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May 9, 2017

Rep. Brian Clem, Chair
House Committee on Agriculture & Natural Resources
State Capitol
900 Court Street NE
Salem, OR 97301

Re: SB 418A

Dear Chair Clem and Committee Members:

Thank you for the opportunity to testify on SB 418. 1000 Friends of Oregon is a 40-year old, non-profit, statewide organization. We advocate for livable urban and rural communities, protecting family farms and forests, and conserving natural areas, largely through the implementation and improvement of Oregon's land use planning program.

SB 418A provides for segmented and sequential review, and approval or remand, of individual work tasks associated with a city's evaluation and possible expansion of an urban growth boundary (UGB). Thus, under this bill, a city could separately submit to the Department of Land Conservation and Development (DLCD) each discrete task, such as the Housing Needs Analysis and the Economic Opportunity Analysis. The city could then later – months or even years later – submit to DLCD the actions the city proposes to take to address any insufficiencies found in those analyses. SB 418A prohibits parties from objecting to a later decision to expand a UGB, or to not expand a UGB, based on an earlier, approved work task.

1000 Friends of Oregon opposes SB 418A for several reasons. First, the bill is not necessary. Cities may already conduct a sequential analysis in the current UGB evaluation system. A city can structure its UGB work tasks and the review of those work tasks as part of its periodic review program with DLCD.

Second, the Land Conservation and Development Commission (LCDC) recently adopted – at the Legislature's direction – a streamlined process that cities can choose to use when evaluating and expanding their UGBs. Cities and counties were very involved in crafting these new rules, and we expect them to be used in UGB expansions in the next few years.

Third, SB 418A and, in particular, the amendment adopted (page 2, lines 23-25), may well lead to outcomes opposite what was intended with the bill. Because this amendment prohibits using a prior approved work task as the basis for a later objection to a UGB expansion, it may well lead interested parties to appeal each individual work task because the end product is uncertain, thus prolonging the entire UGB process. In our experience, those participating in the local public process surrounding the evaluation and possible expansion of their city's UGB want to see how all the pieces fit into the whole puzzle. Often, they might not like some aspects of the final decision but can also

see that other aspects worked out as they hoped, and so they can live with the whole outcome. That is much more challenging to do if each of the individual parts must be dealt with separately or the opportunity to object lost.

Because this bill is unnecessary and is likely to result in inefficiencies in the review and amendment of urban growth boundaries, we ask that you not pass it.

Sincerely,

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

Mary Kyle McCurdy
Deputy Director