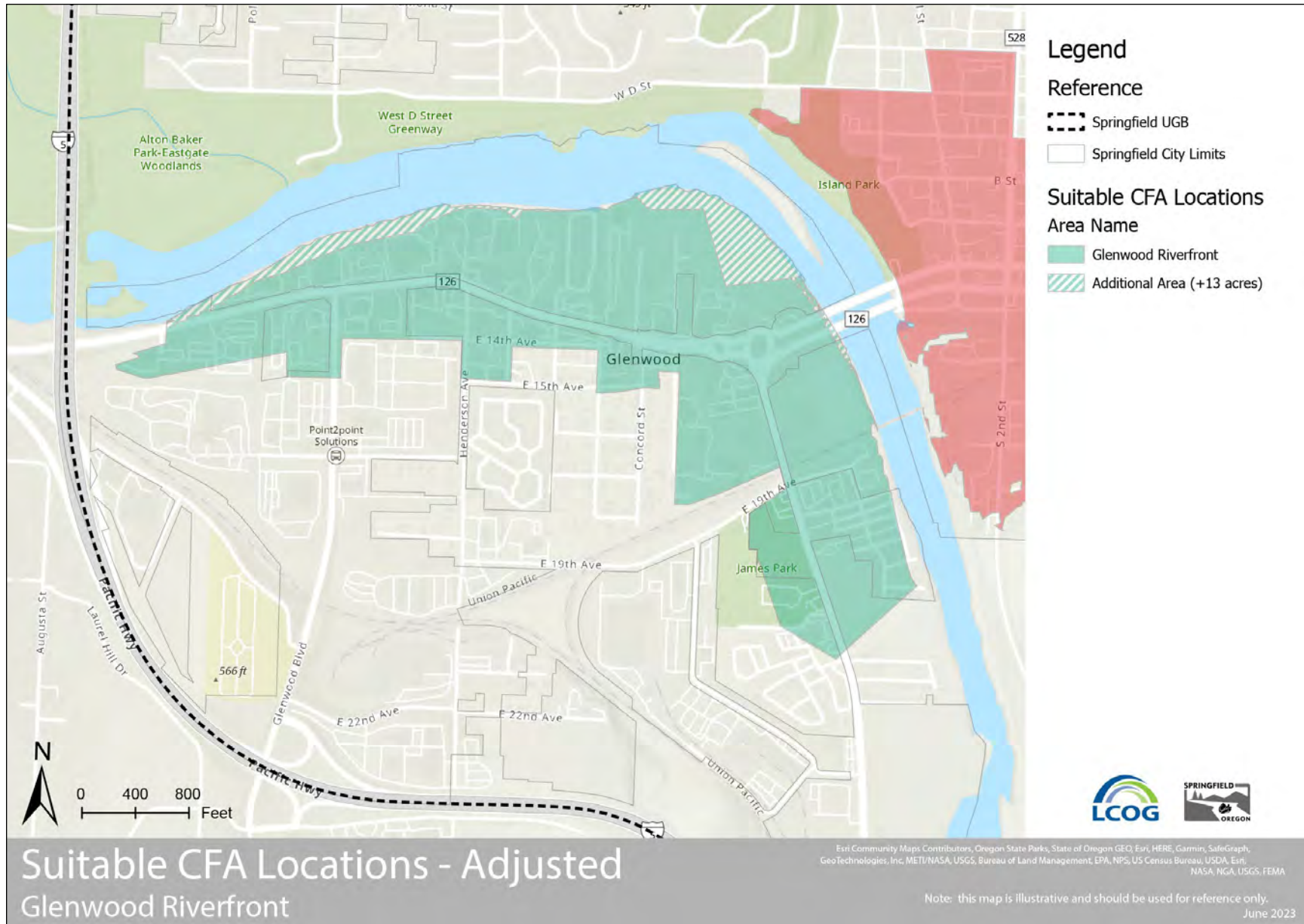
The Glenwood Riverfront and Riverbend locations were found to have areas that are accessible or expected to be accessible due to future development standards compliant with the CFA rules.

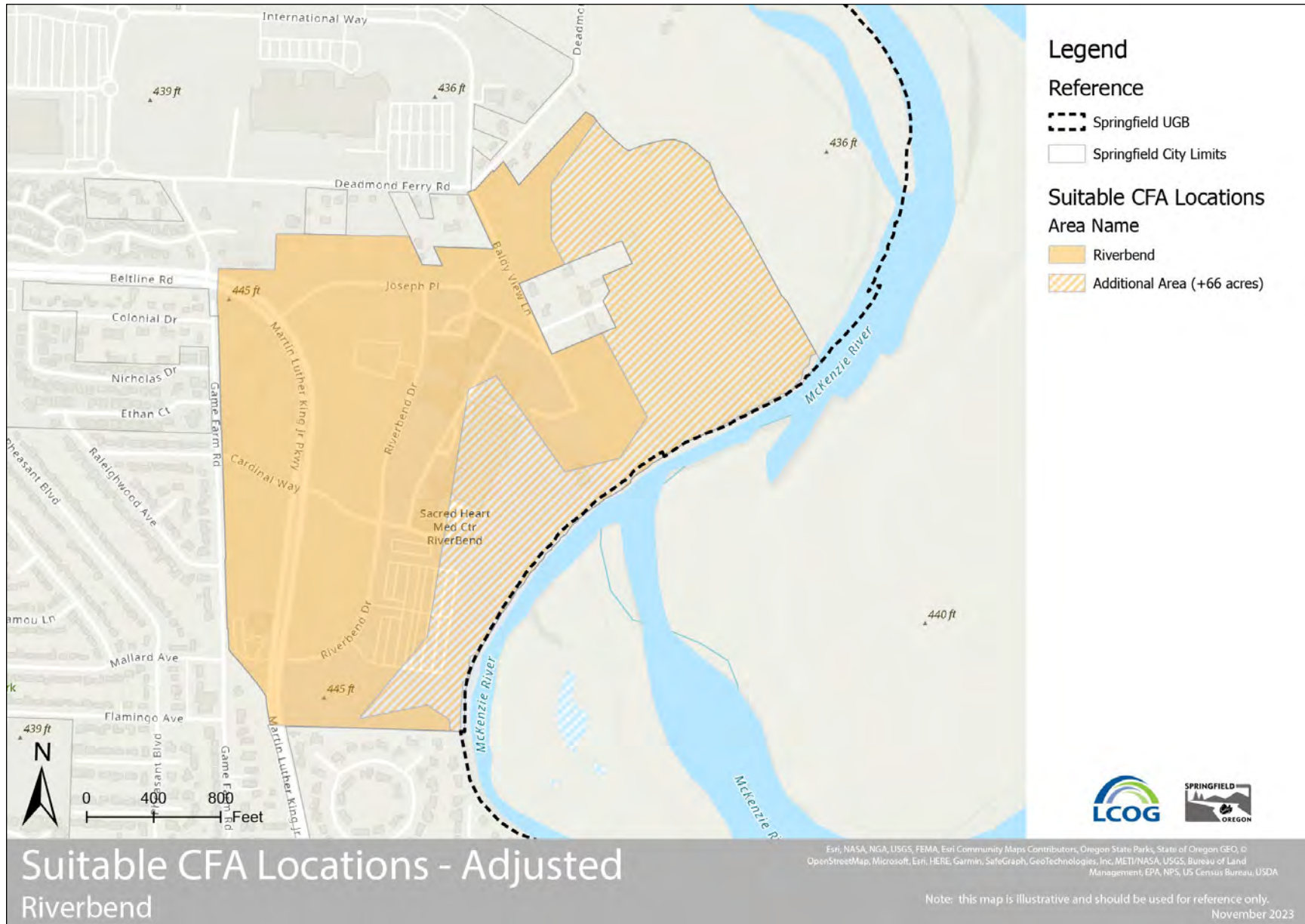
GLENWOOD RIVERFRONT ADJUSTMENTS

Two areas close to the Willamette River and inside the Glenwood Riverfront MMA were added to the Glenwood Riverfront Suitable CFA Location due to Springfield’s future plans to put in a bike path in these areas. On Map 18, the added areas were shown in a crosshatch pattern the same color as the CFA.

RIVERBEND ADJUSTMENTS

Areas close to the McKenzie River and inside the Riverbend Nodal Development Area were added to the Riverbend Suitable CFA Location. On Map 19, the added areas were shown in a crosshatch pattern the same color as the CFA.





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.

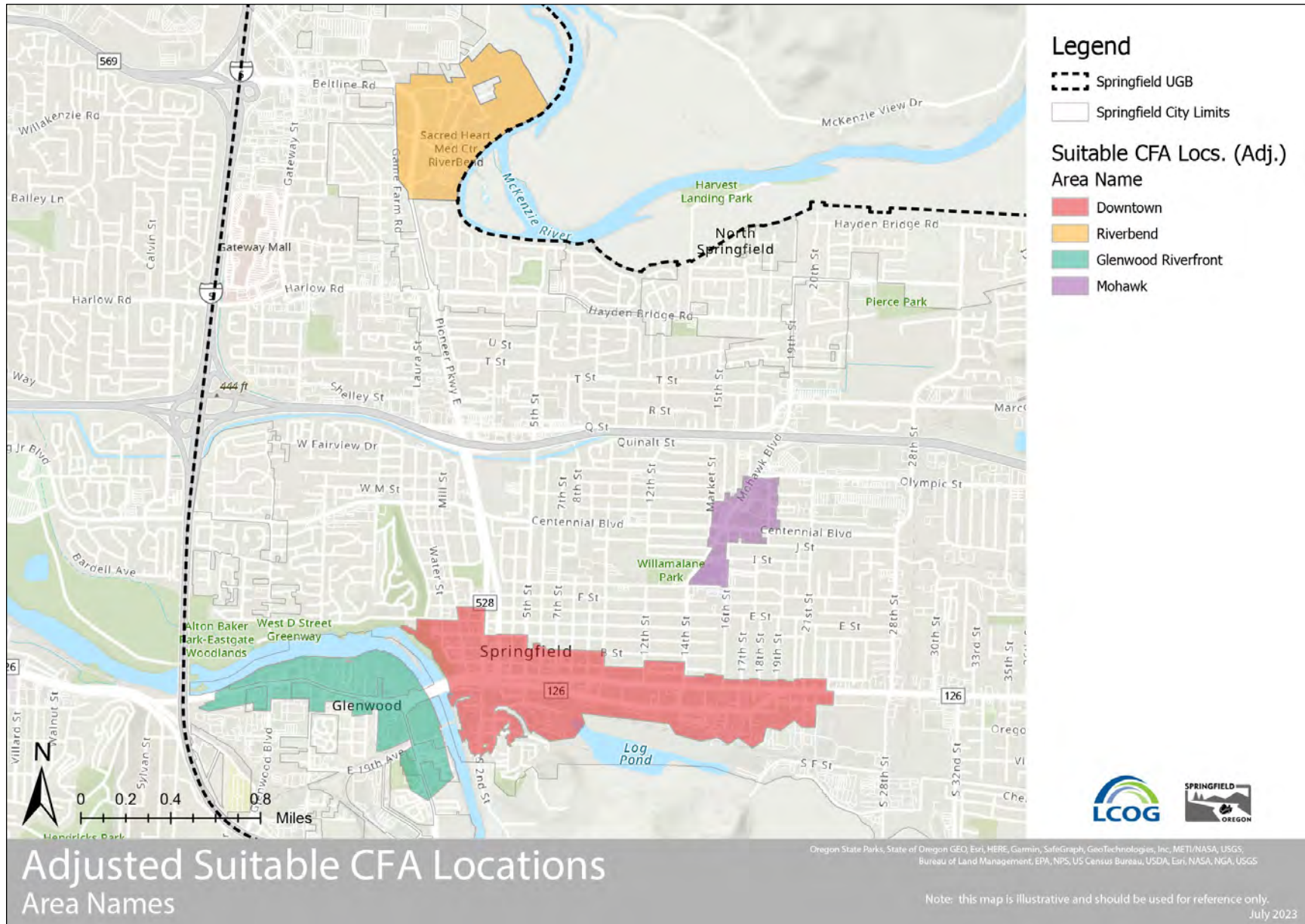
Four (taking Glenwood Riverfront as one) suitable CFA locations were identified. All of the suitable locations were more than 25 acres in size (Table 4).

TABLE 4. CFA LOCATIONS OF SUITABLE SIZE

Location Name	Acres
Downtown	367
Glenwood Riverfront	170
Inside City Limits	46
Outside City Limits	124
Riverbend	175
Mohawk	59
TOTAL	771

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).

Map 20 shows the adjusted suitable CFA locations.



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)
- Most promising areas and their optimal size (CFA Study Step A4)
- Mohawk Potential CFA was added to Springfield’s CFA study during the development of Tech Memo #3a. Because Tech Memos 2a, 2b, and 2.1 did not include Mohawk, the City will have to do that analysis as part of the CFA Implementation Phase.

APPENDIX A – ANNEXATION TIMELINESS

The following table was provided by the City of Springfield Permitting staff from the Accela system, the legal system of record for the City of Springfield annexations. It has been reformatted to fit the page and the “Days to Approval” column has been added.

Note that all annexations in the last five years are shown to be approved in less than one year. The longest annexation in the last five years took 129 days.

Record Number	Description	Street Name	Status*	Opened**	Expires***	CC PH	CC 2nd Reading	CC 3rd Reading	Ordinance	Days to Approval
811-23-000002-TYP4	Annexing approximately 0.36 acres.	NORTH	Complete/Approved	1/6/23	1/6/24	4/3/2023	4/17/2023		6456	101
811-22-000157-TYP4	Annex 0.20-acre residential lot located at 932 S. 40th Place due to failed septic. Concurrently annex portions of Osage Street and South 40th Place rights-of-way.	S 40TH PLACE	Complete/Approved	6/23/22	6/23/23	10/3/2022	10/17/2022		6451	116
811-22-000152-TYP4	Annex 0.29 acre residential lot for connection to City sewer	JANUS	Complete/Approved	6/17/22	6/17/23	10/3/2022	10/17/2022		^6453	122
811-22-000125-TYP4	Request to annex the subject property into City Limits in order to connect to the public sanitary sewer system due to a health hazard situation with their septic system	JASPER	Complete/Approved	5/13/22	5/13/23	9/6/2022	9/19/2022		6447	129
811-22-000074-TYP4	Annexation Submittal - to construct improvements to the SUB Level Three Reservoir	JESSICA	Complete/Approved	3/16/22	3/16/23	5/2/2022	5/16/2022		6441	61
811-22-000062-TYP4	Annexation of a 0.41 acre commercial parcel	MT VERNON	Complete/Approved	3/7/22	3/7/23	5/2/2022	5/16/2022		6442	70

Record Number	Description	Street Name	Status*	Opened**	Expires***	CC PH	CC 2nd Reading	CC 3rd Reading	Ordinance	Days to Approval
	with an existing non-conforming residential use due to issues with the septic system									
811-22-000051-TYP4	Annex 2.33 acres for the Woodland Ridge Phases 3 & 4 subdivision area	HOLLY	Complete/Approved	2/23/22	2/23/23	6/6/2022	6/20/2022		6446	117
811-22-000034-TYP4	Annexation of a single LDR property on Lomond Ave.	LOMOND	Complete/Approved	2/1/22	2/1/23	4/4/2022	4/18/2022		6437	76
811-21-000234-TYP4	Proposed annexation of single residential lot to connect to City sewer.	JASPER	Complete/Approved	8/31/21	8/31/22	11/1/2021	11/15/2021		6432	76
811-21-000203-TYP4	Request to annex a 0.48 acre lot into City Limits	DEADMOND FERRY	Complete/Approved	7/30/21	7/30/22	9/7/2021	9/20/2021	10/4/2021	6430	66
811-21-000101-TYP4	Annexation for future subdivision	THURSTON	Complete/Approved	5/4/21	5/4/22	6/7/2021	6/28/2021		6426	55
811-21-000039-TYP4	Annexation - Wiechert Custom homes - Horace Street	HORACE	Complete/Approved	2/26/21	2/26/22	4/5/2021	4/19/2021		6424	52
811-20-000207-TYP4	Annexation - Jasper Road LLC, single family residences	JASPER	Complete/Approved	10/30/20	10/30/21	12/7/2020	1/4/2021		6423	66
811-20-000006-TYP4	Annexation - Type IV - Annexation of .24 LDR - Single Family Dwelling	LOMOND	Complete/Approved	1/13/20	1/12/21	2/18/2020	4/6/2020		6416	84
811-19-000250-TYP4	Annexation 500 International Way - 8.37 acre	INTERNATIONAL	Complete/Approved	10/18/19	10/17/20	1/6/2020	1/21/2020		6414	95
811-19-000249-TYP4	Annexation of .85 acres for future multi-family residential	DEADMOND FERRY	Complete/Approved	10/18/19	10/17/20	1/6/2020	1/21/2020		6411	95
811-19-000192-TYP4	Annexation of 2 tax lots into the City limits and remove the UF-10 overlay	OSAGE	Complete/Approved	8/7/19	8/6/20	11/18/2019	12/2/2019		6409	117
811-19-000188-TYP4	Annex 0.5 acres to develop 2 existing tracts into 4 parcels.	ANDERSON	Complete/Approved	7/31/19	7/30/20	10/7/2019	10/21/2019		6404	82
811-19-000040-TYP4	Annex 0.91 acres of MDR property to the City along with segment of Horace Street right-of-way	JASPER	Complete/Approved	2/13/19	2/13/20	4/1/2019	4/15/2019		6399	61

Record Number	Description	Street Name	Status*	Opened**	Expires***	CC PH	CC 2nd Reading	CC 3rd Reading	Ordinance	Days to Approval
811-18-000203-TYP4	Sorric Annexation - South 57th street	S 57TH	Complete/Approved	10/25/18	10/25/19	12/3/2018	1/7/2019		6393	74
811-18-000176-TYP4	Annexation of 0.91 acres located at 47th and Jasper	JASPER	Complete/Approved	9/25/18	9/25/19	12/3/2018	1/7/2019		6392	104
811-18-000173-TYP4	Annexation of 1.85 acres of LDR property	S 57TH	Complete/Approved	9/20/18	9/20/19	11/5/2018	11/19/2018		6390	60
811-18-000101-TYP4	Annexation of ROW - 19th Street and Yolanda Ave.	19TH / YOLANDA	Complete/Approved	6/20/18	6/20/19	9/4/2018	9/17/2018		6388	89
811-18-000099-TYP4	Annexation - Single Family home with failing septic system less than 10,000 square feet of property	TAMARACK	Complete/Approved	6/19/18	6/19/19	9/4/2018	9/17/2018		6387	90
811-18-000081-TYP4	Annexation of 1.0 acre for future development	DEADMOND FERRY	Complete/Approved	5/15/18	5/15/19	9/4/2018	9/17/2018		6386	125
811-18-000057-TYP4	Annex portions of Franklin Blvd ROW in Glenwood	FRANKLIN	Complete/Approved	4/5/18	4/5/19	5/21/2018	6/4/2018		6381	60
811-18-000045-TYP4	Annexation - Annexation of 1.35 acres	DEADMOND FERRY	Complete/Approved	3/5/18	3/5/19	5/7/2018	5/21/2018		6379	77

* The Status is the last workflow update in Accela by the planner or as updated for this list on May 22, 2023.

** Opened date is the date the application was taken in. I don't recall having one that was taken in and deemed incomplete, so I am comfortable saying those are accurate to date of complete application received.

*** Expiration date is automatically set by Accela, I believe.

^Ordinance repeals and replaces original annexation Ordinance 6450 due to error in legal description exhibit

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3B

POLICY/CODE EVALUATION

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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 #3b provides an initial evaluation of the policy and regulatory context for the “Potential Climate-Friendly Areas” established through the preceding analyses (Technical Memorandums #1, 2a, 2b, and 3a). The purpose of this memo is to continue the process of refinement in the identification of 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 of relative compatibility will inform CFA recommendations related to policy and code adjustments Springfield would need to incorporate as part of adoption of CFAs.

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to then 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 defined as 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 density of housing, jobs, businesses, and services than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000, and that are also in one of the seven metropolitan areas (outside of the Portland Metro). The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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

¹ 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. 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.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

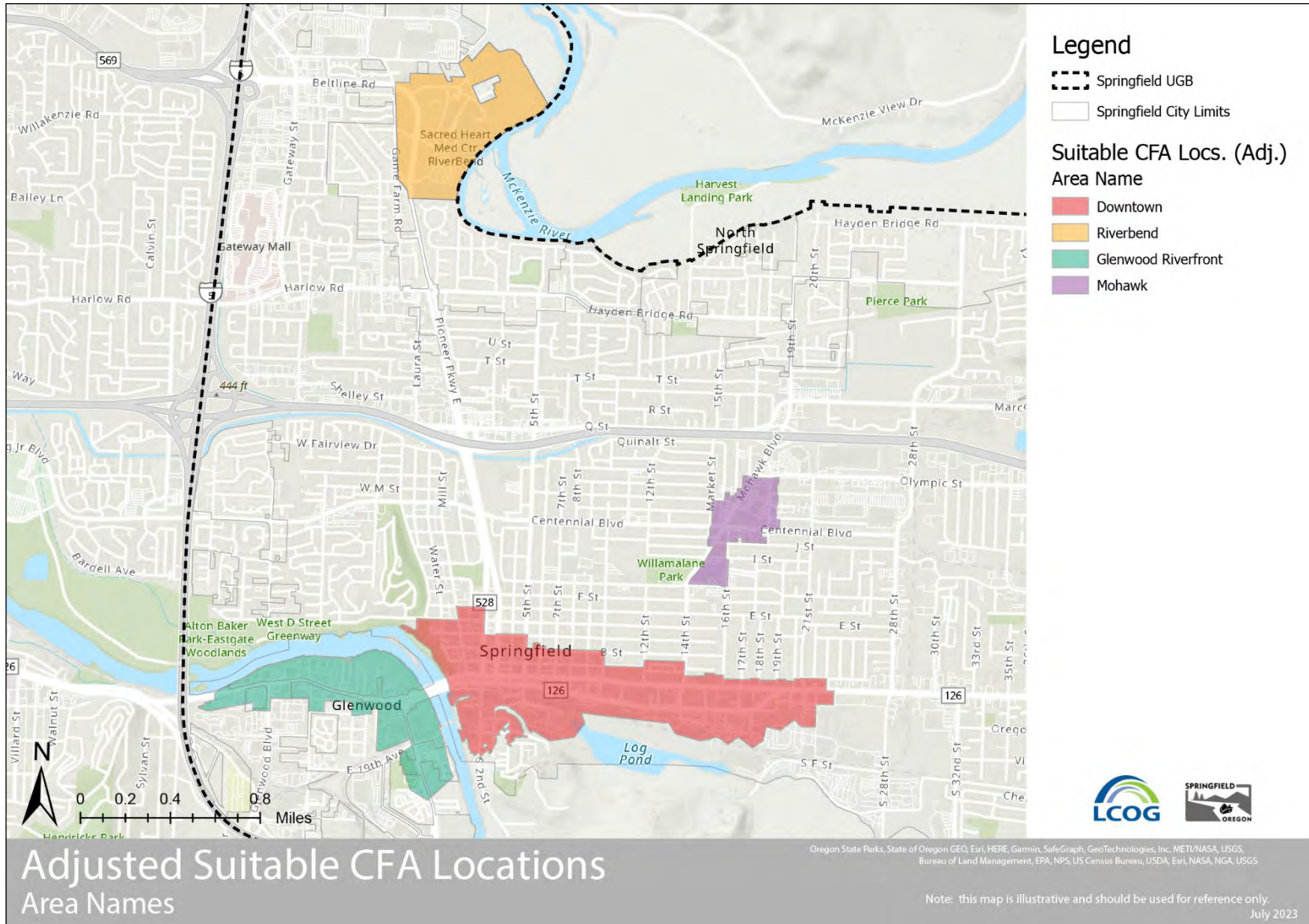
CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
Step A3. Analysis of potential CFAs (Suitability, Policy, Capacity)	Technical Memorandum #3
Suitability Analysis	Technical 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. Analyze potential CFAs for “most promising” options	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

SPRINGFIELD’S SUITABLE CLIMATE-FRIENDLY AREAS

Map 1 on the following page provides visual representation of the City of Springfield Suitable CFAs evaluated in this analysis.

MAP 1. SUITABLE CFA LOCATIONS – AREA NAMES



APPLICABLE LAND USE DISTRICTS IN SPRINGFIELD'S SUITABLE CFAS

Previous analysis has resulted in four “Potential” and “Suitable” CFA locations within the City of **Springfield**. The basic zoning character of these areas is summarized below in Table 2, which organizes Springfield’s “land use districts” in order of their size and percent of the Suitable CFAs. Related analysis specific to each Suitable CFA location will be presented in Technical Memorandum #3c.

TABLE 2. RELATIVE AREA OF BASE LAND USE DISTRICTS WITHIN SPRINGFIELD'S SUITABLE CFAS

Land Use Districts	Abbreviation	Acres in CFAs	% of All Acres in CFAs
R-1	R1	41.5	5.4%
R-2	R2	85.6	11.1%
R-3	R3	13.4	1.7%
Community Commercial	CC	104.5	13.6%
Light Medium Industrial	LMI	20.4	2.6%
Heavy Industrial	HI	65.1	8.4%
Medical Services	MS	46.4	6.0%
Mixed Use Residential	MUR	5.08	0.7%
Mixed Use Commercial	MUC	166.6	21.6%
Glenwood Residential Mixed Use	GRMU	34.1	4.4%
Glenwood Commercial Mixed Use	GCMU	26.3	3.4%
Glenwood Employment Mixed Use	GEMU	46.7	6.1%
Glenwood Office Mixed Use	GOMU	51.1	6.6%
Booth Kelly Mixed Use	BK	35.2	4.6%
Public Land & Open Space	PLO	17.0	2.2%
Unzoned (Right-of-Way)	N/A	12.1	1.6%
Total		771.1	100%

Several Springfield land use districts appear in the resulting spatial analysis at very small proportions. These are generally districts that were not intended to be included in the CFA in the first place, but have been included as slivers, edges, or other forms of data artifacts. Land use districts are not included in the proceeding analysis if they constitute less than 4,000 square feet of area. The Springfield land use districts that were left off of the list above due to the application of this threshold include Campus Industrial, Major Retail Commercial, and Neighborhood Commercial.

