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March 3, 2021

Rep. Julie Fahey, Chair  
Committee Members  
House Committee on Housing  
State Capitol  
Salem, OR 97301

Re: HB 3072

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 choice.

1000 Friends of Oregon opposes HB 3072. This bill would require a local government, at the request of a private landowner, to expand its UGB to include land designated as urban reserve if the property owner shows it will be used for "workforce housing" and "commercial development supportive of workforce housing," under certain conditions.

Urban growth boundaries (UGBs) are required to have land zoned to meet approximately 20 years of need for all urban uses – housing, employment, parks, schools, streets, and more. Urban reserves are those areas - mutually designated by a city and county, using a public process - where a city's UGB will expand if and when a need for additional urban land is demonstrated. Not all cities have gone through a public process to designate urban reserves, but many have, in which residents and elected officials have devoted a lot of time and analysis - including cities in the Metro region, several cities in Jackson County, and Sandy, Newberg, Madras, Redmond, and Grants Pass. We believe that HB 3072 is unwise legislation for several reasons.

- UGB expansions could occur without any showing that the land is needed for more housing. If a city is falling short on its land supply, then the city should go through a public process to determine how to accommodate any housing shortfall, including rezoning and/or upzoning land inside the UGB, expanding the UGB, some combination of each, and more.
- These UGB expansions would be driven by individual private landowners, not through a public process. Such a UGB expansion could run counter to the use and timing for which the public process that designated the urban reserve determined the land would be needed.
- There is no definition of "commercial development supportive of workforce housing."

- A small percentage of Oregon's EFU land is "high value," so this bill still jeopardizes a lot of very good farmland.

Oregonians do need more housing – and more diverse and affordable housing types – near where they work, shop, play, and worship: inside our towns and cities. We also need food and fiber, and Oregon has some of the best land in the world for growing crops, raising cattle, and growing trees. Our soils and water are finite resources, and their value, and our good fortune to have these nearby, has come into keen focus with a pandemic and climate change. We should not, and need not, play these off against one another, by treating working lands as vacant lands.

We ask that you oppose HB 3072.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Mary Kyle McCurdy". The signature is fluid and cursive, with "Mary" and "Kyle" connected at the top, and "McCurdy" written below them.

Mary Kyle McCurdy  
Deputy Director