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# Memorandum

**Date:** February 10, 2023  
**To:** City of Salem staff  
**From:** Kim Sapunar and Scott Whyte, MWVCOG  
**Re:** **Technical Memo #3 Coordination between Marion County, Salem, and Keizer for potential candidate CFA adjacent to city limits.**

## From the Scope of Work:

### **2.3 Identify Climate-Friendly Area Candidate Study Areas (within the Marion County part of Urban Growth Boundary, contiguous to the Salem or Keizer city limits)**

In addition to the work in Task 2.2, Marion County staff will work with City of Salem staff (and City of Keizer staff, as necessary) and the Consultant to identify one or more CFA areas in Marion County (contiguous to the Salem city limits or Keizer city limits - as per OAR 660-012-0310(1)(e) -- that meet the size and locational requirements of OAR 660-012-0310(1)(a)-(d). Per 660-012-0310(2), City of Salem, City of Keizer, and Marion County staff will coordinate on how these CFA area(s) will be used in the report to DLCD. From this work, Consultant will prepare draft Technical Memo #3 identifying Marion County's candidate CFAs contiguous to the Salem or Keizer city limits.

## Background

As the Scope of Work was being drafted for this project, several factors were unknown, and Task 2.3 was included as an option to be applied during the development of the candidate CFAs. The shared Salem-Keizer urban growth boundary includes the jurisdictions of Keizer, Salem, and Marion County. It was unknown where Salem and Marion County would choose to located CFAs, and whether they may be adjacent to each other and to city limits.

## Applicable to cities in the rules is 660-012-0310 (2)

(e) Cities may designate climate-friendly areas within the urban growth boundary, but outside the city limits boundary, if the following requirements are met:

(A) The area is contiguous with the city limits boundary;

Salem is allowed to place a CFA/Walkable Mixed-Use Area outside of city limits, if all conditions are met, as there is land available of appropriate size. This rule option is not applicable for Keizer, as there is little available land outside of the city limits and inside the UGB that could satisfy the minimum CFA requirements as the boundaries are very close to coterminous.

Applicable to Marion County in the rules for coordination is 660-012-0310 (3)

(3) Cities and counties shall designate climate-friendly areas. Counties with planning jurisdiction in unincorporated areas provided with urban water, sanitary sewer, stormwater, and transportation services within an identified urban growth boundary shall coordinate with the respective city or cities to address climate-friendly area requirements for those areas.

1. Salem's Work to Locate Draft CFAs

Salem initially evaluated multiple locations around the city for potential CFAs. One of these locations was along Lancaster Drive, from Silverton Road to Center Street. This area is adjacent to the city limits. Early in the process of evaluating the potential dwelling unit capacity and best suited existing zoning categories, the city focused its choice of candidate CFAs (walkable mixed-use areas) in the downtown area, north of downtown and in West Salem. At this time, the city does not intend to designate a CFA contiguous with or extending past the city limits.

2. Marion County's initial CFA locations

To meet many of the CFA requirements including transit served corridors, close proximity to, areas planned for, or provided with, high-density residential uses and a high concentration of employment opportunities, Marion County's primary suitable area is located along Lancaster Drive. This area is predominately commercially zoned property with some multi-family land. The length of Lancaster Drive is both in and outside the city limits.

3. Keizer

The county's zoning contiguous to the Keizer city limits is AR (agriculture) and EFU (exclusive farm use) and not served by transit, therefore is not currently suitable for CFA

designation for Marion County. It was not necessary to create or coordinate CFA work between the two jurisdictions.

### Coordination

At the first project management team meeting, general geographic locations for CFAs were discussed. The city had no objection to Marion County designating CFA locations along Lancaster Drive, nor did Marion County object to any CFAs the city may place in the same vicinity. After initial work, the city is not pursuing a CFA that would extend beyond city limits with Marion County, as allowed by the rules.

Marion County's final CFA will likely be in proximity to Salem's city limits due to the previously stated conditions which make the area suitable for the county, however this did not necessitate creating a process beyond the CFA work currently being conducted for both jurisdictions.