Overlay Districts

Table 3 is a summary of the presence and extent of overlay districts within the Suitable CFA areas within Springfield. Overlay districts establish additional regulations beyond the base land use district

to address specific community objectives, such as protection of environmentally sensitive areas or areas the City desires increased densities or walkability.

TABLE 3. ACREAGE OF KEY OVERLAY DISTRICTS IN BASE LAND USE DISTRICTS IN SPRINGFIELD'S SUITABLE CFAs

Overlay Districts	Hospital Support (HS)	Historic (H)	Nodal Dev. (ND)	*Hillside Dev. (HD)	**Willamette Greenway (WG)	***Urbanize-able Fringe (UF)
R-1	0.9	5.63	1.2	0.1	2.3	0.1
R-2		1.42	76.0	0.4		0.1
Community Commercial (CC)		0.6	3.2			
Mixed Use Residential (MUR)			3.2			
Mixed Use Commercial (MUC)	9.6	0.1	161.6		5.6	
Glen. Residential Mixed Use (GRMU)			34.2		5.2	32.2
Glen. Commercial Mixed Use (GCMU)			14.2	0.2		13.7
Glen. Employment Mixed Use (GEMU)			32.8		4.0	40.9
Glen. Office Mixed Use (GOMU)			51	0.3	7.1	34.2
Heavy Industrial (HI)					0.4	
Medical Services (MS)			46.4			
Light Medium Industrial (LMI)			0.1	0.04	0.7	
Booth Kelly Mixed Use (BK)			0.1	0.01	0.02	
Public Land and Open Space (PLO)			2.7		10.3	
Total	10.5	7.75	426.7	1.05	35.62	121.2

**Hillside Development segments are all small and reflect narrow riverbank slopes*

***The Willamette Greenway Overlay District does not comprehensively prohibit development. Though it is likely that some development would be prohibited in the overlay, this analysis is not sufficient to assert how much and where.*

****Urbanizable Fringe (UF) is applied to areas within the UGB and not within City Limits. These are necessarily having to be annexed before being developed and the overlay is dropped when formally brought into the City.*

Map 2 and Map 3 provide visual representation of the base land use districts and overlay districts within City of Springfield Suitable CFAs evaluated in this analysis.

For the purpose of evaluating existing regulatory compliance with CFA rules, the Nodal Overlay District (ND) is observed to be the only overlay with regulatory impact that is both adequately predictable and of sufficient scale to merit discrete assessment. The extent of all Overlay Districts within individual CFA Locations is presented in Tech Memo #4.

Plan Designations

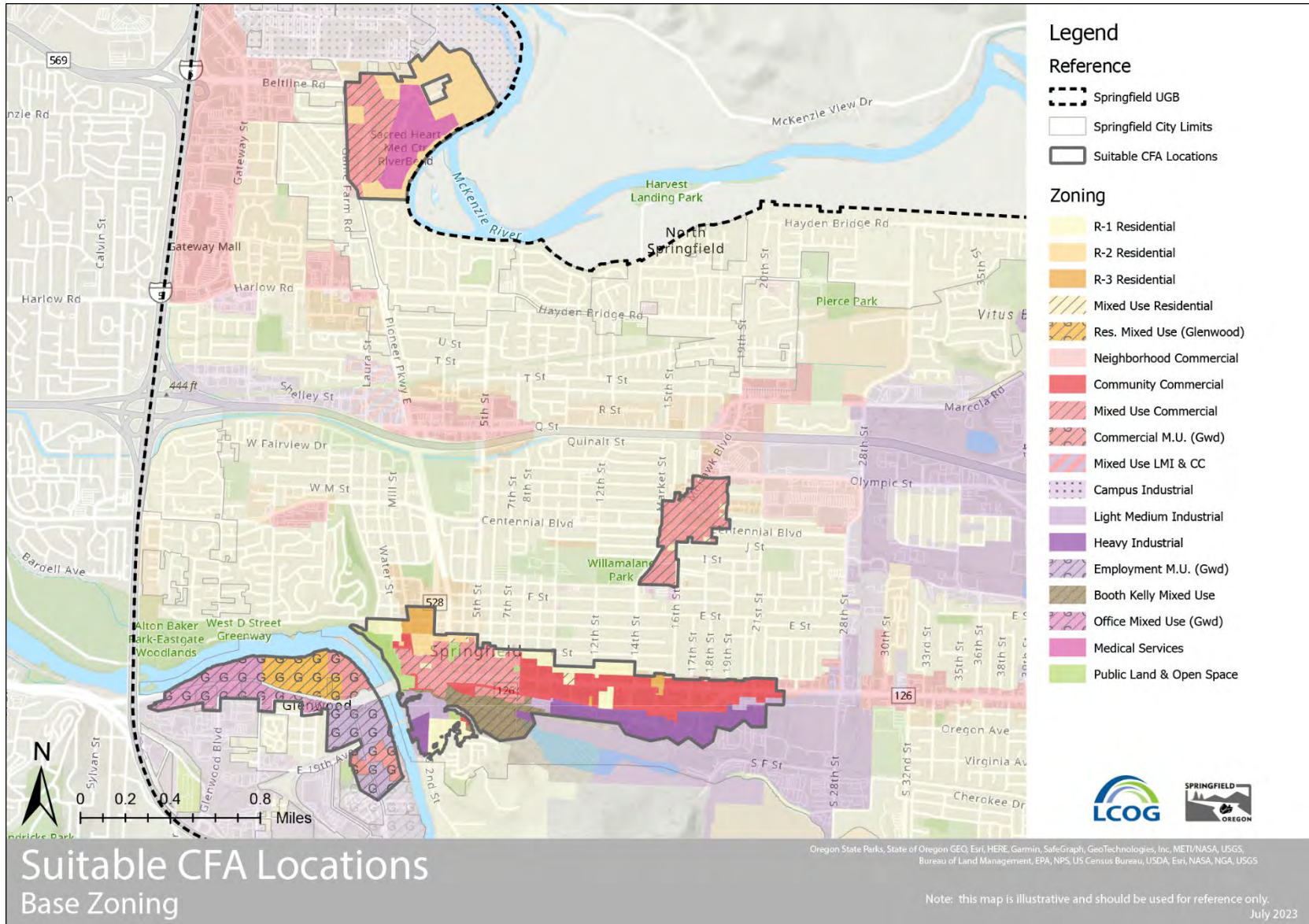
The 1982 Eugene-Springfield Metropolitan Area General Plan (Metro Plan) was created to serve as the sole official long-range comprehensive plan of metropolitan Lane County and the Cities of Eugene and Springfield. In 2007, the Oregon Legislature enacted ORS 197.304, also known as House Bill 3337, which was the impetus for Springfield to establish a UGB separate from Eugene's and to begin to create a Springfield-specific comprehensive plan. The goals and policies of the

Springfield Comprehensive Plan, along with applicable policies in the Metro Plan, will guide Springfield's growth and development into the future.

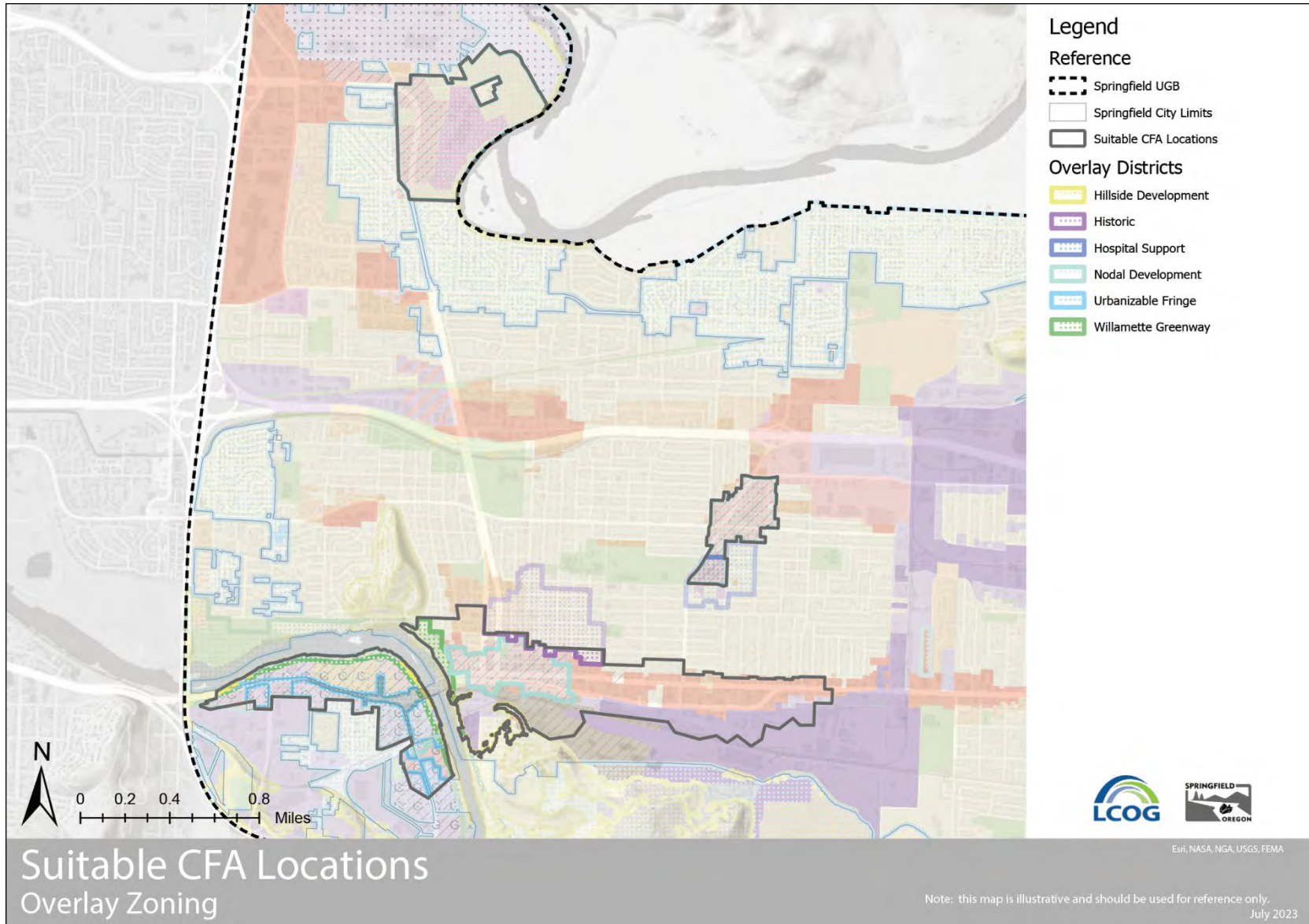
Comprehensive Plan Maps establish "plan designations" for the use of lands in a city or county. When it comes to land use requirements, most people are more familiar with the concept of "zoning." Zoning and plan designations are closely related, but they are separate tools. Plan designations on a Comprehensive Plan Map are used as a policy and planning tool and tend to be more high-level. They reflect the community's vision and generally identify the type, location, and intensity of future development. Zoning, in contrast, is used as an "implementation" tool for realizing the overall vision in the Comprehensive Plan Map. Zoning is typically more detailed. For example, it identifies allowable uses within a specific zone and can specify standards for design and development of properties and buildings. It is subservient to, and should be consistent with, the Comprehensive Plan Map which is the visual component of the guiding land use document for each local jurisdiction.

Currently, the Metro Plan Diagram (which currently serves as Springfield's Comprehensive Plan Map) shows the general locations of desired land uses for Springfield, while Neighborhood Refinement Plans provide more specific plan designations for targeted specific geographic areas of Springfield. However, the Metro Plan Diagram does not meet today's needs for showing which plan designations apply to each property within the region, and the City is in the process of creating a property-specific Comprehensive Plan Map for Springfield. The City of Springfield's Base Land Use Districts implement policies of the Metro Plan, Springfield 2030 Comprehensive Plan, and any applicable Neighborhood Refinement Plan or Plan District. The regulations of Springfield's Overlay Districts supplement the regulations of the underlying land use district.

MAP 2. SUITABLE CFA LOCATIONS – BASE ZONING



MAP 3. SUITABLE CFA LOCATIONS – OVERLAY DISTRICTS



ANALYSIS

OVERVIEW OF METHODS

Cities and counties must incorporate all requirements into policies and development regulations that apply in all CFAs. The following analysis provides a high-level review and discussion of how existing policy and regulation within City of Springfield's Suitable CFAs (identified earlier in the study) compares to the requirements of OAR 660-012-0320 addressed in the previous section. As with other CFA analyses, a key purpose of this evaluation is to provide insight to decision-makers about how existing land use dynamics, policies and regulations compare to CFA requirements. It may ultimately inform any designation of CFAs following the CFA study phase.

OAR 660-012-0320 outlines the policy and regulatory requirements against which Springfield's existing framework is evaluated. LCOG has identified what it believes are key sub-sections within this rule. These subsections are referenced, described and analyzed below for the purposes of this memo.

- **Single Use, Mixed Use and Outright Permitted Determination (OAR 660-012-0320(2)).** The Springfield Development Code organizes permitted use designations and development standards by distinct land use districts and/or land use types. These are referenced to indicate which uses are not permitted, which uses are subject to discretionary review and which uses are permitted outright. Outright permitted uses are assumed to include those uses which are permitted but are subject to objective standards. These are organized in a summary table where green represents outright permitted uses, red represents those uses not permitted, and yellow represents noted nuance, which is intended to lead to more clarity in the case of eventual CFA adoption (Table 3).
- **A Review of Springfield's Existing Density and Height Regulations for CFA Relevant Land Use Districts (OAR 660-012-0320(6) & (8)).** Within this initial study, Springfield has decided to investigate the "Prescriptive Standards" of 25 dwelling units per net acre (minimum) and a building height maximum of no less than 85 feet. This decision was made because cursory analysis of Potential CFAs showed initial promise for a height/density-based capacity approach consistent with the Prescriptive Standards of (OAR 660-012-0320(8)). This approach is also objectively easier to calculate and requires less documentation and justification than the Outcomes Oriented Approach outlined in OAR 660-012-0320(9). A comparative evaluation of the existing density and height standards is presented, along with analysis contributing to potential secondary CFA selection that can be based on the primary CFA standards of smaller communities, per OAR 660-012-0320(8)(c).
- **An Overview of Springfield's Block Length and Streetscape Regulations (OAR 660-012-0320(5)).**
- **A General Review of Existing Springfield Code Allowance for Government Facilities Providing Direct Service to the Public (OAR 660-012-0320(4)).**
- **A General Review of Existing Springfield Policy and Code Related to Bicycle and Vehicle Parking, General Land Use Requirements and Oregon's Transportation Planning Rules (OAR 660-012-0320(7)).**

OAR 660-012-0320(2) & (4): 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) Childcare, 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 Springfield understands OAR 660-012-0320(2) to require the following:

- **Climate Friendly Areas Shall (Must) Allow:**
 - Single-use and mixed-use development within individual buildings and development sites:
 - Permitted Outright:
 - Multifamily residential
 - Attached single-family residential
 - Office-type uses
 - Non-auto dependent retail, services, and other commercial uses
 - Childcare
 - Schools, and other public uses, including
 - 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 multifamily residential buildings.
- **Climate Friendly Areas must prioritize (in Comprehensive Plan updates associated with CFAs):**
 - 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 LAND USE DISTRICTS & POLICIES IN SPRINGFIELD'S SUITABLE CFAS

Comparison Matrix

Table 4 is a summary of the comparison of the permitted (and prohibited) land uses for CFA relevant land use districts within Springfield's existing Development Code. This includes an assessment of whether both single-use and multi-use are allowed, as well as an indication of whether a discrete list of uses are permitted outright in the districts.

Evaluation results are summarized generally as follows:

Evaluation Ratings for Individual Code Provisions in Table 4 (OAR 660-012-0320(2))	
	Consistency with the Requirement (e.g. Use Permitted Outright)
	Inconsistency with the Requirement (e.g. Single Use only)
	Indicates a Noted Element of Nuance or Medium Compliance for a Land Use District.

Overall Evaluation Ratings for OAR 660-012-0320(2) Code Provisions for Land Use/Overlay Districts	
High	Compliant
Medium+	Mostly Compliant
Medium	Nuanced Compliance
Low	Mostly Non-Compliant
Non-Compliant	Non-Compliant (Fundamentally)

TABLE 4. EVALUATION OF SPRINGFIELD DEVELOPMENT CODE FOR APPLICABLE LAND USE DISTRICTS AGAINST THE CFA REQUIREMENTS OF OAR 660-012-0320(2)

Outright Permitted								
Land Use/ Overlay District	Single and Multi-Use (Within Buildings and Dev. Sites) 320(2)	Single- family Attached 320(2)	Multi-family 320(2)	Office Type 320(2)	Non-Auto Commercial, Retail, Services 320(2)	Childcare 320(2)	Schools 320(2)	Overall Compliance Rating OAR 660- 012-320(2)
Low Density Residential (R-1) SDC 3.2.210	Mixed Use Permitted with Site Plan	Permitted	Explicitly Not Permitted (Middle housing permitted)	Permitted with Site Plan	Permitted with Site Plan	Discretionary Permit	Permitted with Site Plan	Low
Medium Density Residential (R-2) SDC 3.2.210	Mixed Use Permitted with Site Plan	Permitted	Permitted	Permitted with Site Plan	Permitted with Site Plan	Discretionary Permit	Permitted with Site Plan	Medium+
High Density Residential (R-3) SDC 3.2.210	Mixed Use Permitted with Site Plan	Permitted	Permitted	Permitted with Site Plan	Permitted with Site Plan	Discretionary Permit	Permitted with Site Plan	Medium+
Community Commercial (CC) SDC 3.2.320	Where Metro or Refinement Plan, or SDC designate as Mixed Use			Permitted	Permitted	Permitted	Discretionary Permit	Medium+
Heavy Industrial (HI) SDC 3.2.400	Single use	Not Permitted	Not Permitted	Corporate Office Only	Not Permitted	Not Permitted	Not Permitted	Non- Compliant

Outright Permitted								
Land Use/ Overlay District	Single and Multi-Use (Within Buildings and Dev. Sites) 320(2)	Single- family Attached 320(2)	Multi-family 320(2)	Office Type 320(2)	Non-Auto Commercial, Retail, Services 320(2)	Childcare 320(2)	Schools 320(2)	Overall Compliance Rating OAR 660- 012-320(2)
Light Medium Industrial (LMI) SDC 3.2.420	Single Use	Not Permitted	Not Permitted	Corporate Office Only	Not Permitted	Not Permitted	Not Permitted	Non- Compliant
Mixed Use Commercial (MUC) SDC 3.2.605, 3.2.610	Permitted (where designated mixed use in Metro Plan)			Permitted	Permitted	Special Standards	Discretionary Permit	Medium+
Mixed Use Residential (MUR) SDC 3.2.605, 3.2.610	Permitted (where designated mixed use in Metro Plan)			Permitted	Permitted	Not Permitted	Not Permitted	Medium
Public Land and Open Space District (PLO) SDC 3.2.700	Single Use	Not Permitted	Not Permitted	Not Permitted	Not Permitted	Permitted as Secondary Use	Special Standards	Low
Medical Services (MS) SDC 3.2.510	Single Use	Only Residential Care Permitted	Only Residential Care Permitted	Medical Offices Allowed	Not Permitted	Permitted	Not Permitted	Low
Booth Kelly Mixed Use (BK) SDC 3.4.300	Mixed Use in Stated Intent	Not Explicitly Permitted	Special Standards 4.7.100	Permitted	Permitted	Special Standards	College/ Trade Schools Only	Medium

Outright Permitted								
Land Use/ Overlay District	Single and Multi-Use (Within Buildings and Dev. Sites) 320(2)	Single- family Attached 320(2)	Multi-family 320(2)	Office Type 320(2)	Non-Auto Commercial, Retail, Services 320(2)	Childcare 320(2)	Schools 320(2)	Overall Compliance Rating OAR 660- 012-320(2)
Glenwood Residential Mixed Use (GRMU) SDC 3.4.245, 250	Single and Multi- Use	Permitted	Permitted	Permitted	Permitted	Permitted	Permitted	High
Glenwood Commercial Mixed Use (GCMU) SDC 3.4.245, 250	Single and Multi- Use	Permitted	Permitted	Permitted	Permitted	Permitted	Permitted	High
Glenwood Office Mixed Use (GOMU) SDC 3.4.245, 250	Single and Multi- Use	Permitted	Permitted	Permitted	Permitted	Permitted	Permitted	High
Glenwood Employment Mixed Use (GEMU) SDC 3.4.245, 250	High Density Residential Not Permitted	Not Permitted	Not Permitted	Permitted	Permitted	Permitted	Permitted	Low

Outright Permitted								
Land Use/ Overlay District	Single and Multi-Use (Within Buildings and Dev. Sites) 320(2)	Single- family Attached 320(2)	Multi-family 320(2)	Office Type 320(2)	Non-Auto Commercial, Retail, Services 320(2)	Childcare 320(2)	Schools 320(2)	Overall Compliance Rating OAR 660- 012-320(2)
Impact of Overlay Districts on Permitted Uses****								
Nodal Development Overlay (ND) Base NC, CC, MRC, GO, MUC, MS	Permitted (where designated mixed use in Metro Plan)	Permitted (where designated mixed use in Metro Plan)	Permitted (where designated mixed use in Metro Plan)	Permitted	Permitted	Special Standards	Discretionary Permit	Medium+
Nodal Development Overlay (ND) Base LMI, SLI, HI, MUE	Permitted (where designated mixed use in Metro Plan)	Not Permitted	Permitted	Permitted	Very Limited Permitted Types	Special Standards	Discretionary Permit	Low
Nodal Development Overlay (ND) Base R-2, R-3, MUR	Permitted (where designated mixed use in Metro Plan)	Permitted (where designated mixed use in Metro Plan)	Permitted (where designated mixed use in Metro Plan)	Permitted	Permitted	Special Standards	Not Permitted	Medium

*Same as MUC SDC 3.3.1010, 3.2.610

**Same as MUE SDC 3.3.1010, 3.2.610

***Same as MUR SDC 3.3.1010, 3.2.610

****As previously noted, the ND overlay is the only overlay district evaluated explicitly for regulatory compliance.

Other Residential Building Types

Uses not listed—or uses allowed but not required to be permitted outright—can still be allowed or permitted outright as desired by the local government, but the rules establish no requirements for those use types. *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. It is not a firm requirement to locate all such facilities in CFAs in the near term.

Table 11 includes a characterization of use allowance related to government services within Springfield’s Suitable CFAs. As the table indicates, government services are broadly allowed in the CFA relevant land use districts. This appears to be unaffected by additional overlay district provisions.

Streetscape

With respect to the streetscape (street trees and landscaping) requirements of OAR 660-012-0320(4), Springfield currently has comprehensive and robust requirements associated with development in SDC 5.5.110 Minimum Development, requiring a 5-foot-wide landscaped planter strip, including street trees. Approved irrigation or approved drought resistant plants in conformance with SDC 4.4.100 and 4.2.140 must be installed between the sidewalk and parking areas or building.

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 Springfield understands OAR 660-012-0320(5) to require the following:

To be compliant with the OARs, adoption of any CFAs in Springfield will need to ensure that policies and regulations are in place to:

- **Establish the following requirements:**
 - Add a maximum block length requirement to any Climate Friendly Area 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 LAND USE DISTRICTS & POLICIES IN SPRINGFIELD’S SUITABLE CFAS

Block Length

Where standards in existing districts in CFAs are not consistent with OAR 660-012-0320(5), Springfield will need to amend its development code. Table 5 is a summary of Springfield’s existing block length and perimeter standards at SDC 4.2.105.

TABLE 5. EXISTING STANDARDS FOR BLOCK LENGTH IN SPRINGFIELD

SDC 4.2.105 (D)(4) – Street Network Standards-General	
Criteria	Block Length Max
Local street not in industrial district*	600 feet
Multiple unit housing development**	800 feet
Local street in industrial district***	1000 feet
Franklin Riverfront 3.4.270(A)(2)(c)	350 feet
SDC 4.2.105 (E)(4) – Street Network Standards-Need Housing Criteria	
For all housing other than multi-unit in all other land use districts	600 feet

*Or that do not serve industrial non-conforming, or the maximum block length established in an applicable Refinement Plan or Plan District, whichever is less

**Or the maximum block length established in an applicable Refinement Plan or Plan District, whichever is less

***Or that serve industrial non-conforming uses, or the maximum block length established in an applicable adopted Refinement Plan or Plan District, whichever is less

Springfield's Development Code does not currently regulate Block Length in the explicit terms that OAR 660-012-0320(5) requires, but it does meet the requirement in some instances. 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) to any future CFA. The CFA rules do 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 meet (e.g. Glenwood, mixed use) or come close to meeting CFA expectations. The City will need to modify its policies and code to ensure comprehensive 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 Springfield understands OAR 660-012-0320(7) to generally require the following:

To be compliant with the OARs, adoption of any CFAs in Springfield will need to ensure that policies and regulations are in place to:

- **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 vehicle parking mandates for commercial developments in CFA or within a ¼ mile.
 - Half or less than half of an off-street vehicle parking requirement per dwelling unit
 - Planning 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)

- **Develop and adopt**
 - Amendments to comprehensive plans or land use regulations within a climate-friendly area that address the requirements enumerated in OAR 660-012-0320(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 their 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 LAND USE DISTRICTS & POLICIES IN SPRINGFIELD'S SUITABLE CFAS

The broad set of additional requirements that OAR 660-012-0320(7) identifies apply both generally to cities as well as in specific ways within CFAs. Springfield must consider these guidelines and requirements and incorporate them when adopting CFA policies and development regulations associated with the 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 Springfield's existing framework in comparison.

