



The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

September 8, 2023

To: **Co-Chairs Damien Hall and J.D. Tovey**
[Members of the Housing Production Advisory Council](#)

Re: **Council Recommendations - 20% “Adjustments” - Comments and Concerns**

The League of Women Voters of Oregon has engaged in both housing and land use policies for many years. The League supports our statewide land use planning program with its 19 Goals. We have a strong position on Goal 1, public involvement, and Goal 2, which requires each local government in Oregon to have and follow a comprehensive land use plan and implementing regulations. Cities and counties must build their comprehensive plans on a factual base, and follow their plan when making decisions on appropriate zoning.

There are 241 cities in Oregon, each with a publicly adopted development code. As the legislature and the development community have required “clear and objective standards” for development codes, the flexibility that was once a part of the development process has been eliminated. Therefore, any ability to assist in development of non-standard lots has required a series of variances to assure that the development meets the public’s concerns around amount of greenspace, trees to help with heat islands and to absorb carbon, street connectivity, and other standards. The development community, even affordable developers, cannot have it both ways: Clear and Objective Standards and Waiving of Important Development Criteria. Allowing a “by-right” exemption of these development requirements without a public process is overreach. What may be seen as a “small technical detail” is often a huge livability issue both for the future resident of that unit as well as current ones.

We hope you will consider these comments as you develop your final recommendation.

Thank you for the opportunity to discuss this proposal.

Becky Gladstone
LWVOR Co-President

Debbie Aiona
Housing Portfolio

Peggy Lynch
Natural Resources Coordinator

Nancy Donovan
Housing Portfolio

Cc: **[Geoff Huntington](#)**, Governor’s Senior Natural Resources Advisor
[Karin Power](#), Governor’s Natural Resources and Climate Advisor
[Brenda Bateman](#), Dept. of Land Conservation and Development Director
[Andrea Bell](#), Oregon Housing and Community Services Director
[Alana Cox](#), Dept of Consumer and Business Services Building Codes Division Administrator