



Oregon Land Conservation and Development Commission
635 Capitol St., NE Suite 150
Salem, OR 97301-2540

July 20, 2022

Dear Members of the Land Conservation and Development Commission,

People for an Affordable Oregon writes today reaffirming the request of coalition partners to have important questions answered in writing and for the Commission to allow Oregonians to provide input on the final CFEC rules. By way of background, People for an Affordable Oregon is made up of community members and organizations who believe that addressing climate change is valuable, but solutions must be reasonable, studied, and crafted in a manner that does not set Oregon back on overcoming our housing crisis and achieving economic recovery post-pandemic. It is disappointing that the Commission plans to adopt the latest version of the Climate Friendly and Equitable Community rules without holding a public hearing, allowing comments on the rules, and without answering important questions put forth by stakeholders. These decisions are not consistent with the spirit of Oregon's citizen engagement model and raises significant public process questions.

We know that these rules are designed to have considerable impacts on how Oregonians work, travel, and live in their communities. But the CFEC rules were developed entirely during a global pandemic when businesses and citizens were focused on the impacts to their families, co-workers, schools, and communities. Now, Oregonians are faced with rising inflation, a lack of housing, and major disruption of supply chains. For so many Oregonians, participating in the rule-making process was just not possible. Most Oregonians still have no idea how these rules will impact their daily lives, the choices they have today that they won't have tomorrow, and the direct costs of these sweeping rules. While all the impacts aren't crystal clear, comments have been submitted outlining local barriers to implementation, increased costs to existing and future business growth, consequences for housing projects, and threats to essential community plans that may not move forward if these rules are adopted without certain changes.

In hundreds of letters, including one from over one thousand Oregonians, the Commission was asked to please slow down, study the impacts, and lean into the concerns expressed by planning professionals, communities, and invested stakeholders. After adoption of the temporary rules, the Department was asked to answer important questions about the rules in writing. Instead, the Commission is moving forward with permanent adoption of the rules, with no objective studies, no public comment, and without answering the key questions impacted Oregonians deserve answers to.

Oregonians should be at the forefront of this conversation, and to have the opportunity to comment on a final set of rules before the Commission. Statewide Planning Goal 1 and state law requires citizen involvement at the beginning, middle, and end of the planning and rulemaking process. We understand the Commission was charged by the Governor to take bold action, but this expedited process risks diminishing trust in our government, and provides little faith for Oregonians that they have a voice in the administrative process. Moreover, when the public is left out of providing input on the final rules, it all but solidifies errors in the rules themselves, and sets local governments up for failure when it comes time to implement. This threatens the overall success of the laudable policy objectives of the rules, and stands to set Oregon back in creating more climate friendly communities. There is no reason to push these rules through when so much is at stake.

We have asked the Commission repeatedly to slow down, study the impacts through community outreach and data, and get more voices at the table to help improve these rules. We reaffirm this request, and ask the Commission to direct the Department to provide answers to the questions submitted in writing, and to please accept public testimony on the final draft rules prior to adoption. Of course, we strongly urge the Commission to make the substantive changes stakeholders are asking for, including elimination of any confusing language that is neither clear nor objective.

The Commission can take meaningful action to reduce our carbon footprint in Oregon, and do it in a way that acknowledges the concerns of impacted communities. Unfortunately, the proposed set of rules and underlying process for adoption achieves neither objective. With this in mind, we ask the Commission to not adopt these rules today.

Please direct the Department to provide answers to the questions submitted in writing, and make those answers public. Please obtain outside, independent review of the costs to local governments, housing, transportation, and small businesses, and prepare a detailed analysis of the impacts so that all impacted parties can understand the final set of rules.

Signed,

The supporters of People for an Affordable Oregon

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