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April 25, 2024

To: Land Conservation and Development Commission  
Commissioner Anyeley Halova, Chair  
Members of the Commission

Re: **Agenda Item #5, 2025 Proposed Policy Option Packages – Comments**

The League of Women Voters of Oregon first studied land use in 1959 and has been active since in supporting our statewide land use planning program with local implementation. We believe that Goal 1 requires open access to the land use process and that all residents have a stake in the development of their communities. As we plan our cities and counties, we are deciding **where we will all live, work, shop, and play and how we'll get there.**

The League believes that the Department of Land Conservation and Development (DLCD) is critical to the health and well-being of Oregonians. Planning determines what kind of infrastructure communities will need. It helps assure our natural areas are protected, addresses natural hazards and ensures not only that we have economically vital agricultural and forest lands, but lands for other industrial uses. LWVOR supports this agency's work on housing and homelessness, but also recognizes that this agency and others need to address climate change—including funding for adaptation and mitigation.

We were engaged in the Oregon Housing Needs Analysis (OHNA) discussion back when it was considered in 2019 with HB 2003. We look forward to reviewing proposed rules being developed this year and next to assure the OHNA is implemented in a way that addresses the housing needs of ALL Oregonians in all parts of Oregon, especially those units needed for 80% and lower AMI. We support the new Housing Production and Accountability Office established in SB 1537 (2024) so funding for that work is high on our budget list. We assume that the staffing needs will be rolled into the agency's Current Service Level (CSL) instead of seen as an addition.

The \$5 million requested for local government assistance (1.2), as well as other grant monies in other Policy Option Packages (POPs) for local government implementation of a variety of new requirements should also be a high priority (1.1, 1.3, 2.2, 2.8). Adequate all-important local government grant funding is needed by jurisdictions to take on a variety of planning tasks to help not only with the Housing Goal but also to address local community visions.

We know that many jurisdictions need to update their public facilities plans so they can access federal funds to add water, sewer, roads and other infrastructure needs in our many vacant urban growth boundary lands. Each jurisdiction needs different planning activities to meet those housing targets. Also, it will take the work of local residents to help assure that policies are adopted and implemented locally so funding for public involvement is important.

Change is hard; we need to bring Oregonians along as we require new planning strategies. Local funding will be needed and local voters will need to support those requests.

**The League is happy to have a conversation on an amendment to our property tax system as mentioned in the Governor’s [Housing Production Advisory Council’s report](#) (See page 33—page 35 on the web) in order to help local governments have monies to implement these requirements and help with other planning and infrastructure needs. One idea is *“Increase annual Maximum Assessed Value change to 5%”*.**

The League recognizes that General Fund revenue in 2025 may be limited. While we always support using data to implement policies and would normally support the GIS Data Collection agency request (2.1) and the various requests around farm and forest and other rural lands (2.4, 2.5), we believe that the impacts of climate change will only worsen.

Local governments are still recovering from wildfires and a variety of natural hazards such as flooding. It’s time to address wildfire (3.6) and flood planning (2.7, 3.4, 3.5). We hope to see staffing added to help local governments and Oregonians prepare for future wildfire disasters as well as continued recovery from previous ones. In order to effectively mitigate the risk presented by future climate change driven geographic expansion of areas subject to wildfire hazards, staff is needed to help coordinate management of those hazards. Fires have burned in incorporated cities, unincorporated towns, and rural county areas and the mix of planning issues is as different as these jurisdictions. As such, Wildfire Evacuation Transportation Planning (3.6) is important, especially as housing unit numbers and densities increase, and will save lives.

We want to note the lack of specific funding to continue the climate adaptation work that DLCDC has led with 24-26 other agencies. The [guidance document](#) is done, but the implementation has just begun. Planning at DLCDC is about [19 Goals](#) and linkages with all these other agencies. Did we spend these last years working together to let this incredible collaboration sit on a shelf? **The League believes that addressing climate change not only by reducing greenhouse gases, but also adapting to our inevitable changing future is critical to all of Oregon.** 3.4 asks for program money and additional staffing to “Establish Climate Adaptation and Natural Hazard Resilience Planning Program.” We applaud the goals of the Green Infrastructure Grant Program. While recognizing that green infrastructure is needed, we ask that you consider that some of the grant funds in 3.1 be redirected to Natural Hazards and Resilience work, given the urgency of preparing for an increase in climate change driven hazards. Staffing can be shared among the programs.

We continue to support Goals 3 and 4. Oregon’s farmlands are finite and feed not only Oregonians but the world. Oregon’s agricultural industry is the second most important in our economy and the most stable due to the large variety of “crops” grown on these lands. Our private timberlands also provide important jobs for rural Oregonians.

We are pleased that the Oregon Dept. of Forestry and Dept. of Environmental Quality are finally addressing issues that will allow Oregon to meet EPA and NOAA requirements around clean water in our Coastal Zone Management Area. (See LWVOR’s [Coastal Study](#) for those boundaries.) We hope that the EPA will release the monies to both DEQ and DLCDC to help fund the Coastal Division.

We were pleased that the agency received monies and staff last session to help with the “roadmap” to address the challenges of offshore wind off our coast. If the monies under 4.1 are needed to complete any engagement program, we support. We also support funding for the Rocky Habitat Coordinator (4.3). As in other areas, we believe that DLCD’s Coastal Division is very important and links to climate change as well.

A common theme of LWVOR testimony is agency collaboration and partnerships. This small agency (well, it’s gotten bigger!) is so critical to **where we will all live, work, shop, play and how we’ll get there** that we hope the Commission works with the Governor to support multiple agency requests.

Please note that missing from this letter is specific support for many of the Goal 1, public engagement, tribal engagement, environmental justice suggestions. It is not that we don’t believe in their importance. It is simply a recognition of the limited General Funds available. The increase in agency staff and the grant monies to local governments must help address these needs unless state revenues increase.

Thank you for the opportunity to discuss the agency’s 2025 budget requests.



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cc: [Brenda O. Bateman, DLCD Director](#), [Geoff Huntington, Governor’s Senior Natural Resources Policy Advisor](#)