

TO: CEPAC

From: Gary Shaff

Date: 9/2/2024

RE: Conceptual phase-out of gas-powered lawn and garden equipment

The gas-powered lawn and garden equipment (GLGE) subgroup has been meeting over the past several months to explore:

- 1) the impacts of GLGE on the environment and human health,
- 2) various strategies to phase-out some types of GLGE, and
- 3) to establish a conceptual time-frame for their phase-out.

Additionally, the GLGE subgroup has discussed and now believes that a GLGE incentive program will be an essential part of any successful phase-out strategy.

The following are attached:

- 1) The subgroup's draft Strategy to Phase-out GLGE,
- 2) A draft flyer announcing the GLGE phase-out open house (public engagement meeting), and
- 3) A draft invitation to the community and licensed lawn and garden maintenance firms to attend the open house.

The subgroup proposes, subject to CEPAC's endorsement, to hold an Open House on September 25, 2024 from 3:00 to 5:00 in the Gresham Room of the Ashland Public Library. It will not be a public hearing. Rather, It will be an opportunity for the subgroup to gain the public's perspectives on the phase-out strategy.

The subgroup will compile all comments and suggestions into a report. While it is impossible to know the level of support or opposition to the strategy, it is anticipated that the subgroup will recommend, at CEPAC's October 10th meeting, that CEPAC request a study session with the City Council to review the strategy and findings, and explore next steps. It is also possible the subgroup will simply recommend dropping the entire concept or modifying it based upon the public input.

Engaging the public, in an informal way, and fostering a discussion about GLGE is critical to the subgroup's decision-making process and ultimately that of the CEPAC.

Ashland Climate and Environment Policy Advisory Committee

- Strategy to Phase-out Gas Powered Lawn and Garden Equipment -

July 19, 2024 (updated 8/16/24)

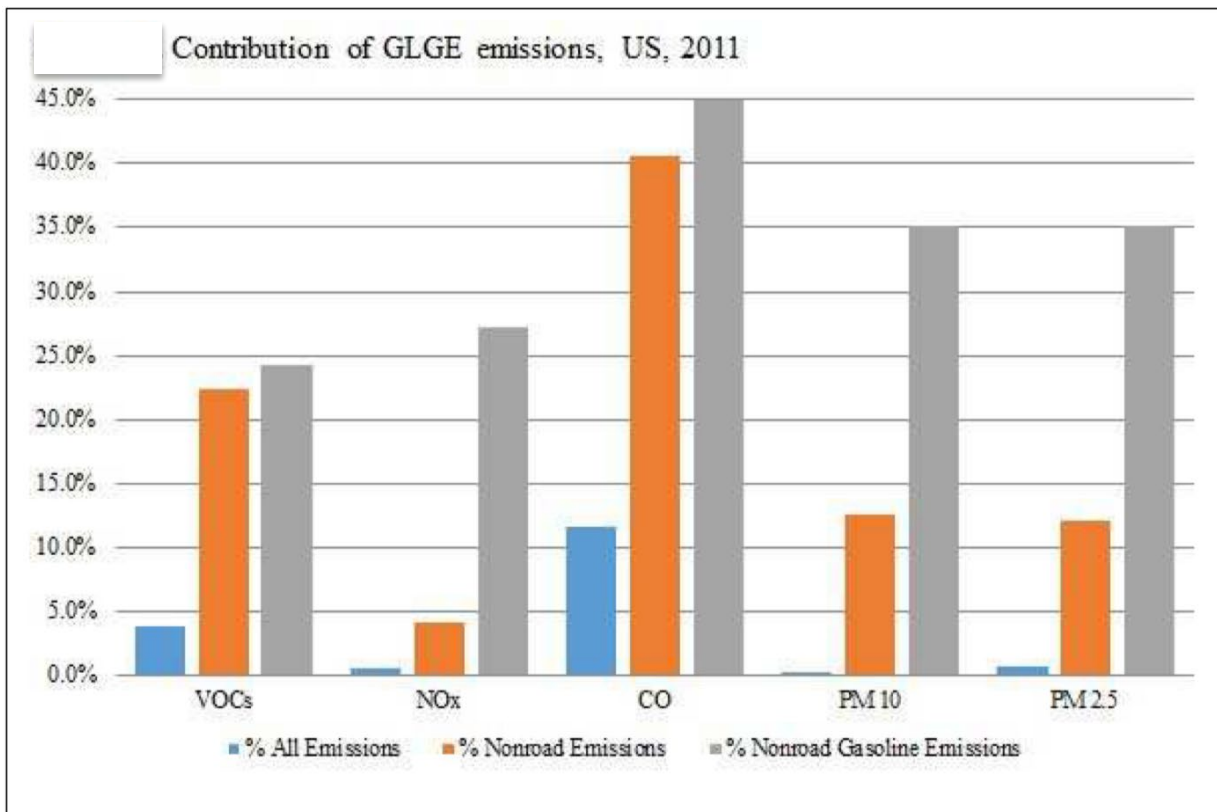
FINAL DRAFT

Why phase-out the use of gas-powered lawn and garden equipment (GLGE)?

To reduce greenhouse gas and other pollutant emissions,¹ protect human health², to protect the natural environment, increase sustainability efforts, and improve the overall quality of life within the City of Ashland.

GLGE equipment is notable for their emission of harmful and climate damaging pollutants. Figure 1, while dated, illustrates GPGE contributions as a percentage of all emissions, non-road emissions, and non-road gasoline emissions.

Figure 1.



Source: National Emissions from Lawn and Garden Equipment, Jamie L. Banks,

<https://environmentamerica.org/oregon/center/media-center/new-report-shows-shocking-amount-of-pollution-from-gas-powered-leaf-blowers-lawn-mowers-in-oregon/>

A 2023 study,³ estimates that GLGE produces 441,000 tons of carbon annually for Oregon, as whole. Distributing that tonnage using a per capita emission rate would mean about 2,300 tons are emitted annually in Ashland.

GLGE Health impacts

Studies show that there are significant health impacts from GLGE on workers and vulnerable populations who are exposed to emissions.

“The high levels of” volatile organic compounds (VOCs) and fine particulate matter (PM10 & PM2.5) “from GLGE are health risks for workers and other members of the public close to the emitting source. Although no studies of grounds maintenance workers were found, studies of gas station workers have shown that regular exposure to gasoline vapors can produce hematological and immunological abnormalities and elevate the risk of cancer.

“In addition, children, seniors, and persons with chronic illnesses are especially vulnerable to the negative health impacts of GLGE emissions. Routine use of GLGE in the vicinity of residential neighborhoods, schools, parks and other public spaces may be exposing the public to unnecessary and preventable health risks.”²

Table 1 and Figure 2 shows activity level and emissions data for GLGE at the national level for commercial and residential operators, respectively.

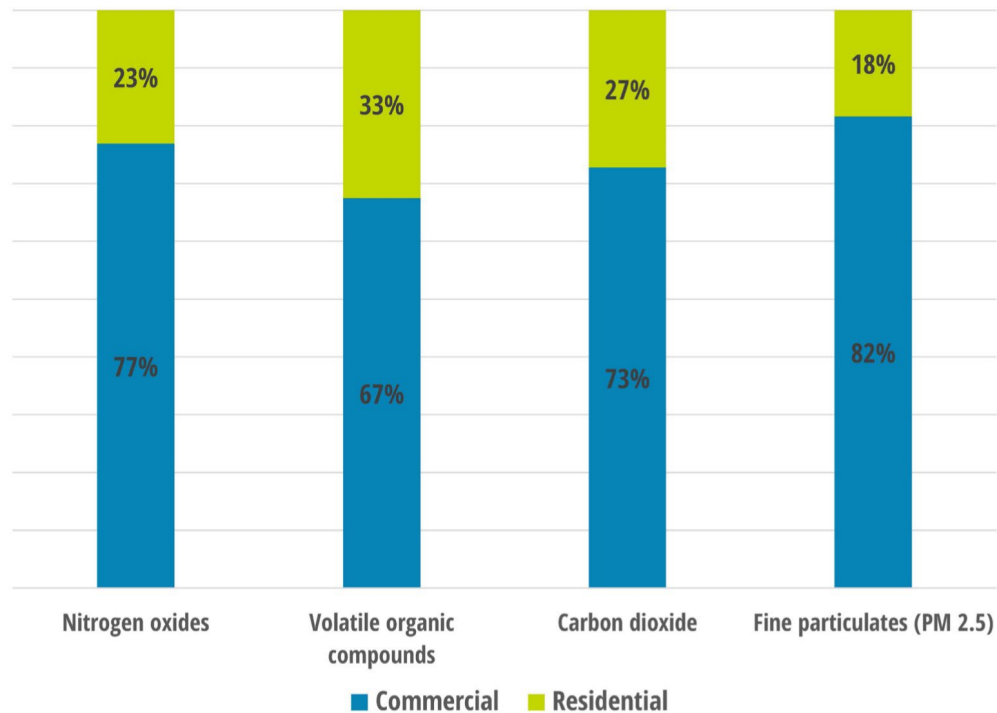
Table 1. Annual hours of use: residential versus commercial equipment of selected GLGE

Equipment type	Use	Activity level (Annual hours)
Lawn mowers	Residential	25
	Commercial	406
Trimmers/Edgers/Cutters	Residential	9
	Commercial	137
Leaf blowers\Vacuums	Residential	10
	Commercial	282
Chainsaws	Residential	13
	Commercial	303

Source: National Emissions from Lawn and Garden Equipment,

The emissions from GLGE, like the hours of operation, are skewed toward commercial equipment.

Figure 2. Share of emissions from commercial and residential lawn equipment



Source: IBID

Who uses GLGE?

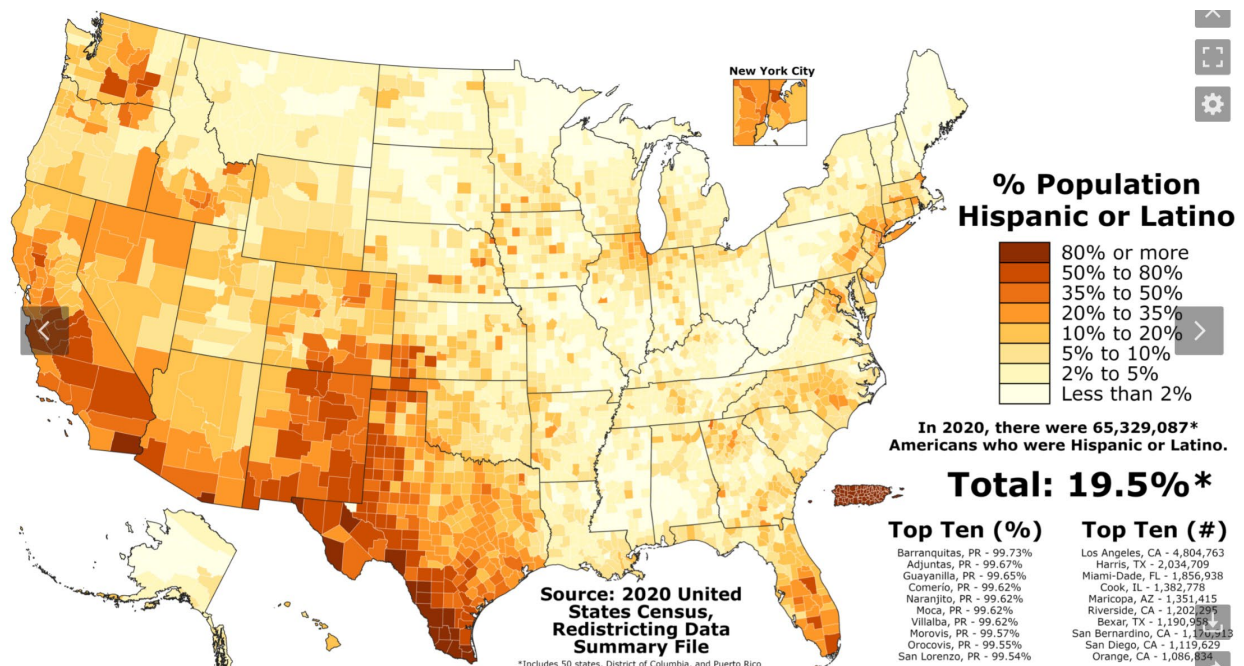
The operation of GLGE is common in the city. Both commercial lawn and garden maintenance firms and homeowners/renters use GLGE. Public agencies, including Ashland School District, City of Ashland (particularly the Parks and Recreation Department) and Southern Oregon University, also use GLGE.

While detailed Ashland specific socio-economic studies of the non-public operators of GLGE is not available, data at the national level provides useful insights. Table 2 provides racial and ethnic distribution of people working in the building grounds cleaning and maintenance occupations. Figure 2 provides an overview of population distribution.

Table 2.

Occupation	2023					
	Total employed	Percent of total employed				
		Women	White	Black or African American	Asian	Hispanic or Latino
Building and grounds cleaning and maintenance occupations	5,534	42.1	78.1	14.3	2.7	41.6
First-line supervisors of housekeeping and janitorial workers	321	44.1	77.2	17.3	2.1	31.8
First-line supervisors of landscaping, lawn service, and groundskeeping workers	283	8.0	84.7	12.0	1.4	30.4
Janitors and building cleaners	2,204	38.7	76.2	16.7	2.6	35.1
Maids and housekeeping cleaners	1,380	88.4	74.0	16.1	4.3	51.9
Pest control workers	90	5.1	84.7	9.2	1.7	21.6
Landscaping and groundskeeping workers	1,119	7.3	84.0	8.6	1.7	49.6
Tree trimmers and pruners	118	3.0	85.3	5.5	1.6	36.7
Other grounds maintenance workers	19	-	-	-	-	-

Figure 2.



Why focus on residential settings and commercial lawn and garden maintenance operators?

Commercial lawn and garden maintenance firms account for the vast majority of GLGE use (see Table 1) In residential neighborhoods the impacts of the operation of GLGE affect not only the operator but also residents of adjacent properties and those living more distant.

GLGE emissions disperse (i.e. drift) onto neighbors' properties and into homes. Noise impacts of GLGE are even more widely dispersed and likely exceed standards/protections provided for in the city's noise ordinance <https://ashland.municipal.codes/AMC/9.08.170>), especially in residential neighborhoods.

Table 3. Noise Levels of Gas and Electric GLGE

Equipment Type	Gas Operated ⁴	Electric
Lawn Mower (non-commercial)	88-94 DBA	75 ⁵ DBA
Weed Whacker (non-commercial)	94-96 DBA	88 ⁶ DBA
Leaf Blower (non-commercial)	95-105 DBA	65-70 ⁷ DBA

GLGE use by public institutions, while equally harmful to operators, have less impact on neighboring properties due the large size of the public's ownerships and isolation relative to residential properties. Further, public institutions vary widely in their missions and priorities. It is anticipated that these institutions will phase out GLGE by 2030 without the city's intervention. The same can't be said of commercial lawn and garden equipment firms

What equipment and when should GLGE be phased-out?

Only equipment with less than 25 horsepower will be phased out under this strategy. Additionally, between now and 2030 the use of the equipment, as specified in Table 4 may continue to be used on lots greater than one-half acre. However, the exception for larger lots will expire in January, 2030 when the equipment listed in Table 4 can no longer be used, regardless of the lot size.

Establishing the scope and timeline for phasing-out of GLGE is essential to allow residents, public institutions and commercial lawn and garden maintenance firms to plan both for the financial and operational changes this transition (from GLGE to their electric/battery operated alternatives) will require. Plans may include setting aside capital, modifying customer pricing, and/or altering service areas.

The following phasing plan recognizes the ever-evolving and improving cost effectiveness of electric and battery powered lawn and garden equipment.

Table 4.

Equipment < 25 Horsepower	Prohibited as of
Gas blowers and string trimmers (i.e. weed whackers)	1/2026 (or 1 year after adoption)
Hedge trimmers, non-commercial chainsaws and lawn mowers	1/2027 (or 2 years after adoption)

The following list of equipment is not subject to the phase-out strategy regardless of horsepower rating:

1. Chippers/stump grinders
2. Tillers
3. Snowblowers
4. Turf equipment
5. Tractors
6. Shredders

Need for, targeting or financial incentives

It is in the public's interest to phase-out GLGE. Cost sharing, at least during a transition phase, is important in order to minimize any financial hardships.

The city's incentive program would include the following:

1. Incentives shall be limited to Ashland residents, and businesses as evidenced by the possession of an Ashland Business License.
2. Incentives shall subsidize all or part of the cost of the electric/battery powered equipment. The actual level of subsidy will be determined based upon available funding and projected demand for the incentive as determined by the city of Ashland.
3. Incentives shall be available during the year that precedes the replacement requirement of GLGE for the specific type of equipment to be phased out. For example, the incentive for leaf blowers shall be limited to the purchase of electric or battery power leaf blowers in the calendar year 2025.
4. Incentives shall only be available at Ashland retailers for the purchase of electric or battery powered equipment, including the purchase of a second battery or extension cord.

