



The League of Women Voters of Oregon, established in 1920, is a 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.

September 8, 2023

To: **Co-Chairs Damien Hall and J.D. Tovey**
[Members of the Housing Production Advisory Council](#)

Re: **Council Recommendations—UGB Expansion Without Need – Opposed**

The League of Women Voters of Oregon has engaged in both housing and land use policies for many years. The League supports our statewide land use planning program with its 19 Goals. We also have strong positions on addressing our Climate Emergency.

We provided [comments](#) to the Land Conservation and Development Commission on Nov. 17, 2022:

...we implore you and your state agency counterparts, the current and new Governor, and the Legislature to take urgent action on recommendations that will more quickly provide housing opportunities for all Oregonians. Among those recommendations are to: Focus on the use of buildable lots in current cities, provide funding for infrastructure needs for those lots, and provide state funding to offset System Development Charges for development that will house Oregonians with 60% and under AMI with a priority placed on units affordable to extremely low-income households.

Next, help local governments look at their current Urban Growth Boundary (UGB) lands and help them update their Public Facilities Plans so that infrastructure can be provided, again using state and federal funds where appropriate—not only to help with the planning but also funding all or part of those infrastructure needs.

We also support a review of those current UGB lands related to wetlands that should not be developed but are assumed “buildable” in city calculations. This same principle should apply to other natural hazards lands. (Cities need to update their Natural Hazards maps and that may well include your proposals related to Wildfire Adapted Communities. This is another area where cities may well need staffing or funding help.)

We provided comments to you in our [August 25th letter](#) on providing developable serviced land for housing:

The League is proud to have advocated for a number of years on the need for affordable housing. We have participated in rulemaking and supported legislation to help Oregonians have a safe home. We support a local government’s adoption of a Comprehensive Plan and Development Code to designate developable lands within their jurisdiction so long as they meet statewide Goals and rules around Hazard areas and Federal Emergency Management Act (FEMA) regulations around floodplains.

The League believes that **the reason for UGB expansions should be focused on clearly defined need.** We acknowledge the statistics provided related to housing unit need, but want to stress that much of the need is for low-income housing requiring a subsidy for which the Governor and legislature have stepped up to help reduce the gap. The residents of that housing need to be near jobs and services, so locating them at the edge of cities does not serve them well. And we want to note that the housing shortage is happening all over the U.S., so **blaming our land use planning system is not only unfair, it is wrong.** Good planning saves money and builds successful communities where **we can all live, work, shop and play and can get there in a manner that reduces the effects on global warming.**

We have no objection to providing an opportunity for cities to consider adopting Urban Reserves, recognizing the cost of such an effort. First of all, we would hope to see cities updating their Public Facilities Plans and invest in conversations with their residents on how to provide infrastructure for the many acres of raw land in their current UGBs.

Since one argument for this process is to assure that truly affordable housing will be part of any units built, the recommendation that 35-acre expansions would not require a master plan assures that these acres will be yesteryear's subdivisions without mixed income developments.

We note that the current recommendation says that the new land only needs to be next to a UGB but that could mean for most cities a leap over unserviced raw land to get to the city boundary.

We also object to allowing Metro cities to be a part of this proposal. Metro was created in part to be the regional planning organization for this 3-county area and allowing individual cities to expand outside of Metro's process removes the important element of Metro's existence and ignores the fact that Metro cities have many acres of raw land yet to be developed.

As to [HB 3414 B](#) (2023) and the density requirements of that bill, **no place in Oregon should allow only 4 units per acre density.** Oregon cannot afford to squander our precious land nor can cities afford to provide services to such a limited density.

The League supports reviewing our UGB process as we did by participating in a previous UGB Streamlining [rulemaking](#). But **the overall principle of "need" must be a cornerstone of that effort.** Otherwise, we squander what is often valuable agricultural land needed to feed the world. And it is our understanding that the statement that it will be 4 years before any UGB expansions is incorrect. The OHNA effort does not freeze planning in Oregon.

The League wants Oregonians—all Oregonians—to have safe shelter. We will continue to monitor efforts by the Council, by the Governor's Office, by the Legislature, and in our various cities and support proposals that provide that housing while also supporting a broader set of values that make Oregon a special place.

We hope you will consider these comments as you develop your final recommendation.

Thank you for the opportunity to discuss this proposal.



Becky Gladstone
Co-President LWVOR



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Cc: [Geoff Huntington](#), Governor's Senior Natural Resources Advisor
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[Brenda Bateman](#), Dept. of Land Conservation and Development Director
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