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i.e. Engineering, Inc.  
809 SE Pine St.  
P.O. Box 1271  
Roseburg, OR 97470

ieengineering.com  
541-673-0166

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April 29, 2025

Senate Committee on Housing and Development  
RE: HB 3921

This letter is being written in support of HB 3921 which approves 2024 City of Roseburg and Douglas County ordinances that provide amendments to the City of Roseburg's Urban Growth Boundary (UGB).

We've been helping clients develop residential land in Roseburg for the past 35 years. For the past twenty of those years that residential development in Roseburg has been mostly limited to small infill subdivisions that have not even sniffed meeting our area's housing needs.

The reason Roseburg has been limited to small infill residential development over the past twenty years is every vacant large or even medium sized undeveloped residential parcel located inside our UGB is undevelopable land.

The vacant flat residential zoned land that we do have located inside our UGB is either predominately jurisdictional wetlands or located inside the FEMA Mapped Floodplains and Floodways. We can't get fill/removal permits as needed from the State and Feds to allow the development of those sensitive wetland areas as they are environmentally protected and even if we could wave a magic wand to somehow make that happen, wetlands are not areas that should be developed, we all know that.

For the undeveloped residential areas located in the Floodplain and Floodway, the recent FEMA Biological Opinion that went into effect on Dec. 1st of last year and the requirements associated with that deem most of those areas as off-limits for residential development and again undevelopable. And I would note that many of those areas here in Roseburg were under water on March 16<sup>th</sup> last month when our City flooded. So again, those aren't areas that should be developed even if these environmental restrictions didn't exist.

The rest of our available vacant residential parcels are on steep hillsides that are all areas that are susceptible to erosion, sliding, earthquakes and other geological events and are not suited to the siting of residential development consistent with public health and safety concerns.

When the UGB was initially established 45 years ago and zoning became a thing in Oregon, things like jurisdictional wetlands and geologically sensitive areas didn't exist, but that's not the case today and these issues have really backed Roseburg into a corner.

I know our buildable lands inventory says we do have some room to grow in Roseburg and I'm here to tell you that's wrong. That inventory doesn't properly take into account any of the issues listed above.

We desperately need additional land to be brought inside our UGB to provide housing for our community and frankly we need a lot more of it than just the 200-acres that you are looking at in front of you today, but this is a start and a good start. I urge your support on this bill and also on any other items that make it easier for rural areas like Roseburg to expand their urban growth boundaries specifically to keep up with our workforce housing needs.

A handwritten signature in black ink, appearing to read 'Alex M. Palm', written over a horizontal line.

Alex M. Palm, PE  
Principal