1. National Emissions from Lawn and Garden Equipment, Jamie L. Banks, <https://www3.epa.gov/ttn/chief/conference/ei21/session10/banks.pdf>
2. Summary Document: Operator Exposure to Emissions from Lawn and Garden Equipment, California Air Resources Board, October 12, 2018 https://ww2.arb.ca.gov/sites/default/files/2023-08/Exposure%20Study%20Summary%2010-12-2018_0.pdf
3. Lawn Care Goes Electric, Tony Dutzik, et.al. October, 2023 https://publicinterestnetwork.org/wp-content/uploads/2023/10/Lawn_Care_Goes_Electric_Oct23.pdf
4. <https://www.nonoise.org/library/household/index.htm>

5. <https://cleanairlawncare.com/electric-lawn-equipment-is-quiet/#:~:text=Electric%20lawn%20mowers%20and%20lawn,drives%20away%20%E2%80%94%20it's%20pretty%20loud.>
6. <https://egopowerplus.co.uk/ego-news/the-results-are-clear-battery-power-tools-are-a-safer-option-than-petrol>
7. <https://www.leafscore.com/eco-friendly-garden-products/why-leaf-blower-bans-on-the-rise/#:~:text=Noise%20levels,range%20between%2065%20and%2070.>

GAS POWERED LAWN AND GARDEN EQUIPMENT – DRAFT STRATEGY TO PHASE-OUT IN ASHLAND, OREGON –

SPONSORED BY: THE ASHLAND CLIMATE AND ENVIRONMENT POLICY ADVISORY COMMITTEE

Location: Ashland Branch Library, Gresham Room
September 25, 2024
3:00 to 5:00 pm

Conceptualized Phase-out Strategy for lots less than 0.5 acres in size

Equipment < 25 Horsepower	Prohibited as of
Gas blowers and string trimmers (i.e. weed whackers)	1/2026 (or 1 year after adoption)
Hedge trimmers, non-commercial chainsaws and lawn mowers	1/2027 (or 2 years after adoption)

Phase-out of the above, citywide, on 1/2030
regardless of lot size

See: www.ashland.or.us/????? for more information
QR code

Dear Members of the Community:

The Ashland Climate and Environment Climate Advisory Committee is exploring strategies to phase-out the use of some types of gas-powered lawn and garden equipment (GLGE). To gain insights into the public's perspective on a GLGE phase-out, the CEPAC has scheduled an open house on September 25th from 3:00 to 5:00 pm in the Gresham Room of the Ashland Public Library. Please consider dropping by to share your thoughts. This is not a public hearing. If you would like to provide written comments please drop them by during the open house or send them to Chad Woodward, 51 Windburn Way, Ashland, OR 97520 or to his email chad.woodward@ashland.or.us.

The proposed phase-out strategy

The preliminary draft strategy is designed to provide ample time for Ashland residents, and lawn and garden maintenance firms to phase-out their use of GLGE. The specific types of GLGE and the corresponding timeframe for each are listed in the figure below.

Figure 1.

Equipment < 25 horsepower	Prohibited as of:
Gas blowers and string trimmers (i.e. weed whackers) adoption)	1/2026 (or 1 year after
Hedge trimmers, non-commercial chainsaws and lawn mowers adoption)	1/2027 (or 2 year after

This initial phase-out would not apply to lots larger than one-half acres through 2030, after which, the phase-out of the above listed equipment would apply throughout the city.

Incentives

The city plans to provide incentives to residents and lawn and garden maintenance firms to purchase electric and battery powered equipment (limited to the types listed in Table 1, above). The details of that program are still under development. The phase-out strategy is contingent upon a city-approved incentive program.

It is likely that the incentive will be available in the year preceding the phase-out deadline. For instance, the incentive for gas blowers and string trimmers would be available starting in January 2025 and end at the beginning of 2026.

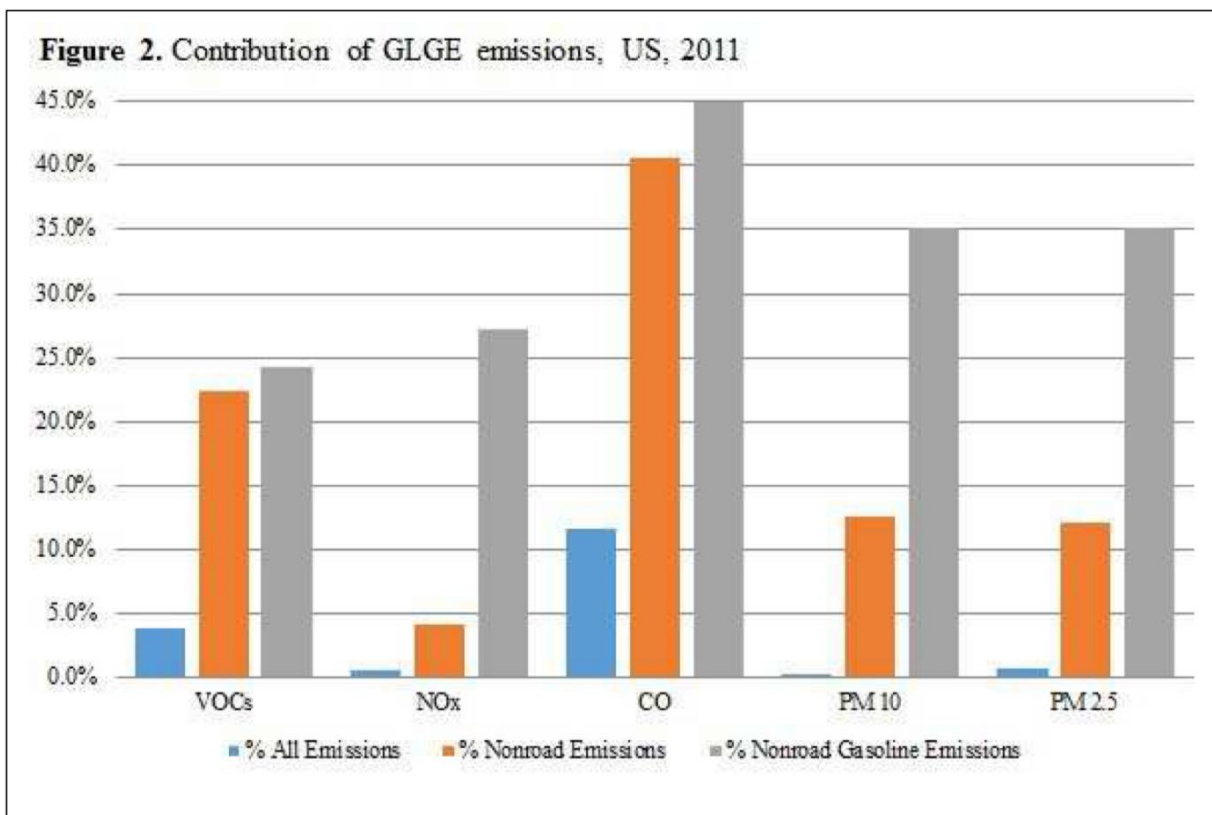
Impacts of GLGE

GLGE emit greenhouse gas and other pollutant emissions,¹ and adversely affect human health.²

Climate Impacts

GLGE equipment is notable for its emission of pollutants harmful to human health and the environment. Table 1, while dated, illustrates GPGE contributions as a percentage of all emissions, non-road

emissions, and non-road gasoline emissions. (For example, GLGE emissions contribute 45% of all nonroad gasoline CO emissions.).



Source: National Emissions from Lawn and Garden Equipment, Jamie L. Banks,

Health Impacts

Studies show that there are significant health impacts on workers and vulnerable populations who are exposed to GLGE emissions.

“The high levels of” volatile organic compounds (VOCs) and fine particulate matter (PM10 & PM2.5) “from GLGE are health risks for workers and other members of the public close to the emitting source. Although no studies of grounds maintenance workers were found, studies of gas station workers have shown that regular exposure to gasoline vapors can produce hematological and immunological abnormalities and elevate the risk of cancer.

“In addition, children, seniors, and persons with chronic illnesses are especially vulnerable to the negative health impacts of GLGE emissions. Routine use of GLGE in the vicinity of residential neighborhoods, schools, parks and other public spaces may be exposing the public to unnecessary and preventable health risks.”²

The draft strategy is available on-line at ????????? and includes additional information about the impact of GLGE.

1. National Emissions from Lawn and Garden Equipment, Jamie L. Banks,
<https://www3.epa.gov/ttn/chief/conference/ei21/session10/banks.pdf>
2. Summary Document: Operator Exposure to Emissions from Lawn and Garden Equipment,
California Air Resources Board, October 12, 2018
https://ww2.arb.ca.gov/sites/default/files/2023-08/Exposure%20Study%20Summary%2010-12-2018_0.pdf

Designation of Climate-Friendly Areas

What's a climate-friendly area and who's required to designate them?

A climate-friendly area (CFA) is a neighborhood where people can meet most of their daily needs without being forced to drive. They are urban mixed-use areas that contain, or are planned to contain, a mixture of housing, jobs, businesses, and services. These areas are served, or planned for service, by high quality pedestrian, bicycle, and transit infrastructure to provide frequent and convenient connections to key destinations within the city and region. In most cases, climate-friendly areas will provide additional



opportunities for housing and employment locations in addition to currently zoned residential and employment areas.

Certain cities in Oregon's seven largest metropolitan areas outside of the Portland metropolitan area (Albany, Bend, Corvallis, Eugene-Springfield, Grants Pass, Medford-Ashland-Central Point, and Salem-Keizer) are required to adopt zoning to enable this type of development. Cities within the Portland metropolitan area will continue to implement similar and previously-adopted programs.

What's the purpose of the community engagement plans required for the designation of climate-friendly areas?

- To gather community input on CFA studies and zoning, with an emphasis on reaching out to underserved populations in order to identify and prioritize equitable outcomes.
- To meet state and local public participation and equitable engagement requirements.
- To help cities evaluate the potential for displacement of underserved populations prior to the designation and zoning of climate-friendly areas. Then, to help cities identify mitigation policies concurrent with or prior to zoning climate-friendly areas, when necessary to avoid displacement.

What is the process for designating climate-friendly areas?

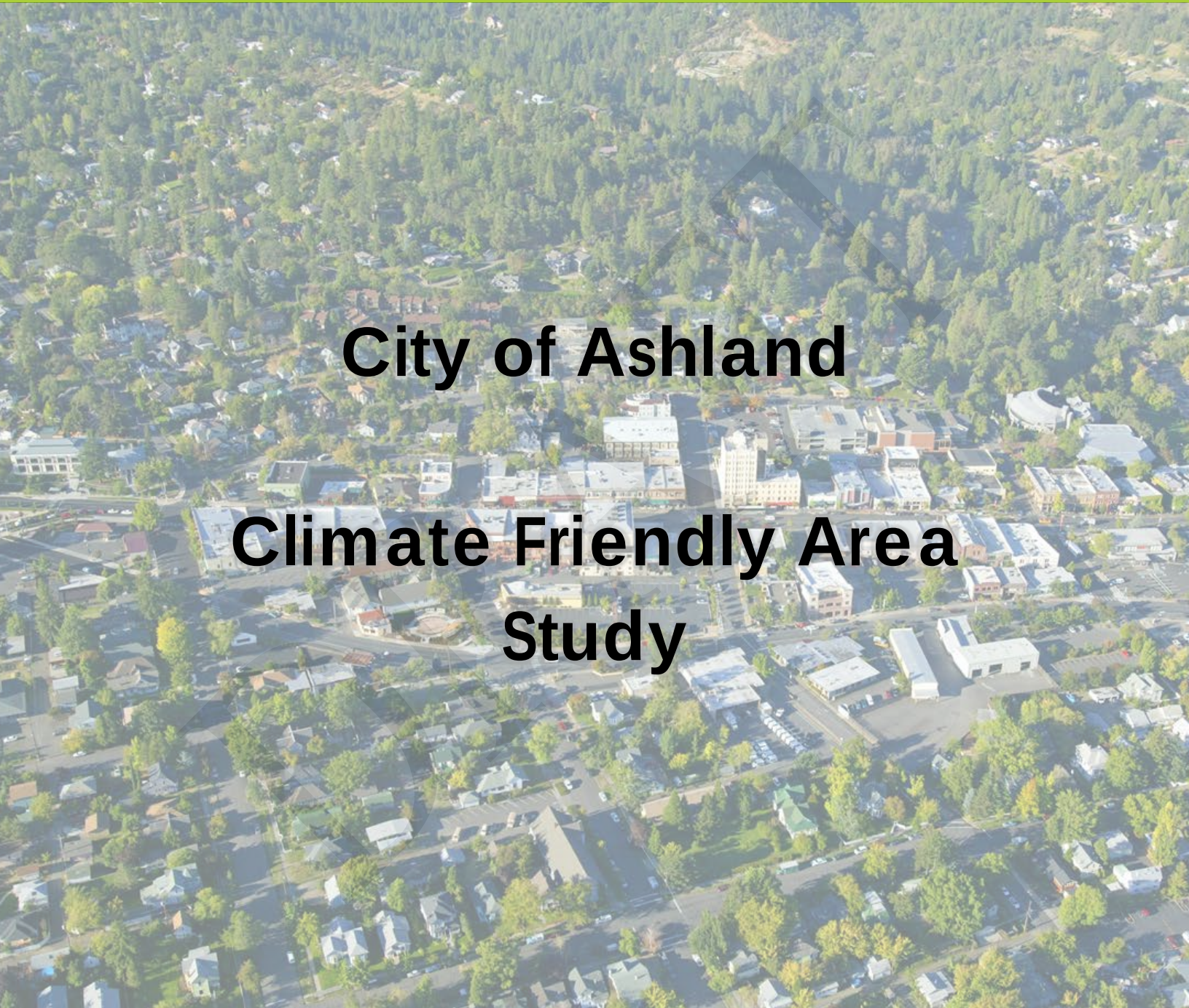
The designation process for climate-friendly areas is divided into two phases:

1. **Phase 1, CFA studies** will identify potential CFAs and evaluate development standards that may be applied within them. The studies must be prepared and submitted for review and comment no later than December 31, 2023. The CFA study is not a land use decision.
2. **Phase 2, CFA locations and development standards** must be adopted. This phase begins with a decision of which of the studied areas will be climate-friendly areas. Cities are not limited to considering only the potential CFAs identified in the study phase. Then cities will likely need to amend zoning in these areas to comply with applicable standards ("likely" because some cities may currently have development standards that comply with CFA requirements). Additionally, cities must adopt a climate-friendly element to their comprehensive plans. The second phase must be completed by December 31, 2024, unless a time-extension request is approved.



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City of Ashland

Climate Friendly Area Study

Produced by the Rogue Valley Council of Governments, in collaboration with the City of Ashland and 3J Consulting

2023



Climate-Friendly & Equitable Communities

CLIMATE FRIENDLY AREA CANDIDATES

Ashland, OR

Legend

- Priority CFA Option
- Secondary CFA Option
- City Boundary
- Urban Growth Boundary

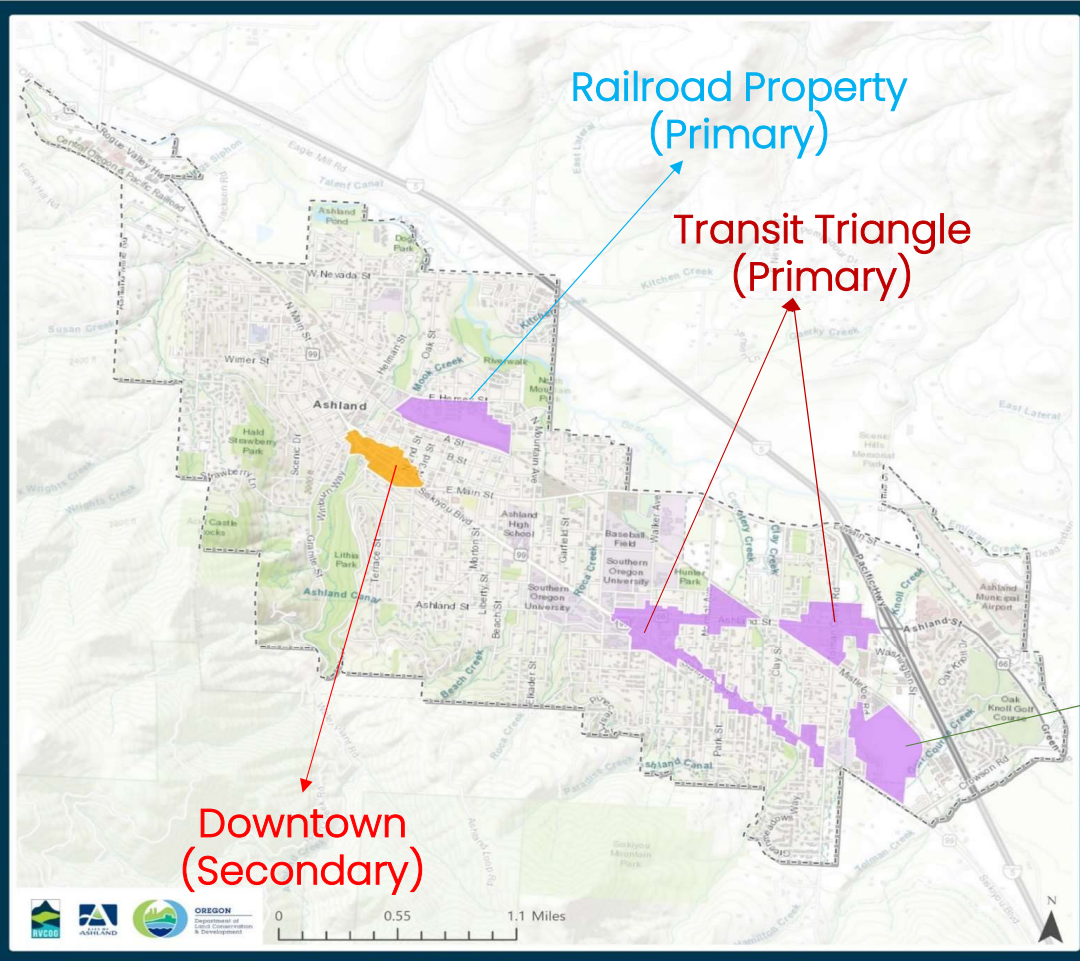


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This map product is for planning purposes only and has not been prepared for, nor is suitable for legal, engineering, or surveying purposes.

Data: Jackson County, BLM, State of Oregon, ODOT, ESRI, USGS, EPA, Garmin, GeoTechnologies, Inc., METI/NASA, Maxar, USDA, HERE, Esri Canada

Created: E. Memmott, RVCOG, 2023



Better Together

Candidate CFAs

Memo

DATE: September 12, 2024
TO: Climate & Environment Policy Advisory Committee (CEPAC)
FROM: Derek Severson, *Planning Manager*
RE: Preliminary Discussion of Climate Friendly Areas

Background

As you may recall, in 2022 the State of Oregon adopted new [Climate Friendly & Equitable Communities \(CFEC\)](#) rules. These rules seek to [reduce greenhouse gas emissions from automobiles](#) in Oregon's eight metropolitan areas by focusing development in pedestrian-friendly, mixed-use areas similar to traditional downtowns in order to encourage walking, biking and transit and reducing the need to drive, while also supporting greater usage of electric vehicles. So far, to comply with these rules, Ashland has:

- Eliminated minimum off-street parking requirements city-wide, as have most of the metropolitan areas in Oregon.
- Created a [study of four potential Climate Friendly Areas \(CFAs\)](#) which could accommodate at least 30 percent of Ashland's future population. The Department of Land Conservation & Development (DLCD) review comments on this study are available on-line here: https://www.oregon.gov/lcd/CL/Documents/AshlandCFA_DLCDComments.pdf.
- Begun implementing state building codes which require infrastructure to support electrical vehicle charging in multi-family developments greater than five units. 40 percent of voluntarily provided parking spaces must have conduit in place to support the installation of electric car charging stations.
- Received a grant, to be administered by DLCD, to support the mapping, code work and public engagement necessary to formally adopt and re-zone CFAs and complete associated gaps analyses, highway impact studies, walkable design standards and findings.