TABLE 6. SUMMARY OF OAR 660-012-0320(7) REQUIREMENTS AND SPRINGFIELD'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 traffic (VMT) - Promoting multimodal options, including for the disabled - 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 Glenwood Riverbend and Mohawk 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 		<ul style="list-style-type: none"> - Primary pedestrian entrances oriented to pedestrian facility and open during business hours - Parking located behind or beside buildings 	Springfield has districts in high proportion within Suitable CFAs which are already “in the spirit” of this CFA rule. Specific code language will need to

OAR 660-012-	Policy/Plan Amendments	Policies/ Principles Relevant to CFAs	Code Requirements	Observed areas for City Focus
	<ul style="list-style-type: none"> - Slow neighborhood streets (designed to encourage slower speeds) comfortable for families, efficient and sociable development patterns, connectivity within the neighborhood. - Auto oriented land uses compatible with walkability - Protecting transportation facilities, corridors, and sites for their identified functions 		<ul style="list-style-type: none"> - Development near transit stop/station must be oriented towards the stop/station. - Ease of access to auto - oriented goods and services for people walking, using a mobility device or riding a bicycle must be equivalent to, or better than, access for people driving a motor vehicle - Allowance for no or low car districts 	be amended to address certain nuances, but many districts are currently aligned.
0435 – Parking Requirements			<p>Either</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 	Springfield has discrete areas where there are no parking mandates. These include all the considered suitable CFA locations.
0630 – Bicycle Parking	<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 multifamily development or mixed-use development <p>Bicycle parking for all new retail development.</p> <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 		Springfield has comprehensive bicycle parking standards. Language will need to be adjusted for full compliance, but the most significant Suitable CFA districts are “in the spirit” of this CFA rule.	

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.²*

...

(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

² The rule subsection (a) is added because, although Springfield does not fit in this population category, as per OAR 660-012-0320(8)(c), its “secondary CFAs” are held to a lower standard including OAR 660-012-0320(8)(c).

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 Springfield understands OAR 660-012-0320(8) and (9) to require the following:

Springfield, a community with over 50,000 residents, can pursue the 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 section (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 of 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 where the minimum residential density is 15 dwelling units per net acre (or 2.0 FAR for mixed-use buildings, as specified in section (8)) and 120,000 square feet per net acre. Additional CFA acres, if needed for capacity or other reasons, would only be required to have a minimum residential density of 15 dwelling units per net acre (or 2.0 FAR for mixed-use buildings) and 60,000 square feet per net acre.

TABLE 7. PRESCRIPTIVE VS. OUTCOME-ORIENTED STANDARDS

Options	Minimum Residential Density	Max. Building Height/Minimum Zoned building capacity in square feet (sq. ft.)
Option A: Prescriptive Standards (OAR 660-012-0320(8))		
25 acres, minimum (Primary)	25 dwelling units/net acre	No less than 85 feet
Additional acres, (as needed)	15 dwelling units/net acre	No less than 50 feet
Option B: Outcome-Oriented Standards (OAR 660-012-0320(9))		
25 acres, minimum (Primary)	15 dwelling units/net acre	120,000 sq. ft./net acre
Additional acres, (as needed)	15 dwelling units/net acre	60,000 sq. ft./net acre

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 people or more must be 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 660-012-0320(6) & (8) AND APPLICABLE LAND USE DISTRICTS & POLICIES IN SPRINGFIELD'S SUITABLE CFAS

Of the two methods to meet the requirements of OAR 660-012-320(8) or (9), Springfield is investigating the option relying on "Prescriptive Standards." Springfield's ultimate pursuit of this option will require adopting a minimum residential density of **25 dwelling units per net acre and maximum building height of no less than 85 feet** throughout at least their "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. Springfield will also not be required to enforce the minimum residential densities for redevelopment that adds residential units within existing buildings (no units outside the existing building).

Table 8, Table 9, and Table 10 organize CFA relevant land use districts in Springfield into regulatory distinctions associated with density, floor area ratio (FAR) and building height. Land use districts are rated High (Higher Compliance with CFA rule OAR 660-012-0320(6) & (8), Medium, (Medium Compliance) or Low (Lower Compliance).

TABLE 8. EXISTING DENSITY MAXIMUMS AND MINIMUMS IN CFA RELEVANT LAND USE DISTRICTS IN SPRINGFIELD³

Land Use/Overlay District	Max Density	Min Density	320(6) No Max Density	320(8) Min Density – 25 du/acre Primary	320(8) Min Density – 15 du/acre Second
R-1	14	6	Low	Low	Low
R-2	28	14	Low	Low	Medium
R-2/ND (Nodal)	None	12	High	Medium	Medium
R-3	42	28	Medium	High	High
R-3/ND (Nodal)	None	25	High	High	High
Community Commercial (CC)	None		High	Medium	Medium
Community Commercial Nodal (CC/ND)	None	N/A*	High	Medium	Medium
Light Medium Industrial (LMI)	No Residential		Non-Compliant	Non-Compliant	Non-Compliant
Light Medium Industrial Nodal (LMI/ND)	No Residential		Non-Compliant	Non-Compliant	Non-Compliant
Heavy Industrial (HI)	No Residential		Non-Compliant	Non-Compliant	Non-Compliant
Medical Services (MS)	None		High	High	High
Mixed Use Residential MUR)**	None	20 (12 for mixed use)	High	Medium	Medium
Mixed Use Residential Nodal (MUR/ND)	None	12	High	Medium	Medium
Mixed Use Commercial (MUC)	None		High	Medium	Medium
Mixed Use Commercial Nodal (MUC/ND)	None	N/A*	High	Medium	Medium
Glenwood Residential Mixed Use (GRMU)	None	50	High	High	High
Glenwood Commercial Mixed Use (GCMU)	None	50	High	High	High
Glenwood Employment Mixed Use (GEMU)	No Residential		Non-Compliant	Non-Compliant	Non-Compliant
Glenwood Office Mixed Use (GOMU)	None	50	High	High	High
Booth Kelly Mixed Use (BK)	None		High	Medium	Medium

³ Measured as net dwelling units/acre

Land Use/Overlay District	Max Density	Min Density	320(6) No Max Density	320(8) Min Density – 25 du/acre Primary	320(8) Min Density – 15 du/acre Second
Public Land & Open Space (PLO)	No Residential		Non-Compliant	Non-Compliant	Non-Compliant

Note: The combination of land use districts and overlays has been simplified to convey land use districts as only those with the ND overlay and those without it. As an example, where MUC, H and ND co-occur, the area is distilled into “MUC/ND” and where, for example, CC and H co-occur, but no ND, the area is distilled into “CC.”

*Density maximums and minimums are viewed as Non-Applicable (N/A) where the Nodal Overlay applies (see Table 9). Base zones CC and MUC with ND Overlay regulate in terms of Floor Area Ratio (FAR), not density. These zones have a minimum FAR of .40. This is less than the FAR minimum of 2.0 to avoid enforcement of min residential density for mixed-use buildings per OAR 660-012-320(8). They are evaluated based on what is viewed as neither a high nor low compliance (Medium) with CFA density requirements under OAR 660-012-0320(8).

**Minimum of 80 percent of the gross floor area within a MUR District must be dedicated to multiple unit housing to ensure that medium and high-density land is preserved for primarily residential purposes.

TABLE 9. EXISTING EXPLICIT FAR REQUIREMENTS IN CFA RELEVANT LAND USE DISTRICTS IN SPRINGFIELD

Land Use/Overlay District	FAR Minimum (No Maximums)
Mixed Use Commercial (MUC) - Downtown Mixed Use	.40
Mixed Use Commercial (MUC) - Over Acre Outside Downtown Mixed Use	.30
Nodal Development Overlay for NC, CC, MRC, MUC, GO	.40
Nodal Development Overlay for LMI	.25
SDC 3.2.630 (A)(b): A minimum of 60 percent of the ground floor area within a new building in the MUC District shall be dedicated to commercial uses to ensure that commercial land is preserved for primarily commercial purposes. Up to 100 percent of any building may be developed for residential uses so long as 60 percent of the total ground floor area within the development area is devoted to commercial uses	

TABLE 10. EXISTING HEIGHT MAXIMUMS FOR CFA RELEVANT LAND USE DISTRICTS IN SPRINGFIELD

Land Use/Overlay District	Height Max	320(8) Primary No less than 85 ft. max	320(8) Secondary No less than 50ft max
R-1	35 feet	Low	Low
R-2	50 feet	Low	High
R-3	None*	High	High
Community Commercial (CC)	None*	High	High
Light Medium Industrial (LMI)	None*	High	High
Heavy Industrial (HI)	None*	High	High
Medical Services (MS)	None*	High	High
Mixed Use Residential (MUR)	60 feet	Medium	High
Mixed Use Commercial (MUC)	90 feet	High	High
Glenwood Residential Mixed Use (GRMU)	None*	High	High
Glenwood Commercial Mixed Use (GCMU)	None*	High	High
Glenwood Employment Mixed Use (GEMU)	None*	High	High
Glenwood Office Mixed Use (GOMU)	None*	High	High
Booth Kelly Mixed Use (BK)	None*	High	High
Public Land & Open Space (PLO)	None*	High	High

*Where land use districts have no maximum height (“none”), building height must be no greater than that permitted in abutting residential districts for a distance of 50 feet, with the exception of Glenwood mixed use districts, where the only constraining factor for height is proximity to the Willamette Greenway (3.4.275(D)).

TABLE 11. SUMMARY OF EXISTING COMPLIANCE WITH OAR 660-012-0320 FOR CFA RELEVANT LAND USE DISTRICTS IN SPRINGFIELD

HIGH = COMPLIANT, **MEDIUM+** = MOSTLY COMPLIANT, **MEDIUM** = NUANCED COMPLIANCE, **LOW** = MOSTLY NON-COMPLIANT, **NC** = NON COMPLIANCE
 WITH ASSOCIATED OAR 660-012-0320 SUBSECTIONS
 WHERE THE NODAL DEVELOPMENT OVERLAY DISTRICT (ND) RESULTS IN A CHANGED RATING FOR A BASE LAND USE DISTRICT, IT IS ADDED AS A SEPARATE LINE.

LAND USE/OVERLAY DISTRICTS	% OF TOTAL CFA	320(2) SINGLE AND MIXED USES PERMITTED (TABLE 4)	320(4) GOV. FACILITIES	320(5) BLOCK LENGTH (TABLE 5)	320(6) NO DENSITY MAX (TABLE 8)	320(7) TRANSPORTATION (TABLE 6)	320(8) PRIMARY DENSITY MIN OF 25 DU/ ACRE (TABLE 8)	320(8) SECONDARY DENSITY MIN OF 15 DU/ACRE (TABLE 8)	320(8) PRIMARY HEIGHT OVER 85' ALLOWED (TABLE 10)	320(8) SECONDARY HEIGHT OVER 50' ALLOWED (TABLE 10)
R-1	5.4%	LOW	LOW	MEDIUM	LOW	MEDIUM	LOW	LOW	LOW	LOW
R-2	1.2%	MEDIUM+	MEDIUM	MEDIUM	LOW	MEDIUM	LOW	MEDIUM	LOW	HIGH
R-2/NODAL (R-2/ND)	9.9%	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH	MEDIUM	MEDIUM	LOW	HIGH
R-3	1.7%	MEDIUM+	MEDIUM	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH	HIGH	HIGH
R-3/NODAL (R-3/ND)	>.01%	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH	HIGH	HIGH	LOW	HIGH
COMMUNITY COMMERCIAL (CC)	13.1%	MEDIUM+	HIGH	MEDIUM	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH
COMMUNITY COMMERCIAL/ NODAL (CC/ND)	0.4%	MEDIUM+	HIGH	MEDIUM	HIGH	HIGH	MEDIUM	MEDIUM	HIGH	HIGH
LIGHT MEDIUM INDUSTRIAL (LMI)	2.6%	NC	LOW	LOW	NC	MEDIUM	NC	NC	HIGH	HIGH
LIGHT MEDIUM INDUSTRIAL/ NODAL (LMI/ND)	>.01%	LOW	LOW	LOW	NC	HIGH	NC	NC	HIGH	HIGH
HEAVY INDUSTRIAL (HI)	8.4%	NC	LOW	LOW	NC	MEDIUM	NC	NC	HIGH	HIGH
HEAVY INDUSTRIAL/NODAL (HI/ND)	0%	LOW	LOW	LOW	NC	HIGH	NC	NC	HIGH	HIGH
MEDICAL SERVICES (MS)	0%	LOW	LOW	MEDIUM	HIGH	MEDIUM	NC	NC	HIGH	HIGH
MEDICAL SERVICES/NODAL (MS/ND)	6.0%	MEDIUM+	HIGH	MEDIUM	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH

HIGH = COMPLIANT, **MEDIUM+** = MOSTLY COMPLIANT, **MEDIUM** = NUANCED COMPLIANCE, **LOW** = MOSTLY NON-COMPLIANT, **NC** = NON COMPLIANCE
 WITH ASSOCIATED OAR 660-012-0320 SUBSECTIONS
 WHERE THE NODAL DEVELOPMENT OVERLAY DISTRICT (ND) RESULTS IN A CHANGED RATING FOR A BASE LAND USE DISTRICT, IT IS ADDED AS A SEPARATE LINE.

LAND USE/OVERLAY DISTRICTS	% OF TOTAL CFA	320(2) SINGLE AND MIXED USES PERMITTED (TABLE 4)	320(4) GOV. FACILITIES	320(5) BLOCK LENGTH (TABLE 5)	320(6) NO DENSITY MAX (TABLE 8)	320(7) TRANSPORTATION (TABLE 6)	320(8) PRIMARY DENSITY MIN OF 25 DU/ ACRE (TABLE 8)	320(8) SECONDARY DENSITY MIN OF 15 DU/ACRE (TABLE 8)	320(8) PRIMARY HEIGHT OVER 85' ALLOWED (TABLE 10)	320(8) SECONDARY HEIGHT OVER 50' ALLOWED (TABLE 10)
MIXED USE RESIDENTIAL (MUR)*	0.2%	MEDIUM	MEDIUM	MEDIUM	HIGH	MEDIUM	MEDIUM	MEDIUM	MEDIUM	HIGH
MIXED USE RESIDENTIAL/ NODAL (MUR/ND)*	0.4%	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH	MEDIUM	MEDIUM	HIGH	HIGH
MIXED USE COMMERCIAL (MUC)	0 %	MEDIUM+	HIGH	MEDIUM	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH
MIXED USE COMMERCIAL/ NODAL (MUC/ND)	21.5%	MEDIUM+	HIGH	MEDIUM	HIGH	HIGH	MEDIUM	MEDIUM	HIGH	HIGH
GLENWOOD RESIDENTIAL MIXED USE (GRMU)	4.4%	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH
GLENWOOD COMMERCIAL MIXED USE (GCMU)	3.4%	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH
GLENWOOD EMPLOYMENT MIXED USE (GEMU)	6.1%	LOW	LOW	HIGH	HIGH	HIGH	NC	NC	HIGH	HIGH
GLENWOOD OFFICE MIXED USE (GOMU)	6.6%	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH	HIGH
BOOTH KELLY MIXED USE (BK)	4.6%	MEDIUM	HIGH	MEDIUM	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH
PUBLIC LAND & OPEN SPACE (PLO)	2.2%	NC	HIGH	MEDIUM	NC	MEDIUM	LOW	LOW	HIGH	HIGH

Note: The combination of land use districts and overlays has been simplified to convey land use districts with the ND overlay and those without it. As an example, where MUC, H and ND co-occur, the area is distilled into “MUC/ND” and where, for example, CC and H co-occur, but no ND, H has been distilled into “CC.”

320(2): High = Compliant, Medium+ = Mostly Compliant, Medium = Nuanced Compliance, Low = Mostly Non-Compliant, Non-compliant

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 = Medium under section (6) reflects where density maximums exist, but allowed densities are consistent with “the spirit of” CFAs

320(7): High = Consistent (minor adjustments necessary), Medium = Medium amount of 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 = Medium under section (8) reflects districts where 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

CONCLUSIONS AND NEXT STEPS

This memo has outlined and evaluated Springfield's compatibility with CFA code and policy requirements outlined in OAR 660-012-0320. Table 11 provides an aggregated summary of the relative compliance of each applicable Springfield land use district with applicable rule subsections.

This information central to purpose of Tech Memo 3c, an evaluation of the capacity of Suitable CFAs in Springfield 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 Springfield's Suitable CFAs. Land use districts with predominantly "High," "Medium+" or "Medium" ratings are more compliant with the CFA requirements and will require fewer adjustments in the City's eventual adoption of its CFAs, while land use districts with a high degree of "Lows" or "Non-Compliance (NC)" present the need for more significant change.

The Springfield land use districts with the highest existing compliance with OAR 660-012-0320 include Glenwood Mixed Use (excepting the Employment district), Mixed-Use Commercial, Mixed Use Residential, Community Commercial, Medical Services (Nodal Overlay), and Booth Kelly Mixed Use. In all of these land use districts, there is no rule subsection that rated "Low" for compliance, and many which rate "High". These areas are very close to compliance with the CFA rules and generally "in the spirit" of CFAs presently. These areas also collectively represent 60% of total Suitable CFA area. 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 Springfield land use districts with the lowest existing compliance with OAR 660-012-0320 include R-1, R-2, Heavy Industrial, Light Medium Industrial, Glenwood Employment Mixed-Use, and Public Land and Open Space. These are land use districts which rate "Low" or "Non-Compliant" in three or more areas. 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 237% of total Suitable CFA area. These zones need to be considered for eventual removal, or adjustment to remain included. Tables 3, 4, 6 and 8 highlight specific compliance issues that the City must evaluate for any adjustment.

CFA adjacency to Low Density Residential is a topic that potentially deserves unique consideration in the identification of "Most Promising CFA Locations" in Springfield. This analysis assumes no allowance for stepbacks or transitions for areas adjacent to R-1. This is because OAR 660-012-0320 does not explicitly allow such adjustments. If CFA adoption truly does not allow stepbacks and transitions, it could reduce the viability of several of Springfield's Suitable CFAs (any surrounded by R-1). The City should consider this dynamic as it pursues a Potential CFA(s) more rigorously.

Though not addressed specially in this memo, additional consideration should be given to the potential development constraints of overlay districts. The Historic Overlay district, for example, is not appropriate for a CFA boundary due to building height requirements (unless a step-down provision is applicable). Additionally, where the Willamette Greenway Overlay District (WG) is present (Downtown and Glenwood Riverfront Potential CFAs), more thorough analysis of Springfield's existing and potential Greenway Setback Line(s) (SDC 3.4.280(D)) will refine ultimate CFA capacity.

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #3C

CAPACITY ANALYSIS

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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

This memo provides an analysis of residential capacity, which is a core part of the Springfield CFA Study (OAR 660-012-0315(1), (2), (3), and (4)(b)). This is one of three technical memos for analysis Step A3 of the study. It takes in data from GIS analysis which uses data from previous analysis in Technical Memorandum #3a: Suitability (TM3a), and earlier CFA Study memos, as well as zoning data from the City of Springfield (City). It also takes in development regulation (zoning) evaluation information from Technical Memorandum #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 then 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 defined as 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 density of housing, jobs, businesses, and services than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000, and that are also in one of the seven metropolitan areas (outside of the Portland Metro). The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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

¹ 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses one component (Capacity Analysis of Suitable CFAs) of the third step in the study phase: analysis of potential CFAs suitability, policy, and capacity.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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 dealing with performing a CFA study, the following form the direction for the calculation of zoned residential building capacity and resultant residential dwelling unit capacity in 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).²

This memo provides that preliminary analysis.

The *suitable* CFA locations that will be 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 the study requirement to analyze 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).

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 were also performed in Technical Memo #3b.

The outputs of those previous analyses provided the analysis in the current memo with the following inputs.

- Identification of suitable CFA Locations.
- Inventory of zoning development regulations represented by base and overlay zones in the suitable CFA locations.

² OAR 660-012-0315(4)(b)

- Assessment of the development regulations and identification of changes to those regulations needed for compliance with the CFA rules.

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 CFAs.

ANALYSIS

METHODOLOGY OVERVIEW

Specific instructions of how to calculate the following 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 CFAs.

The first of these is calculated in this memo. The second is calculated in a related Capacity Calculator interactive tool and is summarized here.

The Capacity Calculator is described below in the Calculate Dwelling Unit Capacity section below.

DETERMINING NEEDED HOUSING UNITS

Rules 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.³

³ OAR 660-012-0315(1)(b)

This analysis uses the Springfield Residential Land & Housing Need Analysis (RLHNA).⁴

Methodology

The calculation of needed housing from Springfield’s RLHNA is as follows.

Existing units + anticipated no. future needed units = total no. units needed
CFA must be sized to accommodate 30% of total current & future units needed

Results

UGB Population, 2010 ⁵	67,031
Minus change in persons in group quarters (as explained on p. 30)	-1,341
Equals persons in households	65,690
Average household size (as explained on p.31)	2.54
Occupied dwelling units	25,862
Average vacancy rate (as explained on p. 32)	5%
Total dwelling units, 2010	27,155
New dwelling units needed, 2010-2030 ⁶	+ 5,920
Total number of housing units to meet all current and future housing needs	33,075
	30%
Target Capacity per OAR 660-012-0315(1)(b) (30% of needed housing)	9,923

⁴ Springfield Residential Land & Housing Need Analysis, adopted in 2017. See <https://www.springfield-or.gov/wp-content/uploads/2019/12/Vol.-2-Tech.-Supp.-Springfield-Comprehensive-Plan.pdf>.

⁵ Springfield Comprehensive Plan: Technical Supplement (Vol. 2.), Table 5-1. See <https://www.springfield-or.gov/wp-content/uploads/2019/12/Vol.-2-Tech.-Supp.-Springfield-Comprehensive-Plan.pdf>.

⁶ Springfield Comprehensive Plan: Technical Supplement (Vol. 2.), Table 5-5. See <https://www.springfield-or.gov/wp-content/uploads/2019/12/Vol.-2-Tech.-Supp.-Springfield-Comprehensive-Plan.pdf>.

CALCULATE DWELLING UNIT CAPACITY

Rules Requirements

The calculation of dwelling unit capacity in CFAs is allowed, under the rules, to use one of two methods, the “standard” method, as described on OAR 660-012-0315(2) or 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 places where an alternative calculation method could be useful are also discussed (see boxed text below).

The City has several reasons to choose to use the standard calculation method.

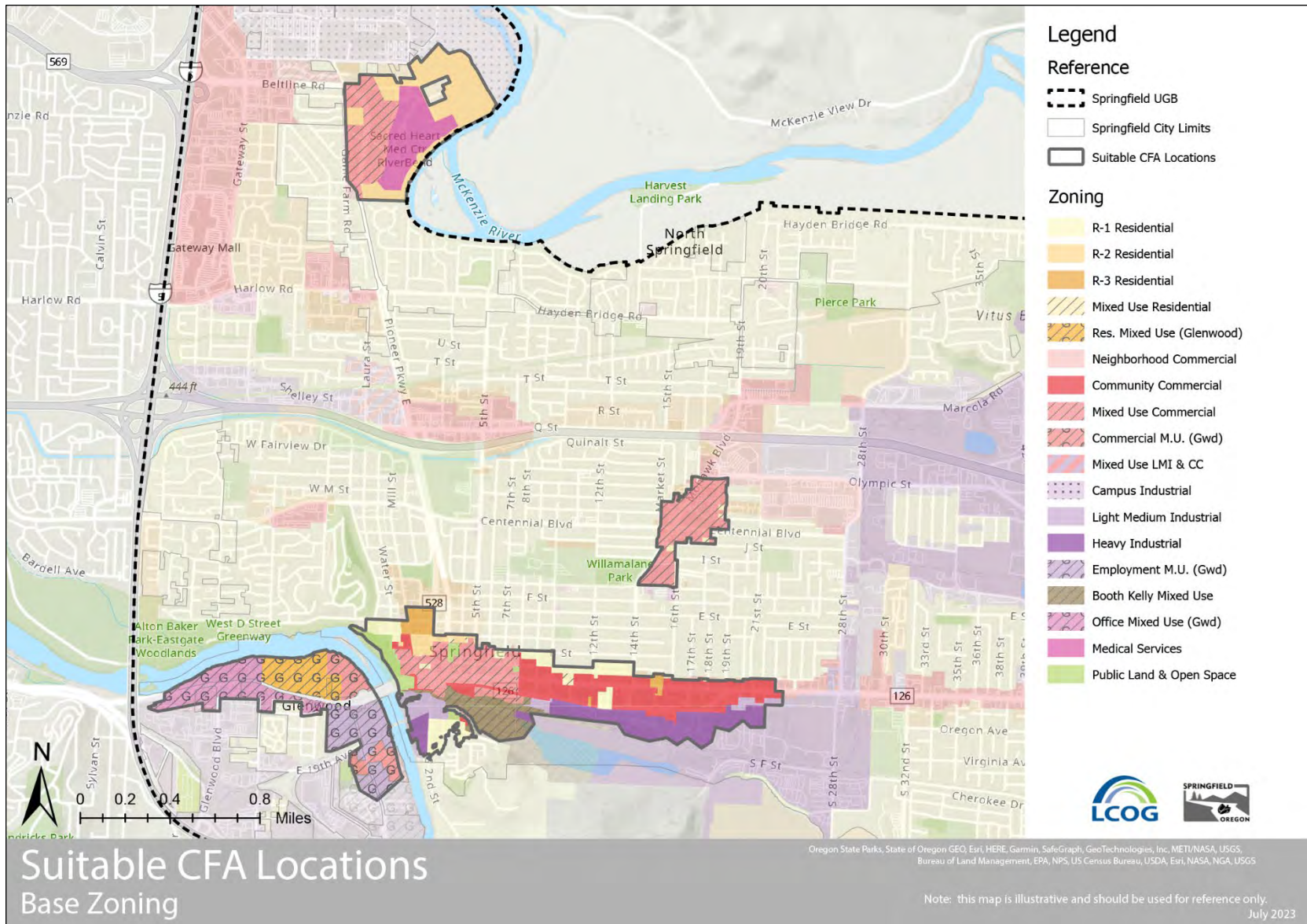
- It requires less development of analysis methods than an alternative method as it is described in detail in the rules.
- The standard method does not require the additional development trend or market activity research and justification that is required for the alternative calculation method.

