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March 3, 2021

Rep. Julie Fahey, Chair
Committee Members
House Committee on Housing
State Capitol
Salem, OR 97301

Re: HB 3154

Friends of Oregon is a nonprofit, membership 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.

1000 Friends of Oregon opposes HB 3154. This bill requires that cities *exclude* from their buildable lands inventories (BLI) manufactured dwelling parks and lands containing multifamily structures with more than eight units. It is not clear to us the objective of the bill.

All cities are required to have a urban growth boundary (UGB) containing sufficient zoned land capacity to meet their projected population, employment, and other needs for approximately 20 years. Among other things, when cities evaluate whether they have that 20-year capacity, they are required to inventory their existing buildable lands – those lands that are vacant or re-developable. In determining whether lands are likely to be re-developed over 20 years, most cities compare the value of the land to the value of the structure(s) on it, based on that city's own market analysis, and other local factors. Being included or not in the BLI has no impact on whether those lands actually redevelop; it is just an assessment of their potential to do so.

So, if the objective of this bill is to protect certain lands from being re-developed, HB 3154 will not accomplish that. There *are* tools to do that; for example, the city of Portland has adopted a mobile home park zone that provides protection to residents that 1000 Friends was part of crafting.

However, as HB 3154 is written, the result from excluding these areas will be to artificially show a need for a UGB expansion. That puts farm and forest land and natural resource areas at risk from unnecessary urban development, and causes cities to have to extend expensive infrastructure that would otherwise would not be needed.

We ask that you oppose HB 3154.

Thank you for consideration of our comments.

Sincerely,

Mary Kyle McCurdy

Mary Kyle McCurdy
Deputy Director