Climate Friendly Area Identification & Re-Zoning

The four CFAs considered in Ashland's initial study were:

- **The former Croman Mill site** – The former Croman Mill site is currently governed by the Croman Mill District overlay under AMC 18.3.2 which was adopted in 2008. The properties here total approximately 92-acres in the southeastern corner of the city including the former mill site and adjacent properties. The district is served by Siskiyou Boulevard at the south end and Mistletoe Road from the north. Development under the adopted district plan has yet to occur. The current plan calls for office and industrial uses for most of the site, with a residential center and mixed-use zones allowed within the former mill site. This site was seen as an excellent CFA location due to its redevelopment potential, large size, and proximity to quality transit service and bicycle and pedestrian infrastructure. There are some complexities in that the site is currently in the process of environmental clean-up regulated by the Oregon Department of Environmental Quality (DEQ), and concurrent with the city's consideration of the site as a CFA there is a developer (Townmakers, LLC) looking at re-zoning, adopting a new masterplan and fully developing the

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65-acre portion comprising the former mill site. This CFA candidate site does not include any property within Ashland's four National Register-listed historic districts.

- **The Transit Triangle** – The Transit Triangle is the triangle formed by Ashland Street/Highway 66, Tolman Creek Road, and Siskiyou Boulevard, all of which are transit routes. The Transit Triangle has an area of approximately 167 acres which could accommodate significant housing capacity with redevelopment. Currently, this area is within the TT-overlay which was intended to facilitate re-development of more/smaller rental housing and businesses to create an environment that was friendly to walking, biking, and using transit. The existing overlay includes parking reductions, additional height allowances, and the elimination of density maximums very similar to the new CFEC rules. If selected as CFA, the CFEC rules would supplant the existing TT-overlay, and there would need to be some boundary adjustments to clearly separate this CFA from Southern Oregon University properties governed by the SOU Masterplan. The Transit Triangle does not include any property within Ashland's four National Register-listed historic districts.
- **The Railroad Property** – The Railroad Property and its surrounding areas total approximately 57-acres in the center of the city, just a few blocks north of downtown. The site rests between the railroad tracks and Hersey Street, bounded on the west by Oak Street and on the east roughly by the course of Mountain Creek. The northern half of the site is developed with commercial and employment uses, but the majority of the southern portion of the site remains undeveloped. The Union Pacific Railroad has a plan for environmental clean-up of their portion of the property; clean-up is currently slated to begin in the Spring of 2025. A master plan for the site was created in 2001, but was never adopted. It showed a pedestrian-focused mixed-use area intermingled with civic uses adjacent to the existing northern commercial area enhanced with new local streets connecting to East Hersey Street. While the masterplan was never formally adopted, the envisioned street system plan which formed the backbone of the plan was adopted into the city's Transportation System Plan and has provided a guide for the site's development since 2001. This CFA candidate site does not include any property within Ashland's four National Register-listed historic districts, but it is just north of and adjacent to the Railroad Addition Historic District.
- **The Downtown** - Ashland's National Register-listed downtown already closely resembles the vision of what a CFA should look like when it has reached maturity, and in fact DLCD has used photos of downtown Ashland for illustrative purposes in discussing CFAs. The downtown largely developed without off-street parking requirements and is almost completely built-out. There have been relatively few new construction projects over the last 20 years. The downtown initially seems an obvious choice as a CFA, but one requirement of CFAs is that the maximum allowed building height be at least 50 feet/four stories. Staff and the Historic Preservation Advisory Committee have some concerns that designation as a CFA could result in a weakening of historic district or downtown development standards or created pressure to redevelop the downtown to the detriment of the existing historic resources or the district as a whole due to additional height allowances. Staff's primary interest in studying CFA designation to this point has been to explore whether a secondary designation might be possible to avoid detrimental impacts to the district while seeking prioritization of the downtown in future transportation improvements. Inclusion of the downtown as a selected CFA is not necessary to meet the CFEC requirements to accommodate 30 percent of Ashland's future population.

The next required step for Ashland under the CFEC rules is to formally select CFAs, re-zone them on official maps, and adopt ordinances and design standards in keeping with the new rules. This step is required to be completed by the end of 2024, although Ashland has requested an extension through June of 2025. DLCD is providing consultant services to complete this work through a technical assistance grant, and Ashland is currently working

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with 3-J Consulting, LLC to complete the CFA zoning, code adoption and associated public engagement work. Subconsultants supporting this effort include JET Planning for an audit of current codes, EcoNorthwest for a market analysis, and the Rogue Valley Council of Governments (RVCOG) and Oregon Department of Transportation (ODOT) who will be assisting with a multi-modal gaps analysis for the selected CFA(s) and a required highway impact study. Cascadia Partners is leading a state effort to develop model walkability standards which will need to be applied citywide. Ashland staff are serving on a Technical Advisory Committee (TAC) lead by Cascadia Partners to help craft model walkability standards, and Cascadia is also working directly with the city to audit our codes and identify any specific standards that may need to be modified. The CFEC rules require that new walkability standards be applied city-wide rather than limiting them just to the selected CFA(s).

Generally, the zoning requirements for designated CFAs include that there be no maximum residential densities and a minimum density for single-use residential developments of at least 15 dwelling units per acre (*the C-1-D district currently has a maximum residential density of 60 d.u./acre and no minimum*); that the maximum height allowance be at least 50 feet/four stories (*the C-1-D district currently has a height limit of 40 feet, with up to 55 feet allowed through a conditional use permit*); and that allowed uses be residential, office, retail and similar pedestrian-oriented commercial and public uses (*generally similar to the current C-1-D district*). There have been suggestions that the city consider implementing CFA strategies significantly beyond what is minimally required (i.e. minimum densities of at least 20 d.u./acre and/or heights of 60 feet/five stories or more) and the Planning Commission and Council will ultimately need to carefully consider these options when selecting CFAs.

Advisory Committee Meetings & Climate Friendly Area Open House

To kick-off this next step in implementing the CFEC rules, preliminary discussions of the Climate Friendly Area adoption process are happening with the Historic Preservation Advisory Committee, the Climate and Environment Policy Advisory Committee, the Transportation Advisory Committee, the Housing & Human Services Advisory Committee and the Social Equity & Racial Justice Advisory Committee at their regular meetings during the months of September and October.

On Tuesday, September 17th from 4:00 p.m. to 6:00 p.m. there will be a Climate Friendly Area Open House in the Siskiyou Room. Ashland staff and members of the consultant team will be on hand to introduce the Climate Friendly Area adoption project, discuss general requirements and the specific potential CFAs, and answer questions. In conjunction with this open house, there will be an on-line survey to gather public input.

Once a code audit and market study have been completed and the recommendations from Advisory Committees and public input have been collected and incorporated into a draft ordinance, they will be presented to the Planning Commission and City Council at study sessions in October and November. Based on Planning Commission and Council input at these study sessions, final recommendations for CFA selection and ordinance adoption will be brought back to the Planning Commission and Council for public hearings and ordinance adoption, along with required walkability design standards updates, multi-modal gaps analyses, highway impacts studies and written findings. Part of the basis for the extension requested was to ensure that the items which proceed after final CFA selection, such as the gaps analyses, and the walkability standards, for which model standards are still being crafted at the state level, can be completed and adopted in a single cohesive package.

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Discussion Topics

Staff believes that the CFEC rules for CFAs are directly in keeping with the city's Climate Energy Action Plan's (CEAP's) goals and strategies for Urban Form, Land Use & Transportation (ULT), and hopes that the CEPAC can provide recommendations to the Council with regard to CFA adoption tonight. In considering the adoption of CFAs, CEPAC may wish to consider:

- The CFEC rules seek to identify gaps in the multi-modal transportation system and prioritize transportation projects to fill them through the upcoming Transportation System Plan process. The CFA project includes a thorough analysis of gaps in the multi-modal transportation network relative to each candidate CFA. In addition, under CFEC rules transportation planning will broaden its focus from looking at just motor vehicle level of service to consider all modes of transportation. The potential to support greater densities in CFA's, which are generally along transit routes, will support improvements to transit **(ULT-1 & -2)**.
- CFEC rules already being implemented through Building Codes require that new multi-family projects over five units require charging infrastructure be provided to 40 percent of parking spaces **(ULT-3-2)**.
- The CFEC rules are based in a recognition that land use and transportation are closely connected, together form the basis for a large percentage of greenhouse gas emissions, and through changing how and where we build we can enable changes to how we get around. **(ULT 4.2)**

Planning staff and the consultant team look forward to your discussion on September 12th!

Attachments

DLCD Overview of Climate Friendly Area Designations

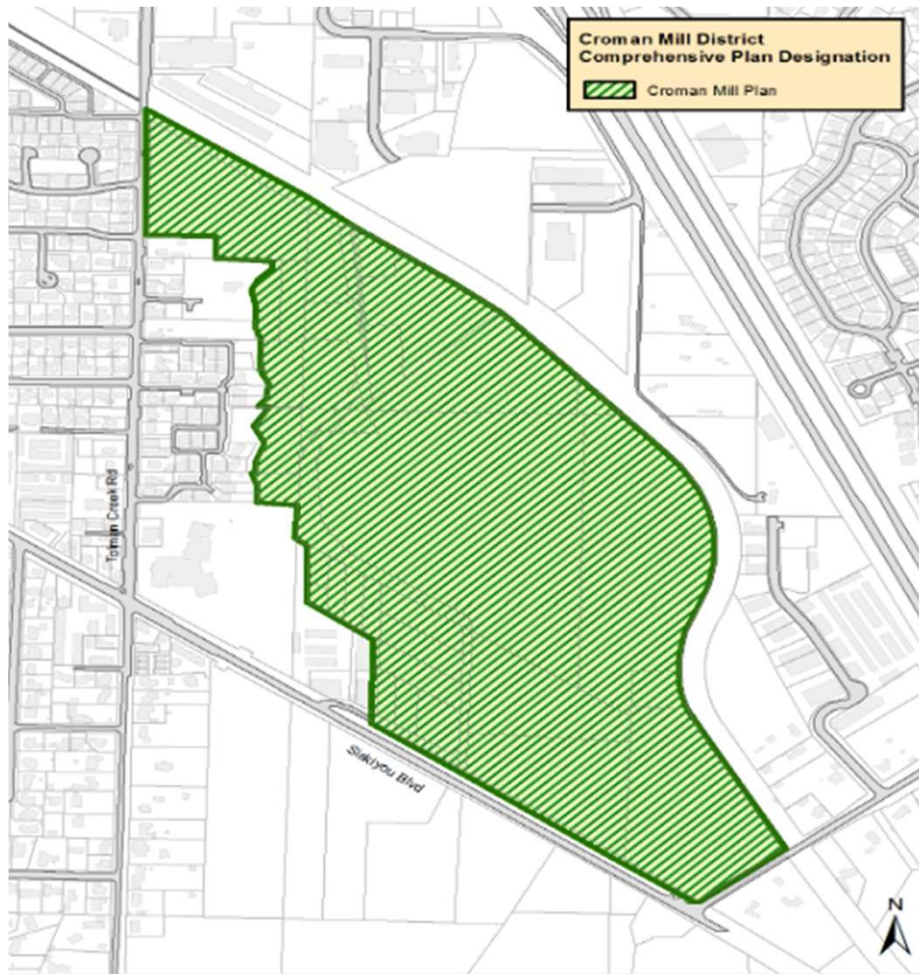
Ashland's Final CFA Study (Approved)

Maps of Potential CFA Areas Studied

COMMUNITY DEVELOPMENT DEPARTMENT

51 Winburn Way
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- **Approx. 92 acres total**
- Masterplan Adopted 2008
- Remains Largely Undeveloped
- *Clean-Up Plan in process*
- Townmakers, LLC currently looking at code changes to develop approx. 65 acres.

By prescriptive methodology:

- **5,142 new dwelling units**
- 79 dwelling units per acre
- 148 percent of needed housing



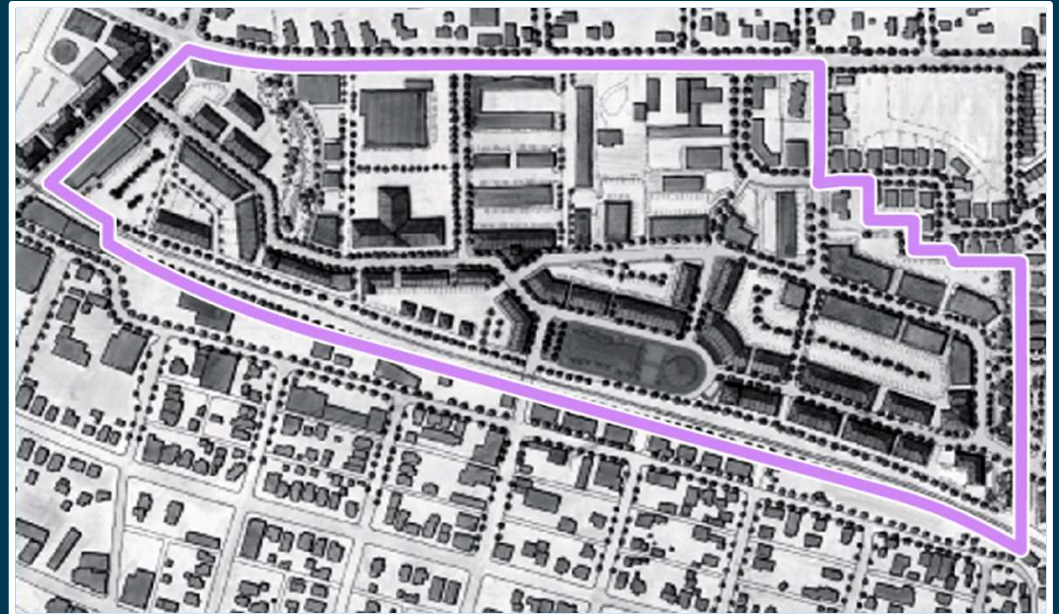
Croman Mill District

Image 3 - Railroad Property



Image 4 - Railroad Property Master Plan

DRAFT



- **Approx. 57 acres.**
- Southern portion largely undeveloped.
- Clean-up Plan under development.
- 2001 Masterplan not adopted, Street plan adopted.

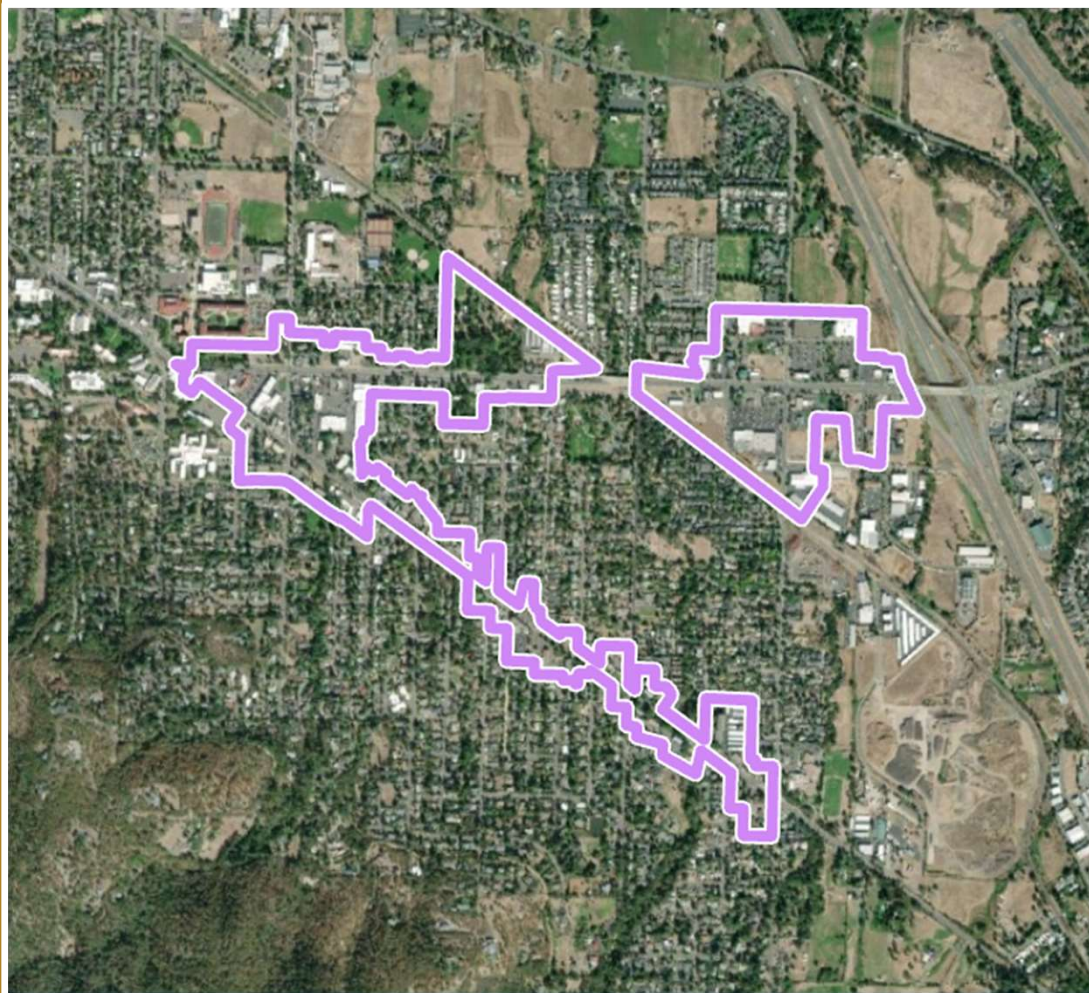
By the prescriptive methodology:

- **2,226 new dwelling units**
- 58 dwelling units per acre
- 64 percent of needed housing.



