



1000 Friends of Oregon
340 SE 6th Ave, Portland, OR 97214
www.friends.org
503-497-1000

February 7, 2026

Sen. Khanh Pham
Senate Committee on Housing and Development
900 Court Street NE
Salem, OR 97301

Re: Vote “No” on SB 1578 – Rezoning Rural Resource Lands for Urban Density Housing

Dear Chair Pham, Vice-Chair Anderson, and members of the Senate Committee on Housing and Development,

1000 Friends of Oregon is a nonprofit, membership organization that works with Oregonians to support livable urban and rural communities, protect family farms, forests and natural areas, and provide transportation and housing choices. 1000 Friends opposes SB 878.

SB 1578 authorizes rural Oregon counties to “rezone” up to 50-acres of resource lands for residential development at urban densities with no consideration of impacts to agriculture and forest lands and other natural and cultural resources.

Unlike the rezoning process established in state law, SB 1578 rezones could take place without consideration of:

- the quality of the agricultural or forest land
- implications to area farming and forest operations
- impacts to fish and wildlife habitat
- cultural resources
- wildfire risks
- availability of water

SB 1578 also advances the ability to site accessory dwellings units (ADUs) on any parcel currently zoned for exclusive farm use (EFU) and increase the size that an ADU may be from 900 square feet to 2500 square feet. It also amends state statute to change the definition of an “area zoned rural residential” to include any parcel currently zoned EFU where a nonfarm dwelling has been approved in the past.

Since our founding in 1974, we have worked with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural areas.

Like SB 1578 rezones, the siting of ADUs could take place without consideration of wildfire risk, water availability or the impact of these additional dwelling on area farming and forest practices. The increase in the area of usable floor space that an ADU could be built in effect creates a second primary dwelling. This inevitably will lead to pressures to divide the original primary dwelling from an “ADU” that has the same characteristics and capacities of a stand along, primary dwelling.

SB 1578 is unnecessary. There are already seven different ways to get a new house approved on farm land, and six different ways to get a new house approved on forest lands.¹ Specifically, Oregon law already allows new homes for relatives of agricultural and forest land managers.² It also allows additional new homes for unrelated farm workers.³ **SB 1578 is harmful to agricultural and forest land.** Oregon counties already approve hundreds of new houses in exclusive farm use and forest conservation zones each year.⁴ They also convert hundreds of acres of agricultural and forest land for residential development.⁵

- The American Farmland Trust estimates that roughly half of the farmland conversion in Oregon between 2001 and 2016 was due to low-density residential development.
- Locating more housing in and around farm and forest areas increases conflicts with common farming and forestry practices, increases traffic on farm roads, creates additional demand on limited water resources, and can increase wildfire risk.
- Allowing more houses on agricultural and forest land increase the cost of those lands, putting them out of the reach for the next generation of farmers and forest land managers. The mere opportunity for additional nonfarm residential development drives up land prices beyond what farmers, ranchers, and forest land managers can afford. See <https://capitalpress.com/2025/02/21/small-parcels-of-farmland-sell-for-more-even-in-oregon/>

SB 1578 is designed to encourage speculative land development on Oregon’s limited supply of world-class agricultural and forest lands. People who want or need an extra

¹ See attached PDF, Dwellings allowed in Exclusive Farm Use and Forest Conservation Zones.2.4.2025

² ORS 215.283(1)(d)(farmer relative help dwellings); ORS 215.757(family forestry dwellings).

³ ORS 215.283(1)(e)(accessory farm dwellings).

⁴ Between 1983 and 2021, more than 33,918 new houses were approved in Oregon’s farm, forest, and mixed farm/forest zones—enough new houses for every household in Bend or Medford. DLCD 2020-2021 Farm and Forest Biennial Report to Legislature. On average, counties approve over 950 new houses in Oregon’s farm, forest and mixed farm/forest zones each year. DLCD 2022-2023 Farm and Forest Biennial Report to Legislature, 45 and 69.

⁵ DLCD 2022-2023 Farm Forest Report, 28.

home on their rural property already have a variety of mechanisms to secure such a home, including dwellings specifically designated for family members. SB 1578 is unnecessary and harmful.

Please vote “no” on SB 1578.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "James W. Johnson". The signature is fluid and cursive, with "James" on the first line and "W. Johnson" on the second line.

Jim Johnson
Working Lands Policy Director

THE SEVEN (7) TYPES OF HOUSES CURRENTLY AUTHORIZED IN EXCLUSIVE FARM USE ZONES

Primary farm dwellings for farm operators. ORS 215.283(1)(e)

Accessory farm dwellings. ORS 215.283(1)(e)

Relative dwellings. ORS 215.283(1)(d)

Nonfarm dwellings. ORS 215.283(4)

Lot of record dwellings. ORS 215.705

Hardship dwellings. ORS 215.283(2)(L)

Replacement dwellings. ORS 215.283(1)(p)

Only 21% of the more than 21,000 new homes approved in Oregon's exclusive farm use zones between 1994 and 2023 were related to agricultural use of the property, i.e., primary, accessory, or relative farm dwellings. DLCD 2022-2023 Farm and Forest Biennial Report to Legislature.

THE SIX (6) TYPES OF HOUSES CURRENTLY AUTHORIZED IN FOREST CONSERVATION ZONES

Large tract dwellings. ORS 215.740

Template dwellings. ORS 215.750

Family forestry dwellings. ORS 215.757

Hardship dwelling. ORS 215.755(2)

Lot of record dwellings. ORS 215.705

Replacement dwellings. ORS 215.755(1)

Less than 1% of new homes approved on Oregon forest land between 1994 and 2023 were found to be related to forest management. DLCD 2022-2023 Farm and Forest Biennial Report to Legislature