

From: [Robert Cortright](#)
To: [CityRecorder](#)
Cc: [Lisa Anderson-Ogilvie](#); [Eunice Kim](#); [Jim Scheppke](#); [Phil Carver](#); [Laurie Dougherty](#)
Subject: Public Comment for 9/25 City Council Meeting
Date: Monday, September 25, 2023 4:09:03 PM
Attachments: [350 Salem on CFAs \(1\).pdf](#)

Please provide the attached comments to the City Council for their meeting this evening.
Comments from 350 Salem address Agenda Item 61 regarding the Climate Friendly Areas Study.

I plan to attend in person to orally present these comments to the Council.

Bob Cortright

503.269.6029



350 Salem OR¹ Comments on the Climate Friendly Area (CFA) Study - Agenda Item 6a
Bob Cortright, Land Use and Transportation Coordinator
September 25, 2023

Greetings to the Mayor, City Council members and Staff

350 Salem recommends that the city study and consider designating additional Climate Friendly, Walkable Mixed Use areas (CFAs or WaMUAs) in order to meet the city's climate and housing goals and to fully meet the goal in LCDCs Climate Friendly and Equitable Communities (CFEC) rule to get 30% of all of the city's housing in such areas.

To meet our climate goals, we need to accommodate a large share of the city's housing and jobs in highly walkable, mixed neighborhoods, where because common destinations are easily accessible, people are able to drive less and can easily walk, bike or take transit to meet daily needs. The state's CFEC rules direct larger urban cities to plan to accommodate 30% of all housing units in CFAs - which for Salem translates into a total of roughly 30,000 housing units in CFAs within the next 20-25 years.

As outlined in comments we submitted to the Planning Commission in March -attached - the city's CFA study proposes too few CFAs with too little real development capacity to meet the 30% goal. Under current plans the three proposed CFAs - downtown, North Downtown, and close-in West Salem - are expected to have a total of only about 3,000 to 4,000 housing units over that planning period, a fraction of our climate friendly housing goal. This has happened because the study uses the so-called "prescriptive method" in the CFEC rules which, in practice, dramatically over-estimates housing capacity in downtown and West Salem. The city can and should correct this by reviewing adopted plans to prepare a more realistic, achievable estimate of the housing capacity of proposed CFA areas - as allowed by CFEC rules. Using this revised estimate, the city should consider and designate additional CFAs to provide enough real capacity for the city to meet the 30% goal in the CFEC rules. Finally, we recommend that the city develop and adopt specific housing goals for each CFA area to guide the city as it develops and adopts other plans to achieve the 30% goal.

We appreciate the opportunity to comment.

Attachment: March 21, 2023 Memo to the Salem Planning Commission

¹ 350 Salem OR is a local chapter of 350.org, an international non-profit dedicated to reducing climate pollution and human-caused climate disruptions, such as the 2020 Labor Day Santiam Canyon wildfire, the June 2021 heat dome event and the 2023 "fir-magedon" dieoff of true fir trees in central and eastern Oregon.

March 21, 2023

TO: Salem Planning Commission

FROM: Bob Cortright, West Salem

SUBJECT: REVIEWING SALEM'S CLIMATE FRIENDLY AREA STUDY

Last week, staff posted [technical memos](#) on the city's website that calculate the housing capacity of four possible Climate Friendly Areas (CFAs). A quick review - provided below - shows that the analysis dramatically over-estimates the potential for housing in these areas: with estimates that are more than 15 times the amount of housing that adopted city plans forecast will occur. The Planning Commission should review the draft CFA study and encourage the city to revise the study to (1) develop a more reasonable, realistic estimate of housing capacity in these areas (2) expand the study to consider additional areas as CFAs.

Background

The goal of CFA planning is to identify and designate Climate Friendly Areas - mixed use areas that are highly walkable, bikeable and transit friendly - to accommodate 30% of the city's housing units. That's a total of about 26,000 housing units by 2035.

CFA capacity assessments are guided by DLCDs CFEC rules. While the CFEC rules include the "prescriptive method" used in the current analysis, they also allow cities to use alternative methods that better reflect local plans and conditions. In January, 1000 Friends and I wrote to Salem staff and other metropolitan cities alerting them to likely problems with DLCDs "prescriptive method" and [recommending use of the alternative option](#) allowed by the CFEC rules.

Review of the Preliminary CFA Capacity Estimates

As outlined in the table below, the current technical memos dramatically over-estimate the capacity of the four potential CFAs:

- Estimated densities are unreasonably high: they assume that CFAs will develop and redevelop at an average of more than 60 units per acre.
- The estimated housing capacity of the four CFAs is more than 15 times higher than what is currently expected in adopted plans. Staff estimate capacity for more than 55,000 housing units in these areas while existing plans estimate there will be only about 3,100 housing units.
- Accommodating 26,000 housing units in these four areas would require that the city plan for roughly 23,000 more housing units in these areas than are called for in existing plans. For comparison, that's essentially 100% of all new housing units that the city expects by 2035.²

² Salem Housing Needs Analysis, cited on page 4 of [CFA Tech Memo #1](#)

| Preliminary CFA Capacity Study versus Current Adopted Plans | | | | | |
|--|--------------|---|----------------------------|---|-----------------------------------|
| CFA Study Area | Acres | Estimated Capacity (Potential Units) | Average CFA Density | Current Plans Forecast³ | CFA Study v. Current Plans |
| Downtown | 252 | 19,638 | 78 units/acre | ~1500 | ~18,000 |
| West Salem | 142 | 9821 | 70 units/acre | ~500 | ~9300 |
| Comm/Liberty | 191 | 8846 | 46 units/acre | ~300 | ~8500 |
| Lancaster | 301 | 16,957 | 56 units/acre | ~800 | ~16,000 |
| Total | 886 | 55,262 | 62 units/acre | 3100 | 51,000 |

In addition, [Salem Breakfast on Bikes review](#) of the CFA study illustrates the extraordinary scale and pace of development that would be needed to achieve the capacity called for in the staff estimates.

Recommendation

The purpose of the CFA study and subsequent planning is to guide changes to city plans to accommodate at least 30% of all housing in the city in Climate Friendly Areas. Getting this amount of housing, as well as lots of other development in these highly walkable, mixed use areas is critical - and foundational - to achieving the 20-30% reduction in vehicle miles traveled (VMT) per capita that is needed to meet GHG reduction goals.

The city needs to make realistic estimates of the capacity of CFAs and include enough land in CFAs to meet these goals. DLCDS CFEC rules allow the city to choose an alternative method that more accurately reflects local plans and conditions. The city should take advantage of this option and also expand the scope of the CFA study to consider other areas as potential CFAs in order to realistically meet the 30% goal.

³ This is a rough calculation that I prepared based on a review of the housing allocations to “transportation analysis zones” (TAZs) included in SKATS draft Metropolitan Transportation Plan. These estimates reflect local planners estimates of the expected results of adopted housing plans. The MWVCOG tech memos do not include information on either the number of existing housing units in the potential CFAs or the number expected under existing plans.