Railroad Property

Transit Triangle



Transit Triangle

- Approximately 167 acres
- Undeveloped or underdeveloped
- Largely auto-dependent uses in “strip development” pattern
- Likely a center of future growth

By the prescriptive methodology:

- 7,524 new dwelling units
- 52 dwelling units per acre
- 207 percent of needed housing.





Downtown

- Largely Developed without off-street parking requirements
- National Register-Listed Historic District

Given the level of development and the historic status, the Downtown is being looked at as a CFA, but was not analyzed under the lens of the prescriptive CFA methodology given it is nearly built out.



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Disclaimer:

The following study analyzes CFA candidates within the City of Ashland and explores paths forward and potential scenarios should the city designate a Climate Friendly Area. By no means does this study alter the current zoning, land uses, or other development regulations governed by the City of Ashland.



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Chapter 1: Climate Friendly Area Regulations and Methodology Background

Introduction

Rogue Valley Council of Governments, in collaboration with the City of Ashland and the project consultant, 3J Consultant, is conducting a study of potential Climate Friendly Areas (CFA) in accordance with the Climate Friendly and Equitable Communities (CFEC) rulemaking (OAR 660-012-0310). The State rules were initiated by the Land Conservation and Development Commission (LCDC) 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. The rules encourage climate-friendly development by facilitating areas where residents, workers, and visitors can meet most of their daily needs without having to drive. A CFA aims to contain a variety of housing, jobs, businesses, and services. A CFA also supports alternative modes of transit by being in close proximity to high-quality pedestrian, bicycle, and transportation infrastructure.

Phase 1 of this project is the CFA study which identifies candidate CFAs and analyzes what zones are most aligned to the CFEC rules, and what adjustments to them would be required.

Phase 2 will encompass the actual designation of the Climate Friendly Areas under consideration, and the adoption of maps and ordinances necessary to implement the CFEC initiative. Cities may use CFA areas from the study or any other qualifying area.

Climate Friendly and Equitable Communities Rulemaking

The Climate-Friendly and Equitable Communities rulemaking is part of Oregon's longstanding effort to reduce pollution from the transportation system, especially greenhouse gases that are causing a change in climate and associated weather-related disruptions, including drought, wildfires, and warming temperatures with greater variation overall.

The rules encourage climate-friendly development in Climate-Friendly Areas (CFAs). Other provisions of the rulemaking call for new buildings to support the growing electric vehicle transformation, reduce or eliminate one-size-fits-all parking mandates, and increase local planning requirements to address critical gaps in our walking, biking, and transit networks. The rules ask communities to identify transportation projects needed to meet our climate goals.



Climate Friendly Areas Overview

A CFA is an area 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. 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. CFAs typically do not require large parking lots and are provided with abundant tree canopy.

A key component of Oregon's plan to meet our climate pollution reduction and equity goals is facilitating development of urban areas in which residents are less dependent on the single occupant vehicle. Before the automobile became common in American life, cities grew more efficiently, with a variety of uses in city centers and other areas that allowed for working, living, and shopping within a walkable or transit accessible area. Over the last 100 years, the automobile and planning practices have served to separate activities, creating greater inequities within cities and widespread dependence upon climate-polluting vehicles to meet daily needs. CFAs will help to reverse these negative trends, with some actions taking place in the short term, and others that will occur with development and redevelopment over time.

The rules require cities (and some urbanized county areas) with a population over 5,000, and that are located within Oregon's seven metropolitan areas outside of the Portland metropolitan area, to adopt regulations allowing walkable mixed-use development in defined areas within their urban growth boundaries. Associated requirements will ensure high quality pedestrian, bicycle, and transit infrastructure is available within these areas to provide convenient transportation options, and cities and counties will prioritize them for location of government offices and parks, open space, and similar amenities.

Implementation Timeline

The rules provide a two-phased process for local governments to first study potential CFAs, and then, in a second phase, to adopt development standards for the area, or areas, that are most promising.

Key CFA Study Dates:

- June 30, 2023 – CFA Study Funding Expires
- December 31, 2023 – CFA Studies Due
- December 31, 2024 – Adopt CFA land use standards and any map changes*

** Local governments may request an alternative date for the adoption of land use standards, as provided in OAR 660-012-0012(4)(c).*



Goals

The purpose of this study is to identify candidate CFA areas that meet the size and locational criteria required by OAR 660-012-0310(1). Relevant zoning codes will be reviewed, and suggestions will be made regarding any changes that are necessary to bring zoning codes into compliance with CFEC rules. It is the intention of the project management team that the candidate CFA selection prioritize community context reflecting the most feasible zoning code changes, little to no infrastructure investment, and alignment with citizen interests. The City of Ashland may move forward with the identified CFA area(s) into Phase 2, or they can use what they learned from the study to choose a new area or areas for adoption.

Methodology

The methodology was developed by the Department of Land Conservation and Development (DLCD) and was adapted to perform this CFA study. The Climate-Friendly Areas Methodology Guide goes over the steps to perform the CFA study. The study goes through each of the eight steps highlighted in the methodology guide, including locating and sizing CFA areas, evaluating existing code, identifying zoning changes, calculating CFA Capacity and equity analysis. While the technical analysis team was responsible for overseeing the steps reliant on GIS or analysis of the land use code, Step 1: Public Engagement Plan, was drafted and prepared by 3J Consulting.



The diagram above shows a workflow for conducting a CFA study. This is not the only order in which the Steps can be performed, but it is a recommended sequence for the purpose of clarity and efficiency.

To understand the context of the steps listed above, a summary of the rules, a CFA's purpose, and what requirements should exist or be adopted in CFA areas is necessary. According to DLCD, "a CFA is an area 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."

The following is a summary of the steps, rules, and regulations on the specifications of siting a CFA. The CFA designation process first requires a study of potential candidate areas, ultimately ending in an area(s) being designated as the City's Climate Friendly Area. This process, slated to conclude by December 2023, is known as phase 1. Phase 2: Adoption requires that cities implement the necessary changes to the land use code to make the zones within the proposed CFA compliant with state regulations, as provided in OAR 660-012-0310 through -0320.



Community Engagement Plan

This step is planned, drafted, and prepared by 3J Consulting, in coordination with city staff and the technical analysis team. While the Community Engagement deliverables are distinctly separate from the technical CFA Study, this study does take into account the community feedback from public meetings throughout the study phases.

Local governments must develop a community engagement plan for the designation of CFAs that includes a process to study potential CFA areas and to later adopt associated amendments to the comprehensive plan and zoning code following the provisions of OAR 660-012-0120 through -0130:

- Engagement and decision-making must be consistent with statewide planning goals and local plans
- Cities and counties must center the voices of underserved populations in all processes at all levels of decision-making, consider the effect on underserved populations, work to reduce historic and current inequities, and engage in additional outreach activities with underserved populations
- Cities and counties must identify federally recognized sovereign tribes whose ancestral lands include the planning area and engage with affected tribes

The community engagement plan must be consistent with the requirements for engagement-focused equity analysis in OAR 660-012-0135(3). Equity analysis is required for a variety of transportation planning actions under Division 12, including study and designation of CFAs. The purpose of an equity analysis is to identify potentially inequitable consequences or burdens of proposed projects and policies on impacted communities in order to improve outcomes for underserved populations.

The equity analysis must include robust public engagement, including a good-faith effort to:

- Engage with members of underserved populations to develop key outcomes, including reporting back information learned from the analysis and unresolved issues
- Gather qualitative and quantitative information from the community—including lived experience—on potential benefits and burdens on underserved populations
- Recognize where and how intersectional discrimination compounds disadvantages
- Analyze proposed changes for impacts on and alignment with desired key community outcomes and performance measures under OAR 660-012-0905
- Adopt strategies to create greater equity and minimize negative consequences
- Report back and share the information learned from the analysis and unresolved issues with people engaged



Locate and Size Candidate CFAs

Every potential CFA must follow the Climate Friendly and Equitable Communities (CFEC) rulemaking (OAR 660-012-0310) requirements in order to be properly located and sized. The rules regarding location for potential CFAs are universal for all cities.

The CFEC rules of OAR 660-012-0310 that must be followed in the CFA location process are:

- CFA locations must be able to support development consistent with the land use requirements of OAR 660-012-0320.
- CFAs must be located in existing or planned urban centers (including downtowns, neighborhood centers, transit-served corridors, or similar districts).
- CFAs must be served by (or planned to be served by) high quality pedestrian, bicycle, and transit services.
- CFAs may not be located in areas where development is prohibited.
- CFAs may be located outside city limits but within a UGB following OAR 660-012-0310 (e).
- CFAs must have a minimum width of 750 feet, including internal rights of way that may be unzoned.

While the allowed land uses and denser environment will largely influence the choice of a CFA, development feasibility is another important criterion to consider. The area chosen to be CFA should not have infrastructure problems or limitations that could prevent the development of Climate Friendly Areas. The infrastructure capacity of a candidate CFA will be discussed with city staff to determine if it is a sufficient choice or to move forward with another candidate area.

City population is the primary determinant regarding CFA size requirements. There are two categories for sizing a CFA: cities over 5,000 and cities over 10,000 in population. Ashland's population falls under the second option for cities with populations greater than 10,000. Cities with a population greater than 10,000 must designate a minimum of one CFA that accommodates 30% of their current and projected housing, the overall area being at least 25 acres in size. In addition, all CFAs must have a minimum width of 750 feet.



In discussing CFA requirements with city staff, the technical analysis team opted to utilize the prescriptive standards as written by DLCDC. The following table 1 shows the prescriptive standards requirements that must be incorporated in the development code, in accordance with the City's population.

Table 1. Prescriptive Standards

Population	Minimum Residential Density	Max Building Height
5,001-24,999	15 dwelling units/net acre	No less than 50 ft
25,000-49,999	20 dwelling units/net acre	No less than 60 ft
50,000 or more	25 dwelling units/net acre	No less than 85 ft

Because the city of Ashland falls within the 5,001 – 24,999 category, phase 2 will require adoption of rules for a minimum residential density of 15 dwelling units/net acre and a maximum building height of no less than 50 ft in height.



Evaluate Existing Code

The land use requirements established in OAR 660-012-0320, as shown below, are pivotal in determining how much a base zone already aligns with CFA requirements.

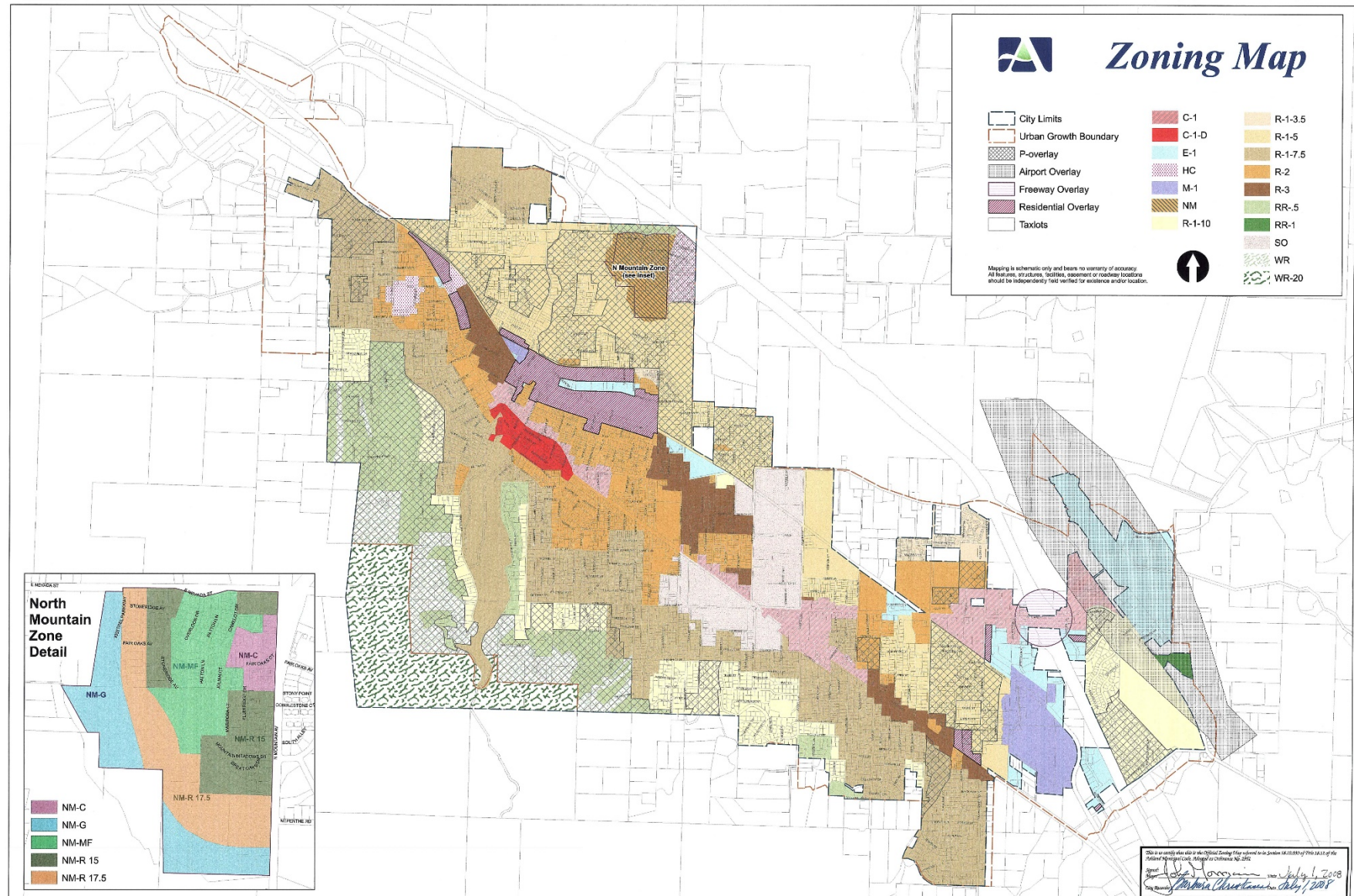
Land Use Requirement for CFAs:

- Development regulations for a CFA shall allow single-use and mixed-use development within individual buildings or on development sites, including the following ***outright permitted uses***:
 - Multifamily Residential
 - Attached Single-Family Residential
 - Other Building Types that comply with minimum density requirements
 - Office-type uses
 - Non-auto dependent retail, services, and other commercial uses
 - Child Care, schools, and other public uses
- Maximum density limitations must be prohibited
- Maximum block length standards must apply depending on acreage of site
- Local governments shall establish maximum block length standards as follows:
 - Development sites < 5.5 acres: maximum block length = 500 feet or less
 - Development sites > 5.5 acres: maximum block length = 350 feet or less
- 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.
- Streetscape requirements in CFAs shall include street trees and other landscaping, where feasible.
- Local governments shall adopt policies and regulations in CFAs that implement the following:
 - Transportation review process in OAR 660-012-0325
 - Land use requirements in OAR 660-012-0330
 - Parking requirements in OAR 660-012-0435
 - Bicycle parking requirements in OAR 660-012-0630
- Local governments may choose to **either** adopt density minimums and height maximums (Option A – Prescriptive Standards) **or** adopt alternative development regulations to meet performance standards (Option B – Outcome-Oriented Standards)

The following map 1 is the city's zoning map, and helps convey where zones are located throughout the city of Ashland.

Map 1. City of Ashland Zoning Map

Available as an interactive map online at gis.ashland.or.us/planning/





Identify Zoning Changes

Zoning in CFAs may need to change if the existing zoning does not meet the land use requirements in OAR 660-012-0320. During phase 1 of the study, cities do not need to adopt the land use requirements, but evaluation of necessary land use reforms may influence a base zone's viability of being a potential CFA candidate. Essentially, an existing zone that meets a large proportion of the CFA criteria will likely feature the characteristics that define climate friendly areas, while zones that require intense reform may not incentivize development due to lack of compatible land uses or alternative transit infrastructure.

During the adoption phase, slated to occur in 2024, local governments will have to make and adopt all necessary zoning changes and will need to provide DLCDD with documentation that all adopted and applicable land use requirements for CFAs are consistent with OAR 660-012-0320.

Calculate CFA Capacity

The proposed CFA(s) must meet the residential housing capacity threshold expressed in OAR 660-012-0315(1). The target threshold to meet is at least 30% of current and projected housing needs citywide. The total number of units necessary to meet all current and projected housing needs is derived from the most recent adopted and acknowledged housing capacity analysis (HCA; also known as a housing needs analysis or HNA) as follows:

$$\begin{aligned} &\textbf{\textit{Total number of units needed citywide}} \\ &= \\ &\quad \textbf{\textit{current number of existing units}} \\ &+ \\ &\quad \textbf{\textit{projected number of units to meet future needs}} \end{aligned}$$

After calculating the Total Units Needed, the technical analysis team proceeded to calculate the potential housing unit capacity of the proposed CFA site. The following page goes over the equation that will be used to calculate the Housing Unit Capacity.



Calculate Housing Unit Capacity

The following method was adapted from DLCD's Climate-Friendly Areas methodology guide. The calculation follows the prescriptive path requirements as described in the methodology guide. Total Housing Unit Capacity in the CFA is estimated using the following variables:

1. The Net Developable Area in sq. ft. (a)
2. The maximum number of building floors (f)
3. The assumed percentage of residential use (r)
4. The average size of a housing unit in sq. ft. (s)

Using these, the housing unit capacity (U) in any part of a CFA can be given by a simple formula:

$$\text{Housing Unit Capacity (U)} = \frac{(\text{Net Developable Area} * \text{Maximum floors} * \text{Resident use percentage})}{\text{Average Housing Unit}}$$

Note: In the above formula, the results are rounded up to the nearest integer.

The values to use for Assumed Percentage of Residential Use (r) and Average Size of a Housing Unit (s) are given in the rules. Net Developable Area and Maximum Building Floor factors in the above calculation require some additional sub-calculations. Each uniquely zoned area of the CFA will have its own calculations of these factors and the above housing unit formula. Then they are summed for the CFA to give the total Housing Unit Capacity.



