



*The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

May 14, 2020

To: Chair Robin McArthur and  
Members of the Land Conservation and Development Commission  
Email: [esther.johnson@state.or.us](mailto:esther.johnson@state.or.us)

Re: **Commission Agenda Item 3 – Update on Implementation of HB 2001 and 2003 - Comments**

The League of Women Voters of Oregon (LWVOR) supports our statewide land use planning program with local implementation. Both components are necessary for the success of the program. The League first studied land use in 1959 and has been active since in supporting our statewide land use planning program with local implementation.

We believe that Goal 1 requires open access to the land use process and that all residents have a stake in the development of their communities. HB 2001 and 2003 demand substantial changes in local government regulations. This is a significant change in our land use system. Cities may well have great difficulty in complying with HB 2001. **By pushing the envelope with the Model Code provisions beyond the minimum compliance, jurisdictions with limited staff capacity will be forced to develop their own codes. LWVOR thought the purpose of the Model Codes was to allow jurisdictions to meet the requirements under HB 2001 with limited costs to the jurisdictions.** We are aware of the grant monies provided (which LWVOR advocated for in order for us to support HB 2001 at the legislature), but we understand that the agency has put a significant amount of that money on the chopping block due to the expected Covid-19 revenue shortfall. This makes consideration of this recommendation more significant. Especially in this budget cutting environment—an environment not only at the state level but also for local jurisdictions--**it is unclear where the legislation directs a Model Code different in content than the “minimum compliance”**.

As we plan our cities and counties, we are deciding where we will all live, work, shop, play and how we'll get there. **It is critical that the housing legislation be implemented in as expeditious yet accurate a manner as possible.** HB 2001 and 2003 demand substantial changes in local government regulations.

As you continue to receive updates on both of these bills, **we encourage your review of the Regional Housing Needs Analysis (RHNA) work.** The Oregon Housing and Community Services (OHCS) and the Dept. of Land Conservation and Development (DLCD) staff have been provided with a variety of data sets and the project team has tried to address concerns of their expert advisory committee and the public. However, we don't have the same sets of data nor the same organizational structure as California. I would also note that OHCS has part of their funding for this project on the “planning exercise” set of budget cuts for 2019-2021. **LWVOR has concerns related to any final recommendation if the project tries to implement the current draft regional approach.** We recognize this is still in draft form (draft report due Sept. 1, 2020) and the agencies will continue to engage others with a recommendation due March 1, 2021.

**We are VERY supportive of the HB 2003 requirement to update Housing Needs Analyses every 8 years (6 years for the Metro area).** For those of you with long memories, there used to be a requirement for regular Periodic Review of land use plans. Although that review became overly cumbersome, the original idea was for jurisdictions to stay current with planning for their future—not only with Goal 10,

but the other Goals in our award-winning land use planning system. At least with this new requirement, Goal 10 plans will be updated.

**LWVOR also wants to give a head nod to the Housing Production Strategy work.** DLCD's Extensive list of creative strategies assigned by "buckets" will assist jurisdictions in drafting their Housing Production Strategies and in addressing their identified housing needs. Cities will review the guidance and, together with members of the public, decision makers will select specific strategies that will work best in their communities to help ensure that all Oregonians are housed at a cost affordable to all.

Lastly, **we want to again commend your incredible staff** as they listen to and respond to these multiple committees—committees representing a diversity of constituencies and expertise.

Thank you for considering these comments and for allowing LWVOR to participate in these efforts that we all hope will make Oregon an even better place to live and work.



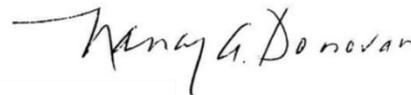
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