



House Committee on Energy and Environment
Testimony on HB 2488
 March 29, 2021

Chair Marsh and Members of the Committee,

Thank you for the opportunity to submit testimony on HB 2488 and the subsequent amendment. Our coalition represents homeowners, builders, businesses, working families, and natural resources across urban and rural Oregon. While we may not always agree on how Oregon’s land use planning system should work, we share common goals of ensuring that Oregon’s land use goals are clear and implementable, that local governments have adequate funding to meet their land use planning goals, and that the Department of Land Conservation and Development is supporting our communities in their planning.

Our coalition recognizes the work our state is doing to address environmental justice, and we have a strong desire to engage with those doing this work to ensure that our state’s approach to addressing environmental justice is workable for Oregon’s businesses. Further, our sectors are leaders in the climate conversation, and are doing our part to combat climate change, from carbon sequestration to climate friendly building practices, to reducing our carbon footprint— our businesses are going above and beyond to do our part.

Despite our critical role in Oregon’s land management, the large economic footprint of our sectors, and our strong desire to be partners in the implementation of Oregon’s land use planning system, our organizations were not engaged in the development of this bill. As a result, while we think the intent behind HB 2488 is positive, we have several concerns about the bill as drafted, and as modified by the -1 amendment:

- **New land use planning goals are not needed.** Oregon’s land use planning goals already incorporate climate and environmental justice considerations throughout all of Oregon’s 19 land use planning goals. From public engagement to housing and transportation, Oregon’s existing land use planning goals are already structured to incorporate any challenges the state is facing, from climate change to environmental justice.

- **This bill duplicates work the governor’s office is already pursuing.** Many of our organizations have been engaging with the Governor’s Office around the development of SB 286, which would reconstitute the environmental justice task force within the Environmental Quality Commission, and develop a mapping tool to help aid Oregon’s natural resource agencies in their approach to addressing environmental justice issues. This work, and particularly the mapping exercise proposed by SB 286, seems entirely duplicative of the mapping exercise contemplated by SB 2488 -1, and which has been developed over the course of months with the Governor’s Office and Racial Justice Council. DLCD should use this map, and not create their own duplicative, and much more confusing, map.
- **The goals of climate change adaptation and mitigation and environmental justice for disadvantaged communities often conflict.** The bill also fails to acknowledge that the goals of climate change adaptation and mitigation may be at odds with the goals of environmental justice. For example, climate change adaptation and mitigation may suggest that increased infill is needed to meet our state’s greenhouse gas goals, with environmental justice considerations may weigh against increasing density in some urban areas, particularly where it may lead to gentrification. Similarly, environmental justice considerations may weigh in favor of siting new industrial development far away from residential areas, while climate change adaptation may suggest those uses should be close together to limit carbon impacts of longer commutes.
- **The bill is unclear in how it would engage local governments in this work.** Our land use planning system is reliant on local government investment to function – this bill is unclear whether and how local governments would be engaged in the implementation, whether there is funding for their work, and how local governments would work with the state on implementation.
- **The bill is inadequately funded.** As drafted, the bill proposes to invest \$850,000 to significantly alter Oregon’s land use planning system, which would require code changes by nearly every local government in the state. Presently, the Governor’s Recommended Budget sets aside \$800,000 for a STUDY of these ideas. The changes proposed by this bill would cost our state and local governments millions of dollars.

Our organizations have a long history with Oregon’s land use planning system, and are always looking for ways to improve its implementation on the ground. While we think the goals behind HB 2488 are honorable, we think there are significant barriers to its ability to be effectively implemented on the ground and achieve its goals of facilitating climate change adaptation and improving environmental justice.

Contact: samantha@oregonfb.org