



June 1, 2023

Representative Julie Fahey, Chair
House Committee on Rules
900 Court St. NE
Salem, OR 97301

RE: Eugene Opposes HB 3414 (-14) amendment

Chair Fahey, Vice-Chairs Breese-Iverson and Kropf, and members of the Committee, the City of Eugene respectfully opposes HB 3414 as introduced and the (-14) amendments receiving a public hearing on 6/1/23. The City of Eugene shares the goals of increased housing production, which is the goal of this bill, yet we believe the bill as written will not achieve increased housing production or more efficient development permitting process.

We want to recognize the leadership and effort that Representative Gamba has provided on this bill, working hand in hand with city professional land use staff to craft amendments and negotiate on technical topics that can make the bill implementable at the local level. Additionally, we are thankful for Representatives Dexter and Helm, and Speaker Rayfield, along with their staff for the recent negotiations and updates to the (-14) bill. Yet, even with this work, the (-14) amendments still need further technical revisions to ensure the law is clear and implementable at the local level. It is this concern of technical clarity that Eugene opposes the (-14) amendment, and Eugene requests additional work on the topic, ideally through an interim work group that can address the technical challenges in an open, comprehensive, and collaborative environment.

The Eugene City Council adopted the [Housing Implementation Pipeline](#) in 2022 with the stated goal of increasing housing supply and affordability. This multi-pronged approach focuses on increasing units within Eugene's UGB through incentives, investments and regulatory changes for multi-family and affordable housing projects, which were identified as the housing types in lowest supply and most in need of public sector investments. Rather than engage cities on how to 'level-up' their existing housing supply plans, most of which are required by state law, HB 3414 (-14) creates a new office of housing accountability within DLCD and 'limits the conditions under which local government may deny an application for an adjustment from land use regulations'. The misleading position that local governments are a barrier to good housing development is carried through in force with this bill. We ask that the sponsors of this bill work more proactively and collaboratively with their jurisdictional partners in governance at the local level to truly understand how to substantially increase housing supply and affordability across the state. HB 3414 (-14) will have a minimal impact on housing production and as written, will result in an increase in litigation and appeals, consuming the limited resources of development

permitting staff, rather than having those staff direct energy and resources towards implementing our adopted housing supply and affordability plans.

Finally, throughout this legislative session we have seen very complex and impactful land use, housing, and development legislation pushed through the legislative process without adequate time and involvement by the local practitioners that are implementing these state laws. As is on the record for HB 2001, we requested technical amendments to the bill that would clarify Eugene's process for updating our housing production goals, the bill did not include those technical fixes and the bill to address this deficiency (HB 2889) is now stalled and likely will not pass before the end of the session. To be clear, this situation will impact our ability to get more units built in a timely manner.

HB 3414 (-14) is now in the same position, without technical amendments to the bill (which will take time to have local governments input addressed), we expect to see multiple legal challenges to many of the types of infill projects that our Housing Implementation Pipeline has identified and we are investing in. Simply put, HB 3414 (-14) will reduce the number and speed which Eugene will be able to add to our housing supply. These complex and technical land use and development permitting challenges are real, they take years to implement, and have long-term impacts. Recognizing that reality, we believe it would be more prudent to work in a collaborative manner to ensure critical housing supply can be produced

Thank you for your time. The City of Eugene urges you to oppose HB 3414 (-14) and instead move this bill and issue to an interim work group, where stakeholders, including the City of Eugene, will proactively engage to develop strong housing supply and affordability legislation that leverages the work from local governments and gets us on the path to addressing our housing crisis.

Thank you,

//submitted electronically//

Ethan Nelson
IGR Manager