



March 3, 2021

**TO:** The Honorable Representative Julie Fahey, Chair  
Members of House Committee on Housing

**FROM:** Emma Land, Legislative Coordinator  
Palmer Mason, Senior Policy Advisor

**RE: House Bill 3154**



HB 3154 excludes manufactured home parks and lands containing multifamily buildings with more than eight units from the supply of “residential infill or redevelopment” lands in a buildable lands inventory. A buildable lands inventory is part of a Housing Needs Analysis, which determines the housing necessary to meet a city’s existing and projected need over 20 years. While the department is not taking a position on HB 3154, we would share several concerns with the committee.

Our initial concern is not knowing what problem HB 3154 intends to solve. If the intent is to preserve these areas and keep residents in their homes, DLCDD would note that the bill does not prevent the redevelopment of manufactured home parks and lands with large multifamily complexes. The department is willing to participate in further discussions with the bill sponsor and interested stakeholders about anti-displacement strategies, particularly for low-income residents and other vulnerable groups.

Alternatively, if the intent of HB 3154 is to remedy a fault in the buildable lands inventory, a categorical exclusion for manufactured home parks and lands with large multifamily complexes is not the answer. A better approach would be to conduct a review of the assumptions that local governments use to determine which “residential infill or redevelopment” lands are included in buildable lands inventories.

Beyond questions of purpose, DLCDD is concerned that HB 3154 may have unintended consequences for projecting a community’s 20-year housing need. Considering the length of time and depth of Oregon’s housing deficit, all areas suitable for residential infill should be evaluated. If local governments cannot evaluate manufactured home parks and lands with large multifamily complexes, valuable opportunities to locate denser residential development in areas with existing public infrastructure will be missed. As a consequence, this result may unnecessarily push urban development into the state’s working farms and forestry operations.