- Based on basic preliminary estimates by LCOG, it appears that well above the needed capacity requirement of 30% of needed housing would be available in available potential CFA locations using the standard method.

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, as depicted in Map 1.

MAP 1. BASE ZONING IN SUITABLE CFA LOCATIONS



CAPACITY CALCULATOR

To provide a flexible method to explore CFA configurations and capacities, LCOG developed an interactive tool 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 staff with a tool for exploring different CFA options.

This workbook takes in data from the GIS analysis supporting this memo which, in turn, uses data from previous analysis in Technical Memo #3a: Suitability, and earlier CFA Study memos. It also takes in evaluation of development regulations (zoning) inputs from Technical Memo #3b: Policy Analysis.

The capacity calculations performed in this tool are following what is often referred to by DLCD staff as the "standard capacity calculation method" as described in OAR 660-012-0315(2). It also assumes that the path followed to comply with the CFA land use requirements is the one referred to by DLCD as the "prescriptive path" and described in OAR 660-012-0320(8).

The GIS data used here is the intersection of Suitable CFA Locations from TM#3a and the zoning for Springfield. To that, zone evaluations and adjustments related to compliance with CFA rules, particularly OAR 660-012-0320(2), are added from TM#3b. Finally, 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 inform the CFA adoption phase.

Results

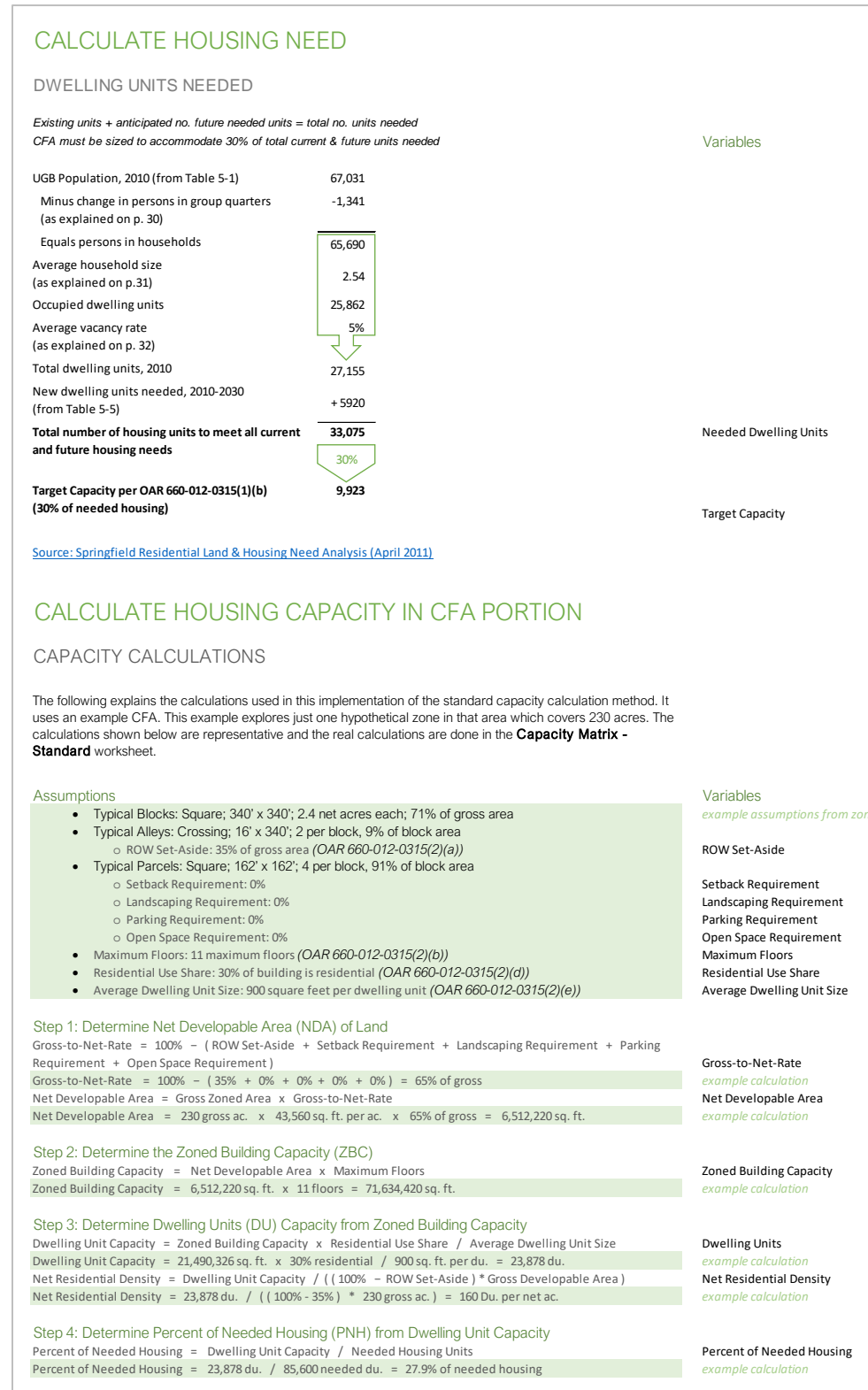
The Capacity Calculator has the following components (represented by worksheets).

CAPACITY CALCULATOR CONTENTS

- Overview*
- Capacity method*
- Capacity matrix - standard*
- Compliance*
- ROW set-asides*
- Other set-asides*
- Max. Building heights*
- Suitable CFA location & zoning*
- Reference*

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 described below (Figure 1).

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 calculates 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 part of each suitable CFA location.

FIGURE 2. CAPACITY CALCULATOR, CAPACITY MATRIX

CFA Dwelling Unit Capacity Matrix - Standard Calculation Method, Prescriptive Path										Size Cut-off	4,000 sqft
										...in acres	0.09183
GIS input	GIS input	GIS input	GIS input	GIS input	calculated	GIS input	calculated	GIS input	calculated	GIS input	calculated
Area Number	Area Name	Area Acres	Zone Code	Zone Name	Zone Code ND	Overlay Codes	All Codes	CFA Zone Acres	Percent of Needed Housing		
1	Downtown	367.11	CC	Community Commercial	CC/ND	ND	CC/ND	3.16	0.47%		
1	Downtown	367.11	MUR	Mixed Use Residential	MUR/ND	ND	MUR/ND	1.26	0.06%		
1	Downtown	367.11	MUC	Mixed Use Commercial	MUC/ND	ND	MUC/ND	53.99	9.95%		
1	Downtown	367.11	BK	Booth Kelly Mixed Use	BK/ND	HD/ND	BK/HD/ND	0.12	0.02%		
3	Riverbend	175.48	R-2	R-2 Residential	R-2/ND	H/ND	R-2/H/ND	0.33	0.02%		
1	Downtown	367.11	MUC	Mixed Use Commercial	MUC/ND	HS/ND	MUC/HS/ND	0.14	0.02%		
4	Mohawk	58.62	R-1	R-1 Residential	R-1/ND	HS/ND	R-1/HS/ND	0.89	0.04%		
4	Mohawk	58.62	MUC	Mixed Use Commercial	MUC/ND	UF	MUC/UF	9.60	1.77%		
3	Riverbend	175.48	R-2	R-2 Residential	R-2	UF	R-2/UF	0.10	0.00%		
2	Glenwood Riverfront	170.41	GEMU	Employment Mixed Use (Glenwood)	GEMU	UF	GEMU/UF	12.00	2.21%		
2	Glenwood Riverfront	170.41	GCMU	Commercial Mixed Use (Glenwood)	GCMU/ND	ND/UF	GCMU/ND/UF	8.91	1.64%		
2	Glenwood Riverfront	170.41	GRMU	Residential Mixed Use (Glenwood)	GRMU/ND	ND/UF	GRMU/ND/UF	27.02	4.98%		
2	Glenwood Riverfront	170.41	GOMU	Office Mixed Use (Glenwood)	GOMU/ND	ND/UF	GOMU/ND/UF	28.41	5.24%		
2	Glenwood Riverfront	170.41	R-1	R-1 Residential	R-1/ND	ND/UF	R-1/ND/UF	0.11	0.00%		
2	Glenwood Riverfront	170.41	GEMU	Employment Mixed Use (Glenwood)	GEMU/ND	WG	GEMU/WG	24.97	4.60%		
2	Glenwood Riverfront	170.41	GCMU	Commercial Mixed Use (Glenwood)	GCMU	WG	GCMU/WG	0.84	0.15%		
1	Downtown	367.11	R-1	R-1 Residential	R-1	WG	R-1/WG	2.25	0.10%		
1	Downtown	367.11	PLO	Public Land & Open Space	PLO	WG	PLO/WG	10.31	0.00%		
1	Downtown	367.11	LMI	Light Medium Industrial	LMI	WG	LMI/WG	0.69	0.10%		
1	Downtown	367.11	HI	Heavy Industrial	HI	HD/WG	HI/HD/WG	0.37	0.05%		
2	Glenwood Riverfront	170.41	GOMU	Office Mixed Use (Glenwood)	GOMU/ND	ND/WG	GOMU/ND/WG	1.10	0.20%		
2	Glenwood Riverfront	170.41	GOMU	Office Mixed Use (Glenwood)	GOMU/ND	WG/UF	GOMU/WG/UF	0.22	0.04%		
2	Glenwood Riverfront	170.41	GEMU	Employment Mixed Use (Glenwood)	GEMU	HD/WG/UF	GEMU/HD/WG/UF	0.54	0.10%		
2	Glenwood Riverfront	170.41	GCMU	Commercial Mixed Use (Glenwood)	GCMU/ND	ND/WG/UF	GCMU/ND/WG/UF	4.54	0.83%		
2	Glenwood Riverfront	170.41	GRMU	Residential Mixed Use (Glenwood)	GRMU/ND	ND/WG/UF	GRMU/ND/WG/UF	5.19	0.96%		
2	Glenwood Riverfront	170.41	GOMU	Office Mixed Use (Glenwood)	GOMU/ND	ND/WG/UF	GOMU/ND/WG/UF	5.68	1.05%		
2	Glenwood Riverfront	170.41	GEMU	Employment Mixed Use (Glenwood)	GEMU/ND	HD/ND/WG/UF	GEMU/HD/ND/WG/UF	3.40	0.63%		
2	Glenwood Riverfront	170.41	GCMU	Commercial Mixed Use (Glenwood)	GCMU/ND	HD/ND/WG/UF	GCMU/HD/ND/WG/UF	0.18	0.03%		
								758.58	107%		
											Percent of Needed Housing

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, and 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 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

CFA Zone Acres	Percent of Needed Housing
771.66	106.8%
Percent of Needed Housing	

Each row of the table corresponds to a unique combination of CFA location and zone and zone overlay. 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 and zoning base zones and overlay zones. Each of these columns are filterable and are 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 CFA⁷ or areas with no zoning identified.⁸ 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 compatible⁹ with the CFA intent even when compliance of current development regulations is not. This is an

⁷ These appear to be minor data anomalies that are a result of imperfect GIS information and were not assessed in Technical Memo #3b or the analysis in this memo.

⁸ These areas cannot be used for capacity calculations as there are no development regulations associated with them. They are typically rights-of-way.

⁹ A zone is considered compatible with the spirit of the CFA rules if its purpose is to support high-density mixed use.

adjustable column for the user, but it should be changed only on the **Compliance** worksheet. It is just 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 Park and Open Space that can be part of a CFA but are not used for capacity calculations.
3. Right-of-Way (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 and is based on the prototypical block (see the discussion of the “prototypical block” later in this memo). 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).¹⁰
 - e. Average Dwelling Unit Size – [Integer] 900 square feet per dwelling unit is assumed, under the rules for the standard calculation method.¹¹
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.

¹⁰ See OAR 660-012-0315(2)(d).

¹¹ See OAR 660-012-0315(2)(e).

- 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.
- 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.¹²

ROW SET-ASIDES WORKSHEET

This worksheet is mostly documentation and explains an important input to the core calculator.

OAR 660-012-0310(2)(f)

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.

Per the above rule subsection, the dimensional requirement admits the idea that internal rights of way that may be unzoned may be included in a CFA and contribute to the width.

¹² The detailed analysis of zone compliance with the land use requirements of OAR 660-012-0320 are found in Technical Memo #3b. The City will need to make decisions about which zones, if any, they do not want to make compliant. Zones whose stated purpose is not mixed-use may be seen to be unsuitable to be modified to be made compliant.

OAR 660-012-0315(2)(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, 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.

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, per the direction of the standard calculation method.¹³

Based on visual inspection, the densest part of the Springfield street grid can be found throughout the downtown area. The percentage of land in right-of-way in this area is 40%.

ROW Set-Aside Percentage: $(2.42 \text{ acres} - 1.46 \text{ acres}) / 2.42 \text{ acres} = 40\%$

Thus, areas in CFAs with blocks larger than 5.5 acres must set aside this percentage from the developable land area.

¹³ As described at OAR 660-012-0315(2).

FIGURE 4. TYPICAL DOWNTOWN BLOCK



Per the above rule referenced OAR, capacity is only to be calculated for zoned areas and then only for the net developable area. As explained in the ROW Set-Aside section of TM #3a, this analysis assumed that "regardless of existing development" means that all areas of a CFA can be replatted and thus that all developable areas should use 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 (i.e., downtown Springfield where rights of way are 40% of land area, on average). In the case of Glenwood, the developable area "bounded by streets" and zoned for development is the area outside the Franklin Boulevard right of way. That right of way is included in the Suitable CFA Location as internal unzoned right of way and counts as helping meet the dimensional requirements but does not contribute to capacity and is not part of the 40% ROW set aside used in the calculations. As a result, the total proportion of land area in right of way in the Glenwood Riverfront Suitable CFA Location is greater than 40% and greater than the total proportion of land area in right of way of 40% found in the other Suitable CFA Locations in Springfield.

WHY A STANDARD ROW SET-ASIDE IS USED

The CFA rules allow us to analyze future capacity within a climate-friendly area "without regard to property boundaries" and "regardless of existing development". This is assumed since the exact shape of future development cannot be known. Streets can be vacated and rededicated and land can be replatted. 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 re-platting and so exceed the 5.5-acre threshold stated above and are required to set aside land for anticipated rights-of-way and infrastructure. Thus, for capacity calculations in all suitable CFA locations, the dimensions of the typical downtown block depicted above are used and this is called the "prototypical block".

ALTERNATIVE METHODOLOGY OPTION – ROW SET-ASIDE

Note that some areas may have existing plans (e.g., neighborhood refinement plans) that direct narrower future ROW. To use those values in CFA capacity calculations, an alternative calculation method per OAR 660-012-0320(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 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.

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.

Typical Block Dimensions: 264 feet by 254 feet

Typical Alley ROW Width: 14 feet

Typical Maximum Parcel Dimensions: 264 feet by 120 feet

Percent of Parcel per n Feet of Front Setback:

$$P_f = 100 * (264 \text{ feet} * n) + ((120 \text{ feet} - n) * n) / 31,800 \text{ feet}$$

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 the 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.¹⁴

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-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, which is defined below.

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 residential¹⁵
- 30% residential space¹⁶
- 70% non-residential space, either in employment use or for structured parking
- Optimal amount of the ground floor in commercial use, depending on the zone¹⁷

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 rules but is precluded by the standard calculation method for capacity. To use those values in CFA capacity calculations, an alternative calculation method per OAR 660-012-0320 (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 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

¹⁴ OAR 660-012-0320(5)(a)-(b).

¹⁵ OAR 660-012-0320(2).

¹⁶ OAR 660-012-0315(1).

¹⁷ OAR 660-012-0320(2)(a).

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. To get from the way this is expressed in the zones, as a distance (e.g., 10 feet), the dimensions of the prototypical block and lots are assumed. This allows the calculation of the percent of land for needed setback using the Percent of Parcel per n Feet of Front Setback formula given in the preceding section on ROW Set-Asides. No side or rear setbacks are considered since the standard calculation methodology allows us to calculate "without regard to property boundaries within the block".¹⁸

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.

PARKING REQUIREMENT

Parking is not required in CFAs that are within a half-mile of frequent transit (as all of Springfield's are),¹⁹ but if present would be assumed to be in structured parking either within the building if the 70% non-residential portion assumed under the standard calculation method²⁰ or 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 that is a development standard in the zone. These are not allowed to double count. For example, if a zone requires 15% of the lot to be in open space and also that the lot have a maximum lot coverage by buildings of 45%, then the open space requirement would be the larger of 15% and 55% (100% - 45%), so 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. Zones and overlays 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 requirement to look at the "proposed" development regulations, so maximum building heights that do not meet the

¹⁸ OAR 660-012-0315(2)(a).

¹⁹ OAR 660-012-0310(2)(c) and OAR 660-012-0440(3).

²⁰ OAR 660-012-0315(2)(d).

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...*²¹

*(b) Where the local government has not established a maximum building height, **assumed building height shall be 85 feet.** ...*²²

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-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 2. SUITABLE CFA LOCATIONS, ALL ZONES

Suitable CFA Location	Acreage		% of Needed Capacity (As Primary)	% of Needed Capacity (As Secondary)
Downtown	367	●	47%	27%
Glenwood Riverfront	170		29%	17%
Mohawk	59		10%	6%
Riverbend	175		20%	11%
Total	772	●	107%	63%

²¹ OAR 660-0315(2)(a).

²² OAR 660-0315(2)(b).

All locations taken together, if considered Primary CFA, easily meet the requirement for capacity ($110\% \geq 30\%$). The Downtown Suitable CFA Location alone has enough capacity to meet the capacity requirement of the rule itself ($47\% \geq 30\%$). Glenwood Riverfront is very close to have enough itself as well with 29%. There are several combinations of the other 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.

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #2.1

ANTI-DISPLACEMENT ANALYSIS

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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 #2.1 begins with a summary of the results of the displacement risk analysis (see Technical Memorandum #2a) and augments that analysis with a review of 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 additional equity information to decision-makers to inform future CFA designation.

BACKGROUND

The Climate-Friendly and Equitable Communities rules require cities to take steps to address 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 more equitable cities 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 considering equity in land use and transportation planning. The rulemaking process was guided by an Equitable Outcomes Statement,¹ 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 term ‘historically marginalized community groups’ is used throughout this Technical Memo in place of “underserved populations” to more accurately capture the nuanced historical patterns of disenfranchisement that have put some community groups at an economic disadvantage today. Per the rules, historically marginalized community groups include but need not be limited to Black and African American people; Indigenous people; People of Color; immigrants; 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; youth and seniors. 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

¹ <https://www.oregon.gov/lcd/CL/Documents/CFECEquitableOutcomesStatement.pdf>

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses Step A2(2) in the study phase: analysis of suitable CFAs for equity and displacement.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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

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) 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.”²

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 #2a & b. Technical Memorandum #2b 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. The majority of the plans and policies apply city-wide and do not

² Source: <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062>

specifically address the CFAs directly. The fair and equitable housing outcomes are identified in OAR 660-008-0050(4) and are summarized as follows:³

- 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 units⁴*
- *Promote the production of accessible dwelling units⁵*
- *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.

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

³ 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). However, Springfield 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.

⁴ 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.

⁵ 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)]

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**” has been given various definitions but according to Oxford Languages it is defined as “the process whereby the character of a poor urban area is changed by wealthier people moving in, improving housing, and attracting new businesses, typically displacing current inhabitants in the process.”⁶

“**Displacement**” occurs when current residents are priced out of their current homes, often through redevelopment, higher housing costs, and rising property values.⁷

The mapping of areas within CFAs that are most susceptible to displacement was also done in Technical Memorandum #2a. 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 #2b with a demographic profile that documents the existence of various state and federal protected classes within Springfield.

When addressing the third part of the rule, **identifying displacement mitigation measures**, the measures selected should be those that are intended to work to achieve the fair and equitable housing outcomes listed above. This Technical Memorandum begins to identify tools, policies and plans that are intended to reduce the likelihood of displacement in the areas that are at the highest risk of displacement due to gentrification when a CFA is designated, and there is more investment in the area.

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 memo⁸ and is based on the Anti-Displacement and Gentrification Toolkit Guide for Cities (Anti-Displacement Toolkit), a toolkit which

⁶ Retrieved from: [Oxford Languages and Google - English | Oxford Languages \(oup.com\)](https://www.oxfordlanguages.com/oxford-english-dictionary/definition/gentrification)

⁷ <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>

⁸ 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.

DLCD provided to local governments for Housing Production Strategies required by HB 2003.⁹ The original research for this work was performed by PSU.¹⁰

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**
 - 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 #2a, which included a spatial analysis consisting of overlaying neighborhood typologies and identifying areas of displacement risk. The results from Technical Memorandum #2a will be discussed in the following section.

Step 2 of the anti-displacement analysis approach is addressed in this memo. 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, as noted below. Several other modifications to the methodology were made and are discussed in Technical Memorandum #2a.

- The term “neighborhood” has a different familiar definition in Springfield (i.e., neighborhood association boundaries), so instead, the LCOG analysis will refer to these demographic

⁹ 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.

¹⁰ Anti-Displacement and Gentrification Toolkit, Attachment A. Retrieved from https://www.oregon.gov/lcd/UP/Documents/AttachmentA_PSU%20Toolkit.pdf on 4/26/2023.

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 #2a provide the City of Springfield 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 plan, as well as an example tools/policies/actions that are best suited for the applicable area types according to a resource provided by DLCD.

RESULTS

Area Typologies in Potential CFAs

In Map 1, the potential CFAs are overlaid with their corresponding area typologies that show the level of risk of displacement that to which an area within the CFA is susceptible. 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 2.

A breakdown of the demographic measures and market factors that make an indicator set can be found in Technical Memorandum #2a.

TABLE 2. AREA TYPOLOGY BY INDICATOR SET STATE¹¹

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	-	-	-	-	-

As shown in Map 1, the only area typologies present within potential Springfield CFAs are Vulnerable, Active Gentrification, Late Gentrification and No Risk Identified. The total amount of acres of each area type within promising CFAs can also be found in Technical Memorandum #2a. Below is a brief description of the characteristics of these area types in the typology, based on the original description in the PSU toolkit.

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.

¹¹ This table is a replica of [DLCD's Anti-Displacement and Gentrification Toolkit Project: Guide for Cities Implementing HB2003 Housing Production Strategies](#), including the original [PSU Study prepared for DLCD](#). City of Springfield Staff have identified ways to more effectively communicate the information and will explore doing so in developing a CFA Study Executive Summary.

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.

LATE GENTRIFICATION

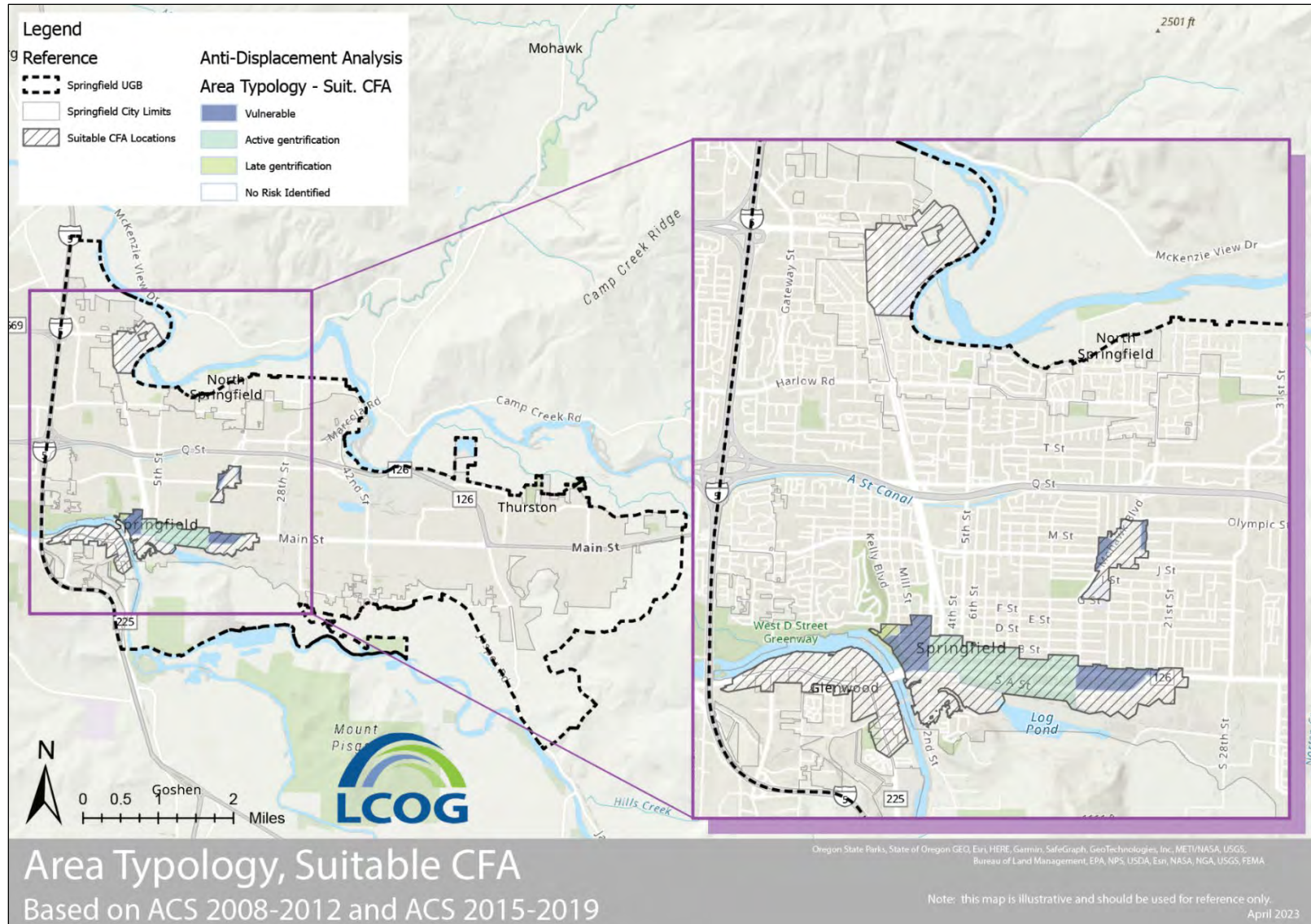
These areas do not have low-income households predominantly, but still have populations vulnerable to gentrification. Their housing market exhibits high housing prices with high appreciations, and they have a relatively low share of precarious housing. The areas experienced significant changes in demographics related to gentrification.

