

September 27, 2023

Rep. Pam Marsh, Chair
House Committee on Climate, Energy & Environment
900 Court Street NE
Salem, OR 97301

Dear Chair Marsh and Members of the Committee:

As Mayor of the City of Springfield, I want to express my appreciation for the Legislature's continued interest in the Climate Friendly and Equitable Communities (CFEC) rules and I hope that we can work together to address the continued obstacles faced by cities like Springfield in advancing the goals of creating more climate-friendly and equitable communities.

Today I will highlight the disconnection between CFEC and HB 2001 that the Legislature passed in the last session. HB 2001 calls for an updated Oregon Housing Needs Analysis (OHNA) and directs local governments to prioritize housing production. However, the CFEC rules - even the most recently amended ones - prioritize reducing vehicle miles traveled (VMTs). The CFEC rules, in effect, prevent cities from prioritizing housing development in three ways:

1. The CFEC rules prioritize future, uncertain, and likely expensive high-density development in climate-friendly areas (CFAs) over what we need, which is near-term, low- or middle-density development within CFAs or elsewhere in the city.
2. The CFEC rules make it harder to build housing in existing areas on the outer edges of UGBs or new UGB areas because the new road networks that will be needed to serve those areas are likely prohibited under the rules strict limits on increases in vehicle miles traveled per capita, including minor increases needed to allow for new housing for the existing population.
3. The CFEC rules have and will continue to require an incredible amount of local government resources dedicated to implementation. If the rules are not fixed to account for local government needs and resources comprehensively, then Springfield's resources will be spread too thin to focus on the housing production requirements under HB 2001, with the urgency pressed by the Oregon Legislature.

The agency may offer to help with resources or grants. The agency has also given verbal suggestions that our concerns will be addressed during the OHNA rule-making process or in another CFEC amendment process. Please understand why statements to this effect do not provide certainty for governments who must follow what is written in the regulatory rules.

Money and technical support from DLCD staff are not the answer. This policy issue needs to be addressed first, and then we can discuss resources.

Furthermore, our one planner is expected to have knowledge and expertise on the CFEC rules and, as OHNA is underway, that process, too. But there is not one person in the state who is knowledgeable about it all - and leading the efforts where significant overlaps exist, and there needs to be integration.

We want these rules to work. We want to meet the needs of our community in a way that helps mitigate the impacts of climate change and accelerate our efforts to close the homeownership gap.

Our frustration is not personal against anyone in the state. Still, it is personal for the people in Springfield that I took an oath of office to serve, and our resources are being spread thin to be the opposite of efficient under this current process.

I hope that this opportunity with OHNA can be capitalized to reset this work as one aligned package - and we can end the wasted time and resources on a bifurcated process to address our state's housing crisis while advancing equity and creating more climate-friendly communities at the same time.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean VanGordon". The signature is stylized with a large, looped "S" and "V" and a trailing flourish.

Sean VanGordon
Mayor, City of Springfield