

Submitter: Erin Flanagan
On Behalf Of:
Committee: Senate Committee On Housing and Development
Measure, Appointment or Topic: SB1522

Dear Chair Pham and Committee Members:

I am writing today to ask you to oppose SB 1522-1. Here's why I hope you will oppose it:

SB 1522-1 removes one of the key pillars of Oregon's land use system: The "prioritization scheme" that ensures a balance between accommodating urban uses and protecting the state's amazingly productive farm and forest lands. Today, if a city determines they want to designate urban reserves for possible future expansion of its urban growth boundary, the city must consider several factors and balance development and urbanization with preserving our farm and forest lands. This bill ends that balance in favor of sprawling urban areas.

Crucially, the -1 amendment to SB 1522 accomplishes this by prohibiting cities, when designating urban reserves, from even considering soil types or existing land uses (such as farming), and instead directs that cities go to lands that are "easiest" to urbanize. That means flat, well-drained farmland. So, when a city goes to expand its UGB, it will be able to urbanize the best farmland first. We need to protect this precious and valuable resource of healthy soil to use for farmland or natural resources, and expand the UBG into other areas.

Without the sideboards provided by this critical part of our land use system, we would see cities always expand onto farm and forest lands, rather than onto lands already planned and zoned for residential or commercial uses.

SB 1522, -1 upends many years of work recently completed by the Department of Land Conservation and Development and stakeholders resulting in the December 2025 Land Conservation and Development Commission adoption of rules implementing the Oregon Housing Needs Analysis.

Thank you for considering my comments; I hope you will say "no" to SB 1522-1.

Sincerely,

Erin