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 neighborhoods that do not have low-income or otherwise vulnerable people but do have mostly older or multi-unit housing.

The Vulnerable, and Active Gentrification area types indicates 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. The Late Gentrification type is designated as high-income and has a relatively hot housing market as indicated by higher rent and home value with higher appreciation rates, compared to the city as a whole. It also does not have relatively high amounts of precarious housing. However, Late Gentrification still has vulnerable people and experiences gentrification-related demographic changes. Precautions must be taken by jurisdictions adopting CFAs to mitigate the potential displacement effects of increasing density and investment in these areas.

MAP 1. AREA TYPOLOGY COMPARED TO SUITABLE CFAS



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”¹² (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 1.

FIGURE 1. ANTI-DISPLACEMENT AND GENTRIFICATION TOOLKIT CATEGORIES

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.

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.

LCOG Staff have conceptualized a list of considerations and questions to ask for the selection of tools/actions/policies. In addition, the factors used to sort the tools/policies/actions in the HSPS list are explained below.

- Tools/Actions/Policies Already in Place
 - See the Fair and Equitable Housing Policy Inventory in Technical Memorandum #2b. 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 engagement-focused equity analysis with concerted efforts to reach out to historically marginalized community groups. In Winter 2022-2023, consultants Kearns & West met with key

¹² 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

community leaders in the Springfield region to gather input on best practices for engaging historically underrepresented communities in local projects to help inform a community engagement plan and engagement activities as Springfield began to implement the Climate Friendly and Equitable Communities rules, including designating climate-friendly areas. Moving forward, engagement efforts will be used to refine the most suitable CFA locations, and hearing from the community may help in the selection of anti-displacement tools.

- How have previous housing production efforts affected communities on the ground? What are the preferences of the communities that will be affected by newly adopted CFAs and accompanying anti-displacement mitigation policies? What could possible unintended consequences of adopting CFAs be according to the community?
- Fair and Equitable Housing Outcomes (OAR 660-008-0050(4))
 - How will the tools selected contribute to fair and equitable housing outcomes? Are each addressed? Which outcomes are lacking a response from existing or planned tools/policies/actions?
- Ability to Implement
 - How long would it take to put this into effect? What other resources are needed? What is the likelihood of implementation?
- 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
 - **DIRECT** strategies for meeting housing equity needs are focused on the 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?
- Mitigating Measures

- The tools/actions/policies listed as housing production strategies may require additional action in order to mitigate displacement pressures. The HSPS provided some notes and strategies to mitigate displacement pressure for several of the policies, but some were left blank.
- Area Typology
 - Are the designated area typologies being addressed? This will be mostly Vulnerable, Active Gentrification and No Risk Identified in Springfield 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.

Following is a compilation of the **green**-coded tools/actions/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 Springfield’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 text in the tables is taken directly from the “Housing Production Strategy Program - List of Tools, Actions, and Policies” list. The meaning of the categories are also explained above. A Mitigation Measure has not been provided for each tool/policy/action, and those without mitigation measures are noted with a dash.

TABLE 3. LIST OF GREEN-CODED TOOLS, ACTIONS, POLICIES – VULNERABLE

Vulnerable					
Category	Tool/Policy/Action	Tenure Target	Affordability Target	Housing Equity Impact	Mitigating Measures
A: Zone and Code Changes	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,					

Vulnerable

	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 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	E01: Nonprofit Low-Income Rental Housing Exemption	For Rent	Publicly-Subsidized Affordable	DIRECT

Vulnerable

and Abatement	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 Tax Exemption Program (HOLTE)	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
	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	F08: Conversion of Underperforming or Distressed Commercial Assets	For Rent For Sale	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.				

Vulnerable					
	F15: Ordinances That Address Zombie Housing	For Rent For Sale	Publicly-Subsidized Affordable Workforce Market Rate	INDIRECT	Most likely to be cost effective in some neighborhood market types
	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/actions that are geared specifically towards the Vulnerable Area Type and could apply to a CFA:

- **Category Types** A, D, E and F are included – B and C are missing,
- The **Tenure Types** included 6 for rent, 1 for sale and 2 for rent or for sale,
- The **Affordability Targets** include 8 Publicly Subsidized, 9 Affordable and 4 Workforce; and
- The **Housing Equity Impacts** are 5 Direct, 1 Indirect, 1 (Direct) and 2 (Indirect)

Categories B (Reduce Regulatory Impediments) and C (Financial Incentives) are missing from the list above. Additional actions from these categories could be considered to make the plan mitigating or avoiding potential displacement. The majority of the actions listed above target residences that are for rent. Additional actions that target residences for sale should be considered. The affordability target contains several tools in each target category (Publicly Subsidized, Affordable, Workforce and Market Rate) but has several additional Publicly Subsidized and Affordable target categories. Finally, the majority of the housing equity impacts are designated as **DIRECT**, which means they will have a direct impact on housing supplies for the designated area types.

TABLE 4. LIST OF GREEN-CODED TOOLS, ACTIONS, POLICIES – ACTIVE GENTRIFICATION

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	DIRECT	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering

Active Gentrification

		Workforce Market Rate		
<p>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.</p>				
A10: Inclusionary Zoning	For Rent	Publicly-Subsidized Affordable Workforce	DIRECT	<p>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</p>
<p>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.</p>				
A13: FAR & Density Transfer Provisions	For Rent	Affordable Workforce Market Rate	DIRECT	<p>These tools work best in strong markets; have a medium impact on displacement when paired with affordability tools</p>
<p>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.</p>				

Active Gentrification

D: Financial Resources	D02: Low Income Housing Tax Credit (LIHTC)	For Rent	Publicly-Subsidized Affordable	DIRECT	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
Description: Federal tax provision that encourages private investment in affordable rental housing by providing qualified investors with a dollar-or-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.					
	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.					
	DO8: 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

Active Gentrification

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
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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
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Description: Use weatherization funds administered by statewide network of Community Action Agencies to preserve aging housing stock occupied by income-qualified residents.

Active Gentrification

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.					

Active Gentrification

F: Land Acquisition, Lease and Partnerships	F01: Land Banking	For Rent For Sale	Publicly-Subsidized Affordable Workforce	(DIRECT)	<p>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.</p>
<p>Description: Public purchasing of vacant/under-utilized sites of land in order to save for future affordable housing development.</p> <p>House Bill 2003, section 15 supports land banking:</p> <p>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.</p>					
	F05: Preserving Low-Cost Rental Housing to Mitigate Displacement	For Rent	Publicly-Subsidized Affordable	DIRECT	<p>Preservation is cost-effective compared to new construction and can prevent displacement in the immediate term for households in place</p>
<p>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.</p>					

Active Gentrification					
	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 16 **green** tools, policies, or actions that are geared specifically towards the Active Gentrification Area Type and could apply to a CFA:

- The **Category Types** A, D, E and F are included – B and C are missing,
- The **Tenure Types** included 11 for rent and 5 for rent or for sale,
- The **Affordability Targets** include 12 Publicly Subsidized, 14 Affordable, 11 Workforce and 7 Market Rate; and
- The **Housing Equity Impacts** are 9 Direct, 1 Indirect, 2 (Direct) and 4 (Indirect)

Categories B (Reduce Regulatory Impediments), C (Financial Incentives) are missing from the list above. Additional actions from these categories could be considered to make the plan mitigating or avoiding potential displacement. The majority of the actions listed above target residences that are for rent. Additional actions that target residences for sale should be considered. The affordability target contains several tools in each target category (Publicly Subsidized, Affordable, Workforce and Market Rate) but has several additional Publicly Subsidized, Workforce and Affordable target categories. Finally, the majority of the housing equity impacts are designated as **DIRECT**, which means they will have a direct impact on housing supplies for the designated area types. It should be noted that the Active Gentrification area type is composed of the presence of all five indicators, and should be heavily evaluated for anti-displacement mitigation activities before CFA adoption.

TABLE 5. LIST OF GREEN-CODED TOOLS, ACTIONS, POLICIES – LATE GENTRIFICATION

Late 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	DIRECT	Planning and continued monitoring of production and locations; add incentives and programs to increase impact and avoid clustering	

Late Gentrification

			Workforce Market Rate		
<p>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.</p>					
A10: Inclusionary Zoning	For Rent	Publicly-Subsidized Affordable Workforce	DIRECT	<p>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</p>	
<p>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.</p>					
A13: FAR & Density Transfer Provisions	For Rent	Affordable Workforce Market Rate	DIRECT	<p>These tools work best in strong markets; have a medium impact on displacement when paired with affordability tools</p>	

Late Gentrification

Late Gentrification					
<p>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.</p>					
A15: Encourage Diverse Housing Types in High-Opportunity Neighborhoods	For Rent For Sale	Publicly-Subsidized Affordable Workforce Market Rate	(INDIRECT)	Planning and continued monitoring of production; add incentives and programs to target affordability and increase impact	
<p>Description: 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 socioeconomic 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.</p>					
D: Financial Resources	D02: Low Income Housing Tax Credit (LIHTC)	For Rent	Publicly-Subsidized Affordable	DIRECT	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

Late Gentrification

Description: Federal tax provision that encourages private investment in affordable rental housing by providing qualified investors with a dollar-or-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.

DO8: 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
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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
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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

Late Gentrification

	displacement of low-income renters and also to avoid or reduce use of other more costly local services, like homeless shelters.				
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.

Late Gentrification

	<p>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.</p>				
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.
<p>Description: Public purchasing of vacant/under-utilized sites of land in order to save for future affordable housing development.</p> <p>House Bill 2003, section 15 supports land banking:</p> <p>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.</p>					
	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

Late Gentrification

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.

Late Gentrification Summary

Out of all the 14 **green** tools, policies, or actions that are geared specifically towards the Late Gentrification Area Type and could apply to a CFA:

- The **Category Types** A, D, E and F are included – B and C are missing,
- The **Tenure Types** included 9 for rent and 5 for rent or for sale,
- The **Affordability Targets** include 10 Publicly Subsidized, 12 Affordable, 10 Workforce and 7 Market Rate; and
- The **Housing Equity Impacts** are 7 Direct, 1 Indirect, 2 (Direct) and 4 (Indirect)

Categories B (Reduce Regulatory Impediments) and C (Financial Incentives) are missing from the list above. Additional actions from these categories could be considered to make the plan mitigating or avoiding potential displacement. The majority of the actions listed above target residences that are for rent. Additional actions that target residences for sale should be considered. The affordability target contains several tools in each target category (Publicly Subsidized, Affordable, Workforce and Market Rate) but has several additional Publicly Subsidized, Workforce and Affordable target categories. Finally, the majority of the housing equity impacts are designated as **DIRECT**, which means they will have a direct impact on housing supplies for the designated area types.

CONCLUSIONS AND RECOMMENDATIONS

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 tools/actions/policies across six categories, plus the option for jurisdictions to come up with additional custom actions. While some of the tools/actions/policies pertain to a particular Area Type, the majority of them apply to all Area Types. There are a variety of factors to consider when creating a plan to identify mitigation actions intended to achieve fair and equitable housing outcomes within CFAs, as required by the CFA rules.

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

TABLE 6. AREA TYPES IN SUITABLE CFAs

Area Type	Acres in Suitable CFAs
Vulnerable	93.8
Active Gentrification	142
Late Gentrification	6.3
No Risk Identified	528.9
Total	771

RECOMMENDATIONS

Mitigation Measures

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 of the DLCDC approach also includes “review mitigation potential for each context”. The “Housing Production Strategy Program – List of Tools” includes a note on Mitigation Measures for some of the tools/actions/policies it contains. The mitigation

measures listed in DLCD's guidance document should be compared to existing measures that the City already has in place, an inventory of which can be found in the Addendum of Technical Memorandum #2b. The final step in DLCD's suggested anti-displacement analysis approach is "Step 3 Report: select strategies to best achieve goals and mitigate unintended consequences".

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 CFA selection as well as the chosen anti-displacement mitigation measures.

Mitigation of Displacement Risk

Review and selection of strategies highlighted in this memo. for mitigation of residential displacement impacts, (i.e., Step 2 and 3 of the DLCD suggested approach) should be further refined before finalizing a plan to achieve fair and equitable housing outcomes. This is not required for CFA study adoption but should be explored before a CFA is adopted and implemented.

Consideration of Equity in Selecting CFA Locations

Areas identified throughout the CFA study, suitable CFA locations are in existing or currently planned urban centers that are also supported by existing or planned high-quality transportations 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 applicable 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 transportations 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.

City of Springfield
Climate-Friendly Areas Study

TECHNICAL MEMORANDUM #4

MOST PROMISING CFA

To: Springfield CFA Study Project Team
From: Lane Council of Governments
Date: November 15, 2023

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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 #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.

BACKGROUND

In September 2020, the Land Conservation and Development Commission launched the Climate-Friendly and Equitable Communities rulemaking in response to then 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 defined as 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 density of housing, jobs, businesses, and services than the urban average. 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 apply to cities and some urbanized areas with a population over 5,000, and that are also in one of the seven metropolitan areas (outside of the Portland Metro). The City of Springfield meets these requirements and must now adopt or amend existing regulations allowing walkable mixed-use development in defined CFAs within its urban growth boundary. 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 urban centers that may currently allow for mixed uses and higher densities. Associated requirements will support the provision of high-quality pedestrian, bicycle, and transit infrastructure within these areas as 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

¹ 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) provided technical assistance to the City of Springfield (City) to complete the CFA Study.

Table 1 provides an overview of the iterative process that LCOG and the City followed to complete the CFA Study. This Technical Memorandum addresses the fourth step in the study phase: Determine Most Promising CFAs.

TABLE 1. TECHNICAL ANALYSIS OVERVIEW

CFA Study Step	Deliverable
Step A1. Identify potential CFAs	Technical Memorandum #1
Step A2(1). Analysis of potential CFAs (equity and displacement)	Technical Memorandum #2a & 2b
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. Analyze potential CFAs for “most promising” options	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 #3a have narrowed down viable CFA locations of all lands within Springfield, first to “Potential CFA Locations,” meeting basic locational factors in Technical Memo #1, and then down to “Suitable CFA Locations,” after applying additional dimensional and other suitability criteria in Technical Memo #3a.

Together, these met the requirements of OAR 660-012-0310(2). In Technical Memos #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.



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.²

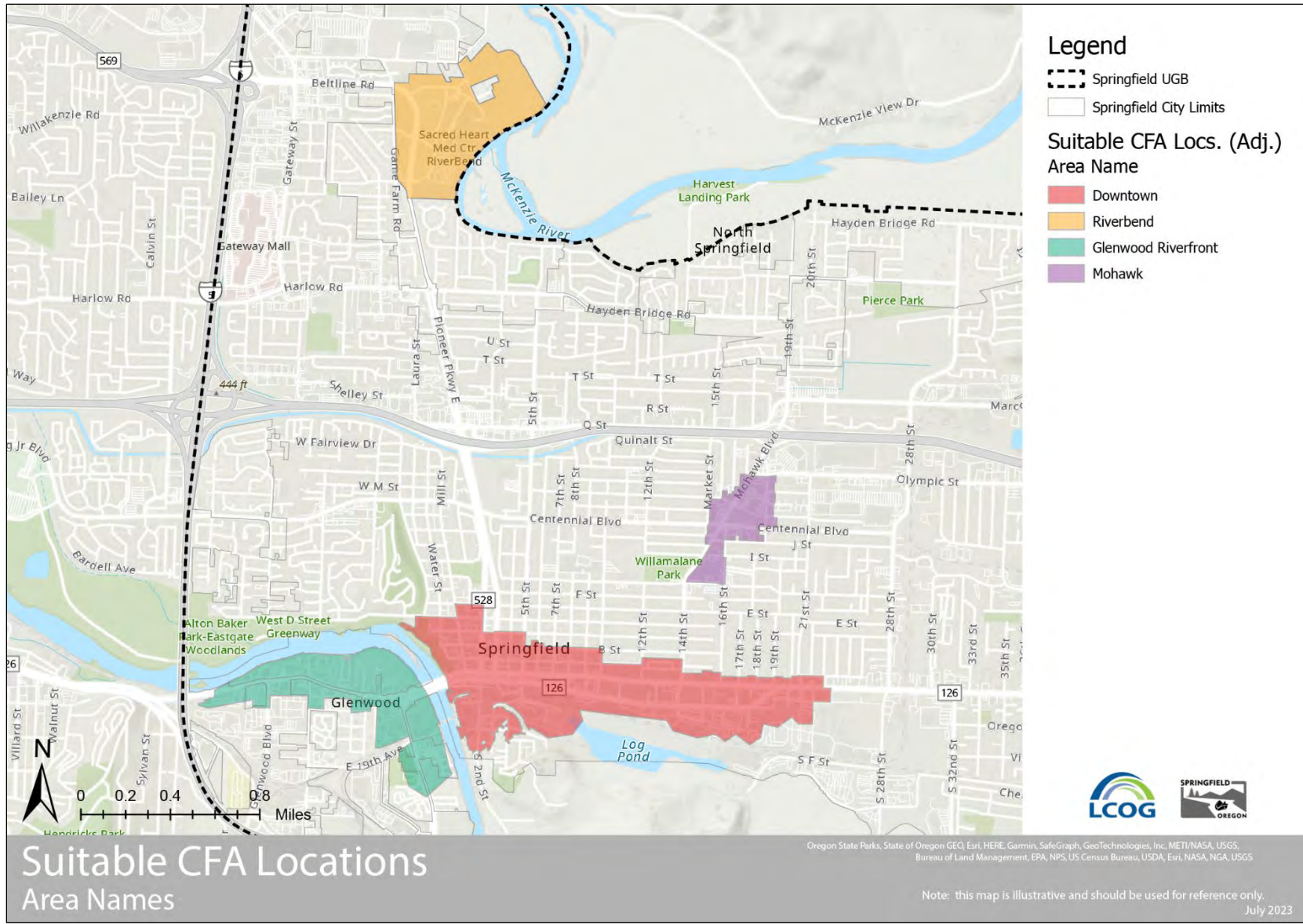
Table 2 and Map 1 provide tabular and visual representation of the City of Springfield's Suitable CFA Locations which will be evaluated in this analysis.

TABLE 2. SUITABLE CFA LOCATIONS

Location	Acreage	% of Total Acreage
Downtown	367	47.6%
Glenwood Riverfront	170	22.1%
Mohawk	59	7.7%
Riverbend	175	22.7%
Total	771	100%

² OAR 660-012-0315(4)(a), retrieved from <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062>.

MAP 1. SUITABLE CFA LOCATIONS



EVALUATION CRITERIA

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 (TM1 and TM3a)**
 1. In an Urban Center³
 2. Within the UGB
 - *Within the City Limits or Subject to Additional Conditions*⁴
 3. Served by High-Quality Active Transportation and Transit⁵
 4. Safe From Natural Disasters and Hazards (Goal 7)⁶
- **Dimensional (TM3a)**
 1. A Minimum of 25 Acres⁷
 2. A Minimum of 750 Feet Wide⁸

Evaluation Criteria

Each location will be analyzed based on the following relative criteria.

- **Development Regulation Compliance (TM3b)**⁹

³ “The locations shall be in existing or planned urban centers, including downtowns, neighborhood centers, transit-served corridors, or similar districts.” OAR 660-012-0310(2)(b)

⁴ “Cities may designate climate-friendly areas within the urban growth boundary, but outside the city limits boundary, if the following requirements are met...” OAR 660-012-0310(2)(e)

⁵ “The locations shall be in areas that are served, or planned for service, by high quality pedestrian, bicycle, and transit services.” OAR 660-012-0310(2)(c)

⁶ “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 660-012-0310(2)(d)

⁷ “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 660-012-0320(8)(c) or OAR 660-012-0320(9)(c)

⁸ “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)

⁹ “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 660-012-0315(4)(b)

- **Dwelling Unit Capacity (TM3c)**¹⁰
- **Supportive Adjacent Uses (TM4)**
 1. In, or Near, High-Density Mixed-Use Areas¹¹
 2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities¹²
- **Development Readiness**¹³

The **Development Regulation Compliance** and **Dwelling Unit Capacity** criteria are summarized from the results of analysis in previous technical memos. The **Supportive Adjacent Uses** criteria were analyzed for this memo. **Development Readiness** is not explicitly required by the rules and thus has not been analyzed as a part of this study.

LOCATION SUMMARIES

The following section provides a summary analysis of the City of Springfield’s Suitable CFA locations (listed below). The CFA rules do not outline a uniform way to evaluate the locations, and therefore this section provides a combination of objective observations (e.g. development regulation compliance and dwelling unit capacity) and subjective observations (e.g. supportive adjacent uses).

1. Downtown
2. Glenwood Riverfront
3. Mohawk
4. Riverbend

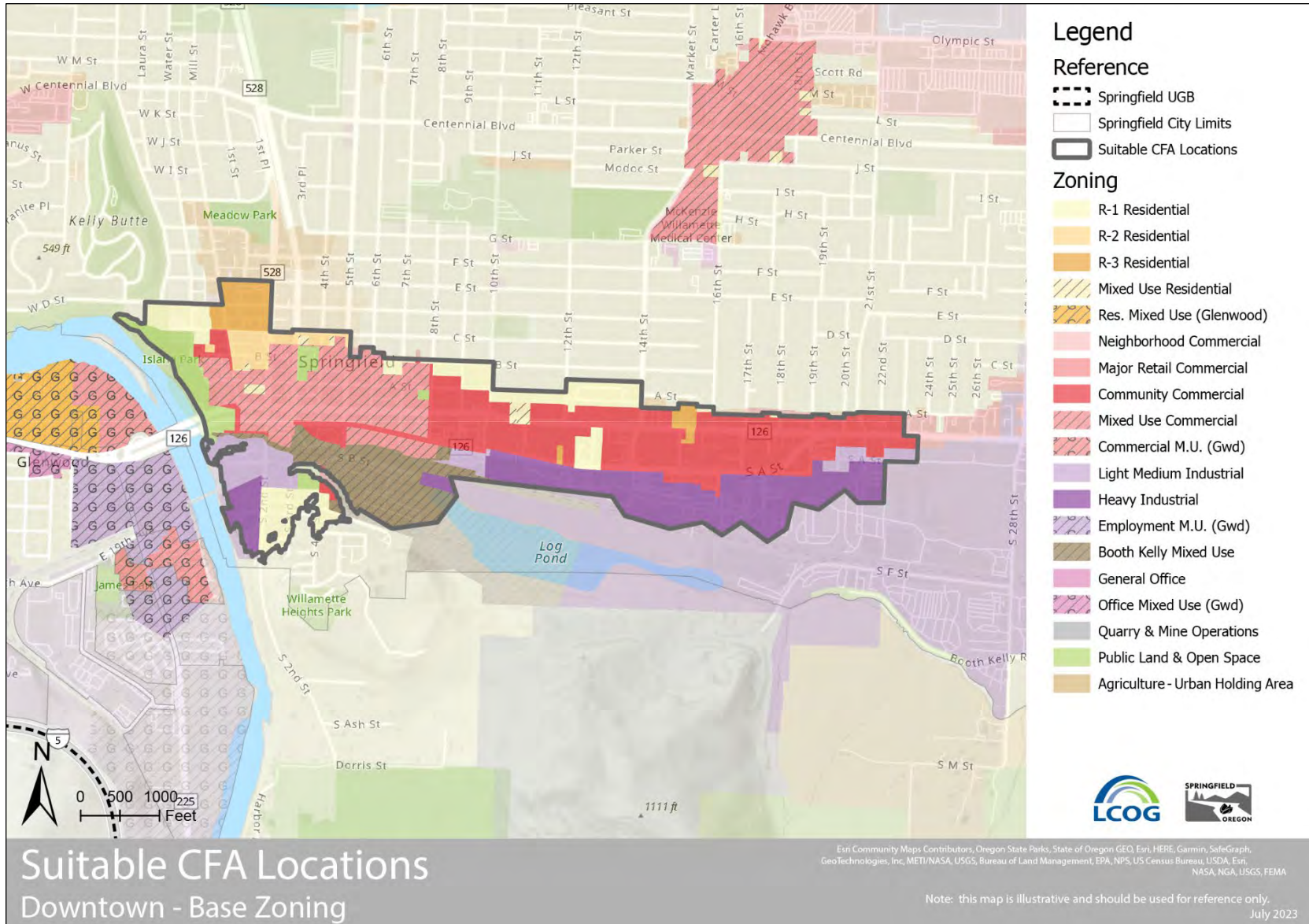
¹⁰ “A preliminary evaluation of existing development standards within the potential climate-friendly area(s) and a general description of any changes necessary to comply with the requirements of OAR 660-012-0320.” OAR 660-012-0315(4)(e)

¹¹ “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 660-012-0310(2)(b)