Equity Analysis

Local governments must determine if rezoning the potential CFA would be likely to displace residents who are members of state and federal protected classes and identify actions to mitigate or avoid potential displacement.

The CFA Study must include plans for achieving fair and equitable housing outcomes within CFAs following the provisions in OAR 660-008-0050(4)(a)-(f). CFA studies must include a description of how cities will address each of the following factors:

- 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.
- Fair Housing: How the city is affirmatively furthering fair housing for all state and federal protected classes.
- 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.
- 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.
- 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.
- 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.

Please note, the equity analysis was performed with the guidance of DLCD's [Anti-Displacement and Gentrification Toolkit](#). The Toolkit provides an in-depth resource for local government to address racial and ethnic equity in housing production, including a list of strategies to mitigate the impacts of gentrification and displacement. The toolkit helps and guides local governments to establishing a framework for creating housing production strategies with a particular focus on the unintended consequences of those strategies.



Chapter 2: Candidate Climate Friendly Area Analysis

This section reviews the analysis components that were performed to derive the results of the study. The technical analysis team began with initial candidate location suggestions from City Staff, then calculated the housing capacity of the proposed CFAs boundary, and readjusting the CFAs size as needed to accommodate the housing unit capacity.

The zoning analysis focuses on the land use requirements in OAR 660-012-0320 and compares them with the city codes to find suitable zones that are fully or partially compliant with the CFA land use requirements. The zoning analysis informs the team of the land use compatibility of the proposed CFAs. Zoning analysis and identifying zoning changes go hand-in-hand. If existing development standards do not meet CFA requirements, then identify the necessary changes to the specific zones and how to bring them into compliance with the land use requirements or OAR 660-012-0320.

The GIS analysis helps determine the status of transportation infrastructure that is within or around the proposed CFA and whether the proposed area satisfies the transportation connectivity aspect of the regulations. A CFA site must be served by, or planned to be served by, high quality pedestrian, bicycle, and transit services according to OAR 660-012-0310.

Capacity analysis determines whether the potential CFA, or a combination of CFAs, can accommodate 30% of citywide current and projected housing need. If identified CFA candidate area(s) are not sufficient to accommodate at least 30% of housing need, resizing the proposed CFA area or identifying additional candidate CFA areas must be performed.

Equity analysis must determine if rezoning the potential CFA would be likely to displace residents who are members of state and federal protected classes and identify actions to mitigate or avoid potential displacement. Chapter 2 of this study includes plans for achieving fair and equitable housing outcomes within CFAs following the provisions in OAR 660-008-0050.

Overall, the analysis steps are intertwined with each other. Locating a CFA candidate, calculating Housing Needs, Zoning analysis, GIS analysis, Capacity analysis are the steps to designate the appropriate CFA area within the city.

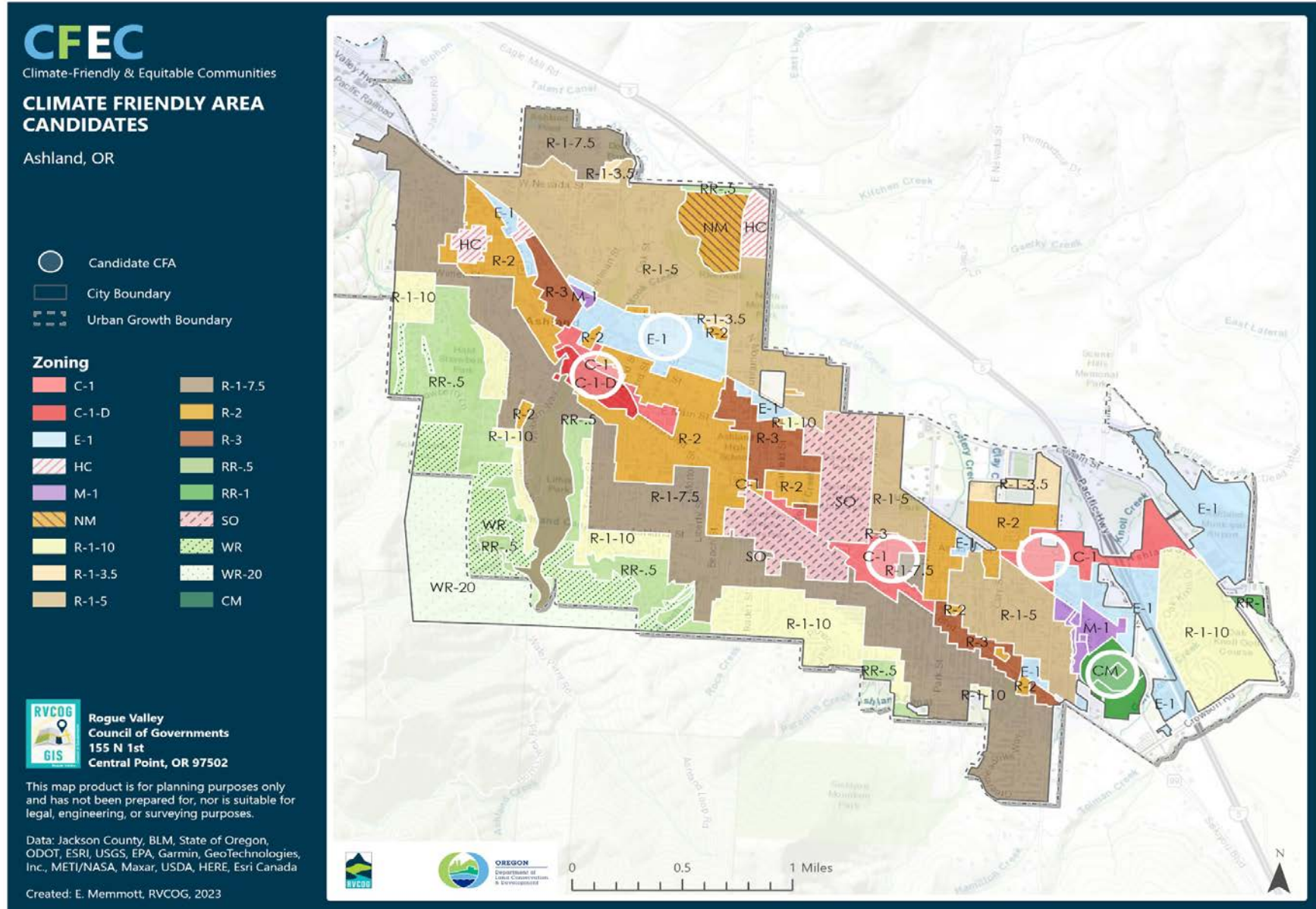


Locate and Size Candidate CFAs

City Guidance

City staff have highlighted several priority CFA candidates, shown in Map 2 below. Staff selected these areas not only for their designated zoning's alignment to the CFA requirements, but also factored in development potential. The Croman Mill and Railroad Property sites are largely undeveloped and present strong cases for rapid CFA-related changes. The Transit Triangle is one of the priority CFA options within the city and has the potential to be improved through redevelopment and development of vacant properties. The prior approval of the Transit Triangle code amendments are largely compatible with CFA, as such this transit served area has considerable redevelopment potential supporting the CFA goals. Conversely, the Downtown area is largely built out, is a National Register Historic District, indicating barriers to potential redevelopment. However, the current built environment is similar to what is expected of CFAs and the C1-D (downtown Commercial) zone could be adapted to comply with CFA guidelines with little trouble and may serve as useful tracts for CFA expansion in the future.

Map 2. CFA Candidates





Calculate Housing Units Needed

As outlined in the methodology guide, the proposed CFA(s) must meet the residential housing capacity threshold expressed in OAR 660-012-0315(1). The threshold to meet is that the cumulative capacity of the CFA(s) is at least 30% of current and projected housing needs citywide. And this is derived by the following formula:

$$\begin{aligned} &\textbf{\textit{Total number of units needed citywide}} \\ &= \\ &\textbf{\textit{current number of existing units}} \\ &+ \\ &\textbf{\textit{projected number of units to meet future needs}} \end{aligned}$$

The most recent Housing Capacity Analysis for the City of Ashland was published in May of 2021 and projects housing needs and trends out to 2041. This analysis estimates there are currently 10,705 dwellings in the city, with a projected need of 858 units more by 2041.

$$\textbf{\textit{10,705 + 858 = 11,563 projected housing units needed by 2041}}$$

Based on these estimates, the city of Ashland will need to locate and size CFA(s) that encapsulate 30% of 11,563 dwellings, or **3,469** units.



Zoning Analysis

Zoning Code Review

Existing zoning codes were compared to the CFA requirements to identify those zones that are most closely aligned with CFEC rules. Shown in Table 2 below, zones were scored for each criterion with 2 points for full compliance, 1 point for conditional or mixed compliance. Zones also earned 1 additional point for having 40-foot building height maximums, while zones that have 35-foot maximums earned no additional points. Green cells are those in compliance. Yellow cells are those that have partial or conditional compliance or are closer to the 50-foot building height maximum, and overall are closer to compliance than other options.

Any zone can be adjusted to be made CFEC-compliant, so CFAs are possible anywhere in the city, but those zones that would take more legislative changes and create more dramatic changes to the built environment relative to what is currently in the area are not prioritized.

The Croman Mill site was master planned in 2008 and this document includes several subzones that are analyzed in Table 3. Much of the area is currently planned for non-residential uses, but City staff have informed the RVCOG team that the property owner is presently working with a developer, TownMakers LLC, to re-envision the area and propose major plan amendments which would newly incorporate residential development throughout the area. While each subzone was scored individually, for the purpose of analyzing prospective zoning changes the entire site has been attributed the attributes and scores of the Mixed-Use subzone.

The Transit Triangle Overlay was also analyzed for its impact on relevant base zones and their CFA suitability.

Overall, the scoring matrix indicates the suitability of the zones regarding the land use requirements. However, the scores are only the first step of the analysis and the results they produce are only one factor among several that the study analyzes. Therefore, a high scoring zone alone does not determine a CFA candidate area. The location of the zones and surrounding transportation infrastructure must be factored in the 2nd step of the study.



Table 2. Zoning Code Analysis

Y - Yes, Permitted Outright C - Conditional M - Mixed N - Not Permitted N/A - Not Applicable	Scoring Matrix Y = 2 C/M = 1 N = 0 40 ft = 1 35 ft = 0	Residential						Commercial			Industrial
		Single Family	Suburban	Low Density MF	High Density MF	Rural	Woodland	Commercial	Downtown	Employment	Industrial
		R-1	R-1-3.5	R-2	R-3	RR	WR	C-1	C-1-D	E-1	M-1
Single Use		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Mixed Use		N	N	N	N	N	N	Y	Y	Y	N
Multi-Family		N	Y	Y	Y	N	N	C	C	C	N
Single -Family Attached		C	C	C	C	C	C	C	C	C	N
Office		N	N	C	C	N	N	Y	Y	Y	Y
Non-Auto Retail/Services/Commercial		N	N	C	N	N	N	Y	Y	C	C
Childcare		C	C	C	C	C	C	Y	Y	Y	Y
Schools		C	C	C	C	C	C	N	N	N	N
Other Public Uses		N	N	N	N	N	N	M	M	Y	Y
Government Facilities		C	C	N	N	C	C	Y	Y	Y	Y
Parks, Open Space, and Other Similar		Y	Y	Y	Y	Y	Y	N	N	N	N
Maximum Block Length		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Density Minimum (15 Dwelling Units/Acre)		N	N	N	Y	N	N	N	N	N	N
Density Maximums Prohibited		N	N	N	N	N	N	N	N	N	N
Maximum Building Height (>= 50ft)		N	N	N	C	N	N	C	C	C	N
Maximum Building Height		35	35	35	35	35	35	40	40	40	40
Score		10	12	13	15	10	10	20	20	19	14



Table 3. Croman Mill Zoning Analysis

Y - Yes, Permitted Outright C - Conditional M - Mixed N - Not Permitted N/A - Not Applicable	Scoring Matrix Y = 2 C/M = 1 N = 0 40 ft = 1 35 ft = 0	Neighborhood Center	Mixed Use	Office/ Employment	Compatible Industrial	Open Space
		NC	MU	OE	CI	OS
Single Use		Y	Y	N	N	N
Mixed Use		Y	Y	N	N	N
Multi-Family		Y	Y	N	N	N
Single -Family Attached		Y	Y	N	N	N
Office		N	Y	Y	Y	N
Non-Auto Retail/Services/Commercial		Y	M	M	M	N
Childcare		Y	Y	Y	Y	N
Schools		C	C	C	C	N
Other Public Uses		Y	Y	Y	Y	Y
Government Facilities		Y	C	C	C	Y
Parks, Open Space, and Other Similar		N	N	N	N	Y
Maximum Block Length		Y	Y	Y	Y	Y
Density Minimum (15 Dwelling Units/Acre)		N	N	N	N	N
Density Maximums Prohibited		N	N	N	N	N
Maximum Building Height (>= 50ft)		Y	Y	Y	Y	N
Maximum Building Height		50	50	75	75	N/A
Score		21	21	13	13	8

Observations:

- Single- and mixed -uses are permitted outright in all zones, but single use multi-family residential is only available in higher density residential zones
- Government facilities, parks, open space, plazas, and similar public amenities vary throughout, but are generally more available in the Commercial zones
- Maximum block length applies to all zones except C-1 and C-1-D
- Most zones permit a portion of the required outright permitted uses (multifamily and single family attached residential, office uses, non-auto dependent retail/services/commercial, childcare, schools, and other public uses), but no zones permit all of them outright
- The more greens and yellows, the more CFA-ready a zone is with less modification.
- The Croman Mill District has the most qualifications for a CFA

Identify Zoning Changes

Zones were evaluated in more depth to determine the specific changes that are needed to bring them into compliance with CFEC rules. The purpose of the initial zoning code evaluation was to identify those zones that are the most CFA-ready, as a way to ensure that CFA-related changes occur where they will fit well within the existing built environment and simplify the City's process of updating zoning codes.

CFA Compatible Zones

Croman Mill (CM)	
Single Use	Y
Mixed Use	Y
Multi-Family	Y
Single -Family Attached	Y
Office	Y
Non-Auto Retail/Services/Commercial	M
Childcare	Y
Schools	C
Other Public Uses	Y
Government Facilities	C
Parks, Open Space, and Other Similar	N
Maximum Block Length	Y
Density Minimum (15 Dwelling Units/Acre)	N
Density Maximums Prohibited	N
Maximum Building Height (≥ 50 ft)	Y
Maximum Building Height	50
Score	21

Croman Mill District

The CM District Mixed Use Zone (CM-MU) is close to CFA-compliance. It permits outright all residential uses and already meets the building height maximum requirement.

To be in line with CFA rules, the CM-MU zone would need to be expanded to the entire site and must permit outright non-auto retail/service/commercial, schools, and civic uses. Parks and open space must be allowed, density minimums of 15 du/acre or more enforced, and density maximums prohibited.

Residential – High Density

Residential - High Density (R-3)	
Single Use	Y
Mixed Use	Y
Multi-Family	Y
Single -Family Attached	C
Office	C
Non-Auto Retail/Services/Commercial	N
Childcare	C
Schools	M
Other Public Uses	N
Government Facilities	N
Parks, Open Space, and Other Similar	Y
Maximum Block Length	Y
Density Minimum (15 Dwelling Units/Acre)	M
Density Maximums Prohibited	N
Maximum Building Height (≥ 50 ft)	C
Maximum Building Height	35
Score	16

The R-3 zone meets many of the CFA land use requirements, except for the 50 ft building height maximum and a portion of the permitted uses. To meet the CFEC requirements, the City of Ashland would have to adjust the currently permitted outright building height maximum from 35 ft (40 ft conditional) to 50 ft and change single-family attached, office uses, childcare, schools, and other public uses from conditional to permitted outright uses. An increase of residential density from 13.5 dwellings per acre would need to be changed to a minimum density of 15 du/acre with no maximum residential density. Non-auto dependent retail/services/commercial and civic uses must be permitted, and density maximums must be prohibited.

Commercial Downtown – Central Business District

Commercial - Central Business District (C-1-D)	
Single Use	Y
Mixed Use	Y
Multi-Family	C
Single -Family Attached	C
Office	C
Non-Auto Retail/Services/Commercial	Y
Childcare	Y
Schools	N
Other Public Uses	M
Government Facilities	Y
Parks, Open Space, and Other Similar	N
Maximum Block Length	N
Density Minimum (15 Dwelling Units/Acre)	N
Density Maximums Prohibited	N
Maximum Building Height (≥ 50 ft)	C
Maximum Building Height	40
Score	15

The Downtown Commercial District is Ashland's Central Business District (CBD), and is the city's nexus for employment, services, and transportation. It is more suitable as a CFA than most other zones because it already has conditional building height maximums of 55 ft and permits mixed uses, government facilities, parks, open space, and other similar public amenities outright. The residential density is currently 60 dwellings per acre, yet there are no minimum density requirements. To meet the full CFA requirements in this area, Ashland would need to mandate a minimum density of at least 15 dwelling units/acre, remove the density maximum, and permit outright building heights of 50 feet or more.

Commercial - Employment

Commercial - Employment (E-1)	
Single Use	Y
Mixed Use	Y
Multi-Family	C
Single -Family Attached	C
Office	C
Non-Auto Retail/Services/Commercial	C
Childcare	Y
Schools	M
Other Public Uses	Y
Government Facilities	Y
Parks, Open Space, and Other Similar	N
Maximum Block Length	Y
Density Minimum (15 Dwelling Units/Acre)	N
Density Maximums Prohibited	N
Maximum Building Height (≥ 50 ft)	C
Maximum Building Height	40
Score	18

The E-1 zone allows for a significant cross section of CFA requirements, but there are several uses like multi-family and single-family attached residential, and schools that would need to be permitted outright to qualify as a CFA. Within a designated CFA, parks and open space also need to be allowed, residential density minimums established, and density maximums prohibited. Like other Ashland zones, building height maximums would also need to be raised from a 40' height to 50'. E-1 zoned properties are also included within the Transit Triangle Overlay, which is discussed later in the document.



