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DRAFT

June 22, 2021

Senate Committee on Rules
Oregon State Capitol
Salem, OR 97301

Re: HB 3318A

Dear Chair Wagner and Committee Members:

1000 Friends of Oregon is a nonprofit, statewide organization that works with Oregonians to support livable urban and rural communities; protect family farms, forests and natural areas; and provide transportation and housing choice.

The original HB 3318 has been recently amended to require, subject to certain conditions, the Department of Land Conservation and Development (DLCD) to approve the expansion of the city of Bend's urban growth boundary (UGB) to include 260 acres of land currently owned by the Division of State Lands (DSL).

1000 Friends of Oregon has concerns about HB 3318A, because it would allow this UGB expansion without application of Oregon's land use laws. Those laws reflect sound policy. They require a city, when evaluating whether a UGB expansion is needed, to conduct a Housing Needs Analysis and other analyses to determine if there is a need for additional housing, employment, or other capacity inside the UGB. If so, the city must first determine whether that need can be met inside the UGB on vacant or redevelopable lands, or through rezoning or upzoning. Cities must take into account the types and affordability of needed housing and existing and future infrastructure needs in determining how and where best to accommodate future urban uses.

Under HB 3318, none of this sound analysis will take place, which might be even more needed in a place like Bend that is growing quickly and must shepherd and phase investments in roads, sidewalks, pipes, etc.....

While the development plan that is part of HB 3318A has many attractive aspects to it, including a donation of land to Bend for affordable housing, we are concerned by the letter from DSL¹ that it might not be able to comply with this plan, especially the affordable housing part. As DSL stated:

¹ <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/PublicTestimonyDocument/32024>

“Our department staff has only had tangential discussions with City of Bend staff and has made it quite clear we have serious concerns about giving away 20-plus acres that would decrease the value of an asset for all Oregon’s school children, as well as circumventing the normal land use process.”

In addition to the lack of application of Oregon’s land use laws, we are concerned about the process by which this legislation has come forward this session, and about the uncertainty of the whole proposal.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Mary Kyle McCurdy". The signature is written in a cursive, flowing style.

Deputy Director