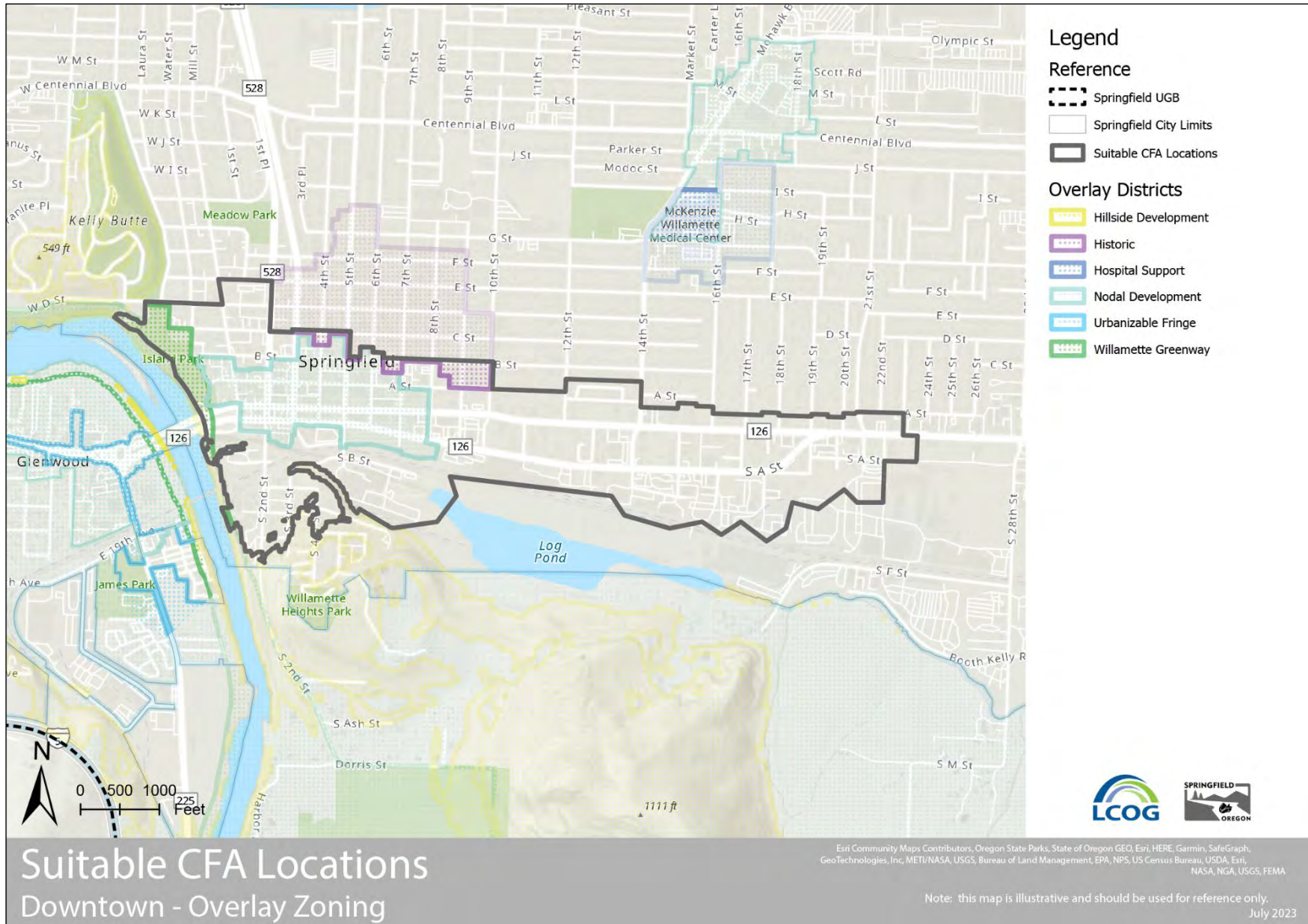
¹² “Local governments shall prioritize locating government facilities that provide direct service to the public within climate-friendly areas and shall prioritize locating parks, open space, plazas, and similar public amenities in or near climate-friendly areas that do not contain sufficient parks, open space, plazas, or similar public amenities.” OAR 660-012-0320(4)

¹³ “Locations able to support development consistent with the land use requirements of OAR 660-012-0320.” OAR 660-012-0310(2)(a)

MAP 2. SUITABLE CFA LOCATIONS – DOWNTOWN BASE ZONING



MAP 3. SUITABLE CFA LOCATIONS – DOWNTOWN OVERLAY DISTRICTS



Location 1: Downtown

ZONING MAPS

See Map 2 and Map 3 on the previous two pages.

DESCRIPTION

The Downtown Suitable CFA Location comprises 367 acres. It is the largest location of the four Suitable CFA Locations evaluated.

CRITERIA

- **Development Regulation Compliance (TM3b)**

See Table 3 on the following page. The Downtown Suitable CFA is large and contains many base land use districts. No one district predominates the CFA, but the districts with the greatest acreage include CC | Community Commercial, HI | Heavy Industrial, R-1 | R-1 Residential, and MUC | Mixed Use Commercial. The CC district rates among Springfield's highest in overall compliance with CFA rules. MUC is also mostly compliant (failing to be completely compliant only by requiring discretionary permits for schools). Both districts have key compliance issues around density minimums (although both allow higher densities, in the spirit of CFA rules).

R-1 rates low for most CFA compliance categories. HI rates low for uses required by CFA rules to be required outright.

The Nodal Overlay District has a significant footprint in the Downtown Suitable CFA. This slightly improves compliance and adds procedural complexity to some otherwise outright permitted uses.

For these reasons the Downtown Suitable CFA Location rates highest among the four CFAs for Development Regulation Compliance.

- **Dwelling Unit Capacity (TM3c)**

Using all zoned areas (excluding those considered unusable for residential capacity¹⁴), the Downtown location meets **47%** of needed housing capacity as a Primary CFA and 27% of needed housing capacity as a Secondary CFA. It is the only location, in the four considered, with enough estimated capacity to meet the 30% of needed housing requirement by itself.. This dynamic makes the Downtown Riverfront Suitable CFA Location the highest rated of the four areas for Dwelling Unit Capacity.

¹⁴ In this CFA, the PLO district was excluded from the development capacity calculations due to inherent prohibitive constraints of development in these areas.

TABLE 3. DEVELOPMENT REGULATION COMPLIANCE – DOWNTOWN

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance - Single and mixed uses permitted	OAR 660-012-0320(4) Compl. - Gov. facilities	OAR 660-012-0320(5) Compl. - Block Length	OAR 660-012-0320(6) Compl. - No density max	OAR 660-012-0320(7) Compl. Transportation	OAR 660-012-0320(8) Primary Density Compl. - Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compl. - over 85' allowed	OAR 660-012-0320(8) Secondary Density Compl. - Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compl. -Over 50' allowed
BK	35.02	Medium	High	Medium	High	Medium	Medium	High	Medium	High
BK/ND	0.12	Medium	High	Medium	High	High	Medium	High	Medium	High
CC	100.7	Medium+	High	Medium	High	Medium	Medium	High	Medium	High
CC/H	0.56	Medium+	High	Medium	High	Medium	Medium	High	Medium	High
CC/ND	3.16	Medium+	High	Medium	High	High	Medium	High	Medium	High
HI	64.66	Non-Compliant	Low	Low	Non-Compliant	Medium	Non-Compliant	High	Non-Compliant	High
HI/WG	0.37	Non-Compliant	Low	Low	Non-Compliant	Medium	Non-Compliant	High	Non-Compliant	High
LMI	19.61	Non-Compliant	Low	Low	Non-Compliant	Medium	Non-Compliant	High	Non-Compliant	High
LMI/WG	0.69	Non-Compliant	Low	Low	Non-Compliant	Medium	Non-Compliant	High	Non-Compliant	High
MUC	4.90	Medium+	High	Medium	High	Medium	Medium	High	Medium	High
MUC/H/ND	0.14	Medium+	High	Medium	High	High	Medium	High	Medium	High
MUC/ND	53.99	Medium+	High	Medium	High	High	Medium	High	Medium	High
MUR	1.84	Medium	Medium	Medium	High	Medium	Medium	Medium	Medium	High
MUR/ND	1.26	Medium	Medium	Medium	High	High	Medium	High	Medium	High
PLO	3.93	Non-Compliant	High	Medium	Non-Compliant	Medium	Low	High	Low	High
PLO/WG	10.31	Non-Compliant	High	Medium	Non-Compliant	Medium	Low	High	Low	High
PLO/ND	2.71	Non-Compliant	High	Medium	Non-Compliant	High	Low	High	Low	High
R-1	32.29	Low	Low	Medium	Low	Medium	Low	Low	Low	Low
R-1/HD	0.11	Low	Low	Medium	Low	Medium	Low	Low	Low	Low

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance - Single and mixed uses permitted	OAR 660-012-0320(4) Compl. - Gov. facilities	OAR 660-012-0320(5) Compl. - Block Length	OAR 660-012-0320(6) Compl. - No density max	OAR 660-012-0320(7) Compl. Transportation	OAR 660-012-0320(8) Primary Density Compl. - Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compl. - over 85' allowed	OAR 660-012-0320(8) Secondary Density Compl. - Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compl. -Over 50' allowed
R-1/H	5.63	Low	Low	Medium	Low	Medium	Low	Low	Low	Low
R-1/WG	2.25	Low	Low	Medium	Low	Medium	Low	Low	Low	Low
R-2	7.5	Medium+	Medium	Medium	Low	Medium	Low	Low	Medium	High
R-2/H	1.42	Medium+	Medium	Medium	Low	Medium	Low	Low	Medium	High
R-2/ND	0.10	Medium	Medium	Medium	High	High	Medium	Low	Medium	High
R-3	13.4	Medium+	Medium	Medium	Medium	Medium	High	High	High	High
TOTAL	366.74									

- **Supportive Adjacent Uses (TM4)**

1. In, or Near, High-Density Mixed-Use Areas

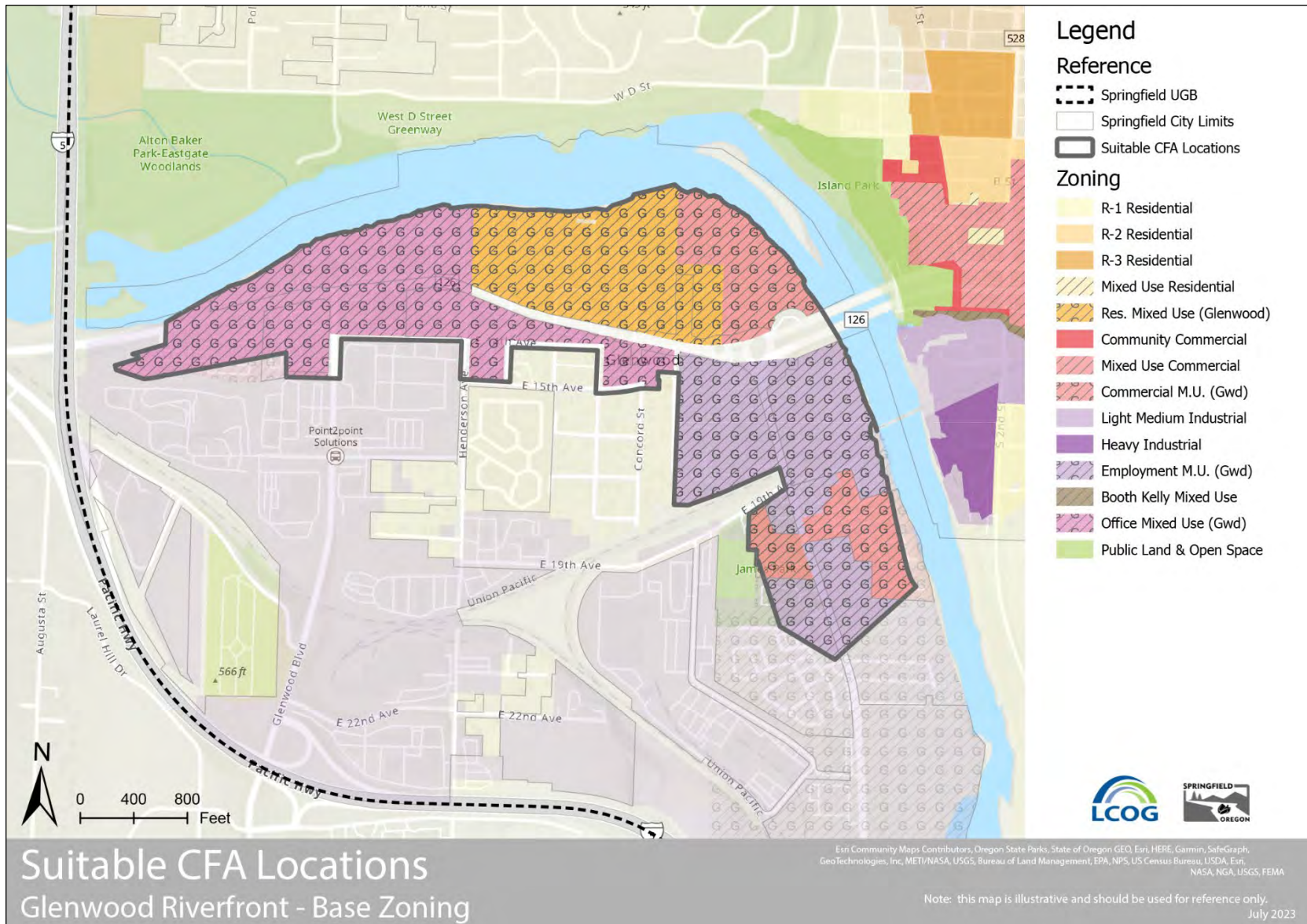
The Downtown Suitable CFA is large and has a lot of adjacent uses. As such, it has a number of both weaker and stronger supporting adjacent uses. The areas bordering the Downtown Suitable CFA to the north are predominantly R-1 – Residential, with potential implications for building step-back and height transitions. There are also pockets of R-2 and R-3 to the north. The area south of the Downtown Suitable CFA is mostly zoned Industrial (Heavy or Light-Medium), with a small pocket zoned R-1. The area east of the Downtown Suitable CFA is Glenwood Riverfront, itself a Suitable CFA. Because the Downtown location is large, it is likely that any designated CFA area would be a sub-geography of the entire existing area, and would, therefore have more supportive adjacent uses on several sides.

2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities

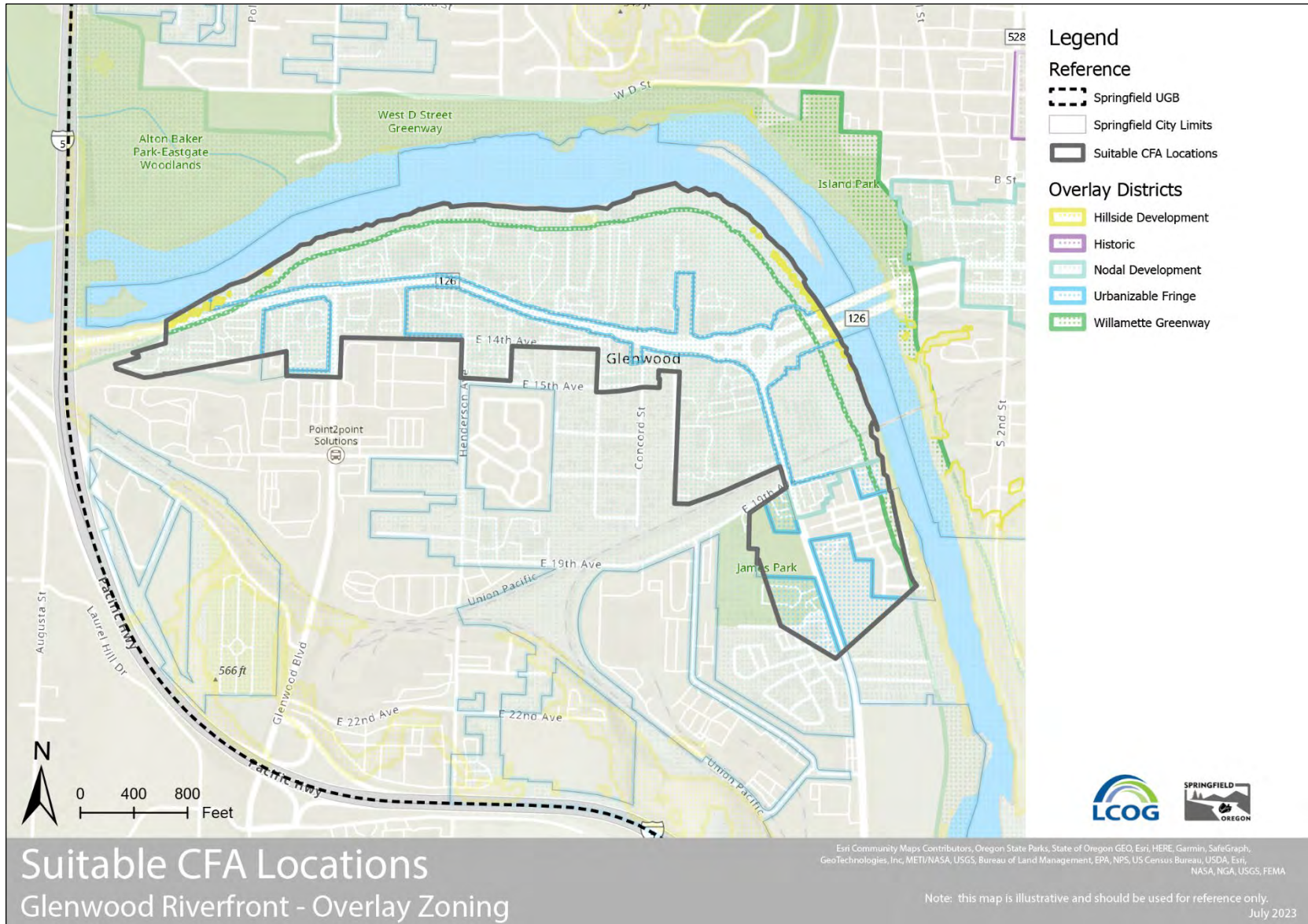
The Downtown Suitable CFA has a relatively strong proportion of and proximity to Parks, Open Space, Plazas and Similar Public Amenities. The area is bounded to the west by the Willamette River and some PLO - Public Land and Open Space (and Willamette Greenway) between Downtown and the river. It is located on multi-use paths that follow the river into Eugene and gives access to the University of Oregon and Downtown Eugene.

For the reasons noted above, the Downtown Suitable CFA Location is rated highest among the four areas in the categories of supportive of adjacent uses in or near high-density, mixed use areas, and adjacent supportive uses containing, or near parks, open space, plazas or similar public amenities. The support of adjacent uses is varied but on the whole, strong, in part of because of the overall size of the CFA. Proximity to public open spaces is strong.

MAP 4. POTENTIAL CFA LOCATIONS – GLENWOOD RIVERFRONT BASE ZONING



MAP 5. POTENTIAL CFA LOCATIONS – GLENWOOD RIVERFRONT OVERLAY DISTRICTS



Location 2: Glenwood Riverfront

ZONING MAPS

See Map 4 and Map 5 on the previous two pages.

DESCRIPTION

The Glenwood Riverfront Suitable CFA comprises 170 acres. It is the 3rd largest location of the four Suitable CFA Locations evaluated.

CRITERIA

- **Development Regulation Compliance (TM3b)**

See Table 4. Development Regulation Compliance – Glenwood Riverfront on the following page. The Glenwood Riverfront Suitable CFA contains the four Glenwood Mixed Use base land use districts, all in sizeable proportions with GOMU | Office Mixed Use having the most acreage and GCMU | Commercial Mixed Use having the least acreage. With the exception of the GEMU | Employment Mixed Use, the Glenwood Mixed Use base land use district have the highest CFA rule compliance of any base land use district in Springfield. GEMU's key compliance issue is due to not permitting uses outright that are required to be so by the CFA rules.

This Suitable CFA Location also contains several overlay districts, the UF-10 | Urbanizable Fringe, WG | Willamette Greenway and ND | Nodal Development. The UF-10 overlay district does not affect CFA criteria, except that there are additional conditions for areas outside the city limits but inside a UGB in OAR 660-012-0310(2). These conditions are met, as explored in Technical Memo #3a. The ND overlay is extensive in the Most Promising CFA Locations. ND increases compliance where it overlaps with base zones. For example, the ND overlay zone generally broadens allowed uses. The presence of the WG overlay alone does create CFA rule compliance issues. There are, however, potential compliance implications from specific dynamics within the WG overlay. Because the extent of those implications are nuanced and cannot be generalized by the WG overlay boundary alone, they are not explicitly addressed in this analysis. The specific implications of Springfield's existing and future Greenway Setback Line(s) in the WG overlay should be evaluated further by the City, prior to final CFA designation. For these reasons the Glenwood Riverfront Suitable CFA Location rates second highest among the four CFAs for Development Regulation Compliance, largely due to GEMU compliance issues.

- **Dwelling Unit Capacity (TM3c)**

Using all zoned areas¹⁵, the Glenwood Riverfront location meets **29%** of needed housing capacity as a Primary CFA and 17% of needed housing capacity as a Secondary CFA.

These relatively higher percentages make the Glenwood Riverfront Suitable CFA Location the second highest rated of the four for Dwelling Unit Capacity

¹⁵ In the case of the Glenwood Riverfront Suitable CFA Location, the developable area "bounded by streets" and "zoned" for development is the area outside the Franklin Boulevard right of way. That right of way is included in the Suitable CFA Location as internal "un-zoned" right of way and counts as helping meet the dimensional requirements, but does not contribute to capacity and is not part of the 40% ROW set aside used in the calculations. As a result, the total proportion of land area in right of way in the Glenwood Riverfront Location, is greater than 40% and greater than the total proportion of land area in right of way of 40% found in the other Suitable CFA Locations in Springfield. This analysis is described in greater detail in Technical Memo #3C.

In this CFA, the GEMU district is included in development capacity calculations. In the adoption phase, GEMU areas could be considered for removal from the CFA due to poor CFA suitability or be rezoned to be compliant.

TABLE 4. DEVELOPMENT REGULATION COMPLIANCE – GLENWOOD RIVERFRONT

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance -Single and mixed uses permitted	OAR 660-012-0320(4) Compliance -Gov. facilities	OAR 660-012-0320(5) Compliance -Block length	OAR 660-012-0320(6) Compliance -No density max	OAR 660-012-0320(7) Compliance -Transportation	OAR 660-012-0320(8) Primary Density Compliance -Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compliance -Over 85' allowed	OAR 660-012-0320(8) Secondary Density Compliance -Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compliance -Over 50' allowed
GCMU	11.29	High	High	High	High	High	High	High	High	High
GCMU/HD/ND/WG/UF	0.18	High	High	High	High	High	High	High	High	High
GCMU/ND/UF	8.91	High	High	High	High	High	High	High	High	High
GCMU/ND/WG/UF	4.54	High	High	High	High	High	High	High	High	High
GCMU/WG	0.84	High	High	High	High	High	High	High	High	High
GCMU/ND	0.55	High	High	High	High	High	High	High	High	High
GOMU/ND	15.58	High	High	High	High	High	High	High	High	High
GOMU/ND/WG	1.10	High	High	High	High	High	High	High	High	High
GOMU/ND/UF	28.41	High	High	High	High	High	High	High	High	High
GOMU/ND/WG/UF	5.68	High	High	High	High	High	High	High	High	High
GOMU/HD/ND/WG	0.22	High	High	High	High	High	High	High	High	High
GEMU	1.41	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GEMU/ND	4.36	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GEMU/UF	12	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GEMU/WG/UF	0.54	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GEMU/ND/UF	24.97	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GEMU/ND/WG/UF	3.40	Low	Low	High	High	High	Non-Compliant	Non-Compliant	High	High
GRMU/ND	1.94	High	High	High	High	High	High	High	High	High
GRMU/ND/UF	27.02	High	High	High	High	High	High	High	High	High

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance -Single and mixed uses permitted	OAR 660-012-0320(4) Compliance -Gov. facilities	OAR 660-012-0320(5) Compliance -Block length	OAR 660-012-0320(6) Compliance -No density max	OAR 660-012-0320(7) Compliance -Transportation	OAR 660-012-0320(8) Primary Density Compliance -Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compliance -Over 85' allowed	OAR 660-012-0320(8) Secondary Density Compliance -Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compliance -Over 50' allowed
GRMU/ND/WG/UF	5.19	High	High	High	High	High	High	High	High	High
R-1/ND/UF	0.11	High	Low	Medium	Low	High	Low	Low	Low	Low
ROW	11.78					N/A				
TOTAL	170.03									

Note: Discrepancies in spatial data produce rare, and very small, instances of zone combinations that do not exist in actuality. These are removed from totals in this table. This may result in small discrepancies with other CFA acreage totals in the study.