Other Residential Zones (R-1, R-1-3.5, R-2, RR, WR)

The lower-density residential zones share a lot in common with each other. They allow single- and mixed-uses and parks. They all partially or conditionally allow single-family attached, childcare, and schools. All except for R-2 do not currently allow office or non-auto retail/service/commercial uses. With the exception of R-2, these lower-density residential zones do not have density minimums except when brought into the City through annexation or as a zone change. The R-2 zone requires a minimum density of 80% the base density. These residential zones have maximum building heights of 35 ft.

Despite their low scores in our analysis, like all zones, these can be made compliant with CFEC rules with certain changes. All office, non-auto retail/service/commercial, childcare, schools, and civic uses would need to be permitted outright making these areas similar to Ashland's commercial zones. To be designated as qualified CFAs density minimums of 15 dwelling units per acres would need to be established and enforced density maximums must be prohibited and building height maximums would have to be raised to a minimum of 50 ft.

Other Commercial and Industrial Zones (C-1, M-1)

C-1 and M-1 zones both score very well in our analysis, but there are other factors that have left them as lower priorities. C-1 scored essentially the same as C-1-D and it would need the same changes to become CFA-ready. The C-1-D receives preference because it encompasses the part of the city with the highest density of jobs and built housing potential, but the adjacent C-1 areas would make good candidates to expand the CFA geographically if needed. C-1 also features prominently in the Transit Triangle Overlay, which is discussed in the next section.

The M-1 zone scored fairly well in our analysis, but it is not prioritized because industrial uses are not as easily relocated as other uses and the goal of the CFA project is to avoid creating undue burdens on the local economy. Additionally, industrial uses do not coexist with residential uses the same way that commercial uses do. That being said, if a portion of the M-1 zone is required to form the ideal CFA form, non-auto retail/services/commercial and schools will need to be permitted outright. Multi-family and single-family attached residential must be permitted along with parks and open space. Density minimums of 15 dwelling units or more must be created and building height maximums need to be raised to 50 ft. Density maximums would have to be prohibited, as well.



Y - Yes, Permitted Outright C - Conditional M - Mixed N - Not Permitted N/A - Not Applicable	Scoring Matrix Y = 2 C/M = 1 N = 0 40 ft = 1 35 ft = 0	Transit Triangle			
		Base Zones			
		Commercial	Employment	Low Density Residential	High Density Residential
		C-1	E-1	R-2	R-3
Single Use		Y	Y	Y	Y
Mixed Use		Y	Y	Y	Y
Multi-Family		M	M	M	M
Single -Family Attached		C	C	C	C
Office		C	C	Y	Y
Non-Auto Retail/Services/Commercial		Y	C	C	N
Childcare		Y	Y	C	C
Schools		N	M	M	M
Other Public Uses		M	Y	N	N
Government Facilities		Y	Y	N	N
Parks, Open Space, and Other Similar		N	Y	Y	Y
Maximum Block Length		N	N	Y	Y
Density Minimum (15 Dwelling Units/Acre)		Y	Y	N	Y
Density Maximums Prohibited		N	N	N	N
Maximum Building Height (>= 50ft)		Y	Y	N	N
Maximum Building Height		50	50	40	40
Score		18	21	15	16

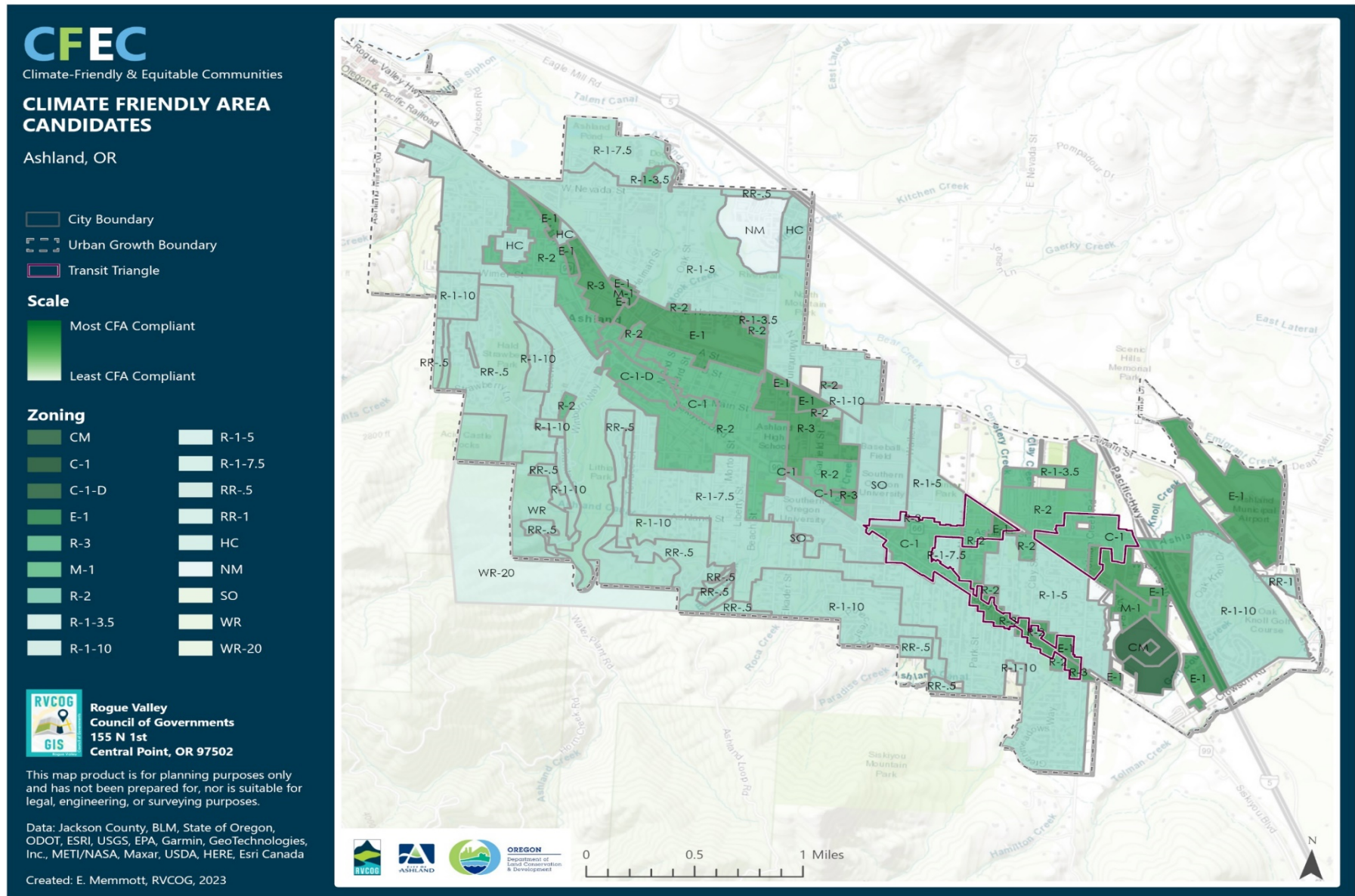
Transit Triangle Overlay

Table 4.
Transit Triangle Zoning Analysis

The Transit Triangle Overlay (TTO) is intended to diversify the mix of housing and business types along major transit routes. Table 4 above shows that the overlay enhances the C-1 and E-1 zones within the TTO and significantly improves their scores in our analysis. However, for the TTO, multi-family residential uses are permitted only for rental and not for purchase. The main improvements to the C-1 and E-1 zones are the increased building height maximums, density minimums, and parks/open space. Within the TTO, the C-1 and E-1 zones have excellent scores and are some of the best candidate areas for CFA locations.

Map 3 on page 29 showcases the zones illustrates which best fit the CFA requirements. No zones are currently in compliance with CFEC rules, but Tables 2 and 3 show that the Croman Mill, Residential – High Density (RHD), and Commercial – Central Business District (CBD) zones stand out as being the closest. Small changes to permitted uses and the building height maximum would bring most into compliance.

Map 3. Zoning Analysis





CFA Capacity Calculation

Candidate CFA locations have been identified and prioritized, and this step evaluates each area's housing capacity. If the proposed CFA's boundaries do not encompass 30% or more of current and future dwellings, there will be a need for boundaries to be adjusted or the creation one or more additional CFAs. Additional CFA candidates that have been identified will be considered first for CFA expansion if need be and the evaluation process will begin at Step 2 for these sites.

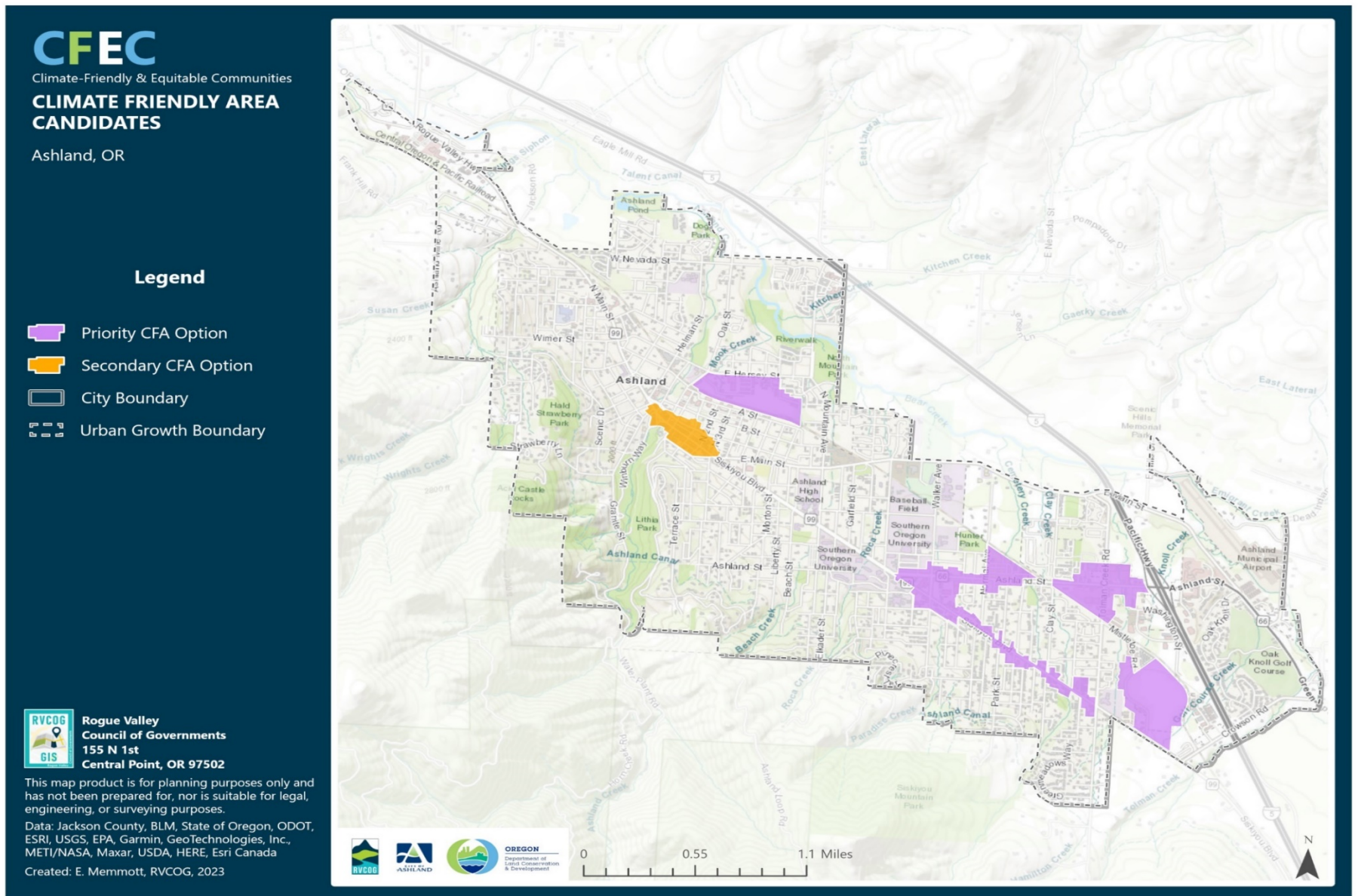
City Guidance

City staff have highlighted several priority CFA candidates, shown in Map 4 below. Staff selected these areas not only for their designated zoning's alignment to the CFA requirements, but also factored in development potential as an additional factor. The Croman Mill and Railroad Property sites are largely undeveloped and present strong cases for rapid CFA-related changes. The Transit Triangle is one of the priority CFA options within the city and do have the potential to be improved within the existing uses and make it more compatible as CFA requirement and it could look like a secondary downtown. Conversely, the Downtown area is largely built out, indicating a barrier to potential redevelopment. However, the current built environment is similar to what is expected of CFAs and could be adapted to CFA guidelines with little trouble and may serve as useful tracts for CFA expansion in the future.

City staff have highlighted several priority CFA candidates, shown in Map 4 below. Staff's selections were made based not only on how well the designated zoning aligns with CFA requirements but also considering the potential for development. Among these areas, the Croman Mill and Railroad Property sites stand out due to their underdeveloped nature, making them suitable for rapid CFA-related changes. Another noteworthy candidate area is the Transit Triangle Overlay, which holds a prime position among the CFA options within the city. There is potential to enhance this area while maintaining its existing uses, thereby making it more compatible with CFA requirements.

In contrast, the historic Downtown area is already extensively developed, posing a challenge for potential redevelopment. Despite this, its current built environment closely resembles what is envisioned for CFAs. With some adjustments, it could be brought in line with CFA guidelines without significant difficulty. As such, it could serve as a valuable location for potential CFA expansion in the future.

Map 4. Priority CFA Candidates



Croman Mill

The Croman Mill site is approximately 92 Acres in the southeastern corner of the city (Image 1). It is served by Siskiyou Blvd. at the south end and Mistletoe Rd. in the north. A master plan for the site was adopted in 2008, but development has yet to occur (Image 2). The plan calls for office and industrial uses for most of the site. Also, there is residential center and mixed-use zones allowed within the Croman Mill site.

The Croman Mill site is viewed as an excellent CFA location due to its redevelopment potential, large size, and proximity to quality transit service and bicycle and pedestrian infrastructure.

Railroad Property

The Railroad Property site is 57 Acres in the center of the city, just a few blocks north of downtown (Image 3). The site rests between the rail line and E Hersey St. The northern half of the site is developed with commercial, and employment uses, but the majority of the southern portion of the site is undeveloped.

The 2001 master plan for the site shows a pedestrian-focused mixed-use area intermingled with civic uses adjacent to the existing northern commercial area enhanced with new local streets connecting to E Hersey St (Image 4).

Image 1 - Croman Mill

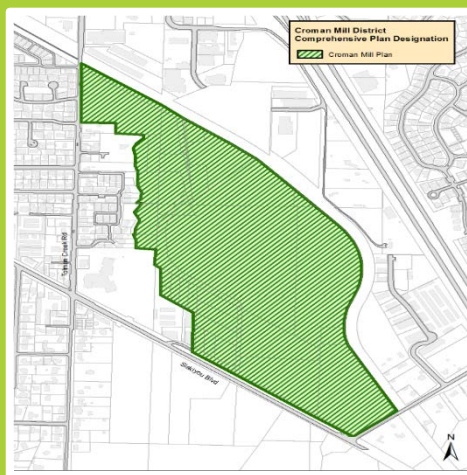


Image 2 - Croman Mill Planned Zones

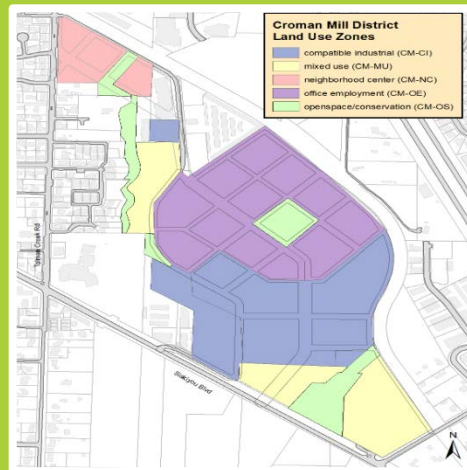
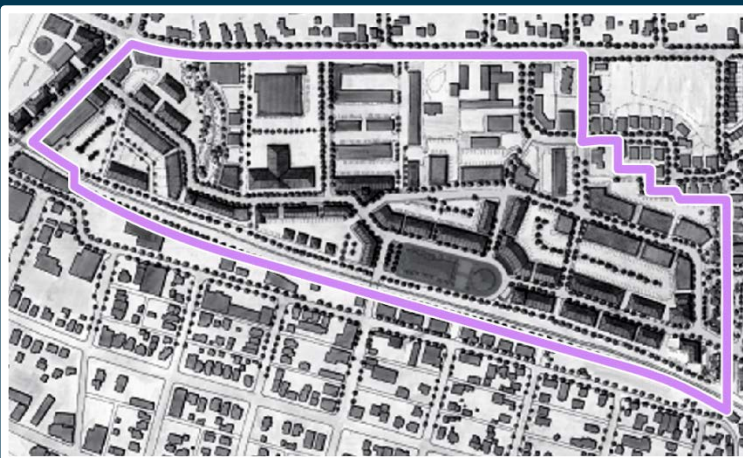


Image 3 - Railroad Property



Image 4 - Railroad Property Master Plan



Transit Triangle Overlay

The Transit Triangle is intended to facilitate a mix of housing types and businesses along major transit corridors on Siskiyou Blvd., Ashland St., and Tolman Creek Rd. The goal is to create an environment that is friendly to walking, biking, and using transit. The Transit Triangle, as written, is close to meeting CFA requirements and as a result it is considered one of the priority CFA options the city can consider. The Transit Triangle has an area of 167 acres and that area could theoretically have a considerable additional housing capacity.

Downtown

The downtown area closely resembles the vision of what a CFA can look like when it has reached maturity and there would be few adjustments needed to make it CFA-compliant. However, it is almost completely built out and there have been very few new construction projects in the area over the last 20 years.

However, the community has expressed interest in implementing CFA strategies significantly beyond what is minimally required, and the downtown area stands out as an obvious place to include in any expansion efforts.

