



March 26, 2025

Oregon State Legislature
House Committee on Housing and Homelessness
Salem, Oregon

Re: HB 2316: **Oppose** base bill and -1 amendments; -2 amendments acceptable with changes

Dear Chair Marsh and Members of the Committee,

Oregon Coast Alliance is an Oregon nonprofit whose mission is protection of coastal natural resources and working with coastal residents to enhance livability.

ORCA strongly **opposes** the original bill, HB 2316, and the -1 amendments, both of which focus on providing Home Start lands from natural resource lands owned by various state agencies, including ODFW, The Department of Forestry, and the Parks and Recreation Department, outside Urban Growth Boundaries. This proposal flouts every philosophy and rule of the land use laws, which seek to protect farm, forest and natural resource lands from development, and to concentrate development inside UGBs (or unincorporated community boundaries), where infrastructure is available or can be smoothly extended to accommodate new development.

The -1 amendment is equally poorly conceived as the base bill, creating enclaves for affordable housing outside actual cities and towns – i.e., not near urban development. It not only overrides all land use laws, but puts decision-making into the hands of an agency with no expertise, the Department of Administrative Services. Furthermore, it would create an enormous burden to find infrastructure funding in rural areas unsuitable for dense development. Cities need to fund such infrastructure, and are struggling to do so; it makes no sense to add to the infrastructure problem by creating another enormous funding need.

The -2 amendment is more acceptable. ORCA would support undertaking an inventory of state-owned lands **inside** UGBs to determine which are underutilized, such as parking lots, construction sites, etc. *However*, how the lands would be evaluated by DAS is critical, to ensure that no lands targeted for Home Start are already serving a public purpose.

The current draft of the -2 amendments, in Section 4 (3)(d)(B), appears to *include* for Home Start those lands constrained by land use regulations based on statewide planning goals related to serving **open space or historical purposes**. This is unacceptable, if that is the intent of this rather confusing language. Lands with constraints related to natural disasters and natural resources including air, water, land or natural areas are protected from the Home Start inventory; open space and historic lands are equally important and need to be included as well.

Otherwise, the -2 amendments appear to be heading in the right direction of inventorying underutilized state lands in UGBs for housing, and also directing that a funding source for their development be identified.

Thank you,

Cameron La Follette
Executive Director