- **Supportive Adjacent Uses (TM4)**

1. In, or Near, High-Density Mixed-Use Areas

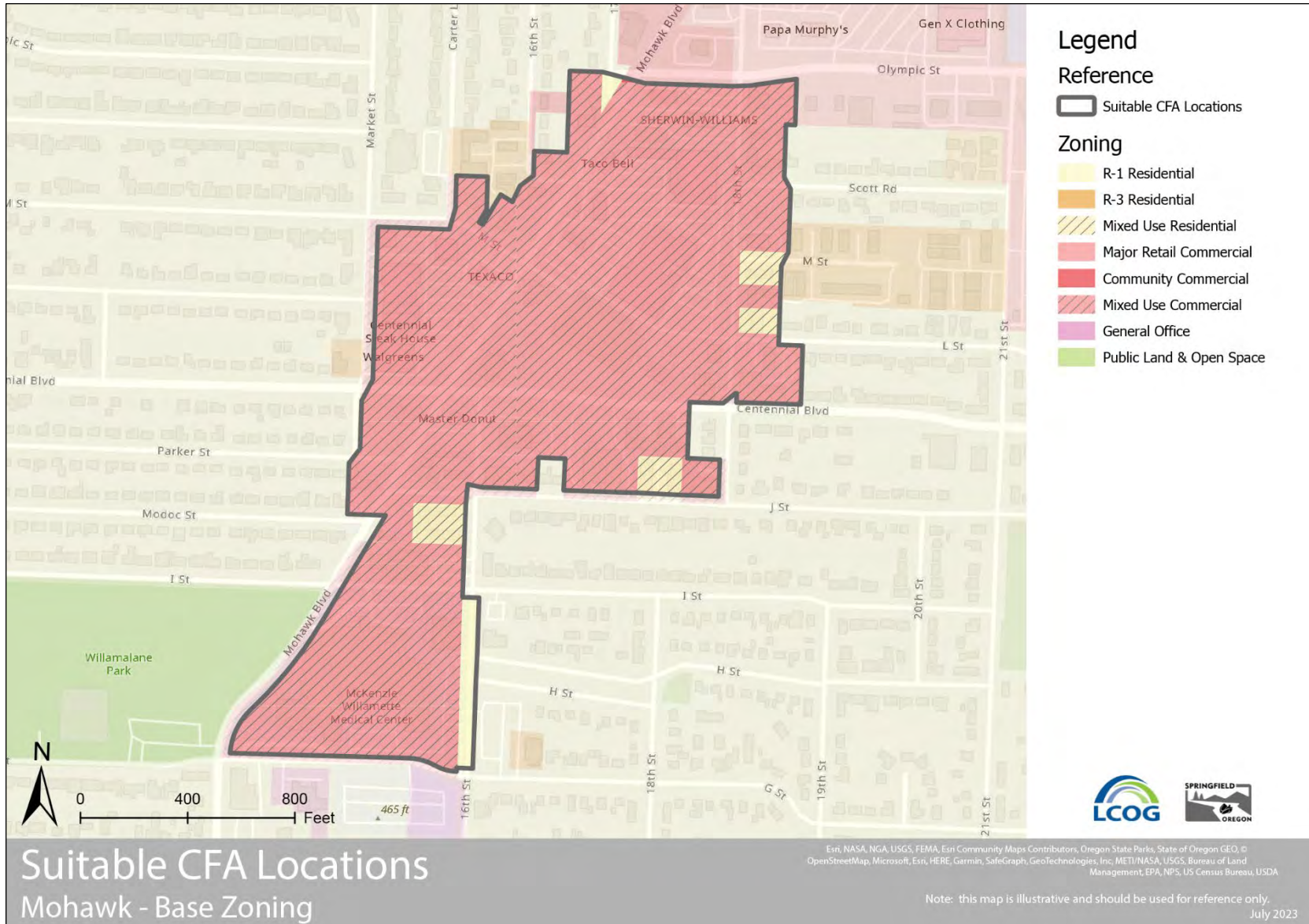
The Glenwood Riverfront Suitable CFA is somewhat spatially bound. Where it is not bounded by the Willamette River, the location's adjacent zoning is LMI | Light Medium Industrial, R-1 | Residential, and GEMU | Glenwood Employment Mixed Use. Although not technically "adjacent," it is only the Willamette River which divides two of the highest existing concentrations of planned mixed use and high density uses in Springfield. For this reason, the Glenwood Riverfront Suitable CFA can be characterized as having a moderate amount of high-density and mixed use supportive uses compared to other Suitable CFA Locations.

2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities

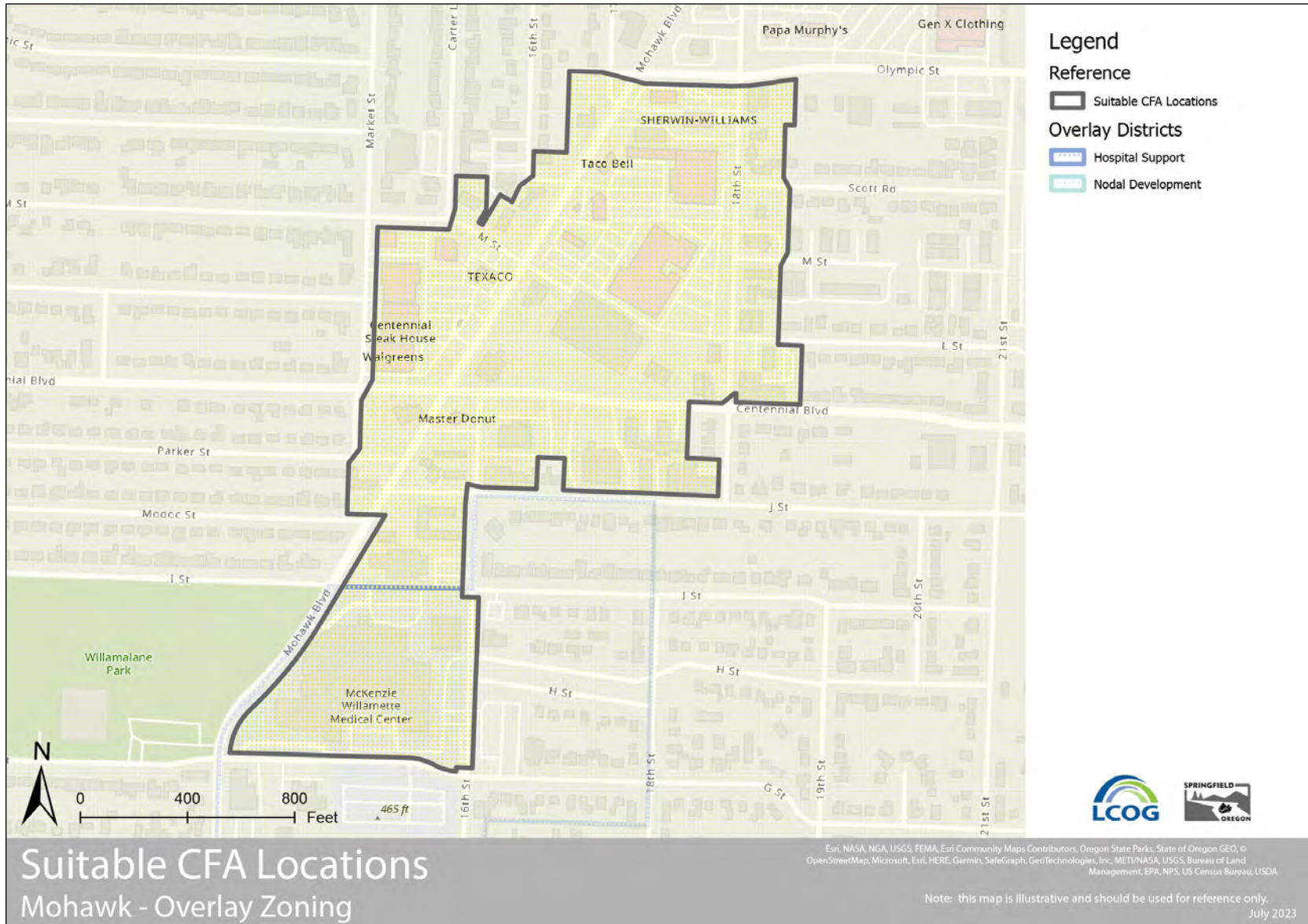
The Glenwood Riverfront Suitable CFA has a relatively strong proportion of and proximity to Parks, Open Space, Plazas and Similar Public Amenities. The Glenwood Riverfront Suitable CFA is bounded on the north and east by the Willamette River. It is connected at the west end to a multi-use path that follows the river into Eugene and gives access to the University of Oregon and Downtown Eugene. The area's Phase I Glenwood Refinement Plan also requires significant additions of parks and open space in the area.

For the reasons noted above, the Glenwood Riverfront Suitable CFA Location is rated second highest among the four areas in the categories of supportive of adjacent uses in or near high density, mixed use areas, and adjacent supportive uses containing, or near parks, open space, plazas or similar public amenities. The support of adjacent uses is relatively strong, though not quite as strong as the Downtown Suitable CFA Location, in part because of the distancing impact of the Willamette River in much of the area. Proximity to public open spaces is strong.

MAP 6. SUITABLE CFA LOCATIONS – MOHAWK BASE ZONING



MAP 7. SUITABLE CFA LOCATIONS - MOHAWK OVERLAY DISTRICTS



Location 3: Mohawk

ZONING MAPS

See Map 6 and Map 7 on the previous two pages.

DESCRIPTION

The Mohawk Suitable CFA Location comprises 59 acres. It is the smallest location of the four Suitable CFA Locations evaluated. The location includes McKenzie Willamette Hospital at its south end and the south part of the Mohawk commercial district.

CRITERIA

- **Development Regulation Compliance (TM3b)**

See Table 5 on the following page. The Mohawk Suitable CFA Location is mostly zoned MUC | Mixed Use Commercial. There are four small pockets of MUR | Mixed Use Residential and two small pockets of R-1 | R-1 Residential around the edges.

The Nodal Development overlay district applies to the entirety of the Mohawk Suitable CFA Location, which generally makes the area more compliant with CFA rules. The south portion of the Mohawk Suitable CFA Location is also under the Hospital Support overlay district since that is the location of McKenzie Willamette Hospital.

Despite being mixed use districts, the MUC and MUR districts are only medium in CFA rule compliance overall, even with the ND overlay. The Hospital Support overlay makes the area less compliant by limiting the uses that can be present, and the hospital takes up most of the area of that overlay district.

For these reasons the Mohawk Suitable CFA Location rates lowest among the four CFAs for Development Regulation Compliance.

- **Dwelling Unit Capacity (TM3c)**

Using all zoned areas¹⁶, the Mohawk location meets **10%** of needed housing capacity as a Primary CFA and 6% of needed housing capacity as a Secondary CFA. These relatively lower percentages make the Mohawk Suitable CFA Location the lowest rated of the four for Dwelling Unit Capacity.

¹⁶ In this CFA no zoned areas were excluded. In the adoption phase, the City of Springfield could consider removing R-1 areas from the CFA due to poor CFA suitability and a need to rezone to effectively utilize these areas.

TABLE 5. DEVELOPMENT REGULATION COMPLIANCE – MOHAWK

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance --Single and mixed uses permitted	OAR 660-012-0320(4) Compliance -Gov. facilities	OAR 660-012-0320(5) Compliance -Block length	OAR 660-012-0320(6) Compliance -No density max	OAR 660-012-0320(7) Compliance -Transportation	OAR 660-012-0320(8) Primary Density Compliance -Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compliance -Over 85' allowed	OAR 660-012-0320(8) Secondary Density Compliance -Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compliance -Over 50' allowed
MUC/ND	45.87	Medium+	High	Medium	High	High	Medium	Medium	Medium	High
MUC/HS/ND	9.60	Medium+	High	Medium	High	High	Medium	Medium	Medium	High
MUR/ND	1.97	Medium	Medium	Medium	High	High	Medium	Medium	High	High
R-1/HS/ND	0.89	Low	Low	Medium	Low	High	Low	Low	Low	Low
R-1/ND	0.23	Low	Low	Medium	Low	High	Low	Low	Low	Low
Total	58.56									

- **Supportive Adjacent Uses (TM4)**

1. In, or Near, High-Density Mixed-Use Areas

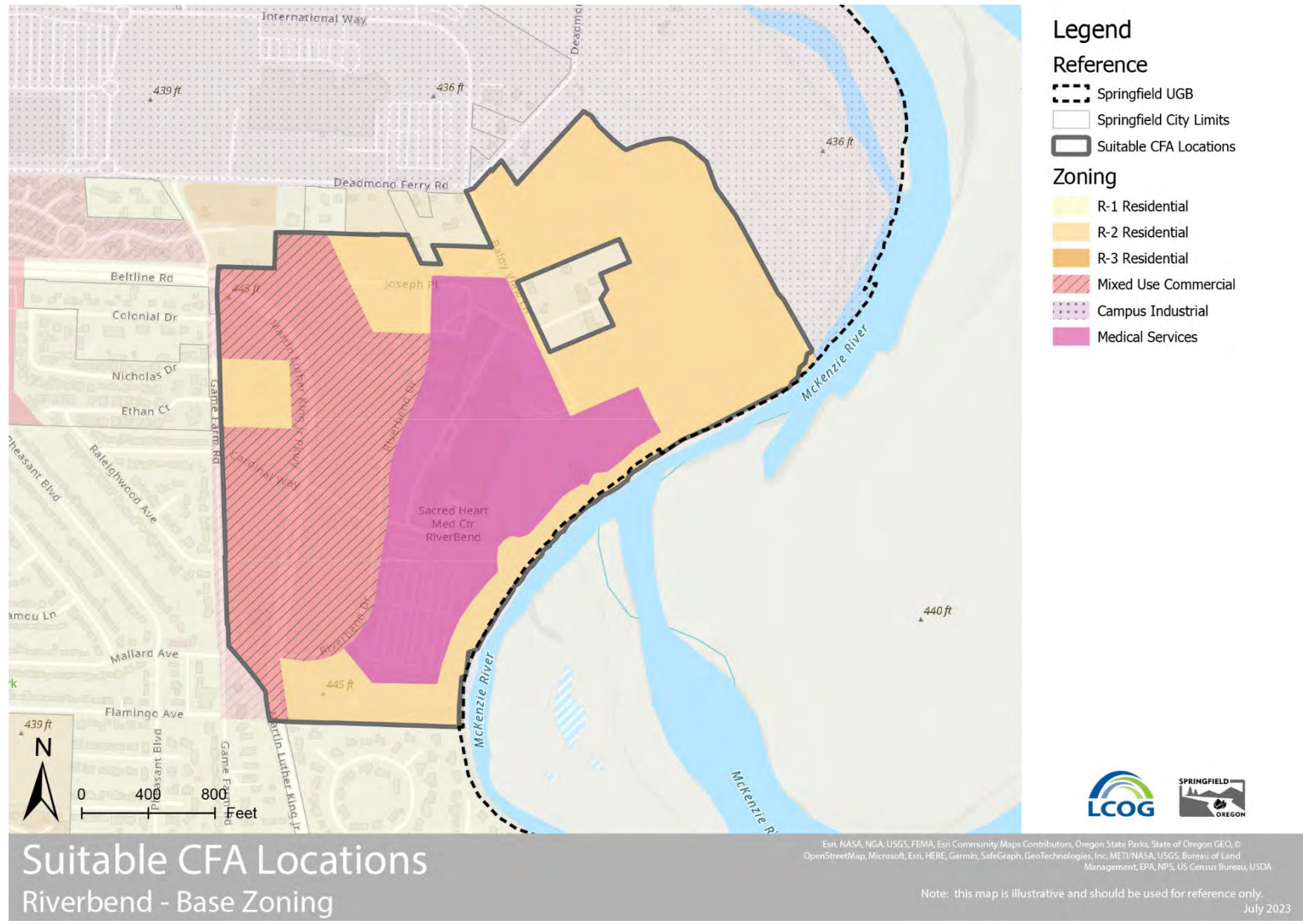
The areas bordering the Mohawk Suitable CFA Location to the north are zoned Commercial (Community and Major Retail). The area surrounding the CFA is mostly R-1 | R-1 Residential. There are also pockets of higher density residential zoning (R-3 | R-3 Residential) to the east and west. The area south of the CFA is mostly zoned R-1 | R-1 Residential, with a couple small pockets zoned GO | General Office. With the exception of the commercial areas to the north, and pockets of R-3, the Location does not have strong high-density and mixed use supportive adjacent uses.

2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities

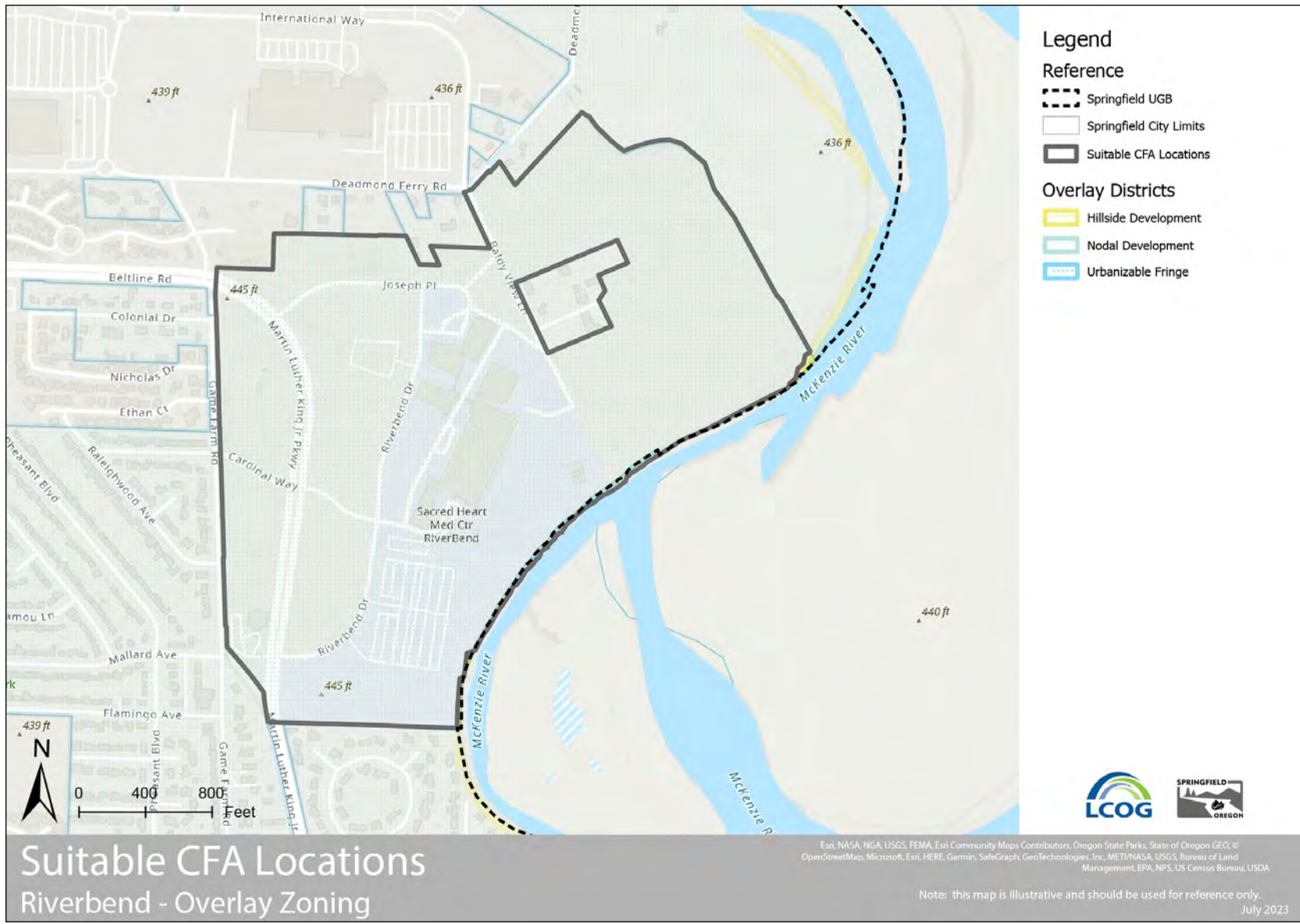
The Mohawk Suitable CFA Location is bounded to the southwest by Willamalane Park, which is zoned PLO | Public Land and Open Space. The Mohawk Suitable CFA has a relatively weak proportion of, and proximity to, Parks, Open Space, Plazas and Similar Public Amenities.

For the reasons noted above, the Mohawk Suitable CFA Location is rated second to last among the four areas in the category of supportive of adjacent uses in or near high-density, mixed-use areas, and last for adjacent supportive uses containing, or near parks, open space, plazas or similar public amenities.

MAP 8. SUITABLE CFA LOCATIONS - RIVERBEND BASE ZONING



MAP 9. SUITABLE CFA LOCATIONS - RIVERBEND OVERLAY DISTRICTS



Location 4: Riverbend

ZONING MAPS

See Map 8 and Map 9 on the previous two pages.

DESCRIPTION

The Riverbend Suitable CFA Location is 175 acres in size. It is the 2nd largest location of the four Suitable CFA Location evaluated.

CRITERIA

- **Development Regulation Compliance (TM3b)**

See Table 6 on the following page. The Riverbend Suitable CFA contains three base land use districts, R-2 | R-2 Residential, MUC | Mixed Use Commercial, and MS | Medical Services. The Riverbend Hospital complex is central to this area and is in the MS base land use district. The west portion of the area is mostly MUC with some R-2, and the north part of the location is largely R-2, as are smaller areas to the east and south.

The base land use districts present are mostly low in compliance with CFA rules. This Suitable CFA Location is also completely covered by the ND | Nodal Development overlay district. The ND overlay district distinction transitions these “low” compatibility base land use districts (R-2 and MS) into medium compliant base land use districts.

For these reasons the Riverbend Suitable CFA Location rates second lowest among the four CFAs for Development Regulation Compliance.

- **Dwelling Unit Capacity (TM3c)**

Using all zoned areas, the Riverbend location meets **20%** of needed housing capacity as a Primary CFA and 11% of needed housing capacity as a Secondary CFA. These relatively lower percentages make the Riverbend Suitable CFA Location the second lowest rated of the four for Dwelling Unit Capacity.

TABLE 6. DEVELOPMENT REGULATION COMPLIANCE – RIVERBEND

Land Use Districts and Overlays, All Codes	CFA Area (Acres)	OAR 660-012-0320(2) Compliance --Single and mixed uses permitted	OAR 660-012-0320(4) Compliance -Gov. facilities	OAR 660-012-0320(5) Compliance -Block length	OAR 660-012-0320(6) Compliance -No density max	OAR 660-012-0320(7) Compliance -Transportation	OAR 660-012-0320(8) Primary Density Compliance -Min of 25 du/acre	OAR 660-012-0320(8) Primary Height Compliance -over 85' allowed	OAR 660-012-0320(8) Secondary Density Compliance -Min of 15 du/acre	OAR 660-012-0320(8) Secondary Height Compliance -Over 50' allowed
MS/ND	46.38	Medium+	High	Medium	High	High	High	High	High	High
MUC/ND	51.97	Medium+	High	Medium	High	High	Medium	Medium	High	High
R-2	0.60	Medium+	Medium	Medium	Low	Medium	Low	Low	Medium	High
R-2/HD/ND	0.33	Medium	Medium	Medium	High	High	Medium	Low	Medium	High
Total	175									

- **Supportive Adjacent Uses (TM4)**
 1. In, or Near, High-Density Mixed-Use Areas

The McKenzie River establishes the eastern boundary of the Riverbend Suitable CFA Location. The areas bordering the Location on the north are zoned Campus Industrial with pockets of R-2. R-1 constitutes the majority of adjacency to the south and west. On the whole, the Location’s adjacent uses are not strongly supportive.

2. Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities

Willamette River to east, hospital grounds, agricultural open space to north. The Riverbend Suitable CFA has a relatively weak proportion of, and proximity to, Parks, Open Space, Plazas and Similar Public Amenities. For the reasons noted above, the Riverbend Suitable CFA Location is rated last among the four areas in the category of supportive of adjacent uses in or near high density mixed use areas, and second to last for adjacent supportive uses containing, or near parks, open space, plazas or similar public amenities.

CONCLUSIONS

All Suitable CFA Locations were found to already meet the following absolute criteria.

- **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 Active Transportation and 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

The following section ranks the Suitable CFA Locations under each criterion and then ranks them in the order of most promising overall. Ranking is based on associated summary tables (either within this memo or other memos), or relatively objective observation (e.g. adjacent uses).

Most Promising Suitable CFA Locations by Criterion

- **Development Regulation Compliance (TM3b)**
 1. Glenwood Riverfront
 2. Downtown
 3. Riverbend
 4. Mohawk

- **Dwelling Unit Capacity (TM3c)**
 1. Downtown
 2. Glenwood Riverfront
 3. Riverbend
 4. Mohawk

- **Supportive Adjacent Uses (TM4)**
 - In, or Near, High-Density Mixed-Use Areas
 1. Downtown
 2. Glenwood Riverfront
 3. Mohawk
 4. Riverbend

 - Containing, or Near, Parks, Open Space, Plazas, or Similar Public Amenities
 1. Downtown
 2. Glenwood Riverfront
 3. Riverbend
 4. Mohawk

Most Promising Suitable CFA Locations Overall

1. Downtown and Glenwood Riverfront
2. Riverbend
3. Mohawk

City of Springfield
Climate-Friendly Areas Study

CONCLUSIONS AND RECOMMENDATIONS

To: Springfield CFA Study Project Team

From: Lane Council of Governments

Date: November 15, 2023

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BACKGROUND

The Technical Memoranda in this CFA Study were developed as part of a process to identify and refine potential CFA areas in Springfield to those areas that are “Most Promising” as CFA locations in the Spring and Summer of 2023. With this completed Study, Springfield has addressed the first phase of Oregon’s two-phased CFA process. The Study provides the City and DLCD with a general evaluation of how Springfield’s “Most Promising” CFA Locations measure up against the land use requirements of OAR 660-012-0310, 0315 and 0320.

The second phase will involve Springfield’s final selection of designated CFAs, and Springfield’s adoption of development standards for those areas. As noted in the Study, the CFA 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 rule also requires cities to take steps to address long-standing inequities in land use, zoning, and transportation investment (and disinvestment) decisions in the state of Oregon. The expectations of Phase 2 are most specifically outlined at OAR 660-012-0315(6). They are also summarized in DLCD’s CFA Methods Guide, available through DLCD’s website, www.oregon.gov/lcd/.

Following is a summary of key conclusions and recommendations from the Phase 1 CFA Study, organized by topic:

CFA EQUITY

CONCLUSIONS

Demographic Context:

Data from various sources has been collected to document the presence of each of the historically marginalized communities in Springfield as listed in OAR 660-012-0125(2) (referred to as ‘underserved populations’). In particular, the presence of low- and moderate- income renters exist in Springfield at a significantly higher rate than in Oregon overall. As Springfield 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 may 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. Due to the lack of quantitative data, there is a lack of representation for these historically marginalized community groups. This may be aided by collecting qualitative data during community engagement efforts.

