



June 8, 2023

Dear Chair Fahey and Members of the House Rules Committee,

I am writing on behalf of The Intertwine Alliance to express opposition to HB 3414, Section 2.

The Intertwine Alliance is a Portland metro regional coalition of 70 public, private and nonprofit organizations working for parks, trails, nature and equitable access to nature for all communities. We align with our friends in housing and transportation for better outcomes for the environment and all communities. We support Gov. Kotek's affordable housing agenda. But this bill represents one of the biggest rollbacks of urban environmental protections since the land-use planning system was put in place, and we believe it will only worsen the situation.

We recognize and appreciate the efforts of Representative Gamba and others over the past few weeks to advance critical changes to this bill that would protect our communities, our environment and the integrity of our land-use planning system. **But we strongly oppose the dash-17 amendment**, which would allow all cities in Oregon a one-time expansion of their urban growth boundaries (UGBs) while bypassing our land use laws. This approach continues to ignore a major barrier to more diverse and affordable housing inside UGBs: lack of funding for infrastructure. Our communities already have a backlog of needs for new and upgraded sewers, sidewalks and more. We have collectively failed to invest in needed infrastructure. Adding more land only exacerbates this challenge.

The dash-17 amendment allows local governments to once again avoid rezoning land inside UGBs—the politically more difficult, but necessary, action—to allow more housing and to remove unnecessary local barriers to development. With 70 percent of all housing and all residential lands zoned for detached single-family housing, the most expensive and land-consuming type of housing, we can and must build better inside our UGBs, by allowing even more housing types and more affordable housing.

We have underused land inside our UGBs that should be converted to housing. For example, currently, we have more parking spaces for cars than we have housing for people, yet we have vast areas of underused parking lots and strip malls. We must make it easy to convert those to housing.

Regarding the -13 amendments, we believe they ameliorate some of the most significant environmental impacts in the HB 3414 base bill, and also target variances toward the housing

types that we most need to address the housing crisis. They eliminate the most egregious elements of the base bill, which would have allowed developers building multimillion dollar mansions to run over core environmental and community protections without demonstrating any public benefit. We strongly favor the -13 amendment over the -14 amendment, because the -13 amendment does a better job of targeting the variances toward needed housing types. Specifically, the -13 amendments do a better job of excluding single family homes from the application of this legislation.

That being said, we still oppose HB 3414, Section 2, with or without amendments.

The HB 3414 base bill represents one of the most significant attacks on our land-use planning system since the system was put in place. It would represent the largest rollback of urban environmental protections since the land use system was established. It turns its back on decades of environmental progress on urban landscapes as well as current commitments to ensure that environmental benefits accrue in our most marginalized communities.

Again, we very much appreciate the work of Representative Mark Gamba to improve HB 3414 and recognize the substantial progress that has been made. Representative Gamba's efforts have resulted in a much better bill. We also recognize the urgency of the housing crisis. However, we cannot move to either a supportive or neutral position on HB 3414. Our land use regulations have been carefully crafted over decades to advance health, safety, livability and equity in our communities. Legislation that substantively dismantles that system needs to be carefully considered, crafted and targeted to maximize efficacy and minimize harm. We do not believe that HB 3414 achieves this threshold.

Thank you for your consideration.

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