Image 5 – Transit Triangle

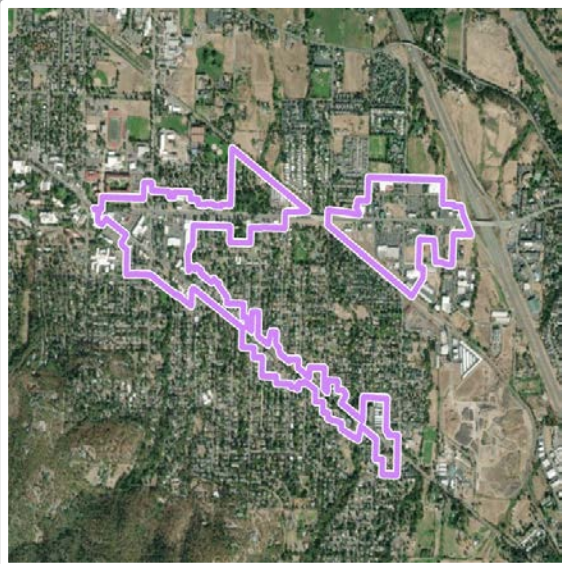


Image 6 – Downtown





Calculate Housing Unit Capacity

This method was adapted from the DLCD Climate-Friendly Areas Methods Guide. The calculation follows the prescriptive path described in the methods guide. Total Housing Unit Capacity in CFA is estimated using the following variables:

- The Net Developable Area in sq. ft. (a)
- The maximum number of building floors (f)
- The assumed percentage of residential use (r)
- The average size of a housing unit in sq. ft. (s)

Using these, the housing unit capacity (U) in any part of a CFA can be given by a simple formula:

$$\text{Housing Unit Capacity (U)} = \frac{(\text{Net Developable Area} * \text{Maximum floors} * \text{Resident use percentage})}{\text{Average Housing Unit}}$$

Note: In the above formula, the results are rounded to the nearest integer.

Net Developable Area and Maximum Building Floor factors in the above calculation requires some additional sub-calculations. The values to use for Assumed Percentage of Residential Use (r) and Average Size of a Housing Unit (s) are given in the rules.

Each uniquely zoned area of the CFA will have its own calculations of these factors and the above housing unit formula. Then they are summed for the CFA area to give the total Housing Unit Capacity.



Evaluation

Assumptions

Both the Croman Mill District and Railroad Property sites have significant development opportunities, and while they are master planned, specific lots have not been identified. Additionally, while ongoing master planning efforts are underway (Croman Mill District revisions), there are several changes being worked on at the moment that could significantly affect the layout of these sites, the details of which will not be available for some time. Therefore, it is prudent to use city standards to determine gross and net block areas. The Right-of-Way (ROW) set aside is 20%, as that is the DLCD standard. We use the street network plans when available to measure out the undevelopable area and subtract it from the overall area. The same standards will be applied for the Transit Triangle area to calculate the housing capacity of the site.

These calculations are based on the block level and do not count for interior lot setbacks. All sites are within 0.5 miles of a frequent transit corridor according to OAR 660-012-0440, and parking minimums cannot be mandated within this area. Values shown below may differ slightly from actual values due to rounding.

Note that 30% of projected needed housing for the city is **3,469**.

<i>Equations</i>			
Gross Block Area	=	Block Length x Block width	
Net Block Area	=	Gross Block Area – deductibles (ex. Alleys)	
Net Developable Area	=	Net Site Area – (Green space, ROW, Streets, etc.)	
Building Floors	=	(Building Height Max -10) / 10	
Housing Units	=	Net Site Area x Percent Residential Use x Floors / Avg. Housing Unit Size	
Units per Acre	=	Housing Units / Net Area	

<i>City Standards</i>			
Block Length			400 ft
Block Perimeter			1,600 ft
Gross Block Area	400 ft x 400 ft =	3.67 Acres:	160,000 sq. ft
Right-of-Way Set-Aside	(DLCD rule of thumb)		20%

<i>DLCD CFA Standards</i>	
Percent Residential Use	30%
Average Housing Unit Size	900 ft



Calculations

<i>Croman Mill</i>		
Site Area		92.69 Acres
Green Space		10.1 Acres
Street Network	<i>Approximately</i>	20 Acres
Net Developable Area	65 Acres:	2,821,010 sq. ft
Housing Units Capacity		5,142
Percentage from Needed Housing	<i>(Housing Unit Capacity/Needed Housing).</i>	148%
Units Per Acre		79

Croman Mil District Results

5,142 units is more than the Needed Housing Units the city will need to meet the CFA requirement of 30% of projected needed housing units, which is **3,469**. The Croman Mill site has the potential to host 28% more than the required 30% of projected needed housing units. Please note that this calculation accounts for the individual Housing Unit capacity of all the different planned land use zones, mainly because different zones allow for different building heights, within the Croman Mill site .

The cumulative housing unit capacity across the site results in a total of 5,142 dwellings. Despite this capacity based on maximum building size, minimum unit size, and maximum lot coverage, City Staff anticipates that the more realistic development scenario would be closer to the minimum residential density of 15 dwellings per acre, rather than the maximum calculated feasibility of up to 80 units per acre. Thus, utilizing 15 units per acre across the 65 net developable acres of the Croman Mill District would lead to a more limited capacity of 975 dwellings. In assessing the designated CFA sites, City Staff would aim to ensure that the 3,469 dwelling units required within CFAs are achievable at the minimum residential density required, rather than the maximum density achievable.



<i>Transit Triangle Overlay</i>		
Site Area		162.89 Acres
Green Space	<i>Approximately</i>	7.51 Acres
R.O.W	<i>(DLCD Standard)</i>	20 %
Net Developable Area	148 Acres	6,447,752 sq. ft
Housing Units Capacity		7,524
Percentage from Needed Housing	<i>(Housing Unit Capacity/Needed Housing).</i>	217 %
Units Per Acre		52

Transit Triangle Overlay Results

The Transit Triangle overlay is capable of hosting around 7,524 units within it if developed in its entirety at the maximum allowable residential density afforded within a CFA. This site alone can meet and exceed the Projected Needed Housing for the city. Please note that this calculation accounts for the individual Housing Unit capacity of all the different planned land use zones, mainly because different zones allow for different building heights, within the Transit Triangle Overlay and

The sum of all the housing unit capacity for the site gives us 7,524 units based on maximum development capacity. However, the Southern Oregon University zone (SO) portion within the Transit Triangle Overlay is not accounted for in the calculations of the housing unit capacity. That zone is being governed by the Southern Oregon University Masterplan. To avoid further complicating overlapping zones and overlays, the SO zone is excluded from the CFA. City Staff have further determined a revised residential density for the Transit Triangle Area, exclusive of the SO zone, based on the scenario where the area is developed at the CFA minimum residential density of 15 dwelling units per acre. This calculation results in an estimated total of 2,220 dwelling units.



<i>Railroad Property</i>			
Site Area			57.27 Acres
Green Space	<i>Approximately</i>		6.41 Acres
Street Network	<i>Approximately</i>		12.52 Acres
Net Developable Area		38.34 Acres	1,670,090 sq. ft
Housing Units Capacity			2,226
Percentage from Needed Housing	<i>(Housing Unit Capacity/Needed Housing).</i>		64%
Units Per Acre			58

Railroad Property Results

The calculated **2,226** housing units of the Railroad Property are not independently enough to meet the CFA requirement of 30% projected needed housing units. The site is short of 1,243 units from being compliance with the CFA requirements were it the sole CFA within the city. Therefore, an expansion of some kind must be considered.

One option for the city is to contemplate were the railroad site to be the primary CFA would be enlarging the boundaries of the Railroad site to encompass the developed residential and commercial regions nearby, which could bridge the existing gap were this site to be the exclusive CFA within Ashland. CFAs. Alternatively, the city has the option to label the Railroad site as a secondary CFA site, with the primary CFA sites being the Croman Mill District and/or Transit Triangle Overlay area. Collectively, these sites would fulfill the CFA requirement to accommodate 30% of Ashland's housing needs.



Conclusion

The Croman Mill and Transit Triangle sites both can provide ample room for CFA development to fulfill the requirement of the CFEC rules for 30% of projected needed housing units. The specific boundaries that have been analyzed could change in a variety of minor ways without bringing the unit count below the necessary threshold.

The Railroad property falls short in covering 30% of the Projected Needed Housing for the city. In any case, resizing the boundary could help increase the housing capacity of the site and bring it closer to compliance with the 30% requirement of the CFEC, or best-case scenario it will bring the railroad property to a full compliance with the 30% requirement of the CFEC.

The downtown area has been included in this discussion because it remains relevant to the CFA transformation and may end up included in a broad CFA overlay that encompasses the major employment, commercial, and higher-density residential areas of the city, even if it is not needed to meet the housing requirement.

Overall, the city of Ashland does have a few options when designating a CFA site. The site will need to be fully compliant with the CFEC land use regulations, and most of the sites do not need major updates to bring them up to compliance with the CFEC regulations. Both Transit Triangle and Croman Mill sites are compatible with the 30% projected needed housing in the city. However, the railroad property does not have the capacity to host the full 30% of the projected needed housing, but it could act as a secondary CFA and as a safety buffer for the projected housing units for the primary CFA(s). City Staff highlights that if the potential CFA candidate areas, namely the Croman Mill District, the Transit Triangle Overlay area, and the Railroad site, are individually developed to meet the minimum density requirement set for designated CFAs (which is 15 units per acre), their combined residential development capacity even at this minimum would successfully meet the CFA mandate of accommodating a minimum of 30% of Ashland's housing demands.



Chapter 3: Anti-Displacement Mitigation Strategies

CFA Redevelopment Outcomes

Due to the nature of the regulations, an area designated as a climate friendly area gains the capability to be redeveloped for a wide variety of uses and dense housing types. While these factors intend to promote nodes not reliant on personal automobile use, they also have the capability of creating modernized, attractive, and competitively priced developments which can subsequently displace protected classes. This trend, known as gentrification, can become a component of a climate friendly areas if cities do not carefully analyze a CFA's location and consider proper phase 2 protections to ensure the developments remains accessible to all populations.

Anti-Displacement Map Analysis

Recognizing this potential threat, DLCD has prepared an anti-displacement guide. This guide classifies areas by neighborhood type which are characterized by their income profile, vulnerable classes, amount of precarious housing, housing market activity, and overall neighborhood demographic change. Each area is identified through the DLCD anti-displacement map, which can be found here: [Anti-Displacement Map](#)

Each neighborhood type is categorized as one of the following:

Affordable and Vulnerable

The tract is identified as a low-income tract, which indicates a neighborhood has lower median household income and whose residents are predominantly low-income compared to the city average. The neighborhood also includes precariously housed populations with vulnerability to gentrification and displacement. However, housing market in the neighborhood is still stable with no substantial activities yet. At this stage, the demographic change is not under consideration.

Early Gentrification

This type of neighborhood represents the early phase in the gentrification. The neighborhood is categorized as a low-income tract having vulnerable people and precarious housing. The tract has a hot housing market, yet no considerable changes are found in demographics related to gentrification.

Active Gentrification

These neighborhoods are identified as low-income tracts with a high share of vulnerable people and precarious housing. The tracts are experiencing substantial changes in housing price or having relatively high housing costs found in their housing markets. They exhibit gentrification-related demographic change. The latter three neighborhoods on the table are designated as high-income tracts. They have hot housing market as they have higher rent and home value with higher appreciation rates than the city average. They also do not have precarious housing anymore. However, Late Gentrification type still has vulnerable people with experiences in gentrification related demographic changes.



Late Gentrification

This type of neighborhood does not have predominantly low-income households, but still have vulnerable population to gentrification. Their housing market exhibits high housing prices with high appreciations as they have relatively low share of precarious housing. The neighborhood has experienced significant changes in demographics related to gentrification.

Becoming Exclusive

The neighborhoods are categorized as high-income tracts. Their population is no longer vulnerable to gentrification. Precarious housing is not found in the neighborhoods. However, the neighborhoods are still experiencing demographic change related to gentrification with hot housing market activities.

Advanced Exclusive

The neighborhoods are identified as high-income tracts. They have no vulnerable populations and no precarious housing. Their housing market has higher home value and rent compared to the city average, while their appreciation is relatively slower than the city average. No considerable demographic change is found in the neighborhoods.

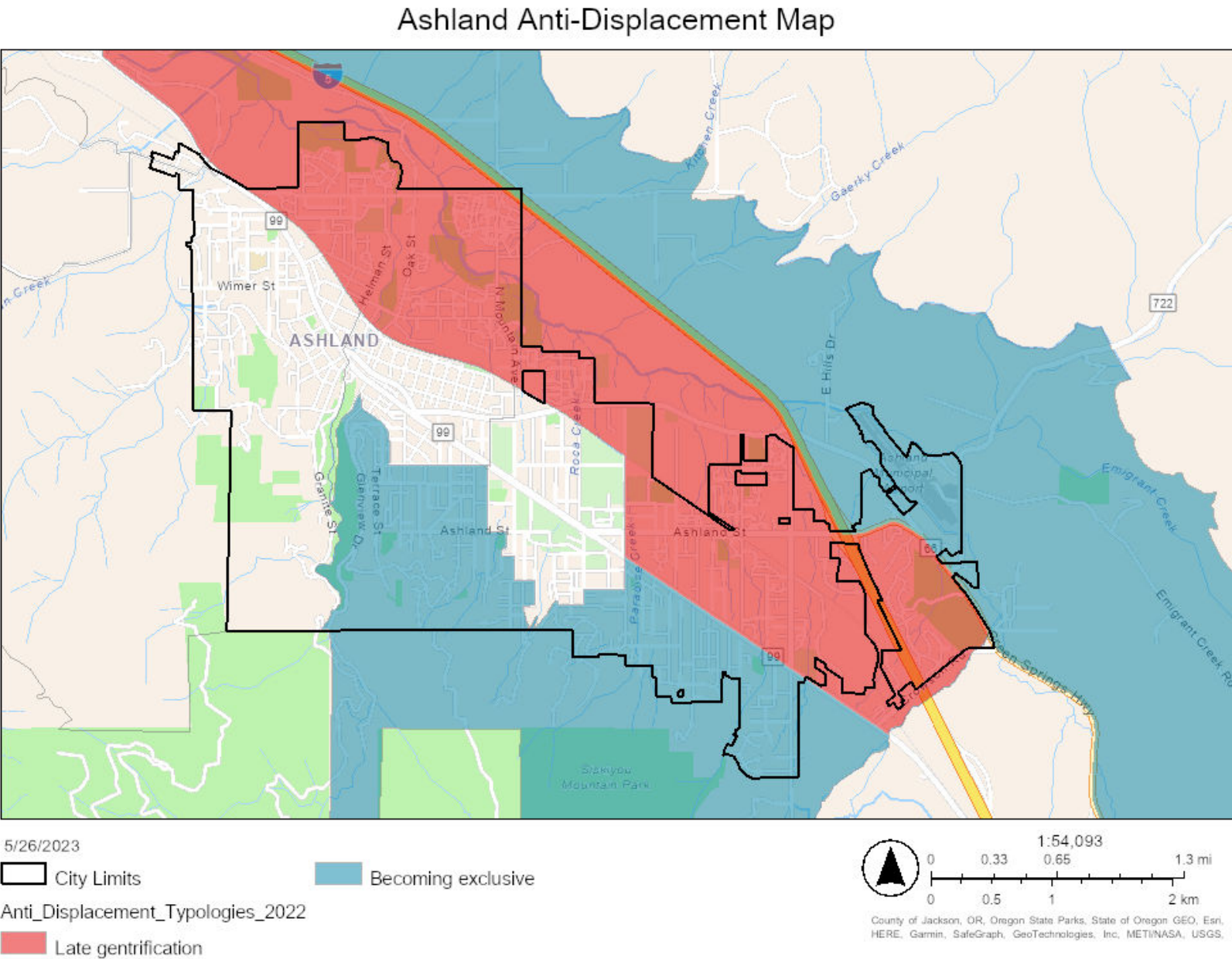
Unassigned

The unassigned tracts have not experienced any remarkable changes in demographics or housing markets. The neighborhood has been stable with unnoticeable change, yet this does not necessarily mean that there is no need for extra care compared to other neighborhoods with assigned types. Planners need to engage with the communities to make sure the neighborhood is stable while aligning with community needs and desires.

Neighborhood Types Present Within the Proposed CFA

As proposed, the candidate CFA for Ashland currently lies within a census tract 18 of Jackson County, which is identified by the neighborhood type: **Late Gentrification**, see the following map.

Map 5. DLCD Anti-Displacement Map





Suggested Strategies

It is important to note that while the project's scope of work directly referenced DLCD's housing production strategies (HPS) as a component of the anti-displacement analysis, the City of Ashland has an approved Housing Production Strategy report which satisfies DLCD's requirements and aims to ensure sustainable and equitable residential development within the city. Because the housing production study was put out for public comment on May 23rd, 2023, the technical analysis in this report utilized DLCD's HPS for the purposes of the Climate Friendly Area analysis. Nonetheless, the technical analysis team recommends use of the in-depth HPS report produced by the City of Ashland for phase 2 of the CFA study.

Referring to DLCD's housing production strategies, which can be found [here](#), RVCOG has identified the following strategies to ensure that a climate friendly area acts as an equitable community. In selecting strategies RVCOG prioritized strategies color coded as green for the **Late Gentrification** neighborhood type for their likeliness to generate little to no adverse impact, factoring in local context and feasibility as well.

Category A: Zoning and Code Changes

A03: Density or height bonuses for affordable housing.

Cities could consider introducing a height and density bonus for developments which introduce units between 30% - 120% of the average median income (AMI). RVCOG suggests using the CFA thresholds as a potential model for such bonuses, in the case of Ashland potentially allowing an increased 10 feet of maximum height and additional 5 dwellings per acre. City Staff notes that Ashland presently allows an affordable housing density bonus of up to two market rate units for every qualifying affordable housing unit provided, accommodating up to a 35% increase in residential density.

A07: Single Room Occupancy

Single room units, such as junior accessory dwelling units, present a new housing typology not commonly considered among residential zones. Enabling this use as a permitted accessory component of a multi-unit development could provide developers with the opportunity to provide unique housing arrangements and a variety of units at different price points. (New State Law)

A14: Re-examine Mandated Ground Floor Use

The City of Bend has determined that while lively streetscape in a dense environment is a worthy goal, mandating that ground floors be occupied by commercial uses when the surrounding market forces can't support such a use can contribute to decreased development or loss of area for dwellings. City Staff notes that HB 2984, passed in the 2023 State Legislative Session, allows the conversion of buildings from commercial use to housing without a zone change or conditional-use permit. It prohibits local governments from requiring more parking and limits collection of system development charges. This statewide legislation effectively allows residential ground floor use within commercial buildings.