Displacement Risk in Potential CFAs:

Indicator Set Maps 1-3 in Tech Memo 2a depict concentrations of low-income households, vulnerable people, and older or multi-unit housing throughout Springfield. Indicator Set Maps 4 and 5 in Tech Memo 2a also depict areas where the housing market has been active and the

demographics have shifted over time. The designation of CFAs will result in increased density allowances and could result in further public investment in CFA locations. Public investment and changes to the built environment typically contribute to rising rent, home, and property values. Displacement occurs when low-income and vulnerable households can no longer afford to live in their established communities.

When the displacement risk indicators discussed in Tech Memo 2a are combined to form area typologies, it can provide an indication of which locations in Springfield are likely especially vulnerable to displacement today (Map 6). City-wide, all area typologies are present except Becoming Exclusive. Within the Suitable CFAs (mapped in Tech Memo 3a) the most prevalent area typologies are No Risk Identified, Active Gentrification and Vulnerable. Both the Active Gentrification and Vulnerable area typologies indicate the presence of low-income, vulnerable people, and older or multi-unit housing (these area typologies differ in the presence or absence of an active housing market and a demographic shift).

Significant gentrification potential and risk of displacement exists in Springfield, as shown by the presence of indicator populations and area typologies in Tech Memo 2a. The majority of Springfield Most Promising CFAs include areas with elevated risk of displacement of historically marginalized community groups. Implementation of CFAs without concurrent displacement mitigation measures (such as investments in affordable housing and strong renter protections) would likely exacerbate increased risk of displacement for historically marginalized community groups.

RECOMMENDATIONS

Area Profiles: Area profiles, with area specific tabular data 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 Area Profiles could 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 Affordable/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 used to inform CFA designation and generally improve equity understanding.

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 influence gentrification and the risk of displacement for historically underserved populations. These maps could complement the area profiles.

Business Displacement Risk: 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. The current CFA anti-displacement analysis was limited by a lack of available localized census data for analyzing business displacement. It is recommended that the City investigates 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.³

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.

Fair and Equitable Housing Policy Context: The City of Springfield has a range of existing tools that could be used to aid in displacement mitigation when it comes time to designate CFAs. When it is time to choose appropriate displacement mitigation measures for designated CFAs, it is advisable to consider the existing policy context and ensure new programs and/or tools align with established policies.

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) should be addressed when finalizing a plan to achieve fair and equitable housing outcomes. There are a variety of factors to consider when creating a plan to identify mitigation actions intended to achieve fair and equitable housing outcomes within CFAs, as required by the CFA rules. The “Housing Production Strategy Program - List of Tools, Actions, and Policies” contains approximately 110 tools/actions/policies across six categories, plus the option for jurisdictions to come up with additional custom actions. The mitigation measures listed in DLCD’s *CFA Methods Guide* should be compared to existing measures that the City already has in place.

Consideration of Equity in selecting Final CFA Location(s): Areas identified as Most Promising CFA locations are in existing or currently planned urban centers that are also supported by existing or planned high-quality transportations services and not in areas with unmitigated natural hazard risks. This analysis has explored the displacement risk in those locations. However, 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 transportations 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.

CFA LOCATION CONFIGURATION COMPLIANCE

CONCLUSIONS

Overall Size: All of the four final Most Promising CFA locations are more than 25 acres in size. 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).

Minimum CFA Width: All of the four final Most Promising CFA locations meet the minimum width requirements outlined at OAR 660-012-0310(2)(f) and analyzed and depicted in detail in Tech Memo #3a.

CFA LOCATION CODE AND POLICY COMPLIANCE

CONCLUSIONS

Relative Compatibility of Land Use Districts and Suitable CFAs: Table 11 in Tech Memo #3b provides an aggregated summary of the relative compliance of each applicable Springfield land use district with applicable rule subsections, outlined in OAR 660-012-0320.

The Springfield land use districts with the highest existing compliance with OAR 660-012-0320 include Glenwood Mixed Use (excepting the Employment district), Mixed-Use Commercial, Mixed Use Residential, Community Commercial and Booth Kelly Mixed Use. These areas are very close to compliance with the CFA rules and generally “in the spirit” of CFAs presently. These areas also collectively represent 54% of total Suitable CFA area. 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 Springfield land use districts with the lowest existing compliance with OAR 660-012-0320 include R-1, Heavy Industrial, Light Medium Industrial and Glenwood Employment Mixed-Use. 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 23% of total Suitable CFA area.

RECOMMENDATIONS

The Springfield land use districts with the lowest existing compliance with OAR 660-12-0320 will need to be removed from CFAs or adjusted to be compliant. This would largely be a matter of enabling residential uses, which may or may not be practical or tenable. Tables 5, 6, 8 and 9 in Tech Memo #3b highlight specific compliance issues that the City must evaluate for any adjustment.

CFA adjacency to Low Density Residential is something that potentially deserves unique consideration in the identification of “most promising CFAs” in Springfield. 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 Springfield’s Suitable CFAs (any surrounded by R-1) if the City wanted to continue to provide those transitions adjacent to R-1 zones.

Additional consideration should be given to the potential development constraints of overlay districts. The Historic Overlay district, for example, is not appropriate for a CFA boundary due to building height requirements (unless a step-down provision is applicable). Additionally, where the Willamette Greenway Overlay District (WG) is present (Downtown and Glenwood Riverfront Potential CFAs), more thorough analysis of Springfield’s existing and potential Greenway Setback Line(s) (SDC 3.4.280(D)) will refine ultimate CFA capacity.

CFA LOCATION CAPACITY

CONCLUSIONS

All locations, taken together, if considered Primary CFA, easily meet the rule requirement for capacity ($110\% \geq 30\%$). Only the Downtown Most Promising CFA Location has enough capacity to meet the requirement of the rule independently ($47\% \geq 30\%$). The Glenwood Riverfront Most Promising CFA Location is very close with 29%. There are several combinations of the other Most Promising 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.

RECOMMENDATIONS

Springfield staff should work with the filterable “calculator” spreadsheet used to generate CFA capacity (and other) calculations, as well as map data and tools, to further explore the configurations of the Most Promising CFA Location(s) to designate a final CFA.

As noted previously, some zones may need to be excluded from CFAs. The city will need to recalculate suitability (min and opt width, size) if zones are excluded that fragment the suitable CFA location.

OTHER CFA STUDY RECOMMENDATIONS

- *Aim High*
 - Adopt CFA locations that have capacity 2-4 times 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 mandates.
 - All Most Promising CFA Locations are desirable locations for increasing mixed use and residential density as well as enhanced high-quality active transportation and transit services. Consider selecting all Most Promising CFA Locations. Designate Downtown or Glenwood Riverfront as the Primary CFA and the rest as Secondary CFA. This will go far ensure future capacity and encourage a more livable, sustainable polycentric, mixed-use-oriented city.
- *Maximize Park and Open Space Access.* Several Most Promising CFA Locations 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 multi-use paths. The City should pursue CFA(s) designation near the Willamette River riparian corridor and park and trail systems.
- *Favor Connection.* Closely connected CFAs meet the transportation goals for CFAs but also magnify the benefits of each by placing each other’s uses in close proximity to each other. The City should pursue designation of a set of closely connected, centrally located CFA locations. This could include coordinating with City of Eugene to maximize connection to Springfield CFAs via the Willamette River corridor and multi-use paths.

- *Consider Glenwood Master Planning in Final CFA Designation*
 - City of Springfield staff note inconsistency between some “required” CFA designation conclusions and the City’s refinement plan assumptions for the Glenwood area. Further, impacts to possible regulatory amendments should be weighed in consideration of the current master-planning of a segment of the Glenwood Riverfront Suitable CFA. The Glenwood Riverfront CFA’s capacity to accommodate future growth is currently at 29% — just shy of the 30% requirement for CFA communities. City staff and LCOG see value and promise in the City contemplating the following.
 - How Glenwood Riverfront as an area should be a candidate for an alternate calculation method per OAR 660-012-0320(10) – showing how the ROW Set Aside and/or Residential Building Share in GRMU could be adjusted allow Glenwood Riverfront to fully accommodate the required CFA. This can be accounted for in the capacity calculator by changing two columns – (ROW Set Aside (to less than 40% and Residential Building Share to larger than 30% - (GRMU actually requires 70%, others much higher than 30% (site))).
 - Find market defense for the changes. The City could potentially look to nearby similar examples to the west, along Franklin Boulevard, of higher densities supported in close proximity to the UO, as well as EmX, bike path infrastructure.

CLIMATE-FRIENDLY AREAS DESIGNATION PROCESS COMMUNITY ENGAGEMENT PLAN

June 2023



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Climate Friendly-Areas Designation Process

Community Engagement Plan

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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 Springfield, 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 part requires Springfield 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 groups to support an engagement-focused equity analysis.
- 2) **Adoption Phase:** After the study phase, Springfield 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 Plan serves as a guide for when and how to engage stakeholders in the two phases of the CFA Designation process. It lays out:

- The context for the 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 Designation process, along with the engagement objectives and potential tactics for each milestone.
- Guidance for measuring and evaluating the effectiveness of engagement activities.

This plan is intended to provide an overarching framework for engagement throughout the CFA Designation process. Implementation of the strategies and tactics for each milestone outlined in this plan will be tailored based on outcomes of the technical work and the resources available for engagement. By developing and implementing this plan, the City will comply with the state mandates.

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 process¹ 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, 2022², the 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 the CFEC rule requirements. LCDC's stated intent in adopting the CFEC rules was to improve equity, and help community transportation, housing, and planning to serve all Oregonians, particularly those traditionally underserved.

¹ Climate-Friendly and Equitable Communities Outreach and Engagement Report: https://www.oregon.gov/lcd/LAR/Documents/CFEC_Rulemaking_Engagement.pdf

² However, DLCD filed the permanent rules with the Oregon Secretary of State on August 17, 2022.

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 intended to be or become 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 climate-friendly areas. These requirements can be met by adopting and applying the CFEC rules’ minimum standards set forth in the rules, or by a process for local governments to craft the alternative standards that meet the rules’ requirements. It is expected that many of these areas will be established in existing downtowns or other established urban centers.

The rules require that jurisdictions complete the CFA Study phase by December 31, 2023. The rules require the CFA Adoption phase to be complete, by December 31, 2024, unless alternative deadlines are approved by the State.

2.3 Equity Requirements

As part of the CFA Study Phase, the rules require cities to adopt a community engagement plan with an emphasis on reaching out to historically marginalized community groups³ in order to identify and prioritize equitable outcomes.

The rules also require cities to evaluate whether displacement of underserved populations would be likely to result from designation of each CFA and identify strategies to avoid, minimize, or mitigate those risks. This process will use both quantitative analysis and community engagement.

3 GOALS

Community involvement is a pillar of effective governance in Springfield. The following goals will guide engagement through the CFA project and CFA Designation process. How successfully each City can meet these goals will depend in part on project timelines and resources.

³ Historically marginalized community groups (underserved populations) are defined in Oregon Administrative Rules (OAR) 660-012-0125,

- **Build awareness.** Strive for stakeholders, affected interests, and interested 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.** Engage voices of historically marginalized community groups, particularly those disproportionately harmed by past land use and transportation decisions, in ways that best meet their unique needs.
- **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 ideas, critiques, comments, and praise, and report back on how input has influenced the process and decisions and/or why it did not.
- **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

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

Per the state 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 CFA study phase will include focused engagement with these groups to better understand general concerns and opportunities of the CFA process on historically marginalized community groups. Once Springfield has identified more promising CFA locations, engagement would focus on the groups and communities that could be most impacted by potential CFA locations.

4.2 Interested and Impacted Parties

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

- Businesses within potential climate-friendly areas
- Property owners and residents within the potential climate-friendly areas
- Transit providers
- 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
- Neighborhood and business associations within or near potential climate-friendly areas.

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 highlight opportunities to get involved in project-specific involvement opportunities.

City outreach and communication channels (including websites, newsletters, social media, etc.) will be used, as feasible, as a foundation for sharing project information.

4.4 Decision Makers

There are two primary decision-makers for the climate-friendly areas designation process:

- **Planning Commission.** The Planning Commission will approve the Community Engagement Plan for the Designation process and will make recommendations to the City Council on the climate-friendly areas element, including specific locations, to add to the Comprehensive Plan, as well as zoning and code amendments to comply with CFEC rules. The Planning Commission will receive regular updates and briefings on CFA technical work and engagement throughout the process.
- **City Council.** The City Council will ultimately approve final land use amendments for the City. The City Council will receive regular updates and briefings on CFA technical work and engagement throughout the process.

If a Climate Friendly Area is located outside the city limits, then Lane County will need to co-adopt the Comprehensive Plan and zoning and code amendments, thereby involving the Board of Commissioners.

5 ENGAGEMENT TOOLS AND ACTIVITIES

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

This list includes a summary of potential tools 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?⁴
- **Reach:** What is the breadth of public input that can be expected from this tool? (Broad, Medium, Focused)

⁴ The level of engagement listed for each activity uses the definitions from the International Association of Public Participation's [Spectrum of Public Participation](#), an internationally recognized tool for defining the public's role in participation processes.

- **Resource Level:** What is the level of staff and financial resources required to implement this tool? (High, Medium, or Low)

Section 7 of this document provides a proposal for how and when to use these tools throughout the CFA engagement process.

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 Climate-Friendly Areas and what these areas could look like in the future

Level of Engagement	Inform
Reach	Broad
Resource Level	Low

based on new rules and regulations. They can be developed in a variety of mediums including:

- Project fact sheets
- Project webpage or website
- Email and social media notifications
- News releases
- Maps and Infographics
- Mailings

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.⁵

⁵ 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.

Level of Engagement	Inform/ Consult
Reach	Broad
Resource Level	Medium

Webinars could also be used at the end of the study phase to share the findings of the study.

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 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

Level of Engagement	Consult
Reach	Medium
Resource Level	Medium

in tandem with attending community events to solicit input on housing and transportation needs, or desired outcomes for the designation of climate-friendly areas. 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.

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 potential climate-friendly areas and understand larger sentiments on the project from different geographic areas or demographic groups. Once a list of potential 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 as a way to encourage participation and show appreciation for the participants' time and effort.

5.8 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 what/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 also 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/valued. Follow up with the community member after the interview to answer questions and show their feedback was valued.

5.9 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. 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 potential climate-friendly areas.

Level of Engagement	Consult/ Involve
Reach	Focused
Resource Level	Low

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 also 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.

5.10 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 potential locations for climate-friendly areas 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 also 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.

5.11 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 climate-friendly areas can be a useful way to gather input from key community leaders.

Level of Engagement	Collaborate
Reach	Medium
Resource Level	High

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*.⁶

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 are able to 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.

5.12 Advisory Group or Committee

An advisory committee could be formed to recommend climate-friendly areas 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

⁶ Anti-displacement Toolkit Guide: https://www.oregon.gov/lcd/CL/Documents/Guidance0315_CFAAntiDisplacement.pdf

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, Springfield staff will engage with their City Councils/Planning Commission to keep them informed about the process and solicit guidance at key milestones. Final decision on the designation of climate-friendly areas 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 WITH HISTORICALLY MARGINALIZED COMMUNITY GROUPS

As part of the early CFA study phase, Springfield 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 reflected the following groups:

- Springfield Eugene Tenants Association
- Asian Celebration and Disorient Film Festival
- ShelterCare
- National Association for the Advancement of Colored People (NAACP of Lane County)
- Lane Independent Living Alliance
- American Association of Retired Persons
- United Way of Lane County
- Lane Education Service District Migrant Education Program
- TransPonder
- Springfield School District

Below is a summary of the common themes that these community leaders shared on how to best engage with their communities.⁷ 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 These takeaways also include information from Stephanie Tabibian's (Indigenous Communities liaison) summary report from the Tribal Community Planning Dialogue Event hosted by Willamalane Park and Recreation District and City of Springfield on 10/22/22 to inform how to approach tribal engagement.

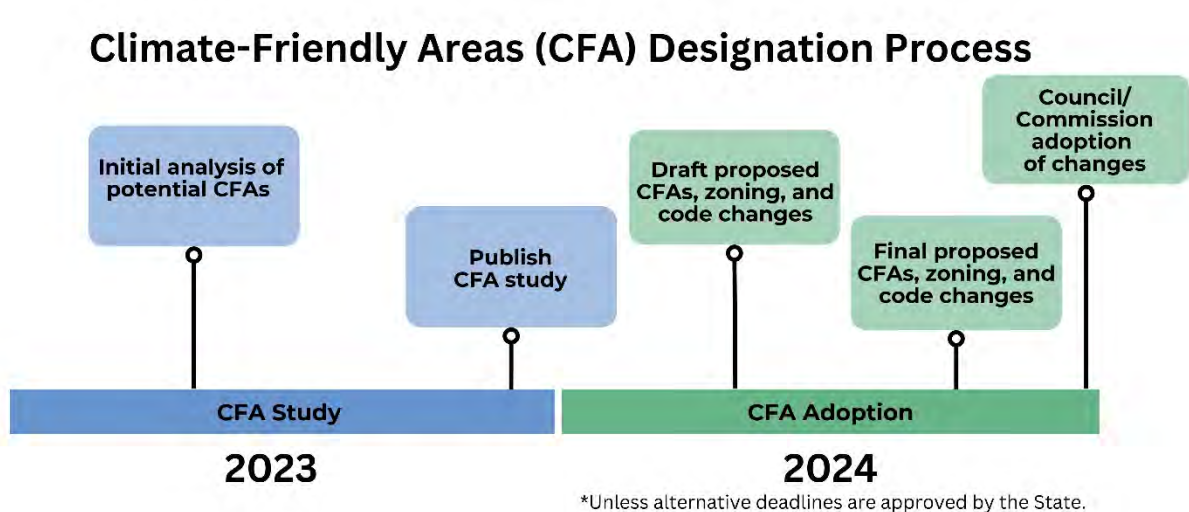
- **Engage communities on their terms.** Strive to reduce barriers to engagement as much as possible by ensuring the needs of the participating community members and families are met. This can be:
 - Engaging communities at their meetings, events, and activity centers.
 - Providing refreshments and free food when possible.
 - Consider kid-friendly events with childcare or activities for young people.
 - Offer 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, have presenters or speakers communicate in the same language as the meeting participants and avoid having a translator alongside a speaker.
 - Consider when translation and interpretation is needed.
 - If possible, offer compensation or incentives for community members to participate.
 - Provide ample time to advertise events and input opportunities, aim for six weeks in advance as a goal.
 - Update people on how their input was used.
- **Do the work to establish trust and build relationships.** 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 solutions.** 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, the steps in the process, 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 r 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-extrapolating individual input as representative of entire

demographics. Strive for diverse representation in all engagement activities and celebrate intersectionality.

- **Continually evaluate and revise engagement strategies.** Meaningfully engaging diverse audiences means always looking for new opportunities, channels, and communication techniques to connect with people. Evaluate your engagement strategies to understand who is and who isn't at the table and seek constructive feedback and input on how your agency can do better. Don't be scared to step outside of our comfort zone a little and try something new!

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 Springfield could use within each milestone. Actual engagement activities will depend on available resources at the time of engagement.



CFA Study		
Initial Engagement: Winter 2023 – Fall 2023 (Inform/consult)		
Engagement Objectives		Potential Engagement Tactics
General Public	Historically Marginalized Community Groups	
<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 • Identify displacement risks <ul style="list-style-type: none"> • Preferences for displacement mitigation strategies 	<p>General Public</p> <ul style="list-style-type: none"> • Establish and update webpage • Project factsheet (<i>as needed</i>) <p>Historically Marginalized Community Groups</p> <ul style="list-style-type: none"> • One-on-one interviews • Listening sessions • Community events/intercept survey • Factsheet (<i>translated as needed</i>) <p>Interested Parties</p> <ul style="list-style-type: none"> • Briefings <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission approval of CEP • City Council briefing

Publish CFA Study: Winter 2024 (Inform)		
Engagement Objectives		Potential Engagement Tactics
General Public	Historically Marginalized Community Groups	
<ul style="list-style-type: none"> • Share results of study, including: <ul style="list-style-type: none"> • Potential 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"> • Potential 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 updates • Link to full study • Factsheet of key elements from study, including maps • Email/social media updates • Open House (virtual/in-person) <p>Historically Marginalized Community Groups</p> <ul style="list-style-type: none"> • Email update • Briefings • Outreach toolkit • Factsheet (<i>translated as needed</i>) • Community events/intercept survey <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 Adoption		
Draft Proposed CFAs: Spring-Summer 2024 (Inform/Consultant)		
Engagement Objectives		Potential Engagement Tactics
General Public	Historically Marginalized Community Groups	
<ul style="list-style-type: none"> • Share draft proposed CFAs and proposed zoning and code changes • Seek input on proposal 	<ul style="list-style-type: none"> • Share draft proposed CFAs and proposed zoning and code changes • Seek input on proposal • Share how equity considerations informed the proposal • Identify any critical concerns or issues that need to be addressed 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage updates with study • Informational handout to outline changes • Email/social media updates • Open House (virtual/in-person) • Online comment opportunity (survey/questionnaire) • Community events <p>Historically Marginalized Community Groups</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, residents, and business owners within proposed CFAs • Briefings • One-on-one meetings <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission briefing • City Council briefing

Final Proposed CFAs: Summer-Fall 2024 (<i>Inform/Consultant</i>)		
Engagement Objectives		Potential Engagement Tactics
General Public	Historically Marginalized Community Groups	
<ul style="list-style-type: none"> • Share details of final proposed walkable-mixed use areas 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 	<ul style="list-style-type: none"> • Share details of final proposed walkable-mixed use areas 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 	<p>General Public</p> <ul style="list-style-type: none"> • Webpage updates • Informational handout • Email/social media updates • Public Hearing <p>Historically Marginalized Community Groups</p> <ul style="list-style-type: none"> • Email update • Direct outreach (phone, direct email) • One-on-one meetings with key stakeholders <p>Interested Parties</p> <ul style="list-style-type: none"> • Direct mail campaign to property owners, residents, and business owners within proposed CFAs • One-on-one meetings with key stakeholders <p>Decision-Makers</p> <ul style="list-style-type: none"> • Planning Commission recommendation • City Council decision

8 KEY MESSAGES

Using key messages throughout project communications helps maintain consistent messaging about the project’s goals and outcomes. These messages can appear on

written communications and serve as talking points and can adapt to include feedback and themes from various phases of the project.

Overview

- A new State program called Climate Friendly and Equitable Communities requires Springfield and other metropolitan cities in Oregon to find spots in our communities that are a good fit for being "Climate-Friendly Areas." This work will take several years to select the right locations.
- The vision for "Climate-Friendly Areas" is to reduce air pollution by creating or improving neighborhood centers so people can meet most of their daily needs without relying on a car. The State's requirements define important features of these areas which include:
 - More opportunities for development where people can live, work, shop, and play.
 - Easier and safer ways for people to walk, bike, roll, and take transit by making sure our streets, sidewalks, and paths are high-quality for everyone they serve.
 - Practical strategies to avoid or minimize the need for people to relocate elsewhere due to rising housing costs, and to preserve and increase affordable housing options.
 - Less off-street parking to free up land for housing, businesses, and other services.
- Some climate-friendly areas may not have all these characteristics yet, but the goal is to encourage them to transition into these types of areas over time.
- This work will build on existing planning work that the City has already done to identify key neighborhood centers in places like Downtown, Glenwood, Mohawk, and Gateway.

Process

- Through 2023, the City will study potential locations that meet State requirements and align with the City's existing plans and policies. For each of these locations, we will try to understand the level of risk each has of people needing to move elsewhere because of rising housing costs and will identify possible solutions for addressing this concern. The City will share the results from this study at the end of 2023, along with a list of potential locations for Climate-Friendly Areas.
- When the study is complete, the City will start a decision-making process to select Climate-Friendly Areas with our community and Springfield's appointed

and elected officials. This work will eventually lead to action by City Council to adopt these areas.

- Creating Climate-Friendly Areas will include changes to land use and zoning rules and Springfield's Comprehensive Plan. These changes will aim to allow and encourage creating places that are easy to get to by ways other than driving.
- Climate-Friendly Areas will also be important as the City works on future efforts to meet transportation priorities and housing needs in our region. This includes:
 - **Scenario Planning:** An exercise for exploring an area's long-term future and how to best plan for reducing greenhouse gas emissions. As part of this, the City will look at how different policies might support growth and development in Climate-Friendly Areas.
 - **Transportation System Plan:** A blueprint for the City's transportation investments over the next 20 years. As part of updating the Plan, the City will identify key investments to ensure Climate-Friendly Areas are safe and easy to get around without a car.
 - **Planning for Housing:** Climate-Friendly Areas will be sized to accommodate at least 30 percent of existing and future housing needs over the next 20 years.

Equity

- Throughout the process and in line with Climate-Friendly and Equitable Communities requirements, the City will center the voices of historically marginalized community groups, especially those who have been harmed by past planning, climate, and transportation decisions.
- The City recently interviewed community leaders to gather input on how to best engage historically marginalized community groups in local transportation and housing planning projects. The feedback from these interviews will guide how the Springfield community can engage with this project and with future planning efforts.
- A challenge we may face as a result of creating Climate-Friendly Areas is putting some vulnerable populations at risk of displacement as new development takes place in these areas over time. Early on in the project, an analysis identified vulnerable populations across Springfield. From there, we can identify strategies to help prevent or reduce potential displacement.

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 people engaged in the project 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 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 find that the outreach is not repetitive to previous outreach or projects?

Equity Focused

- Are underserved communities represented in engagement events and activities?
- Is input from underrepresented communities clearly highlighted and shared with the project team?
- Is input from underrepresented communities centered in the process and informing the 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 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 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
Lane ESD 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 incomes 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 # 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 on 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 a 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 review 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 gathers 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 works 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 get 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 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 have to 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 out 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.