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**GROWING STRONG**

February 12, 2026

Senate Committee on Housing and Development  
Oregon Legislative Assembly

RE: Concerns Related to SB 1522

Chair Pham, Vice-Chair Anderson, and Members of the Committee:

On behalf of the Oregon Farm Bureau (OFB), thank you for the opportunity to convey our perspective on SB 1522 and its proposed amendments. OFB is the state's most inclusive agriculture organization, proudly representing over 6,500 family farms and ranches that produce more than 220 agricultural commodities. From hops and hazelnuts to cattle, cranberries, and timber with operations spanning from just a few acres to thousands, our members utilize all farming methods including organic, conventional, regenerative, biotech, and even no-tech.

OFB believes that Oregon's land use system works best when it is grounded in long-range planning and clear, objective criteria. Our state has limited land resources. Decisions about which lands are positioned for urbanization, and which lands remain available for agriculture and forestry, have lasting consequences that are difficult—or even impossible—to reverse.

We have deep concerns with the SB 1522-1 amendment because it removes soil type and existing land uses as permissible criteria for certain urban reserve designations. This is a fundamental departure from the long-standing understanding that soil capability and current resource use matter when deciding whether land should remain in farm or forest use or be moved toward future urban development.

OFB believes that high-value and regionally significant agricultural lands should not be swept into urban reserve inventories. When soil capability is taken off the table, the resulting process risks treating all land as interchangeable—when, in reality, farmland quality, productivity, and long-term value to the state are not interchangeable.

We recognize Oregon's real housing pressures and the strong demand for residential development. Housing needs are real. But meeting those needs should not require abandoning objective, resource-based planning tools that help ensure we do not trade away irreplaceable soils and working lands for short-term outcomes. Long-range planning is key to Oregon's efforts to balance growth with protection of its farm and forest base. SB 1522-1 moves in the opposite direction by limiting the ability to consider soil and existing land use at a key decision point.

In contrast, the -2 amendment takes a more practical approach. By directing the Land Conservation and Development Commission, via rulemaking, to allow local governments to assign lower priority to lands where providing future urban services is not reasonable or cost effective due to topographical or other physical constraints, SB 1522-2 more directly supports efficient planning and orderly urban development.

However, even with the -2 amendment, we remain concerned about unintended consequences. A "cost effective service provision" lens can, in practice, steer growth toward the lands that are easiest to serve—often flat, contiguous areas near existing infrastructure. In many parts of Oregon, those same characteristics describe some of our most productive agricultural lands. If the prioritization rules do not also preserve meaningful protections for high-value farmland, the practical effect could be increased development pressure on working lands.

Regardless of amendment, these are complex land use planning choices with long-term consequences. The stakes are high for both housing and Oregon's farm and forest land base. We believe this issue deserves more time and deliberation than we are able to devote at the present time in a compressed legislative window. We urge the Committee to allow for additional stakeholder engagement and careful consideration before adopting policy changes that could reshape the reserves process and place new pressures on Oregon's limited resource lands.

Thank you for the opportunity to share this testimony.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan J. Krabill", with a long horizontal line extending to the right.

Ryan J. Krabill  
Oregon Farm Bureau