Category B: Reduce regulatory Impediments

B10: Public Facility Planning

Factoring that some of the proposed CFA sites are largely vacant, assisting in providing public facilities could make these sites more attractive for development. Furthermore, assisting in providing public facilities may enable the city to prioritize key connections or better plan for expansion in the future.

B07: Flexible Regulatory Concessions for Affordable Housing

Considering that cities within the 10,000-24,999 population range are in one of the lower ranges for prescriptive CFA standards, enabling affordable housing to move into some of the upper thresholds could present a unique advantage further attract affordable housing. Furthermore, this strategy enables a CFA to evolve directly in response to its City's population growth, possibly resulting in a CFA pre-emptively meeting the next threshold's requirements.

B19: Survey Applicant on Development Program Decision-Making

User feedback can help illustrate frustrations or pitfalls in the planning process not seen by staff. Utilizing a survey as litmus test for ease of development within a CFA can serve as an asset not only to the CFA, but the City's Planning department as a whole. City Staff notes that in February 2023 the City Community Development Department surveyed all individuals that obtained a Planning Permit, or Building Permit, from 2018-2022. The City is in the process of establishing a Development Process Management Advisory Committee made up developers, builders, architects, and private planners, to assist in reviewing the survey and to recommend areas to improve the permitting process and reduce barriers to the development of needed housing.

Category C: Financial Incentives

C01: Reduce or exempt System Development Charges (SDCs) for needed housing.

SDC's are often seen as necessary yet prohibitive cost associated with new development. Granting exemptions for needed dense and affordable housing helps clear the way for development, while commercial developers seeking to capitalize on attractive areas by constructing recreational or tourism oriented, or general luxury developments can bear a larger part of the burden when it comes to needed infrastructural growth. City Staff notes that Ashland presently waives all SDCs for qualified affordable housing.

C04: Incentivize Manufactured and Modular Housing.

Manufactured and modular housing could be a popular option in vacant CFA areas as it can be constructed for less cost and added on to as a larger population occupies the CFA. Modular housing also supports homeownership rather rented housing, a notion that could ensure a CFA acts as equitable community for permanent residents and doesn't become an area merely for vacation rentals. City Staff notes the City's adopted Housing Production Strategy includes a strategic action to create a Manufactured Park Zone to preserve existing parks and potentially identify opportunities for additional manufactured home parks. Manufactured and Modular housing are presently permitted outright on



individual residentially zoned lots within the City with the exception of designated National Register Historic Districts.

Category D: Financial Resources

D02: Low Income Housing Tax Credit (LIHTC).

Federal tax credits represent an external opportunity for an affordable housing development to feasibly occur within a city. Disclaiming these opportunities to developers comes at little cost to the city, and can facilitate mixed income housing that contributes to a more diverse set of demographics within a CFA.

D09: Demolition Taxes

A demolition tax can ensure that new development within a CFA introduces a greater density than the existing structure or be forced to be pay a tax to fund a housing trust fund. Demolition taxes help mitigate the effects of higher density, aging housing being replaced by lower density, newer, market-rate homes, which could occur if the CFA is sited in a more historic area of a community, or the introduction of the CFA regulation induces more affluent populations seeking proximity to mixed uses.

D09: Construction Excise Tax

Seeing as the CFA's are located on vacant land, a construction excise tax (CET) seems to be an apt solution to ensure development of a CFA accrues funds for affordable housing projects both within the CFA and elsewhere. City Staff notes the City's adopted Housing Production Strategy includes a strategic action to evaluate establishing a CET to support affordable housing development within the community.

Category E: Tax Exemption and Abatement

E03: Vertical Housing Development Zone Tax Abatement

This housing production strategy authorized ORS 307.841 directly aligns with the live work environment that's meant to appear within CFA's and is natural candidate to assist in mixed use development. The effectiveness of this strategy could be somewhat bound by a CFA's respective height limits but coupled with affordable housing density bonuses could be quite effective. City Staff notes that Ashland presently established a Vertical Housing Development Zone to correspond with the Transit Triangle Overlay area. As this Transit Triangle area is a candidate for a CFA, this strategy is in already place within one of the potential CFA areas under consideration.

E04 & E05: Multiple Unit Tax Exemptions (Property and Limited taxes)

Similar to the Vertical Housing Tax Abatement, the multiple unit tax exemptions could serve as a symbiotic strategy to the type of development intended to occur within a CFA. Whether this strategy seeks to aid in overall feasibility by being a long-term exemption or aid in the initial

E10: Delayed tax Exemptions

Delayed tax exemptions can be seen as a viable strategy to allow new development recoup construction costs and establish a profitable base before falling below 80% AMI. This strategy could benefit initial



developments in CFA's, and later assist them in serving a new economic bracket when the area becomes more developed.

Category F: Land, Acquisition, Lease, and Partnerships

F17: Designated Affordable Housing Sites

Designating CFA's partly or entirely as affordable housing sites can ensure the best use of the land in the future. While price control measures may ward off developers initially, highlighting tax exemptions and streamlined planning process coupled with the relative newness of the CFA regulations may highlight these areas as feasible location for affordable housing.

F19: Affordable Housing Preservation Inventory

Identifying and inventorying areas currently hosting affordable housing enables staff to examine what contextual factors have led them to appear in their community, and informs areas to proceed with caution when expanding the CFA.

City staff are encouraged to review and evaluate the list of strategies when it comes time for phase 2 zoning reform.

City Staff emphasizes that the strategic actions outlined in the approved Ashland Housing Production Strategies will be evaluated in the context of identifying and implementing Climate Friendly Areas (CFAs). A new CFA land use designation would be crafted with the primary goal of encouraging the development of transit supported mixed-use, higher-density environments that actively diminish the dependence on fossil fuels. The evaluation process will pay particular attention to addressing the potential displacement of existing affordable housing within any designated CFA area while simultaneously seizing the opportunities to foster necessary housing options within the designated areas. This comprehensive approach underscores the city's commitment to both sustainable urban development and the preservation of affordable housing for its residents.



Appendix A: Acronyms

Regulatory:

- LCDC = Land Conservation & Development Commission
- DLCD = Department of Land Conservation & Development
- OAR = Oregon Administrative Rules
- CFA = Climate Friendly Area
- CFEC = Climate Friendly & Equitable Community

Technical:

- HNA = Housing Needs Assessment
- HCA = Housing Capacity Analysis
- HPS = Housing Production Strategy
- NDA = Net Developable Area
- HUC = Housing Units Captured
- MF = Multifamily Housing
- SF = Single Family Housing



Appendix B: References

- [Climate-Friendly Areas Methods Guide](#) by DLCD.
- [CFA Anti-Displacement Analysis](#) by DLCD.
- [Housing Production Strategy](#) by DLCD.
- The cover picture used in the study document is by Fred Stockwell



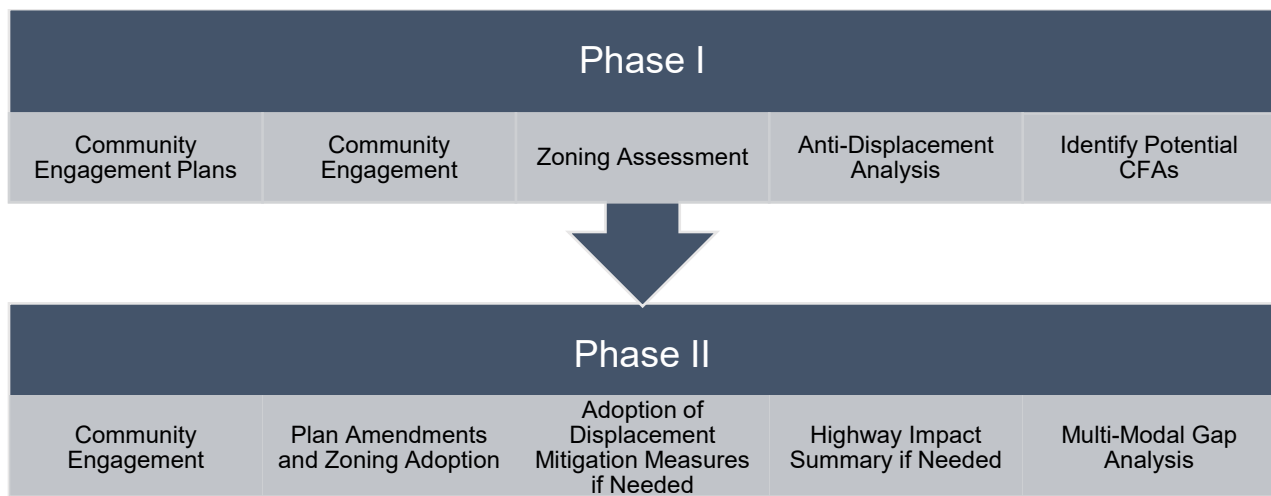
Climate Friendly Areas Study

City of Ashland, OR



Rogue Valley
Council of Governments

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For Phase 1 – completion of the CFA study – cities will:

1. Develop a community engagement plan to be integrated throughout both phases.
2. Identify potential CFAs based on **locational criteria**. This will involve:
 - a) Evaluate downtown areas, planned or existing urban centers, neighborhood centers, transit corridors, and similar areas;
 - b) Identify significant **infrastructure bottlenecks** that would impact the ability to realize more intense development;
 - c) Determine if high-quality transit, bicycle, and pedestrian services are present, or may be provided;
 - d) Look for significant **natural hazards** (floodplain, slopes, etc.) that could prevent more intense development; and
 - e) Determine if potential CFAs would meet the minimum size requirements.
3. Evaluate existing development standards and the level of change needed.
4. Evaluate whether **displacement of underserved populations** would be likely to result from designation of each CFA and identify mitigation measures that could prevent displacement. (“Displacement” occurs when current residents are priced out of their current homes, often through redevelopment and higher housing costs.)
5. **Submit the study** containing the information identified above, by December 31, 2023.

Other Considerations for Phase 1:

- Cities with a population **between 5,000 to 10,000** only need to designate one climate-friendly area that is at least 25 acres.
- Cities with a population **above 10,000** must designate climate-friendly areas sufficient in size to accommodate at least 30% of identified current and future housing needs.
- The **size of CFAs** for cities over 10,000 are based upon zoned residential building capacity.
- Cities may designate **one or many CFAs**. Cities over 10,000 need to demonstrate that the CFA or CFAs cumulatively provide sufficient zoned residential building capacity to accommodate at least 30% of the current and projected future housing needs.
- Studies are submitted to the Oregon Department of Land Conservation and Development (DLCD) for review and feedback on the study.
- CFA studies will be available for **public review and comment** concurrent with the DLCD’s review (within 90 days of report submittal).
- The **studies are not land use decisions** and may not be appealed.

CFA studies will provide information regarding each of the CFA candidate areas to inform the community's decision-making process to determine which CFAs should be designated (see Table 2 below for an example of what that might look like).

For Phase 2 – CFA zoning and comprehensive plan amendments – cities will:

1. **Review and select** CFAs, based on CFA study information, and guidance from the community.
2. Perform **multi-modal gap analysis** on transit, bicycle, and pedestrian services and infrastructure.
3. Complete a **highway impact summary**, if applicable.
4. Determine **development standards** for each CFA.
5. Adopt **displacement mitigation** policies if need.
6. Prepare development codes and a **climate-friendly element** to the comprehensive plan for consideration and adoption through public hearings.
7. Conduct public hearings and **adopt CFA zoning** and comprehensive plan amendments.

Other Considerations for Phase 2:

- Each city will use its own local process to decide which areas will be CFAs. The typical process or processes will require changes to zoning maps, development code requirements, and comprehensive plans.
- Cities of 25,000 or more may designate some CFAs with less intensive development standards, if they wish to.
- CFA zoning includes:
 - A variety of **outright-permitted** residential, commercial, service, and employment uses.
 - May include abutting high-intensity residential or employment areas.
 - Prioritization for locating **public-serving facilities** and the location of parks, plazas, and open space areas. Where feasible, street trees and other landscaping should be provided in CFAs.
 - Block length standards that facilitate **pedestrian connectivity**.
 - Development limitations are based on **allowed building height** and other site development requirements rather than residential density limits.
 - Reduced **parking requirements**.
- Community engagement will center consideration of **equitable outcomes** for underserved populations.
- A **highway impacts summary** may need to determine potential traffic generation from CFAs
- CFAs need to be designated prior to updating a Transportation System Plan

Resources

Kevin Young, Senior Urban Planner, DLCD – the language of these rules, deadlines, etc.
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Disclaimer

This document is an overview of the new administrative rules that apply to climate-friendly area designation. The rules are contained in the Oregon Administrative Rules in OAR 660-012-0310 through 660-012-0325, as well as OAR 660-012-0012(4)(c) and (5)(b) and (c) (deadlines), and OAR 660-008-0010 and 660-008-0050 (housing rule components). Nothing in this document should be construed as Oregon Administrative Rules. A current copy of the adopted Oregon Administrative Rules should be acquired from the [Oregon Secretary of State](https://www.oregon.gov/DES/SecretaryofState/Pages/default.aspx) and used to fulfill planning requirements.

Table 1: Two Options for Land Use Requirements in Climate Friendly Areas

		Option 1 Prescriptive Standards		Option 2 Outcome-Oriented Standards
Cities and Urbanized County Areas (by population)	Sizing of CFA Areas	Minimum Residential Density Requirement	Maximum Building Height No Less Than	Target Development Levels
5,001 – 9,999	At least 25 acres	15 dwelling units/net acre	50 feet	20 homes and jobs/net acre
10,000 – 24,999	At least 30% of total housing need	15 dwelling units/net acre	50 feet	20 homes and jobs/net acre
25,000 – 49,999	At least 30% of total housing need	20 dwelling units/net acre	60 feet ⁴	30 homes and jobs/net acre
50,000 – 99,999	At least 30% of total housing need	25 dwelling units/net acre	85 feet ⁴	40 homes and jobs/net acre
100,000 +	At least 30% of total housing need	30 dwelling units/net acre	85 feet ⁴	50 homes and jobs/net acre

Table 2: Example of How a City Might Summarize Findings by Study Area for CFA Studies

Considerations Regarding CFA Candidate Area 1 – Downtown Planwell	
Would CFA designation be consistent with prior or current planning efforts for this area?	
Yes, the older portion contains a good mix of employment and residential uses, with an abundance of on-street parking, and few parking lots. With downtown transit center, connectivity to the hospital and other major employers is excellent.	
Area (at least 25 acres required if primary CFA)	
78 acres	
Meets minimum 750 foot width with or without abutting parks, high density residential or employment uses/zoning	
Yes, the downtown meets this standard with or without abutting riverfront and other parkland.	
Are there abutting high intensity residential or employment uses that could be included as part of the CFA?	
Abutting historic garden apartment residential neighborhood to the south has an average residential density of 27 dwelling units/acre. The area is approximately 20 acres in size.	
Are parks, plazas, or open space areas located within or near the CFA area? Does the Parks Master Plan identify the need for parks or open space areas within or near the CFA?	
- The riverfront park extends for roughly one mile along the river frontage through downtown. The park contains plazas, a water feature, play structures, a connected bike path, and lawn areas for public recreation and enjoyment. - On the opposite side of the downtown, central park provides approximately four acres of shaded lawns, play areas, and other public amenities.	
Are public-serving government facilities located within the CFA? Are there plans to locate such facilities in the CFA in the future?	
Yes, city hall and the county courthouse are both located within this CFA, along with some additional government facilities.	
Current status and feasibility of needed upgrades to pedestrian, bicycle, and transit facilities and services?	
- No bike lanes on highway through downtown, but existing bike lanes on parallel collector streets and sharrows on low speed downtown streets. Also bike path along river provides good access. - Adequate sidewalks throughout downtown. On-street parking along many streets buffers pedestrians on sidewalk. - Transit center is located in this area and within walking distance of the entire downtown. Connected to all priority transit corridors.	
Presence of identified hazard area, and degree to which hazard development requirements could restrict CFA zoning?	
Portion of downtown is located within 100-year floodplain. Development code allows development if base floor elevation is one foot above base flood elevation. Could remove this area from CFA and meet area and dimensional standards.	
If contiguous, but outside city limits and within UGB, can the area comply with OAR 660-012-0310(e)(A) – (E)?	
N/A – area is within city limits	
Preliminary infrastructure evaluation – Any water, sewer, or stormwater impediments to CFA-level of development that would be challenging to address beyond the scope of capital improvement plans or improvements required with development?	

Trunk sewer line to southeast portion of downtown would need to be upsized to accommodate primary CFA development. Project is identified in Sewer Master Plan, tentatively scheduled for improvement in Fiscal Year 27-28.	
Is there the potential for the displacement of members of underserved groups that could result from CFA designation?	
Yes, the northwest portion of downtown contains a greater than average proportion of low-income residents.	
If yes to prior question, what are some potential mitigation strategies to avoid displacement that would be feasible for Planwell to implement?	
"Housing Planwell CDC" is planning a subsidized affordable housing development in the northwest area, with funding from OHCS and local construction excise tax revenues. - The city's housing division administers a naturally occurring affordable housing (NOAH) no-interest revolving loan fund that could be used to support the preservation of existing NOAH housing in the CFA.	
Are the current land use requirements in this study area close to the land use requirements necessary to comply with OAR 660-012-0320 (either primary or secondary)?	
Considering as primary CFA - Building height allowances would need to be raised 20 feet, addition of minimum residential density requirements, and changes to on-site parking requirements.	
What is the preliminary estimate of the number of residential dwelling units that could be accommodated in this area?	
If primary CFA standard were adopted (per OAR 660-012-0320(8)(a), (b), or (c); or (9)(a),(b), or (c))	If secondary CFA standards were adopted for one of the lesser standards (optional)
Roughly 4,760 dwelling units (buildings to 85 feet)	Roughly 3,430 dwelling units (buildings to 50 feet)