



*Advocating for a liveable and sustainable
Rogue Valley through responsible land use.*

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

February 14, 2022

Re: Opposition to HB 4118 and -1 Amendment

Thank you for the opportunity to provide testimony on HB 4118. Rogue Advocates (RA) is a 501(c)(3) land use advocacy organization working in Jackson and Josephine Counties. **RA strongly opposes HB 4118 because it threatens thousands of acres of farm and forest lands designated as urban reserves in the Rogue Valley without the proper analysis and public input that is central to Oregon's existing land use planning system.**

While RA recognizes and supports the urgent need for affordable housing across Oregon, HB 4118 unnecessarily pits affordable housing against farmland. Other recent measures such as HB 2001 (2019) and HB 2003 (2021) more appropriately address affordable housing within existing city boundaries and should be allowed to play out instead of jumping to urban reserves for solutions.

Rogue Advocates was involved with the extensive Greater Bear Creek Regional Problem Solving (RPS) process, a comprehensive regional land-use planning effort to coordinate long-term urbanization. The process lasted nearly 13 years and involved the cities of Ashland, Central Point, Eagle Point, Medford, Phoenix, Talent, and Jackson County. **Planning for long term growth in the region is particularly complex considering geographical constraints and historical development patterns concentrated around the best agricultural lands.**

The resulting Greater Bear Creek Valley Regional Plan ultimately proposed over 8,000 acres as suitable urban reserve areas in the region, with much of those proposed areas located on agricultural or forest lands. All of the participants except for Ashland have designated urban reserves pursuant to the Plan. Additionally, separately from the RPS process, Grants Pass in Josephine County has designated urban reserves. **All of these communities would be affected by the bill if passed.**

The extensive and detailed Plan developed in the RPS process was agreed upon with the underlying assumption that any land identified as urban reserves was intended for long-term growth and would still need to follow the usual processes for UGB expansion when incorporated into a city. The length and depth of the process also demonstrates the care, consideration, and public input that long-term growth planning necessitates. **HB 4118**

threatens this balance without proper consideration of when, and if, it is appropriate to incorporate these lands designated for long-term growth purposes into the city.

Rogue Advocates opposes HB 4118 for the following reasons:

- HB 4118 would override the community process by which urban reserves were originally designated, including through the extensive Bear Creek Valley RPS process, by allowing an individual property owner to try to bypass it, including to possibly develop the land for a use the community had not intended for a particular area.
- Urban reserve areas around cities in Jackson and Josephine counties contain substantial expanses of farmland, in addition to forests and natural areas. The inclusion of these areas into a UGB for development should be carefully evaluated under the protections of the usual land use planning process and avoided until it has been proven that housing needs cannot be satisfied within existing UGBs.
- The state has recently enacted several other tools for addressing affordable housing that are focused within existing UGBs, including HB 2001 (2019), HB 2003 (2021), and HB 4064 (2022, if passed). Implementation of these tools should be prioritized before allowing developers to bypass land use planning processes and threaten farmland outside of UGBs.

Additionally, **Rogue Advocates opposes the -1 Amendment to HB 4118** because it is too broad, has inadequate representation to successfully address the issues presented, and skews heavily towards stakeholders with interests in pushing development unrelated to addressing affordable housing (e.g. representatives from "the real estate industry", "a building trade organization", "the homebuilding industry", "property owners seeking to develop property.").

There are ways to address affordable housing without bypassing existing land use processes and threatening the agricultural sector. **Rogue Advocates opposes HB 4118 and encourages you to vote no on the bill and the -1 amendment.**

Thank you,



Devin Kesner
Land Use Program Manager