



May 9, 2021

Dear Representatives,

I am writing this letter to let you know that the Oregon Land and Water Alliance (OLAWA) believes that the bill known as A-Engrossed Senate Bill 391 needs further amendments. The original bill has been greatly improved by the adopted amendments, but additional changes are still needed to minimize the damage that this bill will have on our rural lands.

OLAWA is a 501c3 organization in Deschutes County. We work in the public interest to support the rule of law with an emphasis on public natural resource management and the conservation of our public water and scenic beauty. I am Secretary of OLAWA, and I am authorized by our Board of Directors to give you our perspective on SB391.

We believe that additional non-farm dwellings, including ADUs, should take place only within UGBs under almost all circumstances. However, we recognize that currently in Central Oregon there is a critical shortage of housing for both farm employees and for others. We also recognize that our area has a sizable amount of land that has historically been zoned rural residential that is scattered throughout our exclusive farm and forest land areas. That said, it is crucial that any relaxation of current standards be taken with great care.

Although SB391 creates no new lots, it clearly authorizes increased housing density in areas that are designated to be rural. SB391 has the potential to introduce rural sprawl to many parts of Central Oregon. Some of the new ADUs might house farm employees, which would be very useful and for which the market is fairly small. But when, as is more likely, the ADUs are occupied by families whose members must attend schools or work at jobs in town, then we will have put an extra demand on our transportation network and on the school districts, while increasing green-house gas emissions. With this in mind we feel

that the legislation requires two additional amendments to limit its negative impacts.

The first change needed is to limit the scope of this change to lots of at least 5 acres in size. The current proposal would allow ADUs on lots as small as 2 acres, leading to a level of density that will increase the threat of wildfire and have a negative impact on wildlife habitat. In addition, the higher density will change the character of the affected neighborhoods and pit one neighbor against another.

We also feel that the bill should only apply to lots where there is a house already, not to vacant land. This would keep rural lots from being zoned and designed for twice the structures originally planned for, which feels like an end run of the entire concept of UGBs and farmland preservation.

We all recognize that there is a need for more affordable housing in our area, but SB391A in its current form is not the answer. Some current property owners may well favor it as a way to earn extra income, but the negative impacts on infrastructure, air quality, and neighborhood character will affect all who reside in rural areas.

Thank you for considering our views,

A handwritten signature in blue ink that reads "Eva Eagle".

Eva Eagle, Secretary of Oregon Land and Water Alliance