



American Planning Association  
**Oregon Chapter**

*Creating Great Communities for All*

March 4, 2021

Representative Julie Fahey, Chair  
Representative Wlnsvey Campos, Vice-Chair  
Representative Lily Morgan, Vice-Chair  
House Committee On Housing  
900 Court Street NE  
Salem, OR 97301

RE: Testimony from the Oregon Chapter of the American Planning Association in Opposition to HB 3154

Dear Chair Fahey, Vice Chairs Campos and Morgan, and Members of the Committee:

This letter provides testimony from the Oregon Chapter of the American Planning Association (OAPA) in opposition to HB 3154. OAPA is an independent, statewide, not-for-profit educational organization of more than 800 planners from across the state who work for cities, counties, special districts, state agencies, tribes, community-based organizations, universities, and private firms. OAPA provides leadership in the development of vital communities by advocating excellence in community planning, promoting education and resident empowerment, and providing the tools and support necessary to meet the challenges of growth and change. OAPA supports sustainable communities and works to enhance the quality of life for current and future generations by helping to create and stabilize places that are equitable, healthy, and resilient and provide ongoing economic, environmental, and social benefits.

OAPA has several concerns regarding HB 3154 and potential unintended consequences. First, we understand that one of the purposes for HB 3154 is to provide some protection for manufactured home parks from being redeveloped. As written, however, HB 3154 would not provide that protection. The bill would change ORS 197.296, which addresses needed housing in UGBs; specifically, it would exclude any estimate of potential infill and redevelopment of manufactured home parks and multi-family housing developments with eight or more units when calculating buildable lands. Simply not estimating the capacity for additional manufactured homes in existing parks or not considering their redevelopment potential will not achieve the goal of protecting these same parks from redevelopment to higher density residential uses.

In addition, ORS 197.475 to 197.493 already provides protections for existing manufactured homes and manufactured dwelling parks, including a prohibition found in ORS 197.490



against locating such parks in areas planned and zoned for industrial or commercial uses. Those parks previously located in such zones would be nonconforming uses and should not be “counted” in housing inventories in any event.

In addition, HB 3154 could result in overestimating land needs for housing and therefore be used to justify amendments to urban growth boundaries (UGBs). As written, the bill eliminates some potential capacity for housing in UGBs that needs to be accounted for, should a community conclude that a UGB amendment is justified for more land for housing. The amount of that capacity may be small in comparison to overall capacity in other residential zones but still should be included. (HB 2001 in 2019 amended some of the existing language in ORS 197.296(6)(b), so that estimates of capacity could not be overestimated as a means for avoiding a UGB amendment.) Oregon requires inventories of buildable land and housing needs and a process in which the two are matched under local comprehensive plans. There is no reason to upend that process.

One of OAPA’s Legislative Priorities for 2021 is to Address the Housing Crisis. To that end, we are willing to work with the bill’s sponsors to consider amendments that would have the effect of providing protections for manufactured home parks and their residents while not creating problems down the road when communities consider their future supplies of land for all types of housing.

Thank you for your time and attention to our testimony. OAPA recommends that HB 3154 be tabled.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aaron Ray".

Aaron Ray, AICP, President  
Board of Directors

A handwritten signature in blue ink, appearing to read "Eunice Kim".

Eunice Kim, AICP, Chair  
Legislative and Policy